

1. What is your name?

	Response Count
	17
answered question	17
skipped question	0

2. Do you think there are pesticide use data gaps?

	Response Percent	Response Count
Yes 	76.5%	13
No 	23.5%	4
answered question		17
skipped question		0

3. Is there a need for a pesticide data reporting system?

	Response Percent	Response Count
Yes 	64.7%	11
No 	35.3%	6
Comments		12
answered question		17
skipped question		0

4. What is the appropriate format to make pesticide data available for research?

	Response Count
	17
answered question	17
skipped question	0

5. Is legislation necessary to facilitate access to pesticide information and data?

		Response Percent	Response Count
Yes		46.7%	7
No		53.3%	8

If yes, please briefly provide recommendations regarding legislation.

	11
answered question	15
skipped question	2

6. Please provide recommendations as to how to protect privacy of persons reporting data.

	Response Count
	16
answered question	16
skipped question	1

7. Are regulations and guidelines needed for a consistent, unified database?

		Response Percent	Response Count
Yes		68.8%	11
No		31.3%	5

If you answered "Yes," please make recommendations regarding regulations and guidelines.

14

answered question	16
skipped question	1

8. Is there anything else you would like to tell us?

	Response Count
	13
answered question	13
skipped question	4

Page 4, Q3. Is there a need for a pesticide data reporting system?

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|---|---|-----------------------|
| 1 | <p>A growing body of research links pesticides- and certain pesticides even at minutely low doses- to serious public health and environmental impacts. In order to ascertain which pesticides may – or may not - be linked to a birth defect cluster, intersex fish or bee deaths, experts have clearly stated they need specific and comprehensive data no pesticide usage in Maryland. Public health, Bay restoration and bee researchers' monitoring work is stymied by lack of comprehensive, easily accessed pesticide use data with specific data on what pesticides have been used, when and where. This has been underscored by: 1)scientists that have presented before the workgroup from NOAA, UMCES and USGS- and was noted in a 2006 USGS Report: - Pesticides in the Nation's Streams and Groundwater 1992-2001,;, "One of the most important gaps to be filled is improved tracking of pesticide use in agricultural and non-agricultural areas, including amounts, location and timing." 2) Public health experts/researchers including the Johns Hopkins Center for a Livable Future, Dr. Lynn Goldman and Dr. Melissa Perry at The GWU School of Public Health . Of note, Dr. Goldman, dean of the GWU School of Public Health and former EPA Assist. Admin. of Toxic Substances wrote: " To understand and manage the potential cumulative impacts on health and the environment , there is no better information than high quality data on pesticide usage, information that today is completely lacking in Maryland". 3) Beekeepers- represented by the Central MD Beekeepers Assoc. While there are several suspected links to the 50% of bee deaths in MD this past year, pesticides is one of the 4 primary areas being researched. Without data on what pesticides have been used, when and where, experts cannot assess if specific pesticides or mixtures of pesticides are/are not linked to illness clusters, bee deaths or impacts on aquatic life. In order to guide monitoring and also to assess trends, a minimum of annually reported pesticide use data is necessary. 4) The Maryland Department of the Environment is tasked with monitoring the State's waters, fish, and shellfish for toxic substances. The fish tissue monitoring has been ongoing since 1976. Laboratory analysis of each sample is expensive with the cost typically being well in excess of \$1,000. Replicates are required along with samples from predatory fish and bottom feeders. Monitoring of clams and oysters is also part of the status assessment of State waters. Historic funding for this monitoring had restricted annual sampling for the entire State to about 30 locations, which is considered inadequate. Seasonal and geographic patterns in pesticide use confound the ability to schedule the time and locations of each sampling effort. Having a pesticide use database would be valuable in this monitoring program that assesses risks to the consuming public. 5) The registration of pesticides does not ensure their safety. As Dr. LaKind noted- often we find out there are impacts not foreseen during the review process for registration.</p> | Oct 15, 2013 1:42 PM |
| 2 | <p>Including usage data. There is a need for an 'accurate' accounting by locality - municipality and watershed or specific sites over time for human / wildlife health and pollution studies. Results would be easier to assess from a database than from summary reports.</p> | Oct 15, 2013 12:26 PM |
| 3 | <p>In Maryland, we are not aware of any specific plans or dedicated funding to use additional data if it was available. Additionally, general use pesticides applied by farmers and homeowners are unknowable; this would compromise the value of any other data that might be made available. Any additional resources that are identified should be directed to enhanced enforcement, outreach, survey, and making existing data records available to researchers and public agencies under existing authority. The EPA process of risk assessment before and after a</p> | Oct 15, 2013 11:42 AM |

Page 4, Q3. Is there a need for a pesticide data reporting system?

pesticide product is made available for general or restricted use is robust, thorough, transparent, and adaptive.

