

Pest Management in Schools Committee Report

Annual Meeting

Charleston, WV

August 30 – September 1, 2010

Introduction

The Pest Management in Schools committee was established during the 2008, ASPCRO Annual Meeting in Albuquerque, NM, to address issues surrounding pest management in schools.

Key Acronyms

SIPM	School Integrated Pest Management
PESP	Pesticide Environmental Stewardship Program
PMSP	Pest Management Strategic Plan
CSREES	Cooperative State Research Education & Extension Service
NIFA	National Institute of Food & Agriculture
406 Funding	Federal funding source for IPM centers
CAR	Crops at Risk
RAMP	Risk Avoidance Mitigation Program
SEPA	School Environmental Protection Act

Committee Membership

The committee consists of the following individuals:

Michael Page (co-chair)	FL Dept of Ag and Consumer Services
Josh Wiley (co-chair)	Georgia Department of Agriculture
Carl Falco	DuPont
Gene Harrington	NPMA
Dennis Howard	Maryland Department of Agriculture
Janet Hurley	Texas Agrilife Extension Service
Dr. Faith Oi	University of Florida
Dan Suomi	Washington State Department of Agriculture

Mission Statement

The ASPCRO Pest Management in Schools Committee's mission is to assist member states with the improvement and implementation of Integrated Pest Management (IPM) principles and concepts in the interests of promoting and protecting Children's Environmental Safety.

Summary of Committee Actions

The ASPCRO Board identified several goals for this committee:

1. Develop a statement, which identifies *risk* as the commonality between IPM and the “Organic/Green movement”.
2. Develop enforcement inspection protocols/guidance, which include skills and training helpful to states that must regulate industries performing IPM in schools.
3. Engage the committee responsible for the Pest Management Strategic Plan (PMSP) acting as liaison for ASPCRO States.
4. Create a summary of available IPM resources for state IPM personnel.
5. Track current issues related to IPM funding and stakeholder involvement.
6. Develop a model IPM implementation plan by reviewing IPM Region documents related to IPM implementation

Status of Goals

Goal #1. Efforts to complete this goal have been discussed. Work toward the development of an “IPM Principles” document continues. The concept behind this document is to develop a clear position on IPM in schools relative to the components necessary to sustain such a program in pest management. There are numerous articles by groups opposed to the use of pesticides that attempt to redefine IPM as practiced in schools as a program that limits or severely restricts pesticide applications. The IPM Principles document is being developed to state the simple objectives of a sound IPM program and offer science-based recommendations for pesticide use in schools. The document’s premise is based on the principle that children have a right to be pesticide free, but they also have a right to be pest free. Using this statement as a foundation, the document will make an argument for balancing the “risk” of pests and pesticides. It has been suggested that the document be drafted from the perspective of “a day in the life of a kid”. A first draft is forthcoming.

Goal #2. Work toward the development of an inspection procedure has been temporarily postponed. The development of inspection procedures centered on state’s enforcement of applicators that may be noncompliant with state laws and regulations. Similar work was underway in the Inspector Training Committee, but work with this kind of document appeared to be somewhat controversial due to differences in State Enforcement Programs. A similar fate may befall the effort to craft a model School IPM Inspection procedure.

There is a possibility that the Committee could adopt recommendations being developed by the Southern Region IPM Center. This IPM Inspection Procedure is scheduled to be completed prior to the Annual ASPCRO Meeting this year. The committee will look forward to reviewing it.

To date, the Committee's Co-Chairs decided to develop a list of recommendations related to regulatory and program inspection objectives.

Work continues on this goal. There has been no anticipated date of completion set.

