

Bonnie Henwood

This proposal should not go through. The environmental impacts have not been studied enough and the pesticide is likely to have detrimental effects on other species. From my experience working in a lab with ghost shrimp and imidacloprid, this neonicotinoid is not even very effective against the species. Results suggested that ghost shrimp are easily immobilized (paralyzed) by IMI, but concentrations necessary to kill the shrimp exceed those for other marine invertebrates. Using it widespread would be ineffective and they would be likely to build up resistance over a short time. The more long term causes of the ghost shrimp problem need to be addressed instead. Oyster farm techniques as well as dams have affected the rise in ghost shrimp populations. Using a toxin that is likely to have severe impacts on aquatic species should not be the short or long term solution.