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Testimony of the  
**CONSUMER SPECIALTY PRODUCTS ASSOCIATION**  
*in OPPOSITION to*  
**HOUSE BILL 6440**  
***AN ACT CONCERNING MUNICIPALITIES AND THE APPLICATION OF LAWN CARE PESTICIDES***  
*submitted to the*  
**JOINT ENVIRONMENT COMMITTEE**  
**STATE OF CONNECTICUT**  
**FEBRUARY 25, 2013**

Submitted by: Sean Moore, Director, State Affairs – East Region

Chairman Meyer, Chairwoman Gentile and distinguished members of the Joint Environment Committee, my name is Sean Moore and I am Director of State Affairs for the Eastern United States at the Consumer Specialty Products Association (CSPA). CSPA appreciates this opportunity to submit testimony **in strong opposition to House Bill 6440** – a bill that could result in a patchwork of differing pesticide regulations across the state of Connecticut.

CSPA is the premier trade association representing the interests of some 230 companies engaged in the manufacture, formulation, distribution and sale of \$80 billion annually in the U.S. of hundreds of familiar consumer products that help household and institutional customers create cleaner and healthier environments. Our products include disinfectants that kill germs in homes, hospitals and restaurants; candles, and fragrances and air fresheners that eliminate odors; pest management products for home, garden and pets; cleaning products and polishes for use throughout the home and institutions; products used to protect and improve the performance and appearance of automobiles; aerosol products and a host of other products used every day. Through its product stewardship program, Product Care<sup>®</sup>, and scientific and business-to-business endeavors, CSPA provides its members a platform to effectively address issues regarding the health, safety, sustainability and environmental impacts of their products. For more information, please visit [www.cspa.org](http://www.cspa.org).

House Bill 6440 would amend the law providing for state preemption of local pesticide regulation, and allow municipalities and local governments to apply for the ability to regulate pesticides more stringently than the state. The justification for state preemption of pesticide regulation is best stated by a quotation from the California Department of Pesticide Regulation (DPR), which is the primary agency for pesticide regulation in that state:

“Pesticides are unique among toxic substances. They are not an unwanted byproduct of another process, for example, of an industrial operation or an automobile engine. Pesticides are produced specifically for their toxicity to a target pest and must be purposely introduced into the environment to do their job. Therefore, regulation of pesticides does not focus solely on assessing toxicity but also on managing risk by controlling exposure. The effects –

beneficial, harmful or benign – of pesticides or any substance are dependent on several factors. The most important is exposure – how much and how often.”

This quotation explains the unique quality of pesticide regulation that justifies the current law, which preempts local jurisdictions from restricting the use of pesticides approved by the Department of Energy and Environmental Protection (DEEP).

If HB 6440 were enacted into law, nearly 150 local jurisdictions could potentially adopt separate regulations pertaining to the registration, use or transportation of pesticides. The result would be a patchwork of regulations that would impact the public health, economy and environment of Connecticut.

**Public health, sanitation and safety may be compromised.** Reducing the availability and use of tested and effective pesticides could erode the ability to control pests that carry disease and spread allergens and infectious germs.

**Human health could suffer.** Uncontrolled pests cause real and documented human health risks ranging from increased asthma attacks caused by cockroach infestations, to hanta viruses and plague carried by rodents, Lyme disease carried by ticks, to West Nile Virus and other Encephalitic diseases transmitted by mosquitoes that may cause severe illness and even loss of life.

**Property and land value could decline.** Pests that destroy homes (termites), forests and desirable vegetation on lawns, golf courses and other recreational sites and living areas can make land and water less usable to humans and wildlife if not controlled.

**Applicator education is an important aspect of pesticide use.** A uniform statewide regulatory system ensures manufacturers, retailers and regulators all communicate appropriate application instructions and requirements. In the absence of uniformity, consumers may shop in a town that permits the sale and application of a product that is prohibited in the town in which they reside. CSPA is not convinced that a cogent educational program could be employed under the decentralized system that would result from passage of HB 6440.

HB 6440 would undermine DEEP’s regulatory enforcement system and jeopardize Connecticut’s citizens, environment and economy.

CSPA respectfully *urges your NO vote on HB 6440*. Thank you for considering our position on this exceedingly important issue. I apologize that I am unable to appear in-person to present this testimony, as I had a previously scheduled travel commitment, but welcome any questions or discussion of CSPA’s testimony. Please contact Jean Cronin (Hughes & Cronin Public Affairs Strategies), CSPA’s in-state representative, at 860-347-9955 or [jcronin@hughesandcronin.com](mailto:jcronin@hughesandcronin.com).