



Innovative Products For **Home. Work. Life.**

June 28, 2021

Honorable David A. Bennett (Chair)
House Committee on Environment and Natural Resources
82 Smith Street
State House
Providence, RI 02903-1105

RE: HB 5641 SUBSTITUTE A – Oppose Unless Amended

On behalf of the Household & Commercial Products Association, I respectfully oppose HB 5641A (Kislak). HB 5641A seeks to adopt restrictions on the use of neonicotinoid pesticides.

The Household & Commercial Products Association (HCPA) is the premier trade association representing the interests of companies engaged in the manufacture, formulation, distribution, and sale of more than \$180 billion annually in the U.S. of familiar consumer products that help household and institutional customers create cleaner and healthier environments. HCPA member companies employ hundreds of thousands of people globally. Products HCPA represents include disinfectants that kill germs in homes, hospitals and restaurants; air fresheners, room deodorizers, and candles that eliminate odors; pest management products for home, lawn and garden, and pets; cleaning products and polishes for use throughout the home and institutions; products used to protect and improve the performance and appearance of automobiles; aerosol products and a host of other products used every day.

Consumer pest products allow Rhode Island residents in all communities the ability to clean and protect their homes with safe and affordable products against a variety of public health pests. Without access to such products, consumers must choose between taking no action against these pests or paying someone to perform the services for them which can be cost-prohibitive.

Under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), the U.S. Environmental Protection Agency (EPA) reviews all current pesticide registrations to ensure they continue to meet the protective FIFRA risk standard in light of new information and evolving science. Furthermore, the U.S. Department of Agriculture and the EPA released a comprehensive scientific report on honeybee health. The report states that there are *multiple* factors playing a role in honeybee colony declines, including parasites and disease, genetics, poor nutrition, and pesticide exposure. One of the key findings of the report is that arthropod pests have “major negative impacts on colonies” in the U.S. and other countries.

The safety of consumers is the highest priority for HCPA members. HCPA member companies manufacture products that are safe when used according to the directions on the label. Manufacturers are continuously focusing on the safety of products and packaging, as well as helping to prevent their products from reaching children. Users are encouraged to determine the most appropriate product for their needs and to read and follow all label directions.

Many of the HCPA represented products are used indoors or around homes and businesses that have no application to plants where bees typically interact with pesticides. Therefore, HCPA appreciates the author's product application exemption for indoor, personal care, and pet products under HB 5641A. The bill also includes an exemption for product use around home and structures; however, we believe the inclusion of "*wood-destroying*" as a qualifier will result in unintended restriction of use of common pest control products, such as fly abatement strips and scatter bait.

For this reason, HCPA respectfully requests the following change on page 6 of the bill:

"Products used for controlling ~~wood-destroying~~ pests in and around homes and other human-made structures, in accordance with the label"

The requested edit would provide for greater consistency within the region as the State of Maine recently enacted a neonicotinoid prohibition law ([LD 155](#)) that specifically exempts product use for indoor pest management, pet products, and use for "*treating insects outside around structural foundations and other parts of structures.*"

For these reasons and more, HCPA respectfully requests the aforementioned edit to the bill. Should you have any questions about this request, please do not hesitate to contact me at cfinarelli@thehcpa.org.

Sincerely,



Christopher Finarelli
Director, State Government Relations & Public Policy - Western Region

Cc: House Committee on Environment and Natural Resources