



GRASSROOTS Environmental Education

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My name is Douglas Wood, and I am the Associate Director of Grassroots Environmental Education, a non-profit organization with extensive experience in non-pesticide lawn care. I hereby submit my testimony in opposition of HB 5580. My comments pertain to Sections 1-3, relating to pesticides and integrated pest management.

Regarding Section One, it is our understanding that the Pesticide Advisory Council has been largely inactive over the past few years, so charging this body with new responsibilities at this time seems inappropriate. Moreover, we believe the PAC may not be the most suitable body to address these issues.

Pesticides are increasingly seen as a **public health** issue, and while they also impact the environment - sometimes with devastating results - emerging science informs us that their impacts are also felt by human populations, particularly children and pregnant women. Therefore, we believe that jurisdiction over their use and evaluation of their safety should be the purview of medical/toxicological experts.

Section One of the proposed legislation also requires the Commissioner to publish a report on best practices regarding the safe and effective use of "synthetic and organic pesticides" for use by municipalities. We note that the term "organic pesticides" is not one commonly used in the green industry, and lacks any legal definition. There are EPA-classified "minimum risk pesticides" also known as "25(b) products" which are not subject to federal registration requirements because their ingredients, both active and inert, are *demonstrably* safe for the intended use. There are also biological controls and microbial products, but these are not "organic pesticides."

The proposed legislation is also vague as to the scope of the prospective pesticide analysis, specifically whether it relates to indoor pesticides, where policies and expertise of the Department of Health should be considered, or structural pesticides. As we have pointed out on various other occasions, chemical pesticides are not required for the proper maintenance of playing fields and other open spaces where children play.

Children are uniquely vulnerable to environmental toxins and deserve to be protected from unnecessary exposure. In general, municipal uses of pesticides impact children to varying degrees, but the use of lawn care pesticides requires a high level of attention. We draw your attention to the recent DEEP-contracted report authored by Dr. Alex Lu, Associate Professor of Environmental Exposure Biology at Harvard University. His literature review and policy implication synthesis of the impact of EPA registered pesticides that are most widely used on turf and school grounds found that the

“association of residential pesticide exposure and childhood cancers is significant enough that merits a practical and effective intervention on reducing pesticide uses in the environment that children are often present. This is where the public health precautionary principle should be exercised.”

Section Two empowers the Commissioner to establish a regional purchasing program through which municipalities may purchase pesticides for a reduced price. We fully support the idea of cooperative bids and bulk purchasing to save municipalities money, and given the current legislation that mandates that school fields for grades K-8 be maintained without pesticides, we believe that enabling the bulk purchase of grass seed, compost and other products necessary for a natural turf management program would be appropriate. Indeed, in keeping with Dr. Lu’s recommendations that children’s exposure to pesticides be reduced wherever and whenever possible, all municipalities should be encouraged to adopt non-toxic lawn care practices and we should give them the tools to do so in the most cost-effective manner.

Section 3 requires the Commissioner and PAC to review the integrated pesticide management monitoring website maintained by the state of Massachusetts in order to determine if a similar resource should be created in Connecticut. It is unclear from the bill’s current language what specific website this is referring to, as Massachusetts maintains several web pages on IPM directed at various stakeholders. Moreover, the CT DEEP website already has information on IPM for Homeowners, Municipalities and others. That content was last updated on November 30, 2011. We would encourage DEEP to better utilize its existing site. We do not believe the creation of a new IPM monitoring website in CT is an appropriate expenditure of taxpayer funds.

Thank you for this opportunity to submit this testimony.

Douglas A. Wood
Associate Director