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| 4 | If a robust reporting system were developed with adequate funding and resource support, such a reporting system could be valuable for multiple uses, including uses beyond research. Additionally, a reporting system could be valuable from a right-to-know perspective. | Oct 15, 2013 8:07 AM |
| 5 | Assessments are already made on "worst case" scenarios. While use data may refine these assessments, it will not change assessment outcomes as use is already assumed. | Oct 14, 2013 2:54 PM |
| 6 | I made comments in the end. The bottom line is this - what does incorrect data really mean? Take a product like 2,4-D. Farmers may use it upfront in their burndown program for no-till corn or soybeans; they may also use it postemergence in corn; we'll soon see "Enlist" crops like corn and soybeans where you can apply Enlist (a form of 2,4-D) overtop of the crop; famers may also use it in small grains or in pasture; homeowners use 2,4-D in their weed and feed programs; landscape personnel/ sodgrowers/ state highway personnel, etc. all use it. How do you assess the amount of product being used when it's being sprayed 12 months out of the year and comes in a variety of formulations. Who can really interpret incorrect data? Weather also plays a key role in this. If pesticides are being applied under the wrong conditions such as windy conditions, high temperatures, high humidity, etc., is this documented and somehow plays into the overall evaluation? Once again, see my comments in the end. | Oct 14, 2013 12:20 PM |
| 7 | to identify trends, determine area/locations worth monitoring and to assist agencies that see data gaps | Oct 13, 2013 8:34 AM |
| 8 | All data is currently available. Duplicating this information would be at great cost to companies, put companies out of business, pass costs onto consumers, and have a negative impact on the environment by putting more pesticides in the hands of homeowners instead of trained applicators. There is also no evidence of a problem with currently used pesticides in my industry being found in the bay or other water sources. This is truly an answer in search of a problem since caffeine is actually more toxic to humans than most of the pesticides we are applying as indicated by the LD50 of these products. | Oct 11, 2013 3:52 PM |
| 9 | The public needs to be informed of the contents of pesticides and where, when, and how they are being used and applied. | Oct 10, 2013 4:25 PM |
| 10 | Existing pesticide use surveys may satisfy need, but uncertain at this time. | Oct 9, 2013 12:16 PM |
| 11 | It is very difficult to have any sense of exposure without some sense of commercial usage. | Oct 8, 2013 4:49 PM |
| 12 | But only if we first define the objectives of having such a reporting system and do cost/benefit analysis. | Oct 8, 2013 3:53 PM |

Page 5, Q4. What is the appropriate format to make pesticide data available for research?

