



CCM 2013 Testimony

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ENVIRONMENT COMMITTEE

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The Connecticut Conference of Municipalities (CCM) is Connecticut's statewide association of towns and cities and the voice of local government - your partners in governing Connecticut. Our members represent over 92% of Connecticut's population. We appreciate the opportunity to testify on bills of interest to towns and cities.

CCM has many concerns with the following bills – SB 914, SB 916, SB 917, and HB 6440:

Since the passage of the ban on pesticide use on certain school grounds, local groundskeepers and public works directors across the state have been reporting increased pest populations, both insect and plant, and rapidly deteriorating fields as a result of the current statutory restrictions on K-8 school grounds.

In November 2012, EPA released its updated strategic plan for implementing school Integrated Pest Management (IPM) programs citing, **“full implementation of Integrated Pest Management is cost effective, reduces exposure to pests and pesticides, and reduces pesticide use and pest complaints.”** Connecticut's restrictions have continued to be in place for several years now, even though EPA has continued to identify IPM as *“a safer, and usually less costly option for effective pest management in the school community,”* which *“employs commonsense strategies to reduce sources of food, water and shelter for pests in your school buildings and grounds,”* further taking *“advantage of all pest management strategies, including judicious careful use of pesticides when necessary.”*

These bills before you today will only further exacerbate the problems, or make a weak attempt to use a surgical approach to small portions of a complex issue.

- **SB 914** - Would further exacerbate the current problem of addressing pest populations by expanding the pesticide ban to municipal parks. Interestingly enough, considering the fervor of the ban-proponents' positions, there is no proposal to restrict such use from state lands.
- **SB 916** - Would create a civil penalty for the “faulty, careless or negligent” application of pesticides. This proposal is ripe for litigious abuse. Rather, such a proposal should be considered in the context of DEEP fines.
- **SB 917** - Would allow the use of certain “organic” grub combating treatments, and pesticides that do not have a product label of “caution”, “warning”, or “danger” indication. According to experts in the field, there is only one product that would fit this narrow allowance and have any effectiveness in our climate – Acelepryn. This would mean that state law would be actively promoting the product of one very lucky manufacturer. Not to mention the fact that grounds managers understand that you cannot utilize the same product over and over, as it loses its effectiveness. Rather, you must rotate product applications. So, this bill would help groundskeepers for only one season.
- **HB 6440** - Would remove the preemption for the regulation of pesticides and place that burden on municipal backs. Municipalities do not have the staff expertise to make complex scientific decisions as to which products are toxic and which are not. Such products are already heavily regulated by both the US EPA and the CT DEEP. Transferring such burden to municipalities will only lead to potential local

regulation by fear and political pressure – which is not the way any governmental entity should act public policy should be enacted.

CONTINUING MISNOMERS

In recent testimony before the Education Committee, and in a number of other contexts over the last several years, certain towns have been held out as the “poster children” for success within the parameters of this ban – the Town of Branford being one of them.

We have recently learned from a direct conversation between the Glastonbury Parks Superintendent and Branford Director of Recreation, that while Branford is certainly in compliance with the ban on K-8 school grounds, they are indeed using pesticides for the treatment and care of their parks and recreation fields. So, it is not at all accurate to tout them as a “success story” for the ban, otherwise they would be voluntarily implementing the same approach on *all* fields.

Similar circumstances have been eluded to regarding other municipalities that have also been characterized as completely pesticide free.

WHAT IS NEEDED? A BALANCED COLLABORATION TO DEVELOP SOLID STATE POLICY

It is important to note, that municipal officials are second-to-none in ensuring the safety and health of children. Not only are municipal officials parents, but they have a fiduciary duty to protect and defend the public’s interest.

Because of this responsibility, and the continued debate as to whom has the best and right information about these products, **CCM supports the creation of a balanced working group/task force to thoroughly examine and vet the facts** surrounding field management and provide recommendations as to how state policy on this issue should be structured

Chairmen of the Planning & Development Committee and Environment Committee have already agreed to put forth such a proposal, and ensure a balanced collaboration on a solution.

CCM stresses the need for such an entity to be composed of individuals representing all facets of the issue and structured in a manner that *all participants will feel the resulting recommendations are an agreeable collaboration and compromise.* This will be a hard goal to achieve, but with careful thought and consideration it can be accomplished.

- **CCM urges that these bills not be passed individually, but rather a comprehensive proposal be put forward to convene a working group/task force to establish statewide policy, which requires among other things that (1) the subject matter of these individual bills be included as part of the charge for discussion– and – (2) allow the use of grub control products, as outlined in SB 917, with a one year sunset to ensure this issue is also addressed in the statewide policy.**

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If you have any questions, please contact Kachina Walsh-Weaver, State Relations Manager, kwash-walsh@ccm-ct.org or (203) 710-9525.