

National Coalition for Pesticide-Free Lawns

Supporting healthy lawns and landscapes without the use of pesticides
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GRASSROOTS NEWS

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ACTION OF THE MONTH: Object to EPA's Lawns and Environment Initiative

Action Needed: Email EPA and USDA and request that they do not endorse the Proclamation of Environmental Guiding Principles (Lawns and the Environment Initiative) and the Environmental Guidelines. Your individual responses are needed today.

Send your notice to:

johnson.stephen@epa.gov Stephen Johnson, Administrator, U.S. Environmental Protection Agency, Ariel Rios Building, 1200 Pennsylvania Avenue, N.W., Washington, DC 20460, and

mike.johanns@usda.gov Mike Johanns, Secretary of Agriculture, U.S. Department of Agriculture 1400 Independence Ave., S.W. Washington, DC 20250.

Background: In February 2004 EPA announced the unveiling of new lawn care guidelines being developed by a group that includes lawn care and pesticide industry organizations, government agencies and environmental groups, referred to as the Lawns and Environment Initiative. The environmental groups have since withdrawn from the initiative.

On December 15, 2005 the Proclamation of Environmental Guiding Principles (Lawns and the Environment Initiative), and the Environmental Guidelines were released with a request for support from Beyond Pesticides and other organizations. The next step in their campaign is to begin a variety of outreach activities including the development of a training module and a national on-line training conference for master gardeners

Beyond Pesticide, Defenders of Wildlife and many of our National Coalition for Pesticide-Free Lawns Steering Committee members not only refused to endorse the Principles and Guidelines, but requested that there be a listing of objecting organizations listed on the documents. Our response letter follows:

Comments: In an effort to develop consensus on

principles for environmental management of landscapes, the final December 15, 2005 Proclamation of Environmental Guiding Principles (Lawns and the Environment Initiative), the Environmental Guidelines, and the process associated with their development are an unfortunate failure and detrimental to the protection of public health, pets, wildlife and environmental quality. Federal agencies should not endorse these documents for reasons of process and substance.

Process: These documents have emerged from a process that was not fully inclusive and transparent. As a result, while they may reflect the views of chemical manufacturers and chemical landscape management service providers, they do not fully incorporate the concerns regarding the protection of public health, pets, wildlife and the environment. Because there are serious inaccuracies and missing information regarding issues of fact, the documents are misleading. If a federal agency is to "sign on" and thereby endorse such documents, the agency must initiate a formal public review process, publish the document in the Federal Register, and seek public input in the process. It is inappropriate for a federal agency to endorse guidance of this nature that involves select pesticide registrants or their representatives without a formal regulatory procedure to ensure full participation of those who are expert on environmental health effects of pesticides. Furthermore, there is no public record to ensure that the federal agencies asked to endorse these documents have been made aware of the serious deficiencies. Given the critical flaws in the overall development and content of the documents, organizations and individuals submitting comments should not be cited in the documents as "submitting specific comments and recommendations" because this is misleading. To the contrary, organizations opposing the text and failures of these documents should be cited as opposing its distribution.

Substance: The documents do not reflect consensus from a public health and environmental standpoint; rather, they mislead with inaccuracies and incomplete disclosures of fact. Furthermore, the attempt to develop a "balanced set of guidance documents that will represent a broad spectrum of stakeholder interests"

has yielded public relations pieces that compromise public health and safety warnings in order to achieve concurrence from chemical manufacturers and chemical landscape service providers.

First and foremost, the Proclamation and Guidelines do not incorporate, by design or in substance, the environmental community viewpoint regarding the health and environmental impacts of lawn chemicals. Secondly, the documents ignore the viability of landscape and lawn management practices that make synthetic chemical use unnecessary and inappropriate, given their known or unknown risks to health and the environment. The phrase, "choose an organic or conventional product," which appears twice in the Proclamation, undermines the precautionary principle to protect people, pets and wildlife from unnecessary hazards by adopting the safest practices.

This is all taking place in the context of increased awareness that lawn chemicals are not needed to manage healthy landscapes; that they bring unnecessary health and environmental hazards to our communities. In this context, people and communities are seeking ways to avoid the use of toxic pesticides and looking for techniques and products that will assist them. To the contrary, the Proclamation and much of the Principles suggest that there is no difference between organic and conventional products and that people and the environment are fully protected when they read and follow label directions.

Beyond Pesticides and its over 400 member National Coalition for Pesticide-Free Lawns request that your agency not endorse, or sign on to the Proclamation of Environmental Guiding Principles and the Environmental Guidelines.

AROUND THE COUNTRY: Getting Local Businesses Off Pesticides **By Claire Gervais**

Reducing pesticides in our communities is challenging. Perhaps your neighborhood shopping center, library, or church is using lawn care pesticides. Perhaps while walking into your local clinic or hospital, you have been surprised to see a sign stating "Keep Off, Pesticides Applied".

The Greater Madison Healthy Lawn Team (GMHLT) in Madison, Wisconsin has developed a program to acknowledge businesses who stop using toxic lawn care methods. GMHLT has convinced a number of local businesses to discontinue use of lawn care pesticides by creating a relationship with the business and giving them educational materials on non-toxic lawn care. After a business has switched from non-toxic lawn care methods, GMHLT presents them with the "Healthy Lawn Hero" award, which consists of a brief presentation and a framed certificate of appreciation.

The main selling point has been customer health. GMHLT found that local clinics and hospitals have been early adopters since these businesses are committed to community health. However, even these businesses needed some convincing, and only after getting encouragement from physicians did health care facilities administrators shift their priorities from aesthetics to least toxic lawn care.

In the case of a neighborhood business, gathering support from a number of surrounding neighbors is essential to communicating neighborhood preferences, in hopes of instilling a sense of responsibility to the business owner.

Acknowledging businesses with positive feedback provides them with the incentive to continue the safer lawn care approach. It also gives your local group an opportunity to check in with the business and to offer more information on continuing non-toxic landscaping.

The Greater Madison Healthy Lawn Team has developed a brochure for Madison's local use and can be adapted for use in other communities. It is available for viewing at <http://www.healthylawnteam.org/teamResources.htm#otherat>. Scroll to the Business Brochure pdf at the bottom of "other" category. You may also contact GMHLT at gmhlt@healthylawnteam.org for more tips on talking to businesses.