1	<p>Experts have noted that an online comprehensive database similar to CA is what is needed to provide accurate and specific data for guiding monitoring efforts. The CA PUR is considered the best in the world and has been an important source for monitoring impacts of specific pesticides and - impacts resulting from exposures to multiple pesticides in a specific location - on public health and waterways since 1990. It has worked because it provides comprehensive, user-friendly online data and is an excellent model for a workable successful database. The CA database has 3 million reporting entities and 58 counties. Reporting entities are required to report their pesticide usage monthly to each County's Dept. of Pesticide Regulation office, which is then transmitted to the state's Department of Pesticide Regulation. Applicators submit their data mostly electronically. Some still provide the data in hard copy. MD has only about 13,000 potential reporting entities that could directly report their usage to MDA. Annual reporting on what pesticides have been used, when and where, could be sufficient in meeting the needs of researchers. While previous voluntary sample surveys have provided some data, its reliability is questioned by researchers. As noted by several scientists in the Pesticides and the Chesapeake Bay Watershed Project's Research Working Group, "The MDA 2011 data is helpful but it is uncertain whether the methods and conclusions have been peer reviewed and, therefore, whether the survey response was valid. The report does not provide a discussion of data limitations, uncertainty, or supporting information to explain trends. For instance, two frequently used agricultural herbicides, glyphosate and atrazine, are reported to have substantially declined between 2004 and 2011 but no explanation is provided to support the accuracy of the reported data. As suggested by past MDA reports and data that are available for nation-wide pesticide use estimates, substantial shifts in usage can happen over the course of a few years or less. Therefore, there is a gap in the frequency of reported data. Other gaps related to the completeness of the usage information may exist due to the voluntary nature of the currently available information. The available data are not geographically specific, which limits the ability of monitoring programs to link usage with environmental presence and to design efficient monitoring programs based on land use."</p>	Oct 15, 2013 1:42 PM
2	<p>A "raw" database would be the preferred format (standard PC database, spreadsheet, or defined text format) – accessible directly via the Internet (via web page or an accessible FTP directory or through a software gate controlled by an access application /documentation / permission). Other options would include direct transfer via CD or e-mail controlled gateway. The database should include the following basic measures: pesticide(s) used, date and amount applied, application method/rate, weather conditions, application location detail, target pest/resource protected and select data quality measures.</p>	Oct 15, 2013 12:28 PM
3	<p>Enhance and expand existing voluntary survey efforts with NASS to meet research and public agency needs to inform and target monitoring. Use existing authority of the Secretary to obtain pesticide use data for researchers and public agencies. Evaluate the reliability of using known crop distributions and Extension pesticide recommendations to estimate agricultural pesticides used in defined geopolitical regions.</p>	Oct 15, 2013 11:42 AM
4	<p>the current system</p>	Oct 15, 2013 11:29 AM
5	<p>A publicly-available online database should fit research needs well, especially if downloadable data tables and complete metadata (vital information about the</p>	Oct 15, 2013 8:08 AM

Page 5, Q4. What is the appropriate format to make pesticide data available for research?

data, like what it is and how it was collected) are available from an online interface. However, it is important to note that such a format would require significant resources (funding, technological infrastructure, and human resources) to develop and maintain.

6	The California reporting system is a useful model, but it would be useful to consider all of the state models to find helpful. Since Maryland will not be the first state to create a comprehensive tracking system, we have the opportunity to learn from others. In addition, the format used by for-profit agricultural vendors in Maryland and the toxic database developed by the Maryland Department of the Environment should provide additional format guidance - either by replicating or improving upon existing systems.	Oct 14, 2013 7:09 PM
7	STATEWIDE SURVEY	Oct 14, 2013 3:05 PM
8	Much pesticide data is already public as EPA establishes dockets for all new and reevaluated pesticides. FOIA can also be used if needed.	Oct 14, 2013 2:56 PM
9	MDA is the lead regulatory agency within the state. If a reporting system is needed, it should be up to them to collect the needed information. In turn, they can provide any available data to those requesting it. The problem from the onset is the data reliable? Is everyone following the same rules? Who is actually responsible for reporting this data? If they don't, is there a fine or civil penalty? If MDA is the lead agency, they will certainly need to hire dozens of field personnel to make this happen. Lastly, who interprets the data? Glyphosate is sold under 30+ tradenames. Some are package-mixes. How do you interpret what is actually being applied? What about the inerts in each container? Is that a potential problem as well?	Oct 14, 2013 12:23 PM
10	centrally located by geography; preferably electronic and manipulable; in disaggregated form	Oct 13, 2013 8:35 AM
11	We have it available currently by requesting our service tickets. We also participate in a survey of what pesticides and in what quantity we apply in a year.	Oct 11, 2013 3:54 PM
12	Excel Spreadsheets are useful. Any statistical program that can be converted to other programs to be used in research, such as STATA and SPSS.	Oct 10, 2013 4:27 PM
13	Ideally, pesticide use should have type, volume and location information so that the widest variety of environmental and human health effects can be investigated.	Oct 10, 2013 10:58 AM
14	Internet accessible database or report	Oct 9, 2013 12:16 PM
15	It depends on the question(s) being asked. Please make sure that desired uses are understood before attempting to design a format	Oct 8, 2013 7:31 PM
16	Ideally, the goal would be for researchers to have access to pesticide identity, application quantity, and location of application.	Oct 8, 2013 4:50 PM
17	Based on experience, something on the order of a \$100,000 to \$1 million project to ensure the data is comparable and in a georeferenced, usable format. Databased format TBD.	Oct 8, 2013 3:54 PM

Page 6, Q5. Is legislation necessary to facilitate access to pesticide information and data?

