TO VT Citizens Advisory Council for Lake Champlain, 10/19/26

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I live on unceded territory at the confluence of the great Winooski River with Lake Champlain. I work with VT Pesticide and Poison Action Network on policy, legislation and research about PFAS and pesticides.

According to Act 131 of 2024, PFAS are defined as chemicals having at least one fully fluorinated carbon atom. However, this definition has *not* been incorporated into Vermont Statutes governing water quality or pesticides.

Water Quality Division of ANR is developing a budget for 2028, but that process appears unrelated to the process for updating VT's *Water Quality Standards,* which is about 2 years behind schedule. Furthermore, the list of pesticides in *Appendix C* of the Water Quality Standards is woefully out of date: see pp 57-61. https://dec.vermont.gov/sites/dec/files/documents/2022-Vermont-Water-Quality-Standards.pdf Only 2 of the pesticides listed there are currently used in VT. So there is no statutory relationship between pesticides that enter Vermont waters and water quality standards and therefore no basis for enforcement.

PFAS are entering waters all over the country. https://thenewlede.substack.com/p/forever-chemicals-pollute-more-than?utm_source=substack&utm_medium=email

From my spreadsheet of 2026(8 pages) documenting PFAS pesticides used in VT from 2020-2024 (last yr of available data) here are some examples.

bicyclopyrone, herbicide, approx **500 lbs used on corn and forage** each year from 2020 to 2024.

bifenthrin, insecticide, approx **700 lbs used each year 2020 - 2023** on corn and forage; Over **1000 lbs** in 2024. **Location of major use has not been specified in the data!**

ethalfluralin, herbicide, was **used on produce** in Orange County at between 100 and 270 lbs between 2021 and 2024.

fipronil, insecticide, was used in 2024 at over **3000 lbs** for general pest control , but the **locations of major use were not specified** in the data!

lambda-cyhalothrin, insecticide, was used at about **3600 lbs in 2024** and at around **5,000 lbs in 2023.**

prodiamine, herbicide, whose use increased from **1150 lbs in 2020** to over **2000 lbs in 2022 and 2023.** Used on golf courses. It is a carcinogen, endocrine disruptor, liver and thyroid toxicant, very toxic to aquatic life, persistent in the environment.

Recommended actions:

1. Urge ANR to update Water Quality Standards, especially Appendix C to cover currently used pesticides and maximum contaminant levels.
2. Support legislation to *incorporate the definition of PFAS above from Act 131 into statutes for water quality and pesticides regulated by Agency of Agriculture.*
3. Support legislation to prevent the registration of new PFAS pesticides in VT.