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Testimony of the
CONSUMER SPECIALTY PRODUCTS ASSOCIATION
*in **OPPOSITION** to*
HOUSE BILL 6438
AN ACT RESTRICTING THE USE OF METHOPRENE AND RESMETHRIN
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 6438** – a bill that would restrict the use of two important pesticide ingredients useful for mosquito and insect control in 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[®], 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.

House Bill 6438 would restrict the use of methoprene and resmethrin without any demonstrated scientific evidence or scientific review to substantiate the need for such restrictions. Both pesticides have been reviewed by the United States Environmental Protection Agency (EPA) and approved for use with guidelines for minimizing ecological impact. Resmethrin was first registered for use in 1967 and methoprene was first registered in 1975. Both products are classified as general use pesticides and may be used to control a broad spectrum of flying and crawling insects in and around the home.

Methoprene has been widely used because it is not a human skin sensitizer, it has very low acute oral and inhalation toxicity potential in humans, and is not considered an eye or skin irritant by EPA; it also is of low acute dermal toxicity. EPA has placed methoprene in toxicity category III

and IV, which are the lowest toxicity categories. Methoprene is highly effective for protecting public health against diseases caused by mosquitoes; it degrades rapidly in water and does not bioaccumulate in fish. When used for ultra low-volume mosquito abatement, resmethrin must be applied by a certified applicator trained for such use. However, EPA has also placed it in toxicity categories III and IV as it has low oral, dermal, and inhalation acute toxicity, and it is not an eye or skin irritant nor a skin sensitizer.

Additionally, EPA requires specific use instructions for resmethrin products intended to be used around the home by both consumers and professional applicators. The instructions are intended to protect aquatic organisms by reducing the potential run-off and drift that may occur with certain products. Product labels must include maximum application rates as well as best management and stewardship practices that are formulation specific.

Registered pesticides sold and used in Connecticut must be registered with EPA and the Connecticut Department of Energy and Environmental Protection (DEEP). Federal law requires that before selling or distributing a pesticide in the United States, a person or company must obtain registration, or license from EPA. Before registering a new pesticide or new use for a registered pesticide, EPA must first ensure that the pesticide, when used according to label directions, can be used with a reasonable certainty of no harm to human health and without posing unreasonable risks to the environment. To make such determination, EPA requires more than 100 different scientific studies and tests from applicants.

Conclusion

Speculation that methoprene and resmethrin are responsible for lobster die-off is unfounded. Passage of HB 6438 would result in the loss of two valuable tools used to protect public health in Connecticut. While CSPA is sympathetic to the concerns of Connecticut's lobstermen and the challenges they face in the Long Island Sound, we urge the committee to base any decisions regarding methoprene and resmethrin on sound science and available research, not emotion.

CSPA respectfully *urges your NO vote on HB 6438*. 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.