



May 17, 2021

Dear Members of the House Committee on Agriculture and Natural Resources,

Northwest Center for Alternatives to Pesticides (NCAP) submits written testimony in support of convening a stakeholder group to discuss and find solutions to improve the Oregon School IPM Law and ensure healthy schools for children.

Students need a toxic-free school environment in order to perform their best. If a school relies on harmful chemical pesticides to control pests, indoor air quality is compromised and negatively impacts the learning environment. Children are highly vulnerable to acute and chronic health harm from pesticide exposure.

In 2014, NCAP created and disseminated a survey to monitor the integrity of the Oregon School IPM Law. We sent the survey to 440 IPM coordinators across the state and 123 responded. They represented 197 campuses. Some notable statistics can be seen in the attached IPM in schools report, including that 90% of survey respondents were supportive of efforts to reduce pesticides.

However, staff also expressed barriers to successfully implementing the law, including staff time, funding, and availability of useful record keeping tools. We believe improvements to the law are needed. The creation and distribution of standardized templates for paperwork requirements, for example, was indicated as a need of school staff. It would also be useful to improve awareness of existing, available educational materials about safe pest and weed management.

Chemicals should always be a last resort, but requesting emergency applications of pesticides with serious health impacts to children is still possible under the current law. Additionally, applications not compliant with current law do occur.

A review of online pesticide application records for various school districts initiated by Beyond Toxics uncovered the use of Fumitoxin (Aluminum Phosphide, RUP Rodenticide) on athletic fields and improper use of an indoor Total Release fogger type product at Hillsboro School District (HSD). A complaint was subsequently filed with the ODA resulting in an investigation.

Phosphine gas, a byproduct of Fumitoxin that is released in the presence of moisture, can be lethal to children if inhaled and at least six children have died in other states after coming in contact with it. We have safer ways to prevent and treat pests like rodents. While it may take more staff time to manage rodents with safe alternatives, it's well worth it to protect the health

of children. Fumitoxin is one example of the types of chemicals that need to be eliminated at schools with no exceptions.

The ongoing investigation underscores that a school can allow pesticide applications that endanger children despite receiving training to follow the Oregon IPM in Schools Law. HSD has an adopted IPM Plan and adopted list of low impact pesticides. Their employees are properly certified pesticide applicators. HSD has a contract with a commercial pest control company that is licensed and certified in proper categories. The IPM Coordinator and staff attend annual IPM trainings as required. Yet there were multiple instances when HSD did not follow Oregon law.

The ODA investigation established the following facts:

A total of 84 records were requested, 5 records were missing or not provided. Of these 84, 52 records showed uses that were not compliant with the pesticides label. For example, Taurus is a termiticide that can be extremely harmful to children's health, and was applied in a manner that is not in compliance with the label.

Additionally, 74 of 84 records appear to have taken place on a School Day, and 28 of those 74 appear to have been made during school hours, which is not allowed. Twenty-five records show applications using products with a "Danger" or "Warning" signal word, which is not allowed without a declared emergency.

One way we could eliminate these types of dangerous applications in the future is to completely eliminate high risk pesticides and provide more information to staff about non-chemical and least toxic solutions. Please see page four of the attached report for more policy change recommendations as a result of our survey. Ultimately, though, involving stakeholders in the creation of solutions will lead to better compliance with the law. Together with school IPM proponents Beyond Toxics and Representative Neron, we suggest convening a stakeholder group to update the Oregon School IPM Law.

We can create safe spaces for kids to learn and play while also supporting the school staff who maintain the IPM program and manage pests and weeds. Thank you for considering this information as we work to protect the health of Oregon's children.

Sincerely,



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NORTHWEST CENTER FOR
ALTERNATIVES TO PESTICIDES

SPECIAL REPORT:

Oregon Schools are Reducing Pesticides!

An Analysis of State Integrated Pest Management (IPM) Legislation



Students need a healthy school environment in order to perform their best.

If a school relies on harmful chemical pesticides to control pests, indoor air quality is compromised and negatively impacts the learning environment. Since 2012, Integrated Pest Management (IPM) policies have been required in schools and community colleges in Oregon as part of ongoing efforts to reduce pesticide exposure.

We've reached an important milestone. Two years have passed since implementation of a law to protect students from pesticide exposure and we need to know where we stand. What's working and where can we improve?