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| 1 | <p>In order for the data to be useful, public health and environmental experts agree on the following: 1) legislation needs to require that the data be comprehensive and timely - meaning that all commercial and private applicators and farmers must report their pesticide usage and do so at least annually ; 2) The data needs to specify what pesticides have been used, when, where, at what amounts and for what purpose. Existing regulations already require this information to be assembled and maintained at the entity's place of business. The requirement would be simply for submission of such maintained data to a centralized state database, either electronically (via an app) or in hard copy; 3) The online database should include QA programming and that 4) the cost of the database program be covered by a modest increase in existing yearly product registration fees paid to MDA. Currently, Maryland' s product registration fee of \$100/product is the second lowest amongst 13 neighboring states. (NY/\$600; NJ/\$300). An increase of the fee to less than \$200 would provide the funds needed as outlined by MDA in 2013. A recent Washington DC law raised their product registration fee to \$200 to cover the cost of a similar reporting system. 5) According to researchers, it is very important that all of the stakeholders associated with pesticide use be included in the solution to the research dilemma of no clean data for scientific study. Unless a clean and secure database on pesticide use is legislated by law, there is no way to enforce the solution. Without a systematic QA program in place, there would be no verification that the data was accurate or not compromised. 6). Legislation requiring submission is essential given that commercial applicators and farmers would have no incentive to submit the needed data required for the research of possible links between pesticide use and human disease and environmental impacts. This is evident in the low return of surveys from a sampling of entities asked to respond to MDA voluntary surveys. Voluntary surveys as conducted by MDA in previous years have been deemed as inadequate by scientists and public health experts. MDA's voluntary surveys were sent to only a sampling of applicators and in 2011 only resulted in about a 50% return. Consequently, the data collected from farmers for example, only reflected 7% of farmers' pesticide usage in the state. Without legislation requiring applicators and farmers to report their usage, the data collected would be skewed and inadequate and therefore unusable to most researchers.</p> | Oct 15, 2013 1:42 PM |
| 2 | <p>If the data collected are governed by existing open-data / government transparency / free-information laws, then No. Where regulated products are stored, used or discharged should be information generally accessible to the public (security issues notwithstanding). In general, pesticide use data should be accessible by all citizens.</p> | Oct 15, 2013 12:29 PM |
| 3 | <p>Maybe. Legislation might be needed to enhance protection for data and those providing data.</p> | Oct 15, 2013 11:43 AM |
| 4 | <p>Legislation, coupled with necessary funding and resources (both human and technological) for the overseeing agency, would likely be necessary to facilitate pesticide data access. Legislation that narrowly creates mandated reporting of pesticide usage would likely result in a suboptimal reporting system that would be of limited value, even if adequate funding was provided, and would probably be perceived as a burden to those involved. In contrast, legislation – along with necessary funding and resources for implementation – that provides a foundation for a reporting system that directly or indirectly provides benefits to farmers and other pesticide applicators, as well as the overseeing agency or</p> | Oct 15, 2013 8:09 AM |

Page 6, Q5. Is legislation necessary to facilitate access to pesticide information and data?

entity, could improve the chances of a successful reporting database. For instance, legislation that establishes a standard format for data reporting, as well as the infrastructure for a centralized database, could prompt competition in the private sector to market more comprehensive farm/business data management programs to farmers and other applicators; i.e., programs that are capable of generating pesticide usage data compatible with the centralized database but that provide benefits to farmers/applicators from other program functions (as was briefly mentioned in California's experience).

