



BEYOND PESTICIDES

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Statement of Beyond Pesticides Pesticides and Pollinator Hearing

In Support of

H.124, H.954, H.985/S.547, H.975, H.995, H.4091, H.4133, H.4172, H.4191,
H. 4226, H.4310, H.4500, H. 4572, S.26, and S.552

Massachusetts Joint Committee on Environment and Natural Resources
November 10, 2025

Honorable Chair Rausch and members of the Committee, thank you for the opportunity to testify on bills pertaining to the October 27, 2025, hearing on pollinator and pesticide-related issues. We submit these comments on behalf of Beyond Pesticides—a national, grassroots, membership organization that represents community-based organizations and a range of people seeking to improve protections from pesticides and promote alternative pest management strategies that reduce or eliminate a reliance on toxic pesticides. Our membership spans the 50 states, the District of Columbia, and groups around the world. We are submitting this statement on behalf of our supporters in Massachusetts.

We represent our members and supporters in the Commonwealth to urge the Committee to support fifteen pieces of legislation being considered by this committee.

Local Authority in an Era of Federal Uncertainty and Deregulation

We urge the Committee to support the home rule bills—including H.975, H.995, H.4091, H.4133, H.4172, H.4191, H. 4226, H.4310, H.4500, H. 4572, S.26, and S.552—which serve as petitions from local governments to the state legislature to enable the adoption of legislation outside the scope of their home rule authority. As lawmakers, you are aware that the underlying federal statute, the *Federal Insecticide, Fungicide, and Rodenticide Act* (FIFRA), which authorizes the registration of pesticides, was written to allow local jurisdictions in Massachusetts and all states to restrict the use of pesticides. The federal law established pesticide restrictions as a floor, not a ceiling. The intent and spirit of FIFRA was tested in the Supreme Court in the 1991 case *Wisconsin v. Mortier*, when the court upheld the right of localities to adopt more stringent standards than the federal government.

Since the state of Massachusetts relies on the federal government and the underlying pesticide law for the scientific analysis governing permitted pesticide use in the state, it seems illogical, in our view, to take away a local democratic authority embedded in that very same federal law. Congress recognized, and the Supreme Court upheld, the right of local jurisdictions to restrict

toxic pesticides, recognizing the hazardous nature of these substances, local conditions and concerns, and local policy powers to protect residents' health, safety, and general welfare. We are all familiar with local jurisdictions' authority under zoning bylaws, which establish allowable land use that should include the authority over pesticide and fertilizer use in the community.

In a climate of severe deregulation and the elimination of programs affecting pesticide regulation at the federal level and monies provided to states, it is even more critical that local governments can act on behalf of their residents. The petitions for local authority before you represent the will of local communities and their elected officials to engage in decisions that affect the short- and long-term human health consequences of chemical-intensive pest management. We urge the Committee to vote in favor of the bills granting local authority to restrict pesticides and advance them to a floor vote.

Protection of Groundwater

We support H.954 because it creates a more efficient process for applicable localities to make their own decisions on land management choices. This bill, which grants local authority to communities where more than 50 percent of the population sources water from private wells, is necessary to protect against pesticide contamination. Various state agencies and independent reports in recent years, from Wisconsin to Connecticut, emphasize the degree to which pesticides leach into private water wells and move into public waterways.

Approximately four in ten private wells in the state of Wisconsin contain toxic pesticides and pesticide metabolites, according to findings released last year from a 2023 survey, entitled *Wisconsin Agricultural Chemicals in Wisconsin Groundwater*,¹ conducted by the Wisconsin Department of Agriculture, Trade, and Consumer Protection (DATCP) in partnership with U.S. Department of Agriculture's (USDA) National Agricultural Statistics Service (NASS).²

Meanwhile in the neighboring state of Connecticut, based on data collected from U.S. Geological Survey, EPA, and independent monitoring, a multidisciplinary team of researchers at the University of Connecticut³ finds that 46% of Connecticut waterway samples are contaminated with levels of the neonicotinoid insecticide, imidacloprid—one of the most widely used insecticides in the United States on lawn and golf courses.⁴

¹ Wisconsin Department of Agriculture, Trade, and Consumer Protection (DATCP). (2023). *Wisconsin Agricultural Chemicals in Wisconsin Groundwater* (U.S. Department of Agriculture's (USDA) National Agricultural Statistics Service (NASS), Ed.). <https://datcp.wi.gov/Documents2/2023StatewideGroundwaterSurveyReport.pdf>