Goal #3. Co-Chairs continue to maintain dialog with the editors of the Pest Management Strategic Plan (PMSP) *School IPM 2015: A Strategic Plan for Integrated Pest Management in Schools in the United States* (hereafter, School IPM 2015). The School IPM 2015 document initially identified two major priorities important to the strategy: 1) increase coordination and effectiveness for support of SIPM nationally, and 2) facilitate integration of IPM into public school infrastructure. The document was hoped to be a "national guidance document" for the implementation of School IPM. The School IPM 2015 document contained a number of controversial areas and elements including recommendations on limiting pesticides, lobbying efforts and the use of terms and phrases that essentially redefined the hazards of pesticides. The fact that the document's editor's limited contributions from important stakeholders ultimately resulted in the need for revisions that included input from stakeholders such as state regulatory agencies, chemical manufacturers and the Structural Pest Control Industry. Support and funding for the development of School IPM 2015 was based on a PRIA grant awarded to the Western Regional IPM Center. All Regional IPM Centers contributed to fund the project effort.

The editors developed a website for the purposes of soliciting input from stakeholders and other interested parties. A letter was sent to approximately 200 professionals alerting them to the open comment period. Comments on the PMSP were provided to the authors by RISE, NPMA and ASPCRO as well as other interested stakeholders. In addition, the Southern Region School IPM Workgroup provided a thorough review of the document. Recently, the document editor's have provided a preview of the coming version to interested stakeholders. Review of the document is currently underway. Release of the next version (ver 2.0) is uncertain.

The editors of the School IPM 2015 document have completed incorporating comments by interested stakeholders. I've bulleted a selection of the changes made to the document below:

- Revised language considered inflammatory and unnecessary by several commenters's, e.g., changed "toxic pesticides" to "pesticides" throughout.
- Acknowledged additional commenter's and those unable to participate in the initial development meeting due to funding and logistical constraints (appears to greatly expand the stakeholder involvement)
- Added a description of IPM continuum and references, and clarifies a description of "high-level IPM".
- Added original citations for association between asthma and pests and pesticides.

- Substantially revised Table 7.1 (Management Zones), pesticides section related to posting and notification, and preferred pesticides
- Revised cautions on use of pesticides in introduction to section
- Revised table sub-headings to emphasize products listed are examples only

Communication related to the School IPM issues (and those related to the School IPM 2015 doc) have been ongoing through a committee initiated by staff volunteer Lauren Crane (undergraduate student) with IPM Institute. The *Regulatory Committee on SIPM* was formed to discuss regulatory issues germane to promoting implementation of School IPM nationwide. This committee's effort is an addition to the development of the School IPM 2015 document, in that the committee's focus is to communicate to policymakers a rationale for implementing such a program nationwide. Those participating on the committee include state regulators of structural pest control and state and local county health programs, University Extension specialists, NPMA and other parties interested in children's health. The committee's efforts to date appear to be an effort to "redefine" the SIPM issue into one that has a clear anti-pesticide message. Mike Page contacted Tom Green (separate from the committee) to express dissatisfaction with the way the committee appears support an overtly anti-pesticide intent to lobby policymakers. The committee has drafted a letter which is intended to reach policymakers containing the same type of anti-pesticide rhetoric found in the initial version of the School IPM 2015 document. Efforts to neutralize such language were successful during the April 19 Committee conference call. Representative states, ASPCRO and NPMA are not signatories on the letter.

The Committee also provided comments related to the School Environmental Protection Act (SEPA, AKA HR 4159) to the bill's sponsors, Beyond Pesticides. A copy of comments sent to Beyond Pesticides has been requested.

Goal #4. The Committee has compiled a list of School IPM websites from a number of sources in an Excel spreadsheet. The list includes websites from a number of states as well as IPM organizations. The websites have not been "reviewed" by the committee. Once the Committee has a chance to review the website content we will make a recommendation to the Board for posting on the ASPCRO website. A copy of the spreadsheet is available upon request from Mike Page.

Goal #5. Funding for SIPM has changed dramatically over the course of a year and future funding for SIPM is uncertain.