5	The legislation submitted in previous Maryland legislative sessions forms a good basis of a new bill. If it is determined from this Workgroup that there are potential improvements, they should be considered.	Oct 14, 2013 7:12 PM
6	No. Use data adds little value as risk assessments are already done assuming use. The collection of such data will be costly and the processing and compiling of such data even more so. Also noted in previous meeting, monitoring is need to develop models that can employ use data to make any realistic predictions of outcomes of use which would be even more costly. Use data on its own is of limited value.	Oct 14, 2013 3:02 PM
7	You cannot force any regulatory agency to compile this data without sufficient funds to do so. Furthermore, in my mind, the data will be slanted. How do you sort out two, three and four-way mixes of pesticides? In otherwords, some products contain several products at different ai's; and with glyphosate being trade named in 30+ products, how do you sort this out? Lastly, if some legislature saw that we applied x amount of pounds of product x to a certain amount of land, would that really mean anything to them, or to a medical professional? Plus, it's one thing to apply something within a certain timeframe. Some products are applied 12 months out of the year. What about the homeowner? They spray for bugs 12 months out of the year, utilize preemergence products in their yard in the spring, and weed and feed products in the spring and fall. How do you assess this type of activity. If every homeowner is required to send in a summary of what they used throughout the year, who is going to interpret all of this data? In my mind, this is just too cumbersome.	Oct 14, 2013 12:28 PM
8	not sure that Sec. doses not already have the authority - need to address this at next meeting - and if he does do not need legis. if he will use it	Oct 13, 2013 8:37 AM
9	Legislation is needed to insure that members of the public are informed of (1) the hazards related to pesticide use, (2) the potential health impacts,(3) the amount and type of pesticide being applied, (4) how often and where. Additional legislation may also be needed to insure that (5) pesticide applicators are also adequately protected and the (6) workers in the field are trained and adequately protected and not allowed to enter the field after spraying takes place. This protection should be for any number of workers in the field and not just for the 11 employees required in order for OSHA laws to regulate worker overexposure (workers on many small farms are not protected). With access to pesticide information and data, the public and the community at large can be adequately informed.	Oct 10, 2013 4:42 PM
10	I think because of both industry and applicator resistance to sharing data widely, reporting may need to be compelled by law. If it appears that pesticide use	Oct 10, 2013 11:00 AM

Page 6, Q5. Is legislation necessary to facilitate access to pesticide information and data?

information outlined in the previous question can be inferred through sales and distribution data, then perhaps not.

11 Uncertain at this time; depends upon final decision of workgroup

Oct 9, 2013 12:18 PM

Page 7, Q6. Please provide recommendations as to how to protect privacy of persons reporting data.

1	<p>Each reporting entity be given an ID# similar to the CA PUR system to protect the specific identity of the reporting entity. Access to detailed reporting information would be limited by law to the individual applicator (for his/her own data - updating purposes), the Department of Agriculture for enforcement investigations, and to health professionals investigating certain disease occurrences. All other access to the data base would be limited to broad geographic areas such as watersheds that would aggregate individual applicator information and thus prevent the association of the data with an individual applicator. User names and passwords would be needed for all users of the system and would be issued and controlled by the system administrator. Each user name would be linked to specific access rights (individual data for applicators, or agency access), as authorized. Currently, according to law, MD medical professionals are allowed to request an applicator's records via MDA when treating a patient with a suspected pesticide injury. In such situations, privacy is not protected</p>	Oct 15, 2013 1:42 PM
2	<p>How is privacy protected under the existing reporting process? Current State databases allow anyone with a computer to identify landowners through tax records. Incorporation allows a level of privacy as do property leasing agreements. If there are concerns about nuisance or inappropriate lawsuits, perhaps specific hold-harmless provisions could be defined with respect to pesticide use if the material is stored properly, applications are documented and applied according to label, wastes are properly disposed of and records are kept/available. Or, some level of approval by a government authority may provide a legal shield. If reporting pesticide use is mandated, there are few ways to protect an individual's property privacy.</p>	Oct 15, 2013 12:30 PM
3	<p>This is very important if data are reported, or if the Secretary uses existing authority to collect data upon request of researchers or public agencies. Currently the Pesticide Applicator's Law doesn't specifically protect these data; only the protections offered by the Maryland Public Information Act would apply.</p>	Oct 15, 2013 11:43 AM
4	<p>there is no way to adequately protect privacy in government reported information</p>	Oct 15, 2013 11:30 AM
5	<p>If it is determined that property-level data would not be feasible, data could be aggregated at the census tract level. This would provide a relatively fine level of geographic detail for users of the data. Such aggregation should provide a reasonable degree of privacy protection, though there may be cases where property-level data could conceivably be determined.</p>	Oct 15, 2013 8:10 AM
6	<p>The California model would be a useful place to start, though other systems may have other privacy protection mechanisms that could be considered.</p>	Oct 14, 2013 7:14 PM
7	<p>ALL DATA SHOULD BE AGGRAGATED TO PROTECT THE SPECIALTY CROP USES</p>	Oct 14, 2013 3:08 PM
8	<p>Applicators and specific application sites can not be part of public record. If such data were collected, it would have to be aggregated before made public. This of course will require additional resources to do.</p>	Oct 14, 2013 3:05 PM
9	<p>Farmers are already burdened with providing information to MDA and other state agencies. Lawsuits have already ocured. I'm not sure there is a way to protect the privacy of people reporting data unless they just don't report it. If it looks like</p>	Oct 14, 2013 12:32 PM

