

Chairman Dill, Chairwoman O'Neil and members of the Committee on Agriculture, Conservation and Forestry,

For over 40 years the National Association of Landscape Professionals (NALP) has represented tens of thousands of certified professional pesticide applicators across the United States. Tasked with providing plant health services to millions of residential and commercial clients, the core values of our association include advocating on behalf of our members as to the benefits of healthy plants in our landscapes, fostering the highest standards of professionalism, and educating both our members and the public in caring for their landscapes in an environmentally responsible way.

NALP thanks the committee for the opportunity to voice our opposition to LD 519, An Act to Protect Children from Exposure to Toxic Chemicals, and offers the following testimony:

- The underlying premise of LD 519 suggests that the use of glyphosate or any other synthetic herbicide is so pervasive and problematic on school grounds in the State of Maine that it warrants intercession on the part of the legislature. We reject that premise.
- NALP can report that members are rarely contracted to provide weed control services on school grounds, and when they are it is almost always for treatment of sports fields which are typically located well away from the school structure. As a non-selective herbicide, glyphosate is only appropriate for areas such as fence lines and basepaths on baseball fields. It is not used for control of weeds such as dandelion or crabgrass on turfgrass.
- This bill assumes that registered herbicides such as glyphosate have not been evaluated for their risk to the health of humans (including children's). The exact opposite is true. EPA states that there is¹:
 - **No risks of concern to human health from current uses of glyphosate.**
 - Glyphosate products used according to label directions do not result in risks to children or adults.
 - **No indication that children are more sensitive to glyphosate.**
 - After evaluating numerous studies from a variety of sources, the Agency found no indication that children are more sensitive to glyphosate from in utero or post-natal exposure. As part of the human health risk assessment, the Agency evaluated all populations, including infants, children, and women of child-bearing age, and found no risks of concern from ingesting food with glyphosate residues. **EPA also found no risks of concern for children entering or playing on residential areas treated with glyphosate.**

¹ <https://www.epa.gov/ingredients-used-pesticide-products/glyphosate#human-health>

- Additionally, the Agricultural Health Study², a collaborative effort involving investigators from National Cancer Institute, the National Institute of Environmental Health Sciences, the Environmental Protection Agency, and the National Institute for Occupational Safety and Health, looked at long term data surrounding glyphosate.
 - This study, begun in 1993, follows more than 89,000 farmers and their spouses in Iowa and North Carolina have participated in the study. Their participation has provided, and continues to provide, the data that researchers need to help the current and future generations of farmers and their families live healthier lives.
 - In a study³ published in 2018, the AHS reviewed its data and evaluated cancer linkages, stating in conclusion:
 - **In this large, prospective cohort study, no association was apparent between glyphosate and any solid tumors or lymphoid malignancies overall, including NHL and its subtypes.**
- The synthetic versus organic fallacy describes an argument that just because something is manufactured it is therefore more hazardous than something that is natural (we'll put aside the false nomenclature that the opposite of synthetic is organic; organic simply indicates that a substance contains carbon).
- Pesticides must be evaluated individually without respect to being synthetic or natural. Indeed, the acute oral LD₅₀ for glyphosate⁴ (the amount of a material that causes the death of 50% of a group of test animals. The lower the number, the more toxic the substance) for rats was reported to be greater than 5000 mg/kg which is termed as low toxicity.
- By contrast, the organic herbicide known as horticultural vinegar has an LD₅₀ of 3310 mg/kg⁵, a figure that shows the organic herbicide to be more toxic than the synthetic. The active ingredient in horticultural vinegar is acetic acid, a substance the CDC has listed as immediately dangerous to life of health concentrations.⁶
- The non-selective systemic herbicide glyphosate⁷ is enormously beneficial to agriculture, yet is mired in controversy, the target of anti-pesticide and anti-GMO activists. This molecule has been extensively reviewed by not only the U.S. EPA but by multiple pesticide regulatory agencies around the world. The EPA is considered to be the gold standard worldwide in their expertise in evaluating pesticides.

² <https://aghealth.nih.gov/>

³ <https://pubmed.ncbi.nlm.nih.gov/29136183/>

⁴ <http://npic.orst.edu/factsheets/archive/glyphotech.html>

⁵ https://pfharris.com/wp-content/uploads/2019/09/VWEED_091819.pdf

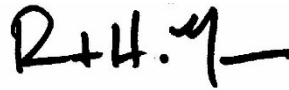
⁶ <https://www.cdc.gov/niosh/idlh/64197.html>

⁷ <https://www.epa.gov/ingredients-used-pesticide-products/interim-registration-review-decision-and-responses-public>

- EPA is nearing the conclusion of its re-registration review of glyphosate⁸ which will represent the latest and most comprehensive review of this molecule. To be frank, no effort by the legislature to review glyphosate will eclipse EPA's exhaustive efforts. The state does not have the resources nor the depth of expertise to replicate what is already underway. The results of EPA's review will be incorporated into label directions and therefore have the force of law.

In conclusion, specific pesticide active ingredients should not be called out in statute; the legislature should not substitute its non-expert opinion for the expertise of the Maine Board of Pesticides Control. NALP would like to voice our support for BOPC staff. Despite the deep level of chaos that surrounds the issue of pesticide policy in Maine currently, the staff at BOPC stands out amongst its peers in other states as especially adept and expert at regulating pesticides. The committee would do well to consult with and, when appropriate, defer to their expertise.

Respectfully,



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⁸ <https://www.epa.gov/ingredients-used-pesticide-products/interim-registration-review-decision-and-responses-public>

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(I signed up for oral testimony earlier today. The attached is written testimony.
Thanks!)