

## MASSQUITO COALITION COMMENTS TO MOSQUITO MANAGEMENT FOR THE 21<sup>ST</sup> CENTURY TASK FORCE

The MassQuito Coalition, a coalition of fifteen state and national NGOs, is concerned the Task Force recommendations hinder the public education and implementation of best management practices for mosquitoes. The Mosquito Control Districts and local communities that want to opt-out of state actions also struggle to comply with current guidelines due to ongoing changes to recommended practices. The MassQuito Coalition encourages the Task Force to be concise in its recommendations with a focus on environmental and public health best management practices that are transparent and based on robust and independent science. Attached you will find the MassQuito Coalitions’ concerns and comments pertaining to the specific Task Force recommendations.

Task Force Topic	Task Force Subcommittee Draft Recommendation	MASSQUITO Coalition Comments
Policy Structure	1. Repeal and replace OR revise MGL C. 252 and enabling MCD/MCP legislations	Agree
	2. Amend the Massachusetts Stormwater Handbook (and relevant local land use and stormwater regulations)	Agree
	3. Revise the structure, function, and funding of MCDs to ensure a comprehensive and cohesive framework for mosquito control across Massachusetts and to potentially allow for towns to join MCDs at lower costs	Agree
	4. Establish baseline mosquito control services such as education, surveillance, source reduction and allow people/ member towns to add additional services such as larviciding, adulticiding, and local stormwater management	Disagree with adulticiding. Adulticiding should <i>only</i> be used during public health emergencies based on robust, independent, and transparent scientific evidence. Support for “aquatic habitat restoration” should be added.

GREEN Shading = Agree with Draft Recommendations; YELLOW Shading = Needs Improvement; RED Shading = Disagree with Recommendation

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<b>Best Practices</b>	<b>1. Improve consistency in the implementation of IPM</b>	Agree
	<b>2. Limit ground-based applications of adulticides</b>	Eliminate ground-based applications of adulticides except in true public health emergencies, based on robust, independent, and transparent scientific evidence
	<b>3. Authorize and fund statewide mosquito surveillance</b>	Agree, and using an improved surveillance program
	<b>4. Improve consistency in MCD staffing</b>	We do not understand what is meant here. Local conditions might require different types of staffing. What consistency are you referring to? Consistent numbers of staff or consistent educational backgrounds? Please clarify.
	<b>5. Establish statewide education on mosquito management.</b>	Agree; must include education for state pesticide applicators with proper pesticide application procedures. Must include education on personal protection to/by public and deterrent/mosquito reduction practices.
	<b>6. Prohibit aerial applications of adulticides</b>	Agree.
	<b>7. Develop online reporting system for private applicators</b>	Agree.
	<b>8. Establish system of communication with public water systems</b>	Agree.
	<b>9. Develop statewide QA/QC testing program for mosquito control chemicals</b>	Agree with QA/QC testing. Not certain what testing is being recommended or testing frequency. Pesticides should be used only as a last resort.
	<b>10. Protect receptor areas from pesticide run-off</b>	Unclear – what is a receptor area? We hope to stop using pesticides and pesticides must not be used if they run off.
	<b>11. Reduce pesticide applications for nuisance control</b>	<b>ELIMINATE all pesticide applications for nuisance control. Develop reporting &amp; education procedures to deal with nuisance conditions.</b>

	<b>12. MCDs to conduct monitoring and evaluations after spraying</b>	<b>Disagree – spraying should be eliminated. Monitoring should also be done after larviciding.</b>
	<b>13. Determine procedures to protect vulnerable populations and non-target species</b>	<b>Eliminating spraying will protect vulnerable populations and non-target species. Schedule and details needed.</b>
	<b>14. Set criteria for declaring a public health emergency</b>	<b>Agree – must be robust, independent, and transparent.</b>
	<b>15. Offer current opt-out option to commercial farms</b>	<b>Expand and clarify definitions – need to include all farms and all crops that might be sold (apiaries, herb gardens, chicken/eggs, other). Opt-out should be offered to all farms whether commercial, organic, community supported gardens, home gardens, etc.</b>
	<b>16. Codify the current protected status for certified farms</b>	<b>Unclear. Is this for certified organic farms? See comments above.</b>

