
APPENDIX C

DEVELOPING AN IPM POLICY STATEMENT FOR SCHOOL PEST MANAGEMENT

A clear policy statement is needed to develop agreement about how pest control will be performed. The sample IPM policy included here does not exclude the use of a pesticide, but places all pesticide use within a context where such use will be minimized. A policy statement for school pest management should state the intent of the school administration to implement an IPM program and should briefly provide guidance on what specifically is expected. The sample policy statement below can be adapted and modified to fit your own situation. This model has been used by a wide variety of institutions and school districts as a way to resolve conflicts and redirect pest control efforts toward least hazardous practices.

SAMPLE SCHOOL PEST MANAGEMENT POLICY STATEMENT

Structural and landscape pests can pose significant problems to people, property, and the environment; however, the pesticides used to solve these problems carry their own risks. It is therefore the policy of this School District to use Integrated Pest Management (IPM) programs and procedures for control of structural and landscape pests.

Pests

Pests are living organisms (animals, plants, or microorganisms) that interfere with human purposes for the school site. Strategies for managing pest populations will be influenced by the pest species and the degree to which that population poses a threat to people, property, or the environment.

Pest Management

Pests will be managed to

- reduce any potential human health hazard or to protect against a significant threat to public safety
- prevent loss or damage to school resources, structures or property
- prevent pests from spreading in the community, or to plant and animal populations beyond the school site
- enhance the quality of life for students, staff, and others

Pest management strategies must be included in an approved pest management plan for the site.

Integrated Pest Management Procedures

IPM procedures will determine when to control pests, and whether to use physical, horticultural, or biological means. Chemical controls are used as a last resort. IPM practitioners depend on current, comprehensive information on the pest and its environment, and the best available pest control methods. Applying IPM principles prevents unacceptable levels of pest activity and damage. These principles are implemented by the most economical means and with the least possible hazard to people, property, and the environment.

It is the policy of this School District to utilize IPM principles to manage pest populations adequately. While the goal of this IPM program is to reduce and ultimately eliminate use of toxic chemicals, toxic chemicals may become necessary in certain situations. The choice of using a pesticide will be based on a review of all other available options and a determination that these options are unacceptable or are infeasible, alone or in combination. Cost or staffing considerations alone will not be adequate justification for use of chemical control agents. The full range of alternatives, including no action, will be considered.

When it is determined that a pesticide must be used in order to prevent pest levels from exceeding action thresholds, the least-hazardous (see Box A) material will be chosen. The application of such pesticides is subject to the Federal Insecticide, Fungicide, and Rodenticide Act (7 USC 136 et seq.), School District policies and procedures, Environmental Protection Agency regulations in 40 CFR, Occupational Safety and Health Administration regulations, and state and local regulations.

Education

Staff, students, administrative personnel, custodial staff, pest managers, and the public will be educated about potential school pest problems and the integrated pest management policies and procedures to be used to achieve the desired pest management objectives.

Record Keeping

Records will be kept on the number of pests or other indicators of pest populations both before and after any treatments. Records must be current and accurate if IPM is to work. Records of pesticide use shall be maintained on site to meet the requirements of the state regulatory agency and School Board, and records will also document any non-toxic treatment methods being used. The objective is to create records from which programs and practices can be evaluated in order to improve the system and to eliminate ineffective and unnecessary treatments.

Notification

This School District takes the responsibility to notify students' parents or guardians and the school staff of upcoming treatments which will involve a pesticide. Notices will be posted in designated areas at school and sent home with students.

Pesticide Storage and Purchase

Pesticide purchases will be limited to the amount authorized for use during the year. Pesticides will be stored and disposed of in accordance with the EPA-registered label directions and State or Local regulations. Pesticides must be stored in an appropriate, secure site not accessible to students or unauthorized personnel. A cabinet in a non-student area with a locked and labeled door is advised. The door label should include a skull and crossbones, Mr. Ugh, or other visual signals for non-English reading adults or children.

Pesticide Applicators

Pesticide applicators must be educated and trained in the principles and practices of IPM and the use of pesticides approved by this School District, and they must follow regulations and label precautions. Applicators must be certified and comply with this School District IPM Policy and Pest Management Plan. Under no circumstances should applications be made while school or school activities are in progress.

Box A

Cautionary Labeling for Pesticides

Law requires that precautionary statements and signal words be included on all pesticide labels. The signal words (see below) indicate the level of acute (immediate) toxicity of the pesticide to humans. The chronic (long-term) toxicity is not indicated on the label. Note that chronic toxicity may be important for materials used frequently or extensively, or used in areas where children may receive regular whole-body exposure (for example, lawns on which young children play, sit, and lie). Chronic toxicity information must be obtained from scientific papers that are published in scientific journals. Every label bears the child hazard warning "Keep Out of Reach of Children."

Signal Words

If none of these warnings is provided do not use the pesticide.

DANGER-A taste to a teaspoonful taken by mouth could kill an average-sized adult.

WARNING-A teaspoonful to an ounce taken by mouth could kill an average-sized adult.

CAUTION-An ounce to over a pint taken by mouth could kill an average-sized adult.

Note that these warnings are expressed as amounts taken by mouth; however, most actual exposure is through skin and lungs. Thus, this system is not sufficient to guarantee safety; it is only one indicator. No materials with the DANGER indication should be used near children. It also follows that WARNING materials should be used only rarely on pests for which no CAUTION materials are registered. Whenever additional information is available about chronic toxicity it should be used to compare different materials to choose the least-toxic pesticides.