Northwest Center for Alternatives to Pesticides (NCAP) has created this report to monitor the integrity of the Oregon School IPM law. As an independent organization, we understand the need to evaluate the effectiveness of laws we helped put in place. This report includes background information on the law and a summary of survey results from 123 IPM coordinators across the state, representing 197 campuses. We also highlight success stories from across Oregon to share the good news that schools are reducing pesticide exposure. **41% of campuses** that responded **have eliminated all pesticide applications**, and **90%** of the survey respondents **support efforts to reduce pesticides in schools** (109 out of 121). Finally, we offer policy recommendations to ensure that this law is protected and remains effective. These changes will better protect the health of students and employees in 1,295 public schools, community colleges, Head Start centers, and other campuses covered under the law. Please contact me for more information.

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The Northwest Center for Alternatives to Pesticides (NCAP) works to protect community and environmental health by inspiring the use of ecologically sound solutions that reduce the use of pesticides. Since 1977, NCAP has worked to advocate for strong policies and to provide education, training and other resources that result in pesticide reduction.

The Oregon School IPM Law

(ORS 634.700-634.750) was passed in 2009 and implemented in 2012. NCAP worked closely with legislators and a working group to ensure the law was scientifically sound and would take steps to protect students and employees.

The law defines IPM as a **proactive approach to pest management to achieve long-term pest prevention and suppression.** This approach protects the health and safety of humans, the campus grounds and structures, and the ecosystem by utilizing reduced risk approaches to managing and preventing pests. The regulation emphasizes non-chemical methods over the use of pesticides, including sanitation and physical facility changes. The law clarifies that campuses must not apply pesticides for purely aesthetic purposes.



Photo: Doug Beghtel/The Oregonian

Each school or district must have a coordinator and an IPM Plan. The IPM Coordinators are required to:

- Oversee pest prevention efforts
- Ensure the IPM plan in the school is followed in their district
- Assure notification, warning sign posting and record keeping of applications
- Maintain an approved pesticide list
- Respond to school staff and parents about non-compliance
- Periodically assess pest control measures
- Receive 6 hours of training every 12 months

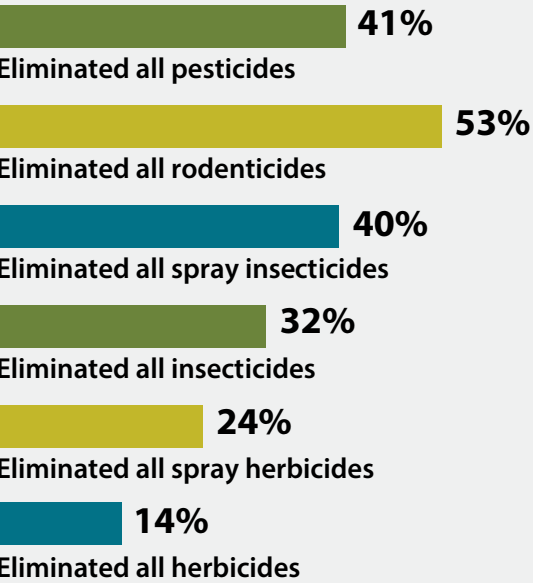
Campus Demographics

NCAP Conducted an Online Survey of IPM Coordinators in October 2014 to receive valuable feedback about the Oregon School IPM Law. Survey answers were collected anonymously with the understanding that the aggregated information would potentially be shared with lawmakers in addition to being used to help meet educational and training needs. The online platform survey monkey was used to collect data from 16 questions and data was analyzed in Microsoft Excel and SPSS statistical software. Of the 409 deliverable email addresses that the survey link was sent to, 123 surveys were completed for a 30% response rate. These responses represent the following campuses under the law: 197 school districts, community college campuses, Head Start centers, Oregon pre-kindergarten programs and Oregon School for the Deaf.



Respondents to the survey were primarily Facilities Managers (33%) and District IPM Plan Coordinators (31%), other positions included custodians and custodial supervisors, grounds staff, teachers and maintenance staff. Results indicate the majority (62%) of campuses have less than 1,000 students. Of the 123 respondents, 95 or 77% had a campus with a sports field.

How is IPM Reducing Pesticide Use in Schools?



The Survey included questions aimed at understanding which of the main components of the law were being followed, what barriers exist for implementation, specifics on alternative practices and support for the law. Results are summarized here and full results are available by request.

