



February 6th, 2024

Chairman David Durfee
Vermont State House
115 State Street
Montpelier, VT

Landscape Industry Comments on HB 706: An Act Relating to Banning the Use of Neonicotinoid Pesticides

Chairman Durfee,

The National Association of Landscape Professionals (NALP) is the national trade organization representing the \$3.8 million landscape industry, employing over 2,000 employees in the state of Vermont. Member companies specialize in lawn care, landscape maintenance, tree care, irrigation, and water management. Landscape professionals throughout the nation work daily performing essential services to homes and businesses to maintain their landscapes, sustain the environment, and enhance and maintain healthy and safe green spaces.

The underlying premise of HB 706 seems to be that the neonicotinoid insecticides have somehow thus far escaped regulatory scrutiny and that they present such a significant risk to humans and the environment that they warrant special consideration from the legislature. This is, of course, not true; quite to the contrary. Neonicotinoids are regulated just the same as any other pesticide and have great utility to the lawn and landscape industry in protecting valuable plant material from predation. Intervention by the legislature into matters that should and ought to be resolved through regulation undermines the entire predicate for our established framework for the oversight of pesticide products. The science-based, deliberative process of regulating pesticides must be left to regulatory experts at the U.S. Environmental Protection Agency (EPA) and the Vermont Agency of Agriculture.

Neonicotinoids bring tremendous value to the landscape industry that service your constituents. The ability of neonicotinoids to move systemically is of particular value in controlling insects that either feed within the vascular system of plants or reside in the soil outside of the reach of topical sprays. The low mammalian toxicity of the neonicotinoids makes them a popular choice for not only agricultural and horticultural applicators, but also for the control of fleas, flies, and lice for veterinary use. Additionally, Neonicotinoids protect against arthropod-borne diseases, in green spaces, like Zika, Dengue, Powassan, West Nile Virus, and Lyme disease that are transmitted by mosquitoes and ticks and are also useful when deployed against stinging insects and ants.

Further, neonicotinoids are essential tools for combating invasive insect species that dwell within plants (as opposed to residing on the surface of the plants) making their control difficult if not impossible. The loss of the neonicotinoids would directly result in the loss of countless trees not only in the landscape but in the wild as well. This is but the camel's nose beneath the tent. If it is acceptable for the legislature to dictate which pesticide uses are permissible and which are not, this establishes a precedent in which another bill will follow as sure as day follows night to remove yet another group of uses. The neonicotinoid class also represents a significant improvement over the far harsher chemistries that they replaced and, more importantly, are far safer than those professional applicators would be forced to use if the neonicotinoids were restricted or banned.

For the reasons mentioned above, considerations must be made for commercial applicators who utilize neonicotinoids as a vital tool in enhancing and maintaining the greenspaces and public health of the communities that we service. We implore the committee to oppose HB 706 in its proposed form. We believe that this bill could be greatly improved through exemptions for commercial applicators and/or mandating neonicotinoid-specific training for use on turfgrass so that professionals have access to this essential tool.

Prohibiting the use of neonicotinoids by licensed, and trained professionals will only have adverse effects on the greenspaces and public health of communities across Vermont and can lead to increased invasive species and public health crises that are completely avoidable through the responsible application of neonicotinoid products.

Sincerely,

Terence Stovall

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Manager, State and Local Affairs