



Representing Household & Institutional Products

Aerosol - Air Care - Cleaners - Polishes
Automotive Care - Antimicrobial - Pest Management

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Consumer Specialty Products Association
Submitted to the Environment Committee
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Senate Bill 231: An Act Relating to Pollinators

Senator Kennedy and Representative Albis and members of the Environment Committee:

Thank you for the opportunity to submit written testimony. On behalf of the Consumer Specialty Products Association, I respectfully oppose Senate Bill 231, which would restrict sales of neonicotinoid pesticides and prohibit use.

The Consumer Specialty Products Association (CSPA) is the premier trade association representing the interests of companies engaged in the manufacture, formulation, distribution and sale of more than \$80 billion annually in the U.S. of familiar consumer products that help household and institutional customers create cleaner and healthier environments. CSPA member companies employ hundreds of thousands of people globally. Products CSPA represents include disinfectants that kill germs in homes, hospitals and restaurants; air fresheners, room deodorizers, and candles that eliminate odors; pest management products for home, lawn and 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.

Consumer pest products allow Connecticut residents in all communities the ability to clean and protect their homes with safe and affordable products. Without access to such products, consumers must choose between taking no action against pests or paying someone to perform the services for them which can be cost-prohibitive.

Neonicotinoids are a class of neuro-active insecticides chemically related to nicotine. Neonicotinoids used in both indoor and outdoor pest control products to manage insects including bed bugs, stink bugs, cockroaches, grubs, and invasive species like Emerald Ash Bore. The neonicotinoids were developed in large part because they show reduced toxicity compared to previously used organophosphate and carbamate insecticides. Most neonicotinoids show much lower toxicity in mammals than insects. Under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), the U.S. Environmental Protection Agency (EPA) reviews all current pesticide registrations every 15 years to ensure they continue to meet the protective FIFRA standard in light of new information and evolving science. US EPA is in the process of reviewing the safety of neonicotinoids in response to President Obama's Pollinator Task Force Action Plan¹. The federal government, at the direction of the White House has created a pollinator task force to study the stressors leading to bee decline and strategies for addressing them. Every state is developing a pollinator protection plan and no state has banned the use of

¹ <https://www.whitehouse.gov/the-press-office/2014/06/20/presidential-memorandum-creating-federal-strategy-promote-health-honey-b>

neonicotinoid products. In addition, the National Academy of Sciences has begun a study on the health of pollinators ordered by the White House.

The weight of scientific evidence shows no correlation between bee health and the use of neonicotinoids. For example, in Australia, where neonicotinoids are widely used, bees are thriving; yet in Switzerland, where there is little use of these products, bee health is generally poor. The UK Department for Environment, Food and Rural Affairs decided to reevaluate existing research over concerns about a problem with data used in a recent study noting, “Laboratory-based studies demonstrating sub-lethal effects on bees from neonics did not replicate realistic conditions, but extreme scenarios . . . While this assessment cannot exclude rare effects of neonicotinoids on bees in the field, it suggests that effects on bees do not occur under normal circumstances. Consequently, it supports the view that the risk to bee populations from neonicotinoids, as they are currently used, is low.” In addition, the U.S. Department of Agriculture and the US EPA recently released a comprehensive scientific report on honey bee health. The report states that there are multiple factors playing a role in honey bee colony declines, including parasites and disease, genetics, poor nutrition and pesticide exposure. One of the key findings of the report is that the parasitic *Varroa* mite is recognized as the major factor underlying colony loss in the U.S. and other countries.

When used properly, pesticides protect plants and home from pests. The safety of consumers is the highest priority for CSPA members. CSPA member companies manufacture products that are safe when used according to the directions on the label. Manufacturers are continuously focusing on the safety of products and packaging, as well as helping to prevent their products from reaching children. Users are encouraged to determine the most appropriate product for the need and to read and follow all label directions.

We support continued research on the risks to bee health and readily acknowledge the critical importance of pollinators to the agricultural economy, however, in recognition of the review underway at US EPA and lacking adequate science to support the measure, CSPA respectfully asks for your no vote on the bill.