



# CCM 2015 Testimony

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## COMMITTEE ON CHILDREN

March 3, 2015

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 96% of Connecticut's population. We appreciate the opportunity to testify on bills of interest to towns and cities.

### HB 6897, "An Act Concerning the Application of Pesticides at State-Operated Parks, Athletic Fields and Playgrounds"

Section 1 of HB 6897 attempts to address current problems faced by municipalities struggling to maintain athletic fields when faced with an infestation of grubs which destroy these fields, and require significant municipal funding to repair or replace.

The bill would allow towns and cities to use a specific synthetic product, Acelepryn based on the fact that it does not have an EPA caution label containing a "signal" word. While this is well intentioned, it offers only a short-term solution, as proper field maintenance cannot be performed through the use of any single product, synthetic or organic. Just as you would not treat the flu with the same vaccine every year, likewise you cannot treat a pest infestation like grubs with the same product year in and year out without that product losing its effectiveness.

Since the passage of the ban on pesticide use on K-8 school grounds, park and recreation officials, public works directors and school grounds officials 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.

In November 2012, the Federal Environmental Protection Agency (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.*"

## **WHAT IS NEEDED? A BALANCED COLLABORATION TO DEVELOP 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 reformation of a balanced Pesticide Advisory Council within the Department of Energy and Environmental Protection to thoroughly examine and vet the facts** surrounding field management and provide recommendations as to how specific synthetic and organic pesticides are reviewed and approved for use.

The Municipal Opportunities for Regional Efficiencies (MORE) Mandates working group, adopted recommendations in 2014 to:

1. Utilize the Pesticide Advisory Council, as constituted in CGS Section 22a-65(d) to (a) review all new pesticides on a continuing basis for safety and effectiveness and (b) report their finding to the Commissioner of DEEP for consideration in adopting regulations.
2. Require DEEP, in consultation with the Pesticide Advisory Council, create, publish, and regularly update a set of best practices, including a review of the Massachusetts IPM monitoring website ([www.massnrc.org](http://www.massnrc.org)), for use by municipalities regarding the safe and effective use of both synthetic and organic pesticides.

CCM stresses the need for such an entity as the proposed Pesticide Advisory Council to be comprised of area experts from relevant state agencies (i.e., DEEP, DoAG, DPH) to study all facets of the issue, using a science based approach. This council would remove the politics from the issue, and work to set policy and regulations based on the most current science regarding the safety and effectiveness of pesticides.

CCM urges that HB 6897 be amended before consideration for approval by the Committee.



If you have any questions, please contact Randy Collins, Senior Legislative Associate, at [rcollins@ccm-ct.org](mailto:rcollins@ccm-ct.org) or (860) 707-6446 or Alexandra Beaudoin, Legislative Analyst, at [abeaudoin@ccm-ct.org](mailto:abeaudoin@ccm-ct.org) or (860) 670-4021.