

A.6366A/S.4314 (Thiele/Lavalle)

AN ACT to amend the environmental conservation law, in relation to prohibiting the use of Methoprene

The New York State Association of County Health Officials, opposes, as written, the above-referenced legislation which would hinder local health department efforts to control and reduce the risk of vector-borne diseases.

Methoprene is an insect growth regulator used in many pesticide products. Methoprene interferes with insect growth and development, and is thus an effective tool for vector control programs that seek to reduce the risk of mosquito-borne diseases to human populations. Methoprene is used in laravacides, which aim to reduce adult mosquito populations. Larvaciding also reduces the need for the application of adulticide products, which can increase the presence of pesticides at the landscape level.

Larvaciding is a key component of Public Health vector control programs that seek to reduce the risk of mosquito and other vector-borne diseases. Since the emergence of West Nile Virus in New York, several local health departments have used this product to reduce adult mosquito populations. Methoprene products are considered the safest larvacide products available and a prohibition on its use would increase the need for increased applications of less efficacious products. The United State Environmental Protection Agency (EPA) has reviewed numerous studies and the existing scientific literature regarding the potential impacts of Methoprene on humans, domestic animals and ecological effects to terrestrial and aquatic species. The EPA has concluded that Methoprene is "of low toxicity and poses very little hazard to people and other non-target species".

While this proposal seeks to allow for limited public health uses of Methoprene-based products, the bill language fails to recognize that Methoprene products are used as *a preventative* measure. The application of larvacides are part of local health departments' vector-borne disease control programs, which are specifically intended to prevent public health emergencies and/or significant threats to public health. The current language, as it relates to public health uses, is more likely to result in increased public health threats from vector-borne diseases.

Local health departments review evidence-based interventions and the best available science when they implement public health measures, such as the application of larvacides as part of vector-control programs. This includes an assessment of the risks posed by pesticides versus the risk of human disease. Local health departments' pesticide use is also permitted and regulated by the NYS Department of Environmental Conservation. Again, all local health departments who conduct larvaciding programs do so to prevent or reduce the risk of vector-borne diseases in humans.

NYSACHO, therefore, opposes this bill as written. The legislation, rather than protecting human health, instead would hamper public health prevention activities and potentially increase the risk of exposure to, and cases of vector-borne diseases, particularly in the elderly and people with suppressed immune systems.

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