

Mr. Secretary: Yesterday, you denied CLF's petition to mandate Best Management Practices in Franklin County sighting as your reason for doing so a provision in statute that requires any remedy for pollution attributable to conventional dairy to be "reasonable." Your decision to deny the petition is tantamount to an admission that conventional dairy pollutes the lake with legislative approbation, that the state puts the conventional dairy industry before clean water; that it puts the needs of 600 conventional dairy farmers above the needs of 600,000, who not only have a right to expect the state to protect the public trust, but they subsidize this industry, once to pollute the lake and again to "clean it up." Your decision is an admission that the state's effort to stanch conventional dairy's contribution to lake pollution goes beyond regulatory passivity and well beyond judicious tolerance; it goes all the way to willful blindness.

You say in your response that no one came forward with a way to fund BEST MANAGEMENT PRACTICES, and there is no certainty that such a change would in fact yield results. But converting the state dairy herd to organic would immediately cut the industry's contribution to lake pollution in half while shifting the cost of conversion onto urban consumers, where it belongs. Your agency and the Sustainable Agriculture Council, which you chair, are agnostic on the important differences between organic, which was designed to be sustainable, and conventional agriculture, which was purposefully designed to externalize its wastes into the environment. The industry's business model was designed to shift its costs onto society.

Water pollution and GMO labeling are big issues in Vermont at the moment but they are only symptoms of a far bigger issue, which is the way we farm. Your largest and most important constituency is not the conventional dairy farmers or their out-of-state processors; it is the 660,000 people of Vermont. And, thanks in large part to Senator Patrick Leahy, who wrote the rules for the National Organic Program, there is another way to farm. Vermont should adopt the NOP as its agricultural practices standard and your office has the responsibility to direct that change.

Your decision yesterday is an admission that the Draft Phase One Plan is not designed to protect the lake; it is designed to reassert the probity of conventional dairy's mid-twentieth century business model, a model that is not only the handmaiden of GMO agriculture, it is the proximate cause of farm attrition, rural economic decay and lake pollution. You have before you a golden opportunity to lead the way on reforming the Vermont dairy industry and I urge you to take that opportunity.

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