

**May 4, 2015 E-Mail Comments on Foray 48B Aerial Spraying from Claude Ginsburg of NoSprayZone.org**

First of all, if you are talking about gypsy moths, the infestation in your area has been there for a number of decades. At this point, it is endemic and I'm not even sure you can call it an infestation any more. You probably have noticed your trees are not defoliated and dying, as agriculture departments like to claim happens. The infestation on the East Coast is approaching an equilibrium point that exists in the gypsy moth's native area, Europe. Occasionally, there will be a bad spring, and some weaker trees get temporarily defoliated, but by midsummer or next year, things are pretty much back to normal. So there is no reason at all to spray for GM in your area - all it does is upset the natural balance that is being established now.

I'm not sure about cankerworm, but I suspect the same issue is at play. If someone wanted to spray Bt on their own property from the ground, well, go ahead. However, spraying wholesale into the air is not healthy for any living beings, despite the hype. And aerial spraying, where pesticide is drifting off-target for as much as a mile or two, raises troubling questions about trespass and invasion of an individual's space without consent, especially since an insect "emergency" often doesn't bear much resemblance to, say, a tuberculosis epidemic.

"Organic" Bt is about as safe as if you obtained a pound of "organic" mold spores and inhaled them - not very healthy. Anthrax (closely related to Bt) is also "organic." The claims that Bt is "organic" or "found naturally in soil" (as is flesh-eating staphylococcus) are misleading and imply nothing about safety when the organism present as an aerosol. As to "perfectly safe", there isn't too much research, but we know (see, for example, <http://www.nosprayzone.org>) that there is a good case to be made that it is not completely safe, especially for sensitive individuals. Genetically modified foods are also called "perfectly safe", but there is a growing body of research that refutes that generalization as well. Finally, we can split hairs, but a "pesticide" is defined as substance that kills pests, and Bt in a commercial spray product such as Foray 48B should be considered a pesticide by that definition.

There is a huge bureaucratic establishment that is reliant on spraying poisons for its existence, and they are kept in place because agricultural and horticultural interests scream bloody murder if they perceive any threat to their products. So you are up against a powerful force. That said, if you can expend a lot of energy over a long period of time, you may be able to get some changes. We did in Washington State - 15 years ago, they notified the public about spraying with a 2-line classified ad in the Legal Notices section of the paper. Now, they give us months of notice via mail and websites, and they are trying some possibly safer ideas like mass trapping.

These are the facts that need to be continually repeated about Btk and Foray products:

- These pesticides are not proven safe, it just is that no one has yet proved with overt sicknesses and deaths that they are unsafe.
- Governments fail to fund any efforts to track or detect public health problems caused by Bt spraying, regardless of nationality. You can see a recent example with the aerial spraying outside of Vancouver, BC this year.
- People aren't looking at the research that shows they might be unsafe because it seems too costly or iffy to try some other, safer methods. Agriculture departments constantly repeat that the "infestation" is "atypical," that the insects create a mess that people will find unattractive, and that it is an "emergency" that should be handled immediately.
- Spraying, in the long run, really does no good - the insects will win in the end, and/or we will poison ourselves and the environment in the bargain. The almost 150-year history of failed gypsy moth eradication efforts is a good example. Better to find natural methods to bring Nature into balance, and put up with a little "mess."

[end of comments]