



April 19, 2021

Representative Bronna Kahle, Chair  
*House Committee on Health Policy*  
Room 352, House Appropriations, State Capitol Building  
Lansing, MI

**RE: HB 4497, Aerial spraying of pesticides to prevent and control diseases and environmental health hazards; require dept. of health and human services to provide notice to public before implementation**

Chair Kahle, Members of House Health Policy Committee:

Thank you for the opportunity to submit testimony on HB 4497, we respectfully oppose this legislation and **request a no vote from the committee on this bill.** HB 4497 fails to contemplate the complexities of vector control and grossly misunderstands the technical aspects of the timetables that are followed when spraying pesticides to control mosquitoes. Given Michigan's history with Eastern equine encephalitis and the ever-present threat of other diseases driven by mosquitoes, the committee must not move forward with this bill.

HB 4497 requires a 3-day notification before spraying pesticides to control mosquitoes. Disease transmission by mosquitoes is usually very focal and intense with dramatic increases in viral prevalence occurring in spans of just a few days. Waiting 3 days after a threat to public health is detected and an aerial treatment is determined to be the best course of action will increase the likelihood of human illness. Time is of the essence when trying to disrupt transmission of viruses to humans. Vector-borne disease outbreaks are not slow moving but instead rapid.

Mosquito control products which have been approved for use by the State and by Federal EPA contain specific labeling instructions on every product. Within the label strict meteorological parameters for application are provided to the user. These include monitoring rainfall, wind speed, time of day, atmospheric temperature, and humidity. The correct meteorological conditions must exist for an application to conform to label requirements and to be the most effective. While weather can generally be predicted within 3 days, the highly specific requirements of an aerial application cannot be predicted 3 days in advance. The slightest change in temperature or windspeed can force a spraying to be delayed because it no longer conforms to the label requirements. Therefore, the time interval between deciding to conduct an aerial spray must be as close as possible to when the spray is conducted. Increasing this interval will reduce efficacy and increase the risk of human illness.

Eastern equine encephalitis (EEE) continues to be a major threat to human and animal health in the State of Michigan. Statistically EEE is one of the most dangerous mosquito-borne diseases in the US with a 33 percent fatality rate in people who become ill. In 2020, Michigan experienced a EEE outbreak which 3 human cases (including one death) and 41 animal cases reported. Because of the outbreak, aerial applications of mosquito control products were conducted, and no adverse events were reported from the applications. When the spraying was

conducted a notification was provided and significant information was posted online for residents to better understand the importance of spraying for mosquitoes.

Prior notification of an impending aerial spray is an important part of communications with the public. The best management practice adopted by almost all mosquito control districts in the country is to provide no less than 24-hour notice with the goal to provide 48-hour notice when possible. 72-hour notice is uncommon and has been proven to be too long in a rapidly evolving disease outbreak.

HB 4497 provides a notification framework that will adversely impact human and animal health in the State of Michigan. At this time, our industry cannot support this bill and we respectfully ask the committee to vote no on this legislation.

Sincerely,

A handwritten signature in black ink, appearing to read "Jon Gaeta".

Jon Gaeta  
[jgaeta@pestfacts.org](mailto:jgaeta@pestfacts.org)  
RISE  
Director, State Affairs  
4201 Wilson Blvd. suite 700  
Arlington, VA 22203

RISE (Responsible Industry for a Sound Environment) is the national trade association representing manufacturers, formulators, distributors, and other industry leaders engaged with specialty pesticides.