

Dear Sir,

I find the rules for the Commercial Manure Hauler & Broker Certification Program to be overly regulatory, highly bureaucratic and confusing! I will try and enumerate my concerns as follows:

INDEPENDENT REGULATORY
REVIEW COMMISSION

A. Level 1 Hauler

If this person is only going to truck manure from one location to another, I fail to see the need for him to be certified at all.

B. Level 2 Hauler

If this person is just an employee of a contract hauler, I see no need for this employee to be certified. The contractor will be responsible for the actions of his employees. There is precedence for this concept in many other fields.

C. Manure Broker

This section needs to be clarified: Is a person, such as a feed & seed dealer, who does nothing more than get buyers and sellers of manure together (at no charge) a commercial broker? I believe it is important to allow this free service to continue.

D. Certification of Hauler & Brokers

I hoped that the training program would be modeled after the Pesticide Training Program for private applicators where applicants attend a training seminar and take an open book test. This is followed up with continuing educational seminars giving credits to attendees. The program seems to work effectively and has been well accepted by farmers. As an added note, bilingual education & tests should be made available for those applicants desiring it.

I believe, when dealing with manure, it is unnecessary to be as strict as when dealing with a toxic substance like pesticides.

E. Certification and Fees

There is no reason for a Certified Hauler or Broker, having successfully completed the Continuing Education Classes, to have to be recertified every 2 or 3 years.

The Fees themselves are excessive! We certainly do not want to discourage applicants with high fees and overly complicated certification requirements.

If compliance with the regulation is your goal, I believe more and better compliance can be obtained if the applicant views the regulations and fees as Fair and Just.

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