The USDA has been a solid supporter of urban issues for the past 10 years under USDAs Cooperative State Research, Education and Extension Service (CSREES). Last year the agency was reorganized to the National Institute of Food and Agriculture, (NIFA). This is important because in the past CSREES' "extension" function was broadly defined, and included "urban" issues, such as SIPM and mosquito control ("406 monies"). The Administrator of CSREES in DC was also very supportive of urban initiatives, however under NIFA, there is no currently defined line item that funds urban pest management. There is a possibility that funding for urban issues may eventually be included in funding

future research proposals but nothing definitive has occurred to suggest this possibility. The immediate problem is that this year RFPs will not be written until it has an existing funding line item because administrators want to avoid the possibility of double funding a project. The unfortunate reality for SIPM funding is that there is no existing funding line item and no one knows what Congress will do. The 406 funds that once supported the IPM Centers (which in turn provided small amount of grant funds to run IPM programs) were zero funded in the President's budget. So far, the Senate and House budgets to not appear to restore 406 funds. Since it's an election year, it is unlikely that appropriations will be made until after the 2010 elections, resulting in resetting the timing for the RFP grant cycles. Under a continuing resolution, Agencies are supposed to spend according to the last year's budget, but since NIFA is in the Executive Branch, they cannot do anything that goes against the President—who zero-funded the 406 IPM dollars.

It warrants mention that NIFA is comprised of four Institutes and are listed below. Thus far the reorganization of this agency appears to restructure the 2012 Farm Bill to include only agricultural issues, when in the past urban initiatives such as school IPM, were often part of the funding. Essentially, the reorganization of the agency has eliminated “urban pest management” issues as a program area. The reorganization has placed a number of scientists in control of redefining the process of funding requests. Guidelines for RFP (research projects) have been reorganized into 4 categories within NIFA. The new agency will have four internal institutes headed by principal scientists with renowned credentials.

The four institutes will be:

- [1] The Institute of Food Production & Sustainability,
- [2] The Institute of Bioenergy, Climate, and Environment,
- [3] The Institute of Food Safety and Nutrition, and
- [4] The Institute of Youth, Family and Community.

Funding for urban projects (which included SIPM) has been expressly removed from competition for the NIFA funding stream for FY2011. In place of what was a historic funding source for SIPM, there appears to be a clear intention to focus research on “youth at risk”. This issue has also been a primary focus of the EPA, as was stated in a recent letter by EPA Administrator Lisa Jackson. Funding for Extension efforts is now really shaky. Also, monies that are earmarked for children's environmental health appear to be going toward “longitudinal” (long-term) studies aimed at finding correlations between children's health and a varied list of other environmentally related factors thought to increase the risk to children such as:

- natural and man-made environmental factors
- biological and chemical factors
- physical surroundings
- social factors (socioeconomic and psychosocial)
- behavioral influences and outcomes
- genetics
- cultural and family influences and differences
- geographic locations

Health concerns include the presentation of asthma, childhood cancer, childhood obesity, autism, endocrine disruption, reproductive health and human fertility, learning and cognition. Information on this kind of research can be found on the following website: <http://www.nationalchildrensstudy.gov/research/researchpublications/pages/default.aspx>.

With respect to asthma, this newly defined direction for NIFA is interesting since much of the literature recently published from groups like Beyond Pesticides appears to suggest a causal link between pesticides and asthma that is separate and apart from known contributing factors like cockroach allergens.

The take home message is that federal funding for SIPM no longer has a line item. And, this will make it increasingly difficult to support funding for research and implementation of SIPM in all states.

Goal #6. Documentation is being collected in an effort to develop a model SIPM implementation plan. A number of documents have been submitted containing information relating to state programs that have requirements for SIPM. Work is ongoing.

Conference Calls/Meetings:

1. Regulatory Committee on SIPM conference calls have been conducted every 2 months.
2. Committee conference call on 3/15/10 to discuss development of committee goals.
3. Region IV conference calls on “Environmental Justice” initiatives (Region by Region).

Other Related Meetings/Conference Calls:

August 29 thru September 1, 2010: ASPCRO Annual Meeting in Charleston, WV.

The meeting will include a panel discussion on current and relative School IPM issues. The Panelists will address children’s environmental health and current problems with pests in schools. Topics will likely include whether there is a demonstrable difference in schools that utilize traditional Pest control methods vs. those using IPM approach; hurdles that prevent the acceptance and implementation of SIPM; whether state legislation related to SIPM has been helpful in implementing programs; and the need for sweeping federal intervention such as SEPA to improve children’s health in schools.

Pest Management in Schools Committee meeting; August 30, 2010, 1:00p