² Beyond Pesticides. 2024. Pesticide-Contaminated Water Wells Documented, Representing Widespread Poisoning. <https://beyondpesticides.org/dailynewsblog/2024/10/pesticide-contaminated-water-wells-documented-representing-widespread-poisoning/>

³ Presley, S., Perkins, C., & Willig, M. (2025). *Neonicotinoids in Connecticut Waters: Surface Water, Groundwater, and Threats to Aquatic Ecosystems*. University of Connecticut. <https://norwalkriver.org/wp-content/uploads/2025/01/Neonicotinoids-in-Connecticut-Final-Report-1-11-2025-1.pdf>

⁴ Beyond Pesticides. 2024. Waterway Contamination Findings with Neonicotinoid Insecticide a Threat to Aquatic Ecosystems and Biodiversity. <https://beyondpesticides.org/dailynewsblog/2025/01/study-finds-waterway-contamination-with-neonicotinoid-insecticide-threatening-aquatic-ecosystems-and-biodiversity/>

The authority of Clean Water Act provisions has only weakened in recent years due to Supreme Court decisions like *Sackett v. EPA*, emphasizing the importance of state governments like Massachusetts and local governments taking on a leadership role. In this spirit, we encourage this committee to vote in support of H.954.

Support for H.124

H.124 is an example of legislation that embraces the precautionary principle, only allowing least-toxic EPA-registered products and allowable inputs according to organic federal law to be used on outdoor schools and facilities frequented by school-age children. Children should be able to attend schools without their parents fearing their exposure to toxic substances.

A research study published in *Environment International*, a multidisciplinary academic journal in public health and environmental sciences, evaluated residues of individual and mixtures of endocrine-disrupting chemicals (EDCs), including pesticides, and found an association between exposure and hyperactive behavior in children. The researchers evaluated urine samples from over 800 preschoolers, identifying and statistically analyzing concentrations of 22 EDCs, and finding that nine of these chemicals are significantly associated with hyperactivity trajectories and EDC mixtures are positively associated with hyperactive behavior, noting the strongest association in girls.⁵ One of those chemicals, diphenyl phosphate (DPHP), is an organophosphate flame retardant that is structurally similar to organophosphate pesticides. Additional studies demonstrate that the children of mothers exposed to organophosphate insecticides during pregnancy or early childhood could disrupt brain development and long-term cognitive and behavioral declines, given their ability to disrupt neuronal migration and synapse formation, among other formative factors.^{6,7}

In considering the alternatives, although there is often significant discussion on the expense of transitioning to an organic land care program, the cost of implementing an organic systems approach is not likely to be substantially more than current costs (assuming a reasonable budget is in place), and there is likely to be savings in the long term.

In considering cost, local governments reflect not only on budget expenditures, but also on the externalities associated with pesticide use, including its effect of eliminating the risk of exposure to carcinogens, preventing the contamination of groundwater and surface water, and protecting wildlife from poisoning. These are costs that residents are already paying for, through hospital visits, expensive clean-ups, and the need for species conservation and habitat restoration. An organic land care program is not only generally on par with, and in the long run less expensive than, a conventional chemical-based program, but it also reduces and in many cases eliminates

⁵ Li, R. *et al.* (2025) Effects of single and multiple endocrine-disrupting chemical exposures on hyperactivity trajectories among preschoolers: A cohort study, *Environment International*. Available at: <https://www.sciencedirect.com/science/article/pii/S0160412025005768>.

⁶ Rebuli, M. E., & Patisaul, H. B. (2016). Assessment of sex specific endocrine disrupting effects in the prenatal and pre-pubertal rodent brain. *The Journal of Steroid Biochemistry and Molecular Biology*, 160, 148–159. <https://doi.org/10.1016/j.jsbmb.2015.08.021>

⁷ Li, H., Tong, J., Wang, X., Lu, M., Yang, F., Gao, H., Gan, H., Yan, S., Gao, G., Huang, K., Cao, Y., & Tao, F. (2024). Associations of prenatal exposure to individual and mixed organophosphate esters with ADHD symptom trajectories in preschool children: The modifying effects of maternal Vitamin D. *Journal of Hazardous Materials*, 478, 135541–135541. <https://doi.org/10.1016/j.jhazmat.2024.135541>

costly externalities borne by the community at large.

