

SUMMARY OF COMMENTS—CHAPTER 27—SEPTEMBER 2012

TESTIMONY GIVEN AT SEPTEMBER 7, 2012 PUBLIC HEARING	
Person/Affiliation	Summary of Testimony
Deven Morrill, Lucas Tree	<p>Concerns: Questions excluding golf courses from the definition of school grounds. The proposed requirement that parents sign and return the annual notification form. He feels IPM already minimizes the use of pesticides. Does not support the proposed requirement under 6.A(2) because it shifts responsibility for notification to the commercial applicator.</p> <p>Suggestions: Make definition of school grounds only include property owned by the school. Delete the proposed statement in 5A about avoiding aesthetic applications.</p>
Heather Spalding, Maine Organic Farmers and Gardeners Association	<p>Concerns: The harmful effects of pesticides on children. She reminded Board members about the original intent of the legislation which ultimately led to the report and this rulemaking effort.</p> <p>Supports: Restrictions on the use of pesticides at schools and daycares and increased use of organic land care practices on school grounds.</p>

WRITTEN COMMENTS RECEIVED BY SEPTEMBER 28, 2012	
Person/Affiliation	Summary of Comments
Lisa Roy, Health Inspection Program, State of Maine	<p>Suggestions: Require schools to follow Maine Food Code requirements; require notification to parents following an incident.</p>
June Boston, Boston Co. Golf & Athletic Fields	<p>Concerns: Contractor should not have to do the job of the IPM Coordinator.</p> <p>Suggestion: Remove Section 6.A(2).</p>
Laurie Wolfrum	<p>Concerns: Rule does not do enough to ensure safety of children.</p> <p>Suggestions: Do not exempt agricultural fields, nursery plot and greenhouses. If left exempt, require advance notification. Do not allow pesticide applications for cosmetic purposes.</p>
Julie Forbes, ND, North Bridgton, Maine	<p>Supports proposed amendments; feels they strengthen the protections for children.</p>
Amy Dietrich, Camden, Maine	<p>Suggestions: No pesticides at school; do not exempt agricultural fields, nursery plots or greenhouses; do not allow IPM Coordinator to choose to use pesticides.</p>

SUMMARY OF COMMENTS—CHAPTER 27—SEPTEMBER 2012

WRITTEN COMMENTS RECEIVED BY SEPTEMBER 28, 2012	
Person/Affiliation	Summary of Comments
Jody Spear, Brooksville, Maine	<p>Concerns: Allowing pesticide use on school grounds for cosmetic purposes is bad policy. Believes that organic pest management and land management practices will result in lower costs and a safer environment for children. Cites a study in Florida in which sanitation and maintenance practices reduced indoor use of pesticide over 90%. Section 5.A states aesthetic uses should be avoided, while 5.C states the aesthetic threshold must be met. Does not support any exemptions for agricultural/horticultural areas. Questions the consequences when a school fails to adopt an IPM policy. Wonders what the training will consist of for IPM Coordinators. The Pest Management Activity Log is not required to describe reasons why pesticides are applied. Questioned why MSDSs are no longer part of the required records. Section 3.B(3) is unclear as to the actual meaning. Questioned the intention of exemptions and disagreed with exempting agricultural facilities from the notification requirements.</p> <p>Suggestions: Believes that parents should receive advance notice of all pesticide applications made at schools. Section 3.C should make it clear that unlicensed school employees are not allowed to make mosquito control applications. Believes that “cosmetic” is the more accurate word to use when describing the Board’s policy on pesticide use on school grounds. The IPM Coordinator should inform the commercial applicator about the notification requirements, and not vice versa. Monitoring results should be the basis for pesticide applications and routine applications should be prohibited in the rule. Promotes the use of organic pest management practices on school grounds and sanitation and maintenance to reduce the need for indoor pesticide use.</p>
Leora Rabin, MD, Maine Medical Center, Portland, Maine	<p>Concerns: Amendments decrease restrictions on the use of pesticides at schools.</p> <p>Suggestions: Increase regulations and minimize the use of pesticides.</p>
Margery Forbes, Blue Hill, Maine	<p>Concerns: Pesticides should not be used on school grounds; IPM Coordinator may not be interested in non-toxic methods.</p> <p>Suggestions: Revise rule to include non-toxic methods used to manage weeds and bugs.</p>
Ann Mullen, Belfast, Maine	<p>Concerns: Students should not be treated as mini adults, subject to the Worker Protection Standard, which do not go far enough to protect adults; children are vulnerable to chemicals.</p> <p>Suggestions: Do not allow pesticides for aesthetic reasons; only allow pesticides for emergencies; require the use of safer, least-toxic products; no exceptions for parental notification; do not allow students to be trained as agricultural workers.</p>
Beedy Parker, Camden, Maine	
Carol Howell, Jefferson, Maine	
Erica Rudloff, Exeter, Maine	
Heather Evans, South Portland, Maine	
Paul Breeden, Sullivan, Maine	

