



STATE OF WASHINGTON  
WASHINGTON STATE BOARD OF HEALTH

*PO Box 47990 • Olympia, Washington 98504-7990*

February 5, 2007

The Honorable Tom Campbell  
Select Committee on Environmental Health Chair  
Washington State House of Representatives  
Post Office Box 40600  
Olympia, Washington 98504-0600

Dear Dr. Campbell:

As the recently appointed chair of the Washington State Board of Health, I am writing to let you know of the Board's concerns with House Bill 1806, which would regulate pesticide use in schools. This bill is scheduled to be heard February 6 by the House Select Committee on Environmental Health.

The Board strongly supports the goal of the bill, which is to reduce exposure of children to pesticides, but it favors an integrated pest management approach that would actively encourage schools to develop and implement alternatives to pesticide use. Integrated pest management is a preventive and sustainable approach to managing pests emphasizing building maintenance and knowledge of pest habits to minimize use of the toxic chemicals. Pesticides should be used only when other control measures are not an option, they should always be used properly, and parents and staff should be notified of their use.

The Board is in the process of revising its school environmental health and safety rule. It has taken under consideration a report from an advisory committee, and it heard extensive testimony on a variety of related issues through last fall. The advisory committee has recommended that schools be required to develop integrated pest management plans. Last October, the Board received testimony about the Washington State Department of Agriculture's program to implement RCW 17.21.415, which requires public schools and daycare centers to notify parents and staff about pesticide use. Agriculture inspectors visit schools and provide technical advice about the safe handling and storage of pesticides.

The Board has noticed that authority for school health and safety programs is dispersed across multiple agencies. This leads to confusion and a lack of accountability. It would therefore favor an approach that strengthens existing efforts at the Department of Agriculture.

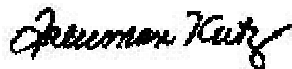
HB 1806 would require the Board to adopt in rule a long list of pesticides to be classified as “high hazard” and banned for use in schools. A large amount of staff time of the Board, Department of Health, and Department of Agriculture would be needed to develop and maintain these rules. Although the bill envisions that the list would be revised every five years, the rapidly evolving nature of pesticides suggests that revisions would be needed every two years. Most pesticides would end up on the banned list, leaving very few options for schools needing to control stinging and biting insects.

Pesticides can be safe if properly applied, and even relatively safe pesticides can be a threat to children’s health if misused. Quantity, method of application, procedures used, and timing play a major part in pesticide safety. One concern heard by the Board was the use in schools of “home-made” pesticides, recipes for which can be found on the internet. The health effects of such mixtures are unknown. By banning most commercial pesticides, this bill may drive classroom teachers and school maintenance staff to increase their reliance on the unstudied and unregulated alternatives.

In summary, rather than requiring the Board to ban almost all known pesticides from use in schools, the Board would encourage the Legislature to consider ways to encourage schools to develop integrated pest management plans and to strengthen current programs at the Department of Agriculture.

Thank you for considering the Board’s concerns.

Sincerely,



Treuman Katz, Chair  
Washington State Board of Health

cc: House Select Committee on Environmental Health Members  
The Honorable Jamie Pedersen, Washington State House of Representatives  
Washington State Board of Health Members  
Ms. Christina Hulet, Governor's Executive Policy Office  
Mr. Bob Arrington, Department of Agriculture  
Mr. Brian Peyton, Department of Health  
Mr. Craig McLaughlin, Washington State Board of Health