

February 23, 2024



Honorable David Durfee
Honorable Heather Surprenant
Vermont State House
115 State Street
Montpelier, VT 05633-5301

Re: H 706, An act relating to banning the use of neonicotinoid pesticides

Dear Chair Durfee, Vice-Chair Surprenant, and Members of House Committee on Agriculture, Food Resiliency, and Forestry:

On behalf of the Household & Commercial Products Association (HCPA), I respectfully submit the following comments regarding H 706, which seeks to ban the use of neonicotinoid pesticides in a variety of applications. HCPA is a voluntary, non-profit U.S. trade association representing approximately 240 companies engaged in the manufacture, formulation, distribution, and sale of products for the household, institutional, commercial, and industrial use. HCPA member companies manufacture and/or market products that will be impacted by H. 706, and thus, our industry has a direct pecuniary interest in the discussion and development of policy concerning this substance.

Neonicotinoids are a class of neuro-active insecticides (acetamiprid, clothianidin, dinotefuran, imidacloprid, nitenpyram, nithiazine, thiamethoxam) available commercially for use in crop and animal agriculture, urban landscapes, and domestic structures and settings. Neonicotinoid-based products are used for common indoor pest management applications, including addressing bed bugs, flies, stink bugs, cockroaches, grubs, and certain invasive species. The substance is also used to control common pests found outside the parameters of structures. Other uses include pet (dog and cat) insect management and personal care product-use (e.g., lice shampoo). These applications have been evaluated by the U.S. Environmental Protection Agency (EPA) and are known as safe. In fact, neonicotinoids were developed in large part because they are both effective and a safer alternative to previously used organophosphate and carbamate insecticides.

Prohibitions on Important Pest Management Options

H 706 seeks to ban the use of pesticides that contain an active ingredient belonging to the neonicotinoid class of insecticides. We believe the bill will lead to indiscriminate limits on access to a wide range of consumer products, which will harm Vermont's residents and restrict their ability to protect their homes and outdoor perimeters with safe and affordable products used against a variety of pests of public health concern.

We are troubled that the bill appears to disregard federal and state risk assessments, labeling requirements, and public health considerations. Specifically, under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), the EPA reviews all pesticide registrations to ensure they continue to meet the protective FIFRA risk standard in light of new information and evolving science, and neonicotinoids are no exception. Furthermore, pesticides are rigorously reviewed, evaluated, and approved for sale and use by the Vermont Agency of Agriculture, Food & Markets (VAAFMM).

The EPA and the state regulatory agencies are in strong positions to determine appropriate pesticide use through continued evaluation of the latest scientific findings on the environment and public health. H 706 simply does not meet the standard and decisions established by regulatory agencies, and instead undermines the existing regulatory process, and expertise and authority of VAAF and EPA. It is for that reason HCPA opposes this measure, and respectfully requests an unfavorable report.

We welcome any opportunity to discuss H 706 and its impact on our industry and consumers. Thank you in advance for your consideration of the points set forth in this letter.

Respectfully submitted,

Michelle L. Kopa

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