

T H E *Scotts* **Miracle-Gro**  
C O M P A N Y

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February 22, 2012

Committee on Planning and Development  
Room 2100, Legislative Office Building  
Hartford, CT 06106

RE: Support Memo for HB 05155 – An Act Modifying the Ban On Pesticide Applications on School Grounds

Dear Members of the Committee,

Thank you for the opportunity to submit testimony in support of HB 05155, an act that would provide a comprehensive pest control plan with flexibility and educational tools for school property managers in the State of Connecticut. The Scotts Miracle-Gro Company has been in the lawn and garden business for over 140 years becoming the largest marketer and distributor of lawn and garden products for consumer use in that time. Our company also operates the Scotts LawnService, the second largest residential lawn service business in the United States.

We strive to put the consumer first which is reflected in our annual research and development investment to innovate products that are simple, safe, and sustainable. With operations in the State of Connecticut supporting various business units of our company we are vested in the State's future both as a place to operate as well as providing a high quality of life for our associates.

Scotts Miracle-Gro is supportive of HB 05155 because it recognizes proper pest control management measures to ensure healthy school landscapes for both students and the environment. The bill implements a requirement that if pest control is to be performed on school playing fields and school grounds, it is done by a certified applicator pursuant to an "Integrated Pest Management Plan" (IPM). Pest control products are highly regulated under the Federal Insecticide, Fungicide, and Rodenticide Act. While we are confident this law adequately addresses exposure concerns through careful testing, we understand the desire for the state to ensure additional protection of children in schools due to the special nature of school operations.

IPM, when implemented under HB 05155 will allow Connecticut Schools to

- Develop comprehensive plans responsive to specific green space uses and pest threats,
- Manage timing, types, location, and amounts of applications,
- Notify employees, students, and community of plan and activities, and
- Maintain records of the IPM plan and its implementation.

Scotts Miracle-Gro supports IPM because it is recognized internationally as a way to manage pests effectively and in an environmentally sensitive manner. The United States Environmental Protection Agency (USEPA), along with many other institutions, recognizes IPM as an economical way to manage pests with the least possible hazards to people, property, and the environment. USEPA and UCONN are already providing information to schools on how to adopt Integrated Pest Management Plans to reduce exposures to children.

IPM permits the use of organic and synthetic pest controls, only after a review of all other available options, and a determination of their acceptability and feasibility by the property owner. This allows for every option to be considered to address threats to people, property, and the environment. Property

owners are allowed access to all potential control measures to handle infestations that vary in size, type and threat.

It should not be forgotten that the State of Connecticut has a certification program for commercial pesticide applicators including on school grounds. Scotts LawnService(SLS) does not stop our training with just the state required certification. A SLS technician must also undergo a 90 day probationary training program that includes, but is not limited to: safety and awareness modules, customer service and communication skills, a review of state and local regulation, environmental policy review, pesticide and fertilizer handling requirements, OSHA hazard communication, proper equipment use, SLS Best Application Practices Certification, principles of weed control, how grass grows, lawn problem identification and resolution, soil sampling and understanding a report.

Proper policy for healthy school grounds must also factor in the need to prevent injuries, ensure access to all property users, protect financial investments in the property, and ensure the full environmental benefits of those grounds. The proposed policy in HB 05155 balances out the concerns around exposure to pest control products with the factors just mentioned.

As an example that directly relates to HB 05155, once healthy grass has been established, less pest control inputs are needed to maintain the grass because weeds and other pests are crowded out. Therefore, school property managers can practice good Integrated Pest Management by properly feeding and maintaining grass areas. This management technique, among others, is taught by existing Integrated Pest Management programs to prevent the need for use of pest control products. However, if those management techniques do not address the problem, then Integrated Pest Management plans detail how best to use the least amount of pest control products to address the problem. In this way school property managers have the flexibility to address pest problems in a way that minimizes use of pest control products.

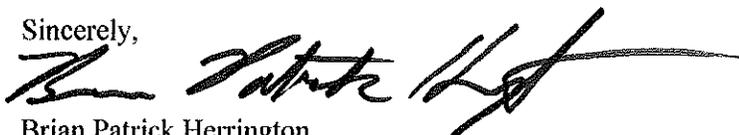
In turn, Healthy green space has been shown to have a number of positive environmental benefits, including;

- Improved water quality - grass filters stormwater runoff, helping to slow and purify water before it is returned to surface and aquifer sources,
- Reduced sedimentation and soil erosion – grass provides a thick root structure, holding soil in place during storm events,
- Improved air quality – healthy grass crowds out allergy causing plants, reducing exposure to allergens, and
- Improved energy efficiency – Grass is up to 30 degrees cooler than hard surfaces like asphalt, and up to 80 degrees cooler than synthetic turf, reducing the urban heat effect which lessens the demand for electricity to cool our schools, homes and businesses.

It is also important to know that the products we use today are not the same products the industry used decades ago. Formulation changes, application methods, and management practices in general have developed out of extensive research and development and overall concern for the health and safety of our families and our communities. I hope all of this information is helpful in developing a new comprehensive school pest management policy in the state. Our company appreciates being part of the dialogue in Connecticut and working collaboratively to address all concerns and finding solutions that benefit all those involved in these efforts.

Thank you again for your time and efforts on these important issues. Please do not hesitate to contact me if you have any further questions.

Sincerely,



Brian Patrick Herrington  
Government Relations Manager  
The Scotts Miracle-Gro Company