

June 12, 2009

Dr. Thomas A. Green
IPM Institute of North America, Inc.
1914 Rowley Ave.
Madison WI 53726

Dr. Dawn Gouge
University of Arizona – Maricopa Agricultural Center
37860 West Smith-Enke Road,
Maricopa, AZ 85249

Dear Tom and Dawn:

We are writing to express concerns and make suggestions with regard to the 2008 Pest Management Strategic Plan (PMSP): *School IPM 2015. A Strategic Plan for Integrated Pest Management in Schools in the U.S.* We appreciate the leadership you have shown in attempting to synthesize the state of school IPM in our country and to set forth an ambitious plan to promote wider adoption of IPM technologies in schools. In addition to the complexity of IPM in schools, this PMSP promised to be especially challenging because of the diverse array of stakeholders associated with the school community. This certainly proved true.

You have forthrightly acknowledged that the final PMSP did not turn out to be a consensus document, and that not all stakeholders were in full agreement with the final product. However this admission implicitly implies that the final PMSP was the best and fairest representation of stakeholder views that could be produced. After careful review of the School IPM 2015, we respectfully disagree. Our group has concluded that the 2015 document in its present form presents an editorial slant that does not represent the majority of schools and pest management specialists, specifically those of us who work in the southern states.

A few of us on the southern region school IPM team were invited to participate in development of this PMSP, though most of us were not. Some of us were added to the group in a minor advisory capacity at a later date after much of the drafting and planning of the document had already taken place. Some of us, who were involved from the beginning, expressed views on numerous occasions during the drafting of the document which, we feel, were not adequately incorporated into the final PMSP. As researchers and extension educators from the USDA Southern Region, we represent many years of expertise with IPM training and the promotion of IPM practice in schools in our states. Warmer temperatures, humid climates, and year-round pest activity in school facilities in the south may give us a slightly different point of view when it comes to how IPM can be successful. An adequate pest management plan for insect or weed control in New York or Maine or North Dakota may not necessarily meet community and school district standards in Florida or Texas or Alabama.

Our major concerns with the *School IPM 2015* document include the following:

- While the PMSP advisory committee included some very qualified persons, we do not believe it represented a diverse array of stakeholders, especially with regard to the southern region of the U.S. Texas, for example, with arguably the most highly developed school IPM program in the nation, was not invited to participate in the committee. We also believe that when including political action groups (PAGs) in such a process, both sides of an issue should be represented. Specifically the anti-pesticide PAG was represented on the committee without the presence of a

corresponding pesticide industry PAG. In a group of this kind it may be preferable to have no active PAGs, but a balance is certainly called for when lobbyists are invited to participate in strategic planning.

- We hoped the document would present a fair and balanced view of the concerns about pesticides and the need for effective tools to manage pests. In many cases it does not meet the standards we would set for ourselves in developing an unbiased, science-based guidance document. Pesticides play an important role in IPM programs because of their ability to control pests effectively and quickly, and because in many cases they are relatively less expensive than other methods. Sometimes pesticides are the only practical control tools available for specific pest problems. While we fully agree that one of the goals of “high-level” IPM is to reduce the use and need for pesticide use, we disagree with the plan’s recommendation that broad categories of products never be used in schools (especially pp. 54 and 55). We prefer to leave such decisions up to states and/or schools, trusting that well-trained pest management professionals will use such products only when effective alternatives are unavailable. We believe the document should focus on risks to school children and not toxicity of an ingredient that may be inaccessible or at extremely low concentrations when applied. The document does not emphasize that risk is a function of both toxicity and probability of exposure.
- We find some statements in the document are inaccurate or have inadequate data support. Before we can support the PMSP we ask that these statements be either removed, substantiated or qualified. We are particularly uncomfortable when the plan refers to documents and websites of anti-pesticide advocacy groups alongside peer-reviewed publications. The documents produced by these groups are not generally, in our opinion, of adequate quality and objectivity to endorse in a document destined for use as a national guidance document supported by the USDA and EPA.
- The goal of *School IPM 2015* is extremely ambitious, but we find the plan on how to achieve these goals inadequate and obstacles to change not well documented. Nearly every recommendation in section 4, which lays out the 2015 strategic plan, requires significant outlays of governmental funding. Sources or strategies for obtaining these funds are nowhere identified. For example, in the Extension sector (p. 27) the plan suggests eight roles to be played by extension educators and eight actions that will need to be taken to achieve IPM implementation. Each of these activities requires a significant commitment of personnel to accomplish, yet most states have yet to devote even part of an extension position to the school IPM cause. In fact, the numbers of extension entomologists are declining in most southern states due to budget concerns, a process expected to continue for some years.

