



Written Testimony
Mike Wallace, Board Member

SB 914, An Act Concerning the Application of Pesticides at Municipal Parks
SB 916, An Act Authorizing Civil Penalties for the Faulty, Careless or Negligent Application of Pesticides
SB 917, An Act Authorizing the Use of Certain Microbial and Biochemical Pesticides and Grub Control Products on School Grounds
HB 6440, An Act Concerning Municipalities and the Application of Lawn Care Pesticides

Monday, February 25, 2013
Environment Committee

Good morning Senator Meyer, Representative Gentile, Senator Chapin, Representative Shaban and the distinguished member of the Environment Committee, my name is Mike Wallace, I am a board member of the Connecticut Environmental Council (CTEC). I appreciate this opportunity to offer my comments on Senate Bills 914, 916, 917 and House Bill 6440.

CTEC is a membership organization representing associations and professionals in the green industry. Our membership includes the Connecticut Grounds Keepers Association, the Connecticut Tree Protective Association, the Connecticut Pest Control Association, the Connecticut Irrigation Contractors Association, the Connecticut Association of Golf Course Superintendents and the Connecticut Farm Bureau Association.

During the 2005 session, CTEC supported legislation that permitted pest controls to be applied to public and private schools 8th grade or under if the applications adhered to an Integrated Pest Management (IPM) plan. Under this legislation the IPM plan must be consistent with DEEP's Model Pest Control Management Plan. From January 1, 2006 until the July 1, 2010 sunset, school grounds were well maintained using the best management practices of IPM.

In the way of background, state law defines IPM as "the judicious use of pesticides to maintain a pest population at or below an acceptable level, while decreasing the use of pesticides." As a result of IPM's judicious methods of applying lawn care pesticides; over the four years of the pilot program tons of active ingredients were withheld from use on school grounds. During the pilot, the IPM approach has proven to be safe, reliable and affordable way of applying lawn care pest controls, while protecting the financial investment towns have made in athletic fields and school grounds.

Since the July 1, 2010 sunset, athletic fields and school grounds have fallen into complete disrepair not through the negligence of the licensed professionals that seek to maintain the properties but as a result of the ban the professionals lack the necessary tools to provide for a safe and healthy property for students. The ban does not allow any EPA registered pest controls to be used. Over the past three years pest populations have grown without controls rendering athletic fields and school grounds unplayable.

Attached to my testimony are two pictures of a middle school baseball field in West Haven. Under the IPM program this athletic field was well maintained and provided a safe playing surface for many different teams during the year. The second picture was taken just 12 months after the ban. This field is unplayable and not safe for students to use. As a result these students from this school are now playing their games on a park and recreations field, which is not subject to the ban. Unfortunately this example is being repeated in many towns in the state.



Specifically CTEC opposes:

SB 914, which would expand the ban to include all municipal parks. The ban on school grounds Kto8 over the past three years has led to the disrepair of these properties, we should not repeat this mistake expanding the ban to include municipal parks.

SB 916, which seeks to oppose penalties on applicators. This legislation is unnecessary because under a DEEP regulation currently scheduled for a final vote before the Regulation Review Committee on Tuesday, there is a process and procedures in place to respond to complaints. This legislation is duplicative and unnecessary.

HB 6440, seeks to repeal a longstanding law, which establishes a statewide pre-emption on municipalities from adopting their own rules regarding the regulation of pesticides. Connecticut's pre-emption law has been in place for 30 years during that time 41 states have approved similar laws with no state repealing their law once in place. Under the current law, municipalities rely on the expertise of the Pesticide Division of DEEP to provide guidance on issues related to pest control ~~these~~ products and their use.

CTEC supports the formation of a **task force or working group** that will review the impact of the ban on pesticide use and report back in time for enactment of legislation during the 2014 session of the General Assembly. This task force should be based in science and must include representatives from DEEP's Pesticide Division, UConn School of Agricultural, the Agricultural Experiment Station, various municipal organizations as well as the licensed professionals directly responsible for maintaining school grounds at every level in both the public and private sectors.

Finally, **SB 917**, which would permit very specific products to be used to address grub control. CTEC believes that it is bad public policy to draft legislation that carves out an exception for one EPA registered product. We strongly recommend that this proposed legislation be amended to sunset on January 1, 2014 and that the legislation be part of a comprehensive discussion that would occur during the working group or taskforce on pest controls. CTEC recognizes that because they are unable to utilize EPA registered pest controls, municipalities have been without the tools to control grub populations.

In conclusion, CTEC respectfully request that you not move forward with these proposals and support a collaborative balanced task force which will report back prior to the start of the 2014 session.

Thank you for this opportunity to provide you with this testimony.



Connecticut Environmental Council

Before the Ban on Pesticides



After the Ban on Pesticides