Employees support reducing pesticide use in schools and childcare centers:

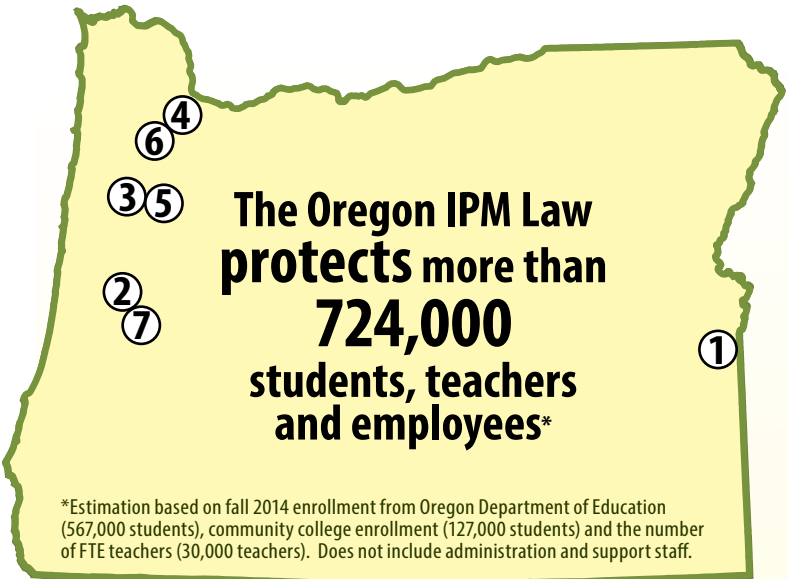
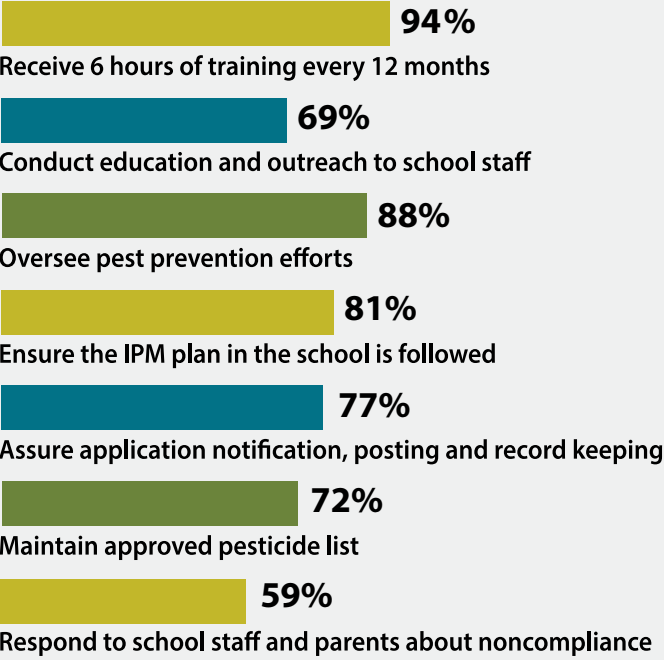
90% (109 out of 121) support efforts to reduce pesticides.

A majority of campuses now use preventative methods over chemical pesticide applications: 76% of campuses *always* or *most of the time* use preventative and non-chemical methods over pesticides.

Children’s health is being protected: Highly toxic chemicals (known to cause cancer) are being eliminated; 34% of schools and centers have a list of highly toxic chemicals to avoid.

Identified obstacles included obtaining the proper licensing to apply pesticides, educating school staff about their role in IPM and managing pests without pesticides or only low-impact pesticides.

Which of the following are being accomplished by the IPM Coordinator for your district? (Select all that apply)



Success Stories



1 Ontario School District drastically cut back on using pesticides and continues to try to reduce routine pesticide use. They’ve had success with billbugs on turf by understanding the lifecycle of the bugs. Previously, they would broadcast spray 80 acres. Now they use drop spraying along concrete barriers at an optimal temperature. They set out early traps for hornets and wasps and have seen a reduction in maintenance calls for yellow jackets and wasps.



2 Corvallis School District uses a vacuuming method to extract ground-nesting yellow jacket nests that pose a stinging threat to campus occupants. This reduces the amount of insecticide used.



3 The Chemeketa Eola Northwest Wine Study Center campus has reduced herbicides by employing goats to eat blackberries and other unwanted weeds. Pesticide applications have reduced each year as the grazing has extinguished numerous unwanted weeds from returning.

4 Portland Public Schools has also reduced herbicides by using goats. A herd of more than 20 goats now mow a troublesome patch of blackberries and weeds on a steep slope near the Portland Public Schools headquarters. A llama named Monty accompanies the goats to protect them from predators. Using goats also saves the district thousands of dollars a year.

4 Portland Public Schools, 5 Salem-Keizer School District and 6 Beaverton School District are now employing non-chemical methods to combat ant pests. This is a change from applying a granular, liquid, or gel bait as a first response. The practice of accurate ant identification, diagnosis and sanitation results in better management and overall investment of time.

