

August 26, 2021

Maine Board of Pesticides Control  
Augusta, ME 04333

Re: Stakeholder Information Gathering Work Session on LD 155

Dear Members of the Board of Pesticides Control,

I applaud the State for passing LD155. Today, I would like to address the portion of LD 155 relating to exemptions for certain applications.

A neonicotinoid's longevity is one of the features that make it so successful in the treatment of structural pests, wood preservation and invasive insects. It's longevity also makes it more hazardous to non-target organisms as it can bioaccumulate and raise toxicity in the soil. When one compares imidacloprid to dinotefuran, there is a vast difference in their half-life. As an example, in a comparative study during the 5-month period of a rice-growing season, residual concentrations of imidacloprid were 5–10 times higher than those of dinotefuran in both soil and water.<sup>1</sup>

As the Board considers neonicotinoid use, consideration should be given as to the effect on the non-target organism as well as the pest. I propose that as you consider the exemption that it be selective and preference is given to the active ingredient that has a shorter half-life, application method should also be considered. In the case of soil drenches, it might mean more frequent applications, but the one with a shorter half-life could help slow down bioaccumulation and its effects on non-target organisms.

With global warming, invasive pest control treatment could be on the rise and with that more frequent requests for the use of neonics on living shrubs and trees. When an application is in the 250 ft shoreland zone it would be in keeping with another State insect control measure that is in place for *browntail moth*, and to have more stringent application regulation considered. The Town of Harpswell has been regulating the use of neonicotinoids since 2016 and the ordinance takes into account distance from the water, type of application and whether treatment is on a wind pollinated tree or not.

Thank you for your consideration,



Mary Ann Nahf  
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<sup>1</sup> Comparative ecotoxicity of imidacloprid and dinotefuran to aquatic insects in rice mesocosms, <https://www.sciencedirect.com/journal/ecotoxicology-and-environmental-safety>