

March 10, 2024

Committee: Health and Government Operations

Testimony on: Pesticides - PFAS Chemicals - Prohibitions

Position: Support: HB1190

Dear Chair Pena-Melnyk and Members of the Committee,

My name is Robin Todd. I am a retired board-certified entomologist. I spent seven years working for the Mosquito Research & Control Unit in Grand Cayman before arriving in the US in 1979. For the next 36 years I tested insect control products for their efficacy and registered such products with EPA for clients, the companies that manufactured and/or marketed them. Then for 3 years I consulted for companies seeking to register such products. I write as a member of the Smart on Pesticides Coalition in strong support of HB1190 due to the harmful impacts of PFAS pesticides.

My testimony focuses on the availability of Maryland registered alternative products to replace the PFAS pesticides which HB 1190 would take off the market.

One concern about HB1190 could be that it would deprive Maryland's farmers, pest control operators and homeowners of vital tools from the pest control toolbox. Data from the Maryland Department of Agriculture's excellent website shows that there will still be plenty of tools left in that toolbox if HB1190 is signed into law. There are currently approximately 14,000 pesticide products available to Marylanders; HB1190 would remove just under 8% of these, leaving approximately 13,000 products to choose from.

The top 10 PFAS pesticides, in terms of quantities used in Maryland (based on MDA data for 2020) are listed below from greatest to least. The big three are clearly the insecticides; chlorfenapyr, fipronil and bifenthrin.

PFAS Pesticide	Pounds Used (2020)	Category
chlorfenapyr	82,600	Insecticide
fipronil	52,740	Insecticide
bifenthrin	25,047	Insecticide
fluopyram	6401	Fungicide
dithiopyr	3540	Herbicide
prodiamine	2734	Herbicide
fluazinam	1590	Fungicide
fluazifop-P-butyl	707	Herbicide
oxyflurifen	216	Herbicide
fluridone	48	Herbicide

There follows a summary of how many non-PFAS pesticides products would be available in Maryland for each pest group that the PFAS products are used for, if HB1190 is passed into law. The use sites are also given.

Top 10 PFAS Pesticides, Pest Groups (Non-PFAS products) & Sites

Chlorfenapyr - Insecticide

Pests: Termites (165), Alfalfa Looper (106), Worms (29), Mites (477), Fungus Gnats (2)

Sites: Greenhouse, Industrial, Ornamental

Fipronil - Insecticide

Pests: Ants (761), Bees (215), Beetles (230), Black Widow Spiders (553), Spiders (553), Crawling Insects (91), Crickets (654), Earwigs (451), Fleas (878), Cockroaches (507), House Fly (419), Termites (165), Ticks (856), Wasps (360), Yellowjackets (240)

Sites: Industrial, Rights Of Way

Bifenthrin - Insecticide

Pests: Worms (29), Mites (477), Moths 182), Ants (761), Beetles (230), Thrips (320), Caterpillars (218), Termites (165)

Sites: Field, Forest, Fruit, Vegetables, Nursery, Industrial

Fluopyram - Fungicide

Pests: Black Leg (21), Brown Spot Of Soybean (), Nematodes (32), Seedling Diseases (32), Soilborne Diseases - fusarium (29)

Sites: Seed Treatment

Dithiopyr - Herbicide

Pests: Grasses (138), Mustard (264), Thistle (153), Weeds (75)

Sites: Nursery, Forest, Turf, Ornamental, Field, Industrial

Prodiamine - Herbicide (preemergence)

Pests: Annual Bluegrass - preemergence (156), Carpetweed - preemergence (175), Common Chickweed - preemergence (141), Foxtail - preemergence (97), Lovegrass - preemergence (64), Witchgrass - preemergence (136)

Sites: Nursery, Fruit, Industrial, Regulatory, Forest, Turf, Rights of Way

Fluazinam - Fungicide

Pests: Alternaria (68), Black Rot (56), Blight (57), Colletotrichum (29), Mildew (269), Gray Mold (113), White Mold (36)

Sites: Fruit, Vegetables, Nursery

Fluazifop-P-butyl - Herbicide

Pests: Annual Grasses (90), Barley - Volunteer (67), Corn - Volunteer (83), Foxtail (175), Oat - Volunteer (45), Wheat - Volunteer (78)

Sites: Fruit, Vegetables, Industrial, Field, Rights of Way, Regulatory, Turf, Ornamental

Oxyfluorfen - Herbicide

Pests: Annual Grasses (90), Bittercress (95), Crabgrass (258), Henbit (517), Mustard (264), Nettle (147), Oxalis (222), Thistle (153), Weeds (75)

Sites: Fruit, Vegetables, Nursery, Ornamental, Forest, Industrial

Fluridone - Herbicide

Pests: Barnyard Grass (356), Cattail (131), Hydrilla (48), Smartweed (274), Watergrass (45)

Sites: Regulatory/Waterways

It is clear from the above that the loss of the top 10 PFAS pesticides should not be an obstacle to Maryland's farmers, pest control operators or homeowners from controlling pests. Accordingly, I ask that the Committee for Health and Government Operations give a favorable report on HB1190.

Sincerely,

A handwritten signature in blue ink that reads "Robin G. Todd". The signature is written in a cursive style with a large initial 'R' and a distinct 'G' and 'T'.

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