

From: [Pesticides](#)
To: [DACF-Pesticides](#)
Subject: FW: New restrictions on Neonicotinoids.
Date: Monday, April 10, 2023 8:30:23 AM
Attachments: [IpmLogosmall.bmp](#)
[Invasive Certificate2.png](#)
[NHAA LogoSmall.png](#)

From: Xavier Asbridge-IPM Of New Hampshire <xasbridge@gmail.com>
Sent: Friday, April 07, 2023 5:40 PM
To: Pesticides <Pesticides@maine.gov>
Subject: New restrictions on Neonicotinoids.

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Thank you for the information. For the most part I support restricting these and some other pesticides to use by those who know what they are doing. Bifenthrin is one I would like to see suffer this fate.

I have some comments on this rule though. First it gives the impression that the Neonicotinoids are effective against Asian Longhorned Beetle which they are not as when the larvae emerge they immediately tunnel into the heartwood where the chemicals do not reach. Unlike most other borers they do not spend enough time in the cambium to absorb enough chemical to kill all or even most of them. If we can't get 100% control we might as well not bother trying to eradicate them. Of course if there is some new research which shows I am wrong please let me know.

If we give people the idea that we can control this pest with pesticides we are in for a really rough awakening. The only way to battle Asian Longhorn Beetle is the immediate and total eradication of all food sources around any area where it is found.

I was also not pleased to see Elongate Hemlock Scale skipped in the list of invasive species. This pest is likely to cause far

more Hemlock death than Woolly Adelgid in colder areas. Fortunately they almost always occur together so that won't present much of a problem except when they occur on Fir.

Thanks,

Xavier.

IPM Of New Hampshire

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Thank You

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