Page 7, Q6. Please provide recommendations as to how to protect privacy of persons reporting data.

a lawsuit can happen down the road, people will be gun-shy to report anything. If there is a law stating that you have to report every pesticide you use, under penalty of law, who is going to enforce this? Furthermore, I don't see how this information can be protected with today's "Freedom of Information" laws.

10	non-disclosure of names; provide an ID # that can create some privacy; reporting by zip code or county and zip	Oct 13, 2013 8:38 AM
11	I don't see how it can be protected once made available for public record.	Oct 11, 2013 3:54 PM
12	There are general numbers that can be assigned to corporations who provide such data and information.	Oct 10, 2013 4:43 PM
13	The most important things are to know what is being used where in what quantities. It really doesn't matter who is using it unless an environmental or public health case arises. A California type registry should be able to provide the necessary data. If cases arise, I think reasonable amounts of forensic investigation can determine responsible parties without linking identity to the use registry.	Oct 10, 2013 11:05 AM
14	If database is geospatially focused, then some limitations may be necessary. CA system should be studied. Summary reports should be available without privacy considerations.	Oct 9, 2013 12:21 PM
15	Perhaps used lessons learned from privacy protection in the cancer registry or in the National Health and Examination Surveys	Oct 8, 2013 7:32 PM
16	User ID number stored in a separate database..	Oct 8, 2013 3:55 PM

Page 8, Q7. Are regulations and guidelines needed for a consistent, unified database?

1	<p>There should be a uniform format for maintaining pesticide use –both in hard copy and electronically. Specific guidance would be needed in some data fields to assure that all data was compatible. Geographic information, such as the application site location, would need to be reported as per standard State formats. This Geographical Positioning System (GPS) might need to be specified (e.g., degrees, minutes and seconds, or decimal degrees). It would be anticipated, however, that the software accepting the data would have the necessary conversion tables to transform the submitted data into the preferred format. Likewise, the system is envisioned to have similar conversion tables to convert and verify that the GPS information is associated with the proper watershed and zip codes. Almost all GPS computer systems now have the required basic geographic information envisioned. It is also envisioned that the developed software would incorporate a mapping overlay capability whereby the cursor location would generate the required latitude and longitude for the system. Post office box addresses and rural route addresses would not be acceptable. Urban and suburban street addresses should have adequate information for conversion to adequate latitude and longitude data. Product names and/or registration numbers would need to be linked automatically to a look up table in the system to assure that the product being entered had a defined chemical composition, specifically the percentages of the ingredients. This would be necessary to document the pounds or ounces of active ingredients being applied. This would remove the need for the applicant to calculate application loads. The balance of the reported information may need to conform to standard name, date, and address conventions, but this should not impede the reporting process or be a burden. The envisioned system should have a recall feature to upload the previous report by name, address, field location, or other identifying code, thus minimizing repetitive entries from one reporting cycle to the next.</p>	Oct 15, 2013 1:42 PM
2	<p>Guidelines, Yes. Regulations, No. Any long-term database will evolve over time and information needs change. In contrast, the regulatory process is designed to resist change - costing time, money and agency resources. A regulation requiring MDA to develop, implement and update a consistent, unified pesticide use database could lead to specific guidelines developed, reviewed and updated by a specific group (perhaps the MD Pesticide Council) or an analogous workgroup defined for that task.</p>	Oct 15, 2013 12:30 PM
3	<p>From MDA's perspective, current regulations and guidelines work well for our enforcement programs.</p>	Oct 15, 2013 11:43 AM
4	<p>If a database were developed and supported by adequate funding and resources, data standards for content and format would be essential to database success. Otherwise, incoming data with varying content and formats would need to be processed, sometimes extensively, which could distract resources from database design and maintenance (which by themselves require a lot of resources).</p>	Oct 15, 2013 8:10 AM
5	<p>A haphazard, inconsistent, and fragmented database would defeat part of the purpose. It is unlikely that this would happen without regulations and guidelines. Again, California and other created databases are the sensible systems to review.</p>	Oct 14, 2013 7:17 PM
6	<p>ACTIVE INGREDIENTS, CROP/SITE, TARGET PEST IS ADEQUATE</p>	Oct 14, 2013 3:10 PM