The following provides select examples of the experience of cities and institutions with organic land care programs:

- A report produced by nationally renowned turfgrass expert and Beyond Pesticides' board member Chip Osborne, in coordination with Grassroots Environmental Education, looks specifically at the cost of conventional and organic turf management on school athletic fields. The report concludes that once established, a natural turf management program can result in savings of greater than 25% compared to a conventional turf management program.⁸
- Research from Harvard University determined that, ultimately, the total operating costs of its organic maintenance program are expected to be the same as the conventionally based program. As stated in a 2009 *New York Times* article,⁹ the school determined that irrigation was reduced by 30%, saving 2 million gallons of water a year as a result of reduced irrigation needs. The school was also spending \$35,000/year trucking yard waste off-site. The university can now use those materials for composting and has saved an additional \$10k/year due to the decreased cost and need to purchase fertilizer from off-campus sources.¹⁰
- The Department of Energy and Environmental Protection in the state of Connecticut, which itself has a successful ban on pesticide use in school playing fields, notes in its information on organic lawn care that, "If your lawn is currently chemically dependent, initially it may be more expensive to restore it. But in the long term, an organic lawn will actually cost you less money. Once established, an organic lawn uses less water and fertilizers, and requires less labor for mowing and maintenance."¹¹
- The experience in South Miami, FL, may also be instructive. The city completed a two-year pilot program that limited toxic pesticide use only to organic certified products, and the city codified the practice into law. A city memo describes the success of this approach: "Thus far this initiative has been a qualified success, allowing the city to cut down on its waste footprint significantly at relatively little expense, and providing a model for other local governments to use as guidance."¹²
- One year after passing and implementing an organic landscape management policy, the City of Irvine, California's fields look "as pristine as ever," according to the Orange County

⁸ Osborne, Charles and Doug Wood. 2010. A cost Comparison of Conventional (Chemical) Turf Management and Natural (Organic) Turf Management on School Athletic Fields. Grassroots Environmental Education.

<https://bp-dc.org/cost-comparison-of-conventional-and-organic-turf-management-for-school-athletic-fields>

⁹ Raver, Anne. 2009. The Grass is Greener at Harvard.

http://www.nytimes.com/2009/09/24/garden/24garden.html?_r=2

¹⁰ Harvard University. 2009. Harvard Yard Soils Restoration Project Summary Report.

http://www.slideshare.net/harvard_uos/harvard-yard-soils-restoration-project-summary-report-22509-4936446.

¹¹ Connecticut Department of Energy and Environmental Protection. 2016. Organic Land Care: Your neighbors will "go green" with envy. <https://portal.ct.gov/DEEP/P2/Individual/Organic-Lawn-Care-For-Consumers>

¹² City of South Miami. 2019. City Commission Agenda Item Report: Inter-office Memorandum. https://beyondpesticides.org/assets/media/documents/SouthMiami_FL_Organicordinance.pdf.

Register.¹³ It notes further, “Weeding by hand and using organic pesticides, which must be applied more frequently, will increase costs by about 5.6 percent in a \$21.2 million landscaping budget, according to a city report on implementation of the program.”

While a decade ago the natural systems approach required slightly increased up-front costs and saw savings in the long run, technology and practices have now progressed to the point where parity can often be achieved from the outset. (See Beyond Pesticides Cost Comparison: Chemical vs Organic Land Management.¹⁴)

Ecological Mosquito Management

H.985/S.547 builds on years of advocacy from beekeepers to public health professionals, calling for a safer and ecologically grounded approach to mosquito management. We submitted testimony on this legislation earlier this year, which is also cited herein for your review.¹⁵

Conclusion

We must meet this moment of cascading crises of biodiversity decline, public health threats, and climate change with more opportunities for local governments to protect health and the environment. We urge you to advance these 15 bills out of committee.

Thank you for your consideration of our comments. We remain available to answer any questions on the hazards of pesticides and the benefits of organic land management.

Thank you again for your time.

Jay Feldman, Executive Director

Max Sano, Senior Associate, Policy and Coalitions

¹³ Perkes, Courtney. 2017. Irvine Little League mom leads charge to wipe out pesticides on ball fields nationwide. Orange County Register.

<http://www.ocregister.com/2017/05/24/irvine-group-working-to-get-pesticides-off-city-baseball-fields-nationwide/>

¹⁴ Beyond Pesticides. 2020. Cost Comparison: Chemical vs Organic Land Management.

<https://beyondpesticides.org/assets/media/documents/documents/Cost%20Comparison.pdf>.

¹⁵ Beyond Pesticides. Statement of Support: Statement of Beyond Pesticides in Support of H.985 and S.547 with Amendments. <https://bp-dc.org/epm-commonwealth-2025>.