## As You Sow

As You Sow is a national 501c3 non-profit that has researched and promoted corporate responsibility for over 25 years. We advocate for long-term sustainability programs that benefit shareholders, companies, and the communities in which they do business. We work with major food companies to develop sustainable agriculture policies that meet current needs while securing future supply.

Imidacloprid is a dangerous neurotoxin. It is well-established that invertebrates quickly develop resistance to neonicotinoid pesticides, including imidacloprid. The pesticide applications in this proposal will only kill 60-80 percent of the shrimp in a plot, which will accelerate imidacloprid resistance, rendering the program ineffective. This pesticide will wreak havoc on the local system for a few years of relief.

We urge the Department to determine why burrowing shrimp are overgrowing in these regions and seek proposals that are sustainable for oyster farmers, local communities, and all other stakeholders.

Austin Wilson Environmental Health Program Manager As You Sow