Page 8, Q7. Are regulations and guidelines needed for a consistent, unified database?

7	I say no, because it is not clear what such a database would be.	Oct 14, 2013 3:06 PM
8	You cannot police the entire state. We have everything from farmers, sod growers, greenhouse growers, landscape professionals, golfcourse superintendants, termite professionals, etc. all doing their job. At the moment they are over-regulated. Adding one more tier to their job, would be like adding the straw that killed the camel's back. Enough is enough. Like I said earlier, who is going to interpret this data and make some noteworthy sense out of it?	Oct 14, 2013 12:32 PM
9	require that all report the same data in same format and layout; records retained in same format and reported that way	Oct 13, 2013 8:39 AM
10	If there was a database, excluding homeowners would exclude 70-90% of pesticide applications for pest control in the state.	Oct 11, 2013 3:56 PM
11	Please see previous responses.	Oct 10, 2013 4:44 PM
12	There will be much public and stakeholder interest in identifying the appropriate fields for a database and providing assurances of anonymity.	Oct 10, 2013 11:06 AM
13	Strict guidelines and quality assurance measures are critical. Summary statistics should contain confidence intervals.	Oct 9, 2013 12:22 PM
14	regulations should restrict use to those who know how to use these data. The inability of 95% (maybe more) of the public to be able to interpret what these data mean relative to risk is a problem. Guidelines are necessary to ensure the usability of these data, consistency in reporting, and toxicity in meaningful units. Again, the design is critical.	Oct 8, 2013 4:00 PM

Page 9, Q8. Is there anything else you would like to tell us?