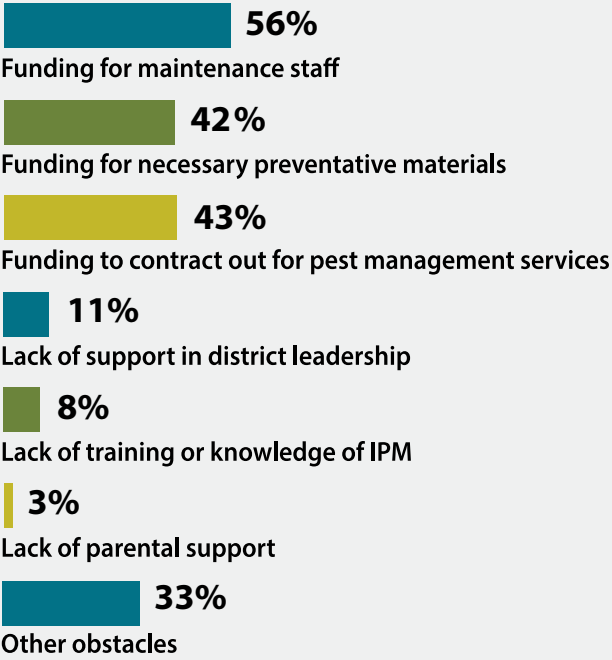


7 When managing wasps, **Springfield School District** first identifies the wasp. If it’s a paper wasp, they knock the nest down as opposed to spraying. Making this distinction between paper wasps and other types of social wasps that are more likely to sting reduces unnecessary pesticide applications.

“The big thing about IPM here is that before, individual departments would have a can of Raid or set out their own De-Con. Now it is being controlled and these products are not used at all in favor of better methods.”

-School IPM Survey Respondent

What are the barriers to implementing IPM in your district? (Select all that apply)



Policy Recommendations

Survey results indicate that coordinators support the need for continued efforts to reduce pesticides in schools through school IPM policies. Responders held the position titles including IPM Coordinator, facility managers and custodians. The staff that implement this law are receiving the necessary training and following the individual components of the law, but there is room for improvement to help districts and campuses streamline notification and record keeping. We offer the following policy solutions to strengthen the law and for other states to follow Oregon's lead in reducing pesticides and protecting students and employees.

Training

Offer advanced training for those renewing training. Broaden availability of training providers, including bilingual and online options. Promote and expand IPM classes to other school-related staff (including nurses, Environmental Health Specialists, custodians, etc). Research the potential for allowing one trained coordinator for multiple small districts for efficiency of scale and cost savings, as small schools and big schools have different needs.

Communication

Improve awareness of educational materials available for schools and staff through Oregon State University and promote materials for parents and volunteers explaining why IPM is required.

Funding

Resources are needed to improve sustainable IPM implementation.

Time

Research ways to streamline the time it takes to carry out an IPM policy by identifying and publicizing time saving best practices for implementation, documentation, notification, training and maintaining requirements.

Contractors

There is a perception that schools are required to contract with a licensed applicator for pesticide applications. This is leading to concerns over high costs and noncompliance with the law. The restrictions on low impact pesticides should be further researched.

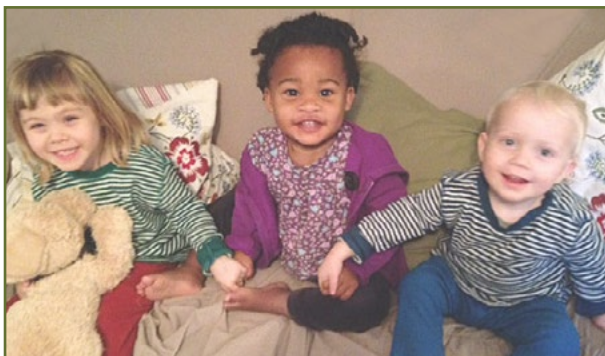
Structure and Governance

Promote the distribution of standardized templates for paperwork requirements; expand the online tracking database to track alternative methods, pest activity and pesticide use. Encourage transparent online notification of pesticide applications for parent notification (see Los Angeles School district as an example). Request additional input from IPM Coordinators; involve the stakeholders in researching and reviewing the law to make it work better.

Results indicate that staff are fulfilling the main components of the law. However, more can be done to encourage universities, tribal schools, churches, daycare centers and eldercare facilities to follow IPM. Additionally, the successes of the Oregon School IPM Law indicate that it could be used as a model policy for other states.



Photo: Oregon State University



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