

January 21, 2014

Smart on Pesticides Maryland's Response to the Interim Report of the Maryland Pesticide Information and Reporting Workgroup

The Smart on Pesticides coalition applauds the leadership of the Maryland Pesticide Reporting and Information Workgroup co-chairs, Senator Roger Manno and Delegate Stephen Lafferty, in working to find consensus amongst a stakeholder group representing significantly divergent perspectives.

The following are our coalition's specific response to the findings and recommendations in the workgroups' [interim report](#).

Re: Findings

The co-chairs' facilitation of the Workgroup's agreement made very important steps forward in the work to establish a useful pesticide use database, in finding that:

- There are data gaps about pesticide use as indicated by scientists and public health experts to monitor public and environmental exposures, and that
- These identified gaps include where, when and the amount of specific pesticides have been used and their impact on public health and the environment, and that "... data would be valuable for identifying use trends and would assist in targeting specific monitoring efforts by researchers and agencies charged with protecting the environment and public health"

As the report acknowledges "to date, the [MDA] Secretary has not expressed a willingness to create such a database, so legislation appears to be needed to create one." It also underscores the need for legislation to establish a statistically valid, useful comprehensive database to protect public health, wildlife, and Maryland's waters, including the Chesapeake Bay

Re: Recommendations

As it is critical to ensure the "content and adequacy" of data collected, the report recommends that MDA establish an advisory group of scientists with no vested or conflicts of interest with knowledge of research methodology and survey design, and the impacts and usage of pesticides in public health and environmental health to ensure a useful, statistically valid body of data.

- We applaud the recommendation of an increase in annual product registration fees to create a dedicated fund for collecting and providing pesticide use data

Our concerns:

- While the report findings state that there was no consensus that a database is needed, in fact, several workgroup members and scientists and public health experts who presented to the workgroup underscored the urgent need for a pesticide use tracking system.
- While the report states that, the workgroup recommends that MDA should contract with NASS to develop and institute a statewide survey to be released in 2016 and 2017, as also noted in the report, “There was also debate, and disagreement about the scientific reliability of the [NASS] survey methodology” and that “The [previous] NASS survey data were neither disaggregated by geography nor other temporal or spatial method to determine how much, or which, pesticides have been used in a particular area of the state.”

Given that NASS has not yet provided cost estimates for developing a disaggregated survey that provides information on amounts of when, where specific pesticides have been used and cost for issuing a survey to all certified applicators and farmers rather than requesting data from a sample of applicators and farmers, once the workgroup reconvenes there would be significant value in comparing cost estimates from NASS and other potential vendors/options in order to ensure that the most useful, efficient and cost-effective database is established. The report indicates that one estimate “presented to the Workgroup from individuals who have developed data storage systems [for state agencies] indicated that it could cost MDA between \$250,000 and \$350,000 to establish a database reporting system and a similar amount for annual operating costs for the system.

The workgroup would benefit from exploring this matter further when it reconvenes and considering recommending that MDA issue an RFP for services for its final report.

- The recommended survey would be published in 2016 and 2017. We urge the workgroup to establish a transition to a more viable system for 2018 if the 2017 survey does not provide the threshold of statistically valid data needed.
- As Maryland has the second lowest product registration fee amongst 13 neighboring states, a very modest fee increase should be based on the needs of setup and maintenance of data collection and may require the fee to be increased by more than \$10.
- We applaud the recommendation for a scientific peer review advisory body with expertise in public health, wildlife and Bay restoration research and think it is not necessary or useful for this advisory group to work in conjunction with the Pesticide Advisory Committee to evaluate utility and performance of a survey or other database. The majority of the Pesticide Advisory Committee members do not have the appropriate expertise in likely areas of research.

Read more about the Maryland Pesticide Reporting and Information Workgroup on the Maryland Department of Agriculture's website [here](#).

For more information, please contact Ruth Berlin, Maryland Pesticide Network, 410.849.3909, ext. 1; info@mdpestnet.org or Andrew Fellows, 202-895-0420, x102, afellows@cleanwater.org.

The [Smart on Pesticides Maryland](#) – For Safe Waters & Healthy Kids campaign is a coalition of concerned Maryland citizens working to pass legislation creating a simple and cost-neutral, centralized online pesticide reporting database. The coalition includes: Assateague Coastal Trust, Central Maryland Beekeepers, Chesapeake BaySavers, Clean Water Action, Farmworker Justice, Johns Hopkins Center for a Livable Future, Maryland Environmental Health Network, Maryland Hospitals for a Healthy Environment, Maryland League of Conservation Voters, Maryland League of Women Voters, Maryland Nurses Association, Maryland Organic Food and Farming Association, Maryland Pesticide Network, Maryland Public Interest Research Group, Sierra Club – Maryland Chapter, West/Rhode Riverkeeper.

Smart on Pesticides is part of the Pesticides and the Chesapeake Bay Watershed Project, which was established in 2007 by the Maryland Pesticide Network and the Johns Hopkins Center for a Livable Future. It is the first working group in Maryland dedicated to reducing the occurrence and risks of pesticides in the Bay watershed, in order to protect water quality, aquatic life, wildlife and public health. Project participants include scientists, public health experts, waterkeepers, watermen, representatives of the agricultural and pest management industries, and environmental organizations.