In the PMSP plan, state and local regulatory agencies are assigned the role of evaluating progress of school IPM in their states (pp. 25, Appendix C), but surveys of schools require time, expertise and money which few states have been willing to commit. We believe it is commendable to draft recommendations for action and set ambitious goals, but the challenges and obstacles to change should be clearly identified and acknowledged. We believe that specific goals in the PMSP should be “tiered” to reflect various levels of funding that may be available.

- The length and scope of the PMSP is impressive and reflects your tremendous dedication to making school IPM a reality. However, in our opinion, the size of the document is a major flaw of the plan. At 286 pages, few of us have been able or willing to give the document the careful review that it deserves, and we doubt that few policy makers will read it either. The PMSP reads, in some places, more like a textbook than a strategic plan. In our opinion, excessive length is a hindrance rather than a help to a document of this type.

We understand that, as editors of *School IPM 2015*, you faced a significant challenge in breaking new ground for pest management strategic plans. Describing the current state of school IPM and what is needed from regulatory, research and extension communities to see IPM established in the nation's public schools was, and is, a big challenge. We commend your committee for taking on the task and for the tremendous commitment you have made toward promoting safer and more effective pest control for public schools. You have stated on numerous occasions, however, that the PMSP is intended to be a living document, one that is subject to ongoing review and revision. We therefore ask you to consider our group comments carefully as you draft the next document version.

If, after consideration, there should continue to be strongly held and significant differences of opinion among us (such as the role and use of pesticides in schools) we believe a fair approach would be to eliminate the most divisive statements from the body of the document and devote a section to expressing differing views about how schools or policy makers might approach the task of reducing pesticide risks in schools. We believe there are, in fact, valid differing viewpoints about the best pesticide policies for schools to follow and the PMSP should strive to reflect these views fairly and accurately.

We firmly believe that the stakes involved in IPM for schools are significant enough that we cannot afford to allow our different perspectives to slow progress in this area. We agree on far more than we disagree. It is not our intent to derail the PMSP process for school IPM; however, after careful consideration we felt that this letter was a necessary first step in our efforts to see the changes we feel are essential to secure our support of the *School IPM 2015* document.

Attached to this letter are some specific criticisms and suggestions on how we believe the current PMSP could be improved. We include these not as an exhaustive edit of *School IPM 2015*, but as selective illustrations of our general concerns outlined above. We hope you will consider our input and look forward to the chance to work with you on the next draft of the document.

Respectfully,

The Southern Region School IPM Team

Jim Criswell, Oklahoma State University

Fudd Graham, Auburn University

John Hopkins, Arkansas Cooperative Extension

Janet Hurley, Texas AgriLife Extension

Michael Merchant, Texas AgriLife Extension

Godfrey Nalyanya, North Carolina State University

Faith Oi, Florida Cooperative Extension Service

Dale Pollet, Louisiana State University

Dennis Ring, Louisiana State University

Tom Royer, Oklahoma State University

Cc: Tom Brennan
Debra Edwards
Sherry Glick
Herb Boulton
Jim VanKirk
Steve Toth
Rick Melnicoe
Linda Herbst