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<b>Local Engagement</b>	<b>1. Create an online system for requesting property exclusions and property opt-outs</b>	<b>AGREE</b>
	<b>2. Remove physical marking requirements for property exclusions and property opt-outs</b>	<b>AGREE</b>
	<b>3. Public Engagement: improve outreach to the public and input from the public</b>	<b>AGREE</b>
	<b>4. Establish a menu-based approach: funding/resources by the state; opt-in to additional services at discretion of municipalities</b>	<b>AGREE</b>
	<b>5. Create program for pilot evaluation of environmental impacts.</b>	<b>AGREE. Yet we need to go beyond a pilot program; we need to start comprehensively evaluating impacts now. Clarify impacts from what? Historic spraying? Future spraying? The MassQuito Coalition recommends eliminating use of pesticides wherever possible.</b>
	<b>6. Increase sharing of pesticide application locations</b>	<b>We recommend complete disclosure of what pesticides are being used in Massachusetts for mosquito management, where they are being sprayed and how much volume has been sprayed. This information should be available on a public facing website. The MassQuito Coalition recommends sharing information about the locations of mosquito traps monitoring for disease with the local Boards of Health</b>
	<b>7. Increase transparency on sensitive habitat/rare species exclusion</b>	<b>Unclear – what is meant here? Transparency is a good thing, but there should not be spraying on these sensitive habitats/rare species. Pesticide companies should be educated about online sources of information showing the locations of sensitive receptors.</b>

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Pesticide Selection	1. Further review pesticide products used in mosquito control and ensure transparent selection process	Agree with transparency; subcommittee should have NGO or academic, conservation/environmental representatives. Risks need to include total pesticides and toxics burden. Document how to share this information
	2. Consider synergists: conduct periodic assessments of insecticide levels; evaluate whether synergism of insecticides is already present or possible	Agree. Detailed Task Force document recommends annual reviews; review must include volumes/amounts as well as names of products used. Include effects on endangered and rare species. How will this information be shared? Recommend online summaries.
	From Detailed comments - #3. Impacts on Drinking Water (the numbering sequence does not synch up with number of recommendations provided on the screen during the Listening Sessions).	Groundwater protection list is inadequate because the toxicity threshold is too high, and should be lowered to be protective of drinking water and ecosystems. Following the EPA groundwater rule (40 CFR 152.170) is not protective enough for the pesticide selection process.
	3. Establish several mechanisms to avoid use of PFAS-containing pesticides	Agree. Need to use total organic fluorine analyses in addition to the targeted PFAS analyses. The Pesticide Selection process must prevent PFAS compounds in the active ingredients, inert ingredients, or as a contaminant. More detail is needed.
	4. No recommended action relative to active ingredient disclosure	Disagree; additional evaluation is needed into the active ingredients, as well as documenting the Confidential Business Information (CBI). The mosquito management program has used pesticides for years and do not know what is in the products used. Case in point is the PFAS contamination found in Anvil 10+10, which was discovered only after PEER collected a sample and had it analyzed for PFAS compounds in 2020.
	5. No recommended action relative to inert ingredient disclosure	Disagree; EPA's evaluation of inert ingredients in pesticides is inadequate. Pesticide Sampling should be addressed in the Task Force recommendations. The MassQuito Coalition recommends periodic sampling.

	<p>6. Update/amend the Massachusetts Pesticide Control Act to address the components of inert ingredient review</p>	<p>Agree – we believe the Pesticide Control Act should be updated and/or amended to address ALL of the components in the ingredient review. We would like to understand the details of this recommended process. We support the state going beyond the EPA regulations.</p>
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Representing the MassQuito Coalition

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