



MEMORANDUM IN OPPOSITION

S.2684 (Parker)

A.700 (Englebright)

AN ACT to amend the public health law, in relation to
integrated pest management for hospitals

This bill would, amongst other things, establish a definition of integrated pest management (IPM) for hospitals, which would basically deselect the use of chemical pesticides, rodenticides, insecticides, fungicides, herbicides and other necessary infestation controls. Moreover, it would likely curtail the preventive use of such pest management tools that enable hospitals to avoid infestations in the first place. Oftentimes, physical, mechanical, cultural, biological or educational practices simply cannot prevent, arrest, reduce or control pest infestations that may pose an imminent threat to patient and provider welfare.

The **New York State Chemistry Council**, the statewide trade association that represents many of the major manufacturers, re-formulators and distributors engaged in the business of chemistry in the State, **OPPOSES** this legislation on behalf of its member companies.

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. An IPM plan takes advantage of all appropriate pest management control tools. 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. . The IPM approach can be applied to all agricultural and non-agricultural settings, including the home, school, day care center, hospital or workplace.

Rather than set-up a statutory definition of IPM solely for hospitals, it would be far better to adopt a neutral definition in law for all settings like that set forth in **S.3064 (Young) / A.1186 (Gunther)**, which was 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.



As such, for the reasons stated herein, the New York State Chemistry Council **OPPOSES** S.2684 / A.700 and **URGES ITS DEFEAT.**

Respectfully submitted,

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