



May 10, 2011

MEMORANDUM IN SUPPORT

S.2775 (Young)

A.7129 (Gunther)

AN ACT to amend the environmental conservation law,
in relation to providing the definition of integrated pest management

This bill would add a much-needed statutory definition of integrated pest management (IPM) to Article 33 of the environmental conservation law to read as follows:

"Integrated pest management" means a systematic approach to managing pests that utilizes a diversity of management options to minimize health, environmental and economic risks and impacts. These options may include biological, cultural, physical and chemical tools to prevent pest infestations or reduce them to acceptable levels.

The New York State Chemical Alliance, the state trade association that represents many of the major chemical manufacturers and companies engaged in the business of chemistry in the state **STRONGLY SUPPORTS** this bill.

Integrated pest management (IPM) is the coordinated use of pest and environmental information with available pest control methods to prevent unacceptable levels of pest damage by the most economical means and with the least possible hazard to people, property, and the environment. The IPM approach can be applied to both agricultural and non-agricultural settings, such as the home, garden, and workplace.

IPM takes advantage of all appropriate pest management options including, but not limited to, the judicious use of pesticides. IPM is not a single pest control method but, rather, a series of pest management evaluations, decisions and controls. Once monitoring, identification, and action thresholds indicate that pest control is required, and preventive methods are no longer effective or available, IPM programs then evaluate the proper control method both for effectiveness and risk. Effective, less risky pest controls are chosen first, including highly targeted chemicals, such as pheromones to disrupt pest mating, or mechanical control, such as trapping or weeding. If further monitoring, identifications and action thresholds indicate that less risky controls are not working, then additional pest control methods would be employed, such as targeted spraying of pesticides. Broadcast spraying of non-specific pesticides is a last resort.



This bill is the culmination of effort by various stakeholders who worked to craft a reasonable, compromise definition of IPM following several pesticide roundtables convened by the Senate Environmental Conservation Committee. This definition of IPM was also written in consultation with Cornell University's New York State IPM Program. Moreover, it tracks the regulatory definition of IPM in 6 NYCRR Part 235.1(a) and comports with IPM provisions in the federal Food Quality Protection Act of 1996, and the policy of the National Integrated Pest Management Network and the Empire State Council of Agricultural Organizations.

For all the reasons cited herein and on behalf of the member companies of the New York State Chemical Alliance, we **STRONGLY SUPPORT** S.2775 / A.7129 and **URGE THAT IT BE ENACTED**.

Respectfully submitted,

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