1	<p>Some farmers believe that there is a real public health need for this database- including farmers who do not practice monocrop farming who would need to report a larger set of data given their crop variety and therefore a larger number of products to report – are supportive of a mandated pesticide use reporting system as they feel they too will benefit from public health experts assessing what products may/may not be impact their health. Additionally- while tracking sales of pesticides to homeowners may provide some useful additional data, it does not provide information on where, when and what pesticides have been applied by homeowners. Of note: Homeowners do not have access to restricted use pesticides and, a significant amount of data regarding residential use pesticides can be ascertained based on lawn care companies' data.</p>	Oct 15, 2013 1:46 PM
2	<p>As of October 15, comments provided in this survey are those of the assigned Department of Natural Resources staff.</p>	Oct 15, 2013 12:30 PM
3	<p>The costs in time and money to MDA and the regulated community of building and maintaining a pesticide use database would be considerable, and the tangible benefits of such a database are unclear. Pesticide use data should be collected with a specific problem in mind, not just broadly collected for undetermined future use. An unintended consequence could be diversion away from current enforcement and outreach activities that provide the very real benefit of helping to prevent pesticide misuse.</p>	Oct 15, 2013 11:43 AM
4	<p>1. If database development is sought, planning efforts should ensure that the resulting database is robust and reliable, and that ongoing database maintenance needs are recognized. These quality assurance and usability needs would require significant resources for implementation. 2. An item for consideration: The 2012 policy statement from the American Academy of Pediatrics entitled "Pesticide Exposure in Children" might be worth sharing with the group. It represents the perspective of an influential organization and is available at: http://pediatrics.aappublications.org/content/130/6/e1757.full.pdf</p>	Oct 15, 2013 8:12 AM
5	<p>It seems clear that a comprehensive tracking system would be a great benefit for those interested in scientific approaches to restoring the Bay and other Maryland waters. Perhaps more importantly, it seems certain that such a database would both help protect public health and save Maryland taxpayers money by creating an expedient and cost-effective means of conducting relevant research.</p>	Oct 14, 2013 7:21 PM
6	<p>FUNDING FOR A PESTICIDE USE SURVEY SHOULD BE PROVIDED EVERY TWO YEARS</p>	Oct 14, 2013 3:12 PM
7	<p>Resources at state government agencies, including Maryland are stretched in covering vital services, including registration and regulation of pesticides. Simply raising pesticide registration fees does not guarantee increase revenues as the number of registrations may drop as a result of increased fees. Better for the state to focus resources on encouraging proper use of pesticides and enforcement against willful misuse than on collection of data of limited value.</p>	Oct 14, 2013 3:12 PM
8	<p>Farmers are always held hostage to being the culprits for contaminating the Bay, waterways, etc. Whether it be fertilizers or pesticides. They are stewards of the lands they farm. Over-regulation will just create more and more farmers to sell land to developers. Is this what we need? If we collect all of this data from farmers, landscapers, sod farms, golf courses, etc., who is going to interpret it?</p>	Oct 14, 2013 12:34 PM

Page 9, Q8. Is there anything else you would like to tell us?

In my mind, this is a monumental task that will service nobody. In the farming arena, things change from year to year. With GMO's constantly changing, products used one year, may not be needed the next. How do you assess the impact? Lastly, as products come off patent, if people report a product or products in the trade name version, there may be dozens of products under the same common name, with various trade names. Who sorts this out? Trade names for products used in turf, ornamentals, farmland, etc. vary, but may be the same thing or may have an additional component added. How do you separate out a product like Lumax or Lexar which have three different herbicides in the same jug? The rates of all three components vary from product to product and from use rate on different soil types. I really don't see how you can get a clear picture of anything. One of the components in Lumax and Lexar is also used in turf. How do you separate that out and get a clear picture of how much of the actual product is used statewide, or on a county by county basis. One would need a trained statistician/biologist to sort this out. Finally, you have the whole area of application timing. If product A is used in farmland during the months of April and May, but is also used in turf during the months of April, May, June, July and August, how do you come up with an impact of product A on anything? Other products like 2,4-D and dicamba can be used 12 months out of the year on corn, turf, small grains, etc. How do you assess their impact? The same goes for products like glyphosate. Homeowners use a lot of it. Farmers use a lot of in on glyphosate-resistant crops. The landscaping industry uses a lot of it throughout the year. We also have formulations of glyphosate that are used to fight phragmites. All of these timings of application are different. How do you come up with a common denominator with these types of products, let alone report it?

9	need cost information	Oct 13, 2013 8:40 AM
10	The presentations given during the workgroup meetings have been instrumental to helping members formulate their understanding of the needs. I hope we can continue productive dialog throughout the upcoming process.	Oct 10, 2013 11:07 AM
11	Pesticide use reporting is an important issue for a variety of users and reasons, but depends to a large extent on how data will be used. Need to consider the economics of this project. How much is the State willing to invest in this issue? Will monitoring networks that use reporting data be established? In my opinion, the concept of budget neutral funding is a fantasy -- someone always pays!	Oct 9, 2013 12:35 PM
12	Just to reiterate that understanding the questions that need answering is an important first step in designing a data collection program.	Oct 8, 2013 7:33 PM
13	I am concerned about cost/benefit of the proposed database, and if this really will be worth the cost. If we are trying to protect human health and the environment, this isn't a smart way to spend our money. We could design a better monitoring system/archival sample system for much less investment each year that would really answer these questions.	Oct 8, 2013 4:50 PM