SUMMARY OF COMMENTS—CHAPTER 27—SEPTEMBER 2012

WRITTEN COMMENTS RECEIVED BY SEPTEMBER 28, 2012	
Person/Affiliation	Summary of Comments
Scott Gaiason, Lisbon Falls Maine	
Suzanne Hachey, Stetson Maine	
Jayne Chase, Marlborough, New Hampshire	
Kathryn Stevens, Brunswick Maine	
Mary Owen, Augusta, Maine	
Molly Stone, Camden, Maine	
Natalie Lounsbury, Auburn, Maine	
Prescott McCurdy, Harpswell, Maine	
Read McNamara, Alfred, Maine	
Alice Sheppard, Presque Isle, Maine	
Alyssa Owens, Keene, New Hampshire	<p>Concerns: Pesticides are not safe; testing does not include synergistic effect of multiple pesticides; pesticides are ineffective long-term solutions.</p> <p>Suggestions: Be prudent with the use of synthetic pesticides.</p>
Marsha Smith, Camden, Maine	<p>Concerns: Teaching students that it's okay to poison environment; teachers are as susceptible to health hazards as students.</p>
Abigail King, Natural Resources Council of Maine, Augusta, Maine	<p>Supports: Improvements around notification, record-keeping and training.</p> <p>Concerns: Statement about aesthetic purposes is not strong enough.</p> <p>Suggestions: Ban the use of pesticides for aesthetic purposes; require schools to use only organic land care.</p>

SUMMARY OF COMMENTS—CHAPTER 27—SEPTEMBER 2012

WRITTEN COMMENTS RECEIVED BY SEPTEMBER 28, 2012	
Person/Affiliation	Summary of Comments
Nichelle Harriott, Staff Scientist, and Jay Feldman, Executive Director, Beyond Pesticides	<p>Concerns: Children are especially vulnerable to the harmful effects of pesticides. Opposed to aesthetic use of pesticides. Section 5.A states aesthetic uses should be avoided, but 5.C states pesticides should only be used when the aesthetic threshold has been exceeded. They oppose the substitution of WPS worker training for proper notification.</p> <p>Suggestions: IPM guidance should be clearer about eliminating unnecessary pesticide use and promoting the least toxic approach to pest management. Training for IPM Coordinators is not defined and should stress pest prevention and cultural strategies with least toxic pesticide use as a last resort. The proposed pest management activity log should focus on the steps taken before the application and the reason for using a pesticide. Notification should cover all pesticide applications and should be provided to all staff, student and parents.</p>
Ed Antz, Maine School Management Association	<p>Concerns: The proposed training requirements for IPM Coordinators are not clearly defined and are potentially unreasonably burdensome. Notifying the BPC about the identity of the IPM Coordinator within two weeks of the beginning of the school year is not a customary approach, and the timing coincides with the busiest period of the school year. Requiring the IPM Coordinator to authorize pesticide applications is unnecessary and burdensome because applications are already authorized through written contracts. Opposes the new proposal to have parents sign and return the annual notification form and questions the purpose of Section 4.B of the amendment “when school is in session.”</p> <p>Supports: Shifting responsibilities to the commercial applicators, since they are paid professionals and are familiar with pesticide laws.</p> <p>Suggestions: One-time 20-minute awareness training video should be sufficient for IPM Coordinators.</p>