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February 12, 2025

The Honorable Joseph M. McNamara, Chair  
House Committee on Education  
State House  
82 Smith St.  
Providence, RI 02903

## **H 5216 – An Act Relating to Health and Safety – Pesticide Control**

Dear Chair McNamara:

Please accept this letter with concerns regarding H 5216, legislation which would prohibit the application of lawn-care pesticides and rodenticides on the grounds of any public or private pre-school or public or private school with students up to grade 12. The bill provides exceptions that would allow their use in an emergency or on the playing fields and playgrounds of the school, pre-school, and childcare centers in accordance with an integrated pest-management plan as developed by the Department of Environmental Management (DEM) and the Department of Health (RIDOH). RIDOH would be required to provide any public or private pre-school and child day care center with an explanation and the requirements of the pesticide or rodenticide application and notification law. In addition, the bill would create two new task forces.

Although RIDOH applauds the intent of the proposed legislation, it would not be possible for RIDOH to engage in the actions outlined in the bill without adequate resources. H 5216 requires RIDOH to participate in the creation of two task forces and author two different legislative reports, both of which will require considerable staff time from RIDOH. RIDOH does not believe that a task force to examine the health risks associated with PFAS in artificial turf athletic fields is necessary due to the PFAS ban that will be in effect as of January 1, 2027 (Consumer Ban Act of 2024 - [law24344](#)). Please be informed that RIDOH's drinking water regulations prohibit pesticide or fertilizer application or storage within the 200 ft or 400 ft protective radius of a public water system well. See RIDOH regulations 216-RICR-50-05-1, Sections 1.4(B)(3), 1.4(C), 1.4(G), and 1.23.

Funding is also needed for the task force to develop and implement methods to promote public education and professional training about pesticides and rodenticides and to enforce regulations related to pesticide and rodenticide use in schools. Given the general timetable associated with the promulgation of regulations, which is designed by statute to ensure maximum public input, it is not likely that RIDOH will be able to promulgate the required regulations by January 1, 2026.

I thank you for the opportunity to comment on the proposed legislation and would be happy to work with the sponsor(s) and members of the Committee to identify the resources needed to implement the actions

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included in the bill.

Sincerely,

A handwritten signature in black ink, reading "Jerome M. Larkin". The signature is fluid and cursive, with a long horizontal stroke extending from the end.

Jerome M. Larkin, MD  
Director

CC: The Honorable Lauren H. Carson  
The Honorable Members of the House Committee on Education  
Nicole McCarty, Chief Legal Counsel  
Lynne Urbani, Director of House Policy