



**Testimony on behalf of
The Connecticut Recreation and Parks Association, Inc.
Before the Committee on Children
March 3, 2015**

**Raised Bill 6897 - AAC The Application of Pesticides
at State-Operated Parks, Athletic Fields and Playgrounds**

The Connecticut Recreation and Parks Association, Inc. (CRPA) is a nonprofit charitable organization whose mission is to provide a network of support to our members through professional development and resources in order to enhance the quality of recreation and parks services in Connecticut. CRPA represents **over 600 individual professionals** from municipal, nonprofit and private, park, recreation & camp organizations, as well as **126 of the 169 municipal park and recreation departments in Connecticut**.

Our organization's members are directly responsible for the safe and effective maintenance and operation of municipal athletic fields, playgrounds, and grounds throughout Connecticut. They are non-profit public servants and have no financial interest in the sale of any product used to maintain such fields and athletic areas. They are trained professionals that know what is safe and effective.

CRPA believes that although the intent of HB 6897 appears to be to allow professionals to safely and effectively maintain such recreational areas, the bill is seriously flawed and therefore **we cannot support it at this time**. Section 1 of HB 6897 attempts to legislate the use of a particular product and fails to acknowledge that science is rapidly evolving. CRPA recommends that permitted usage be based on a product's toxicity rating rather than whether it contains an EPA caution label.

We believe that more flexibility is needed to determine which products can be used to maintain fields and grounds. Since implementing the ban on the use of integrated pest management on K-8 fields many members have seen their fields deteriorate. Section 1 of HB 6897 is an attempt at a partial solution to this problem. Unfortunately, a comprehensive solution is needed and this bill only confuses an already challenging situation.

Section 1 of HB 6897 recognizes that certain low toxicity products must be allowed to combat grubs, particularly since so called organic products are ineffective to combat grubs and neither preserve our fields nor protect the public. Furthermore, Section 1 of HB 6897 would appear to only allow one product to combat grubs: Acelepryn, based on the fact that it does not have an EPA caution label containing a "signal" word.

This is troubling for several reasons but most importantly because as science evolves and more products become available Connecticut must rapidly respond by permitting the use of more effective and less toxic products, whether synthetic or organic. This area requires the science based expertise of our regulatory agencies. Timely evaluation of the toxicity and effectiveness of both synthetic or organic products is not within the Legislature's expertise and should be handled by a council of scientists overseen by DEEP. Secondly, even if the EPA does not mandate a caution label on a product, a manufacturer can ask the EPA for a caution label, thereby rendering a safe product unusable in Connecticut.

Section 1 of HB 6897 is further flawed in that it references:

1. "horticultural soap" as an exemption to the ban if it does not contain "any synthetic pesticide or synergist". If this is the same product as an insecticidal soap then no product will fit this description as every insecticidal soap is synthetic.

2. “microbial pesticides”; according to professionals among our members they are unaware of any commercially available that are effective in turf management.

Section 1 of HB 6897 also precludes the treatment of ash trees from the infestation and devastating effects of the Emerald Ash Borer (EAB). The EAB infestation has been identified by the USDA and DEEP’s Department of Forestry as a crisis. Treatment is critical to the survival of ash trees, the bill does not allow for these treatments. With this legislation, historic trees are destined to go the way of chestnuts, elms and hemlocks, and will be lost to future generations.

Further, Section 2 of HB 6897 seems to apply only to state-operated parks, athletics fields, and playgrounds but is so ambiguously written that it may be interpreted to apply to all parks, athletics fields, and playgrounds statewide, whether operated by the state or not.

In summary, HB 6897 is fatally flawed. It is neither safe nor effective. It fails to address the need for effective products to deal with more than grubs, such as various invasives and such common problems as poison ivy. The concept of trying to legislate the use of a particular product makes little sense if science is to form the foundation for protecting the public. **Instead the legislator should take a closer look at HB 5024 and reestablish a pesticide advisory council within DEEP.** The unintended consequences of HB 6897 are not in the public interest. **Therefore, CRPA must oppose HB 6897.**

Paul J. Roche,
Chairman of the Legislative Committee for the
Connecticut Recreation & Parks Association