

**The Consumer Specialty Products Association
Testimony In Opposition to Raised Bill 257**

**Presented: February 26, 2009
To: Select Committee on Children**

By: Sean Moore, State Affairs Representative

Chairman Musto, Chairwoman Urban and distinguished members of the Select Committee on Children, my name is Sean Moore and I am State Affairs Representative for the Consumer Specialty Products Association (CSPA). CSPA is testifying today to express our concerns with Raised Bill 257. As it is currently drafted, the bill would place unnecessary restrictions on “ready-to-use” pesticides, (such as: bait stations, gels and crack and crevice treatments) which are used to help control and prevent pest infestations at daycares.

CSPA is a non-profit trade association representing the interests of approximately 250 companies engaged in the manufacture, formulation, distribution and sale of hundreds of familiar consumer products that help household, institutional and industrial consumers create cleaner and healthier environments. Our products include disinfectants that kill germs in homes, hospitals and restaurants; candles, fragrances and air fresheners that eliminate odors; pest management products for the home; cleaning products for use throughout the home; products used to protect and improve the performance and appearance of automobiles; and a host of other products used every day. Specifically, our members that manufacture pest management products would be directly affected by this bill.

Pest Management Products Protect Children’s Health

CSPA appreciates that for the purposes of this bill, antimicrobial products are exempted from the definition of a pesticide. Antimicrobial products, such as disinfectants and sanitizers are used every day in a variety of settings and provide many important health protection benefits by limiting the spread of diseases such as **MRSA, Norovirus** and the **flu**, as well as controlling the spread of bacteria like **E.coli, Shigella** and **Salmonella**.

When used in conjunction with proper cleaning techniques, “ready-to-use” pesticides, such as bait stations and gels, serve as a safe and proven means of preventing and eliminating pest infestations. Tamper-proof bait stations and gels are commonly recommended alternatives to treating an entire building; they may be placed in areas that are inaccessible to children and are targeted to eliminate and prevent specific pests. Crack and crevice treatments are also frequently recommended as least toxic options to prevent pest infestations before they occur. All of these products come with clear and easy to understand instructions, are easy to use and do not require the services of a certified applicator.

Additionally, while the bill allows for the application of a pesticide in the event of an emergency, it requires the pesticide be applied by a certified applicator. The type of service that might be appropriate to address such hazards as a nest of stinging insects located outside the building, does not necessarily apply to more immediate and unavoidable threats. For example, it would be impractical to seek the services of a certified applicator in the event of a stinging insect or venomous spider *within* a daycare building. Such an immediate threat to children’s health and well being could be effectively dealt with using a directed-spray aerosol product.

The current text of Raised Bill 257 would prohibit the use of any of the above pesticides except in the case of an emergency, and then they would only be permitted when applied by a certified applicator. CSPA believes that these low-risk pesticides, used in places inaccessible to children, should be afforded the same exemption for antimicrobial products under subsection (a) of this bill. Directed-spray aerosols should also be permitted in the event of an emergency and exempt from the certified applicator requirement. Requiring these commonly used products to be applied only by a certified applicator could inadvertently deter daycares from using these products as preventative measures. The end result could be an increased demand for pesticides to address pest infestations after they have begun to occur rather than preventing their occurrence from the outset.

Additionally, a 2005 study by the National Institutes of Health found that cockroach allergens exacerbated symptoms of childhood asthma more than other triggers such as dust mites and pet dander. Proper cleaning procedures and proven extermination techniques were recommended to keep these allergens under control.

Conclusion

Daycares need to have the resources to prevent pest infestations before they occur. This ability would reduce the overall need for pesticide applications and benefit children's health by providing a clean and sanitary environment. While Raised Bill 257 exempts antimicrobial products from the provisions in this bill, there remain overly stringent requirements on ready-to-use pesticides. Bait stations, gels, crack and crevice treatments, as well as directed-spray aerosol products can be safely used by an adult without exposing children to the products.

CSPA supports the responsible and judicious use of pesticides and encourages the committee to amend the bill to protect the use of the preventative measures outlined above, as well as directed-spray aerosol products for the purpose of addressing an immediate threat to the health or safety of the children. CSPA would be glad to work with Senator Meyer and the committee on language to address these concerns. We appreciate your consideration of our position on this important issue.