



ORS 634.700 – 634.750 Requires IPM in All Schools

The governor signed SB 637 into law June 24, 2009, which was then incorporated into ORS 634.700 – 634.750. The bill was the result of a long process led by then Sen. Suzanne Bonamici. It involved multiple stakeholders with a wide range of interests and concerns. Among other things, it requires schools to adopt Integrated Pest Management (IPM) plans, create a list of acceptable low-impact pesticides, and designate IPM coordinators.

-What are pests?

Pests are organisms that can cause problems for humans. Ants, wasps, mice, rats, voles, weeds, slugs, bats, pigeons and other organisms can all be pests, depending on where they are and what they are doing.

-What are the concerns?

Children are especially vulnerable to problems associated with some pests. Cockroaches are asthma triggers. Rodent infestations can also trigger asthma and are vectors of disease. Many children are allergic to yellow jacket stings.

Children are also especially vulnerable to the effects of pesticides because their anatomical and physiological makeup is different from adults, as are their behavior patterns. Many frequently applied pesticides are asthma triggers. Nationwide, asthma is the leading cause of absenteeism in schools today.

Municipalities often have contaminated surface waters due to urban pesticide use. Pesticide labels are not consulted or followed by a large percentage of users, and pesticides are often not properly stored. Overuse and misuse of pesticides not only poses a risk to children, it can lead to environmental contamination, causing concern about the potential long-term health effects.

-What is “Integrated Pest Management?”

Integrated Pest Management, also known as IPM, is a process for achieving long-term, environmentally sound pest suppression through a wide variety of tactics. Control strategies in an IPM program include structural and procedural improvements to reduce the food, water, shelter, and access used by pests. Since IPM focuses on remediation of the fundamental reasons why pests are here, pesticides are rarely used and only when necessary.

Key concepts for school IPM include:

- Long-term solutions
- Prevention and avoidance through pest exclusion and good sanitation
- Monitoring and identification of pests
- Action – A combination of cultural, physical, biological, and (last of all) chemical methods

-The promise of IPM for schools

The national average reduction in pesticides and pest complaints for verifiable IPM programs is over 70 percent. The key word is “verifiable.” A verifiable IPM program includes records of site inspections, monitoring protocols, and treatments. A verifiable IPM program also results in a reduction in costs (though initial costs for exclusion and control of serious pest problems can be higher), without increasing the workload of school facilities staff.

-What does ORS 634.700 – 634.750 require of schools?

Some key sections of ORS 634.700 – 634.750 are described below. For a complete copy of the law, visit the OSU School IPM Program at osuipm.org and click on the “Law” tab.

Section 634.700 (3) defines an IPM plan including an emphasis on prevention, monitoring, and nonchemical control measures. Schools can create and follow their own plans, but each plan must contain the elements of what is in this section.

A plan must focus primarily on the prevention of pest problems by working to reduce or eliminate conditions that attract pests. Pests need food, water, and shelter. Good housekeeping and sealing up access points greatly reduces pests. Targeted application of baits for such pests as ants and rodents should only be used in combination with or after improving sanitation, sealing access points, setting snap traps, and other measures. Traps and baits have special risks in schools, and should not be employed as a substitute for sanitation and sealing up access points.

A plan must include “regular monitoring and inspections to detect pests, pest damage and unsanctioned pesticide usage.” Most schools will need training and guidance to set up effective monitoring and inspection programs for their schools. Recognizing this, the law requires staff be educated “about sanitation, monitoring and inspection and about pest control measures.”

Any plan must exclude “the application of pesticides on a routine schedule for purely preventive purposes, other than applications of pesticides designed to attract or be consumed by pests,” and “the application of pesticides for purely aesthetic purposes,”

Section 634.705 (5) defines a “low-impact pesticide” and requires schools to create a list of acceptable low-impact pesticides that meet specific criteria. A “low-impact pesticide” does not have the signal words “warning” or “danger” on the label, and is not classified as a human carcinogen or probable/likely to be a human carcinogen under EPA guidelines. Creating a list of pesticides that meet the low-impact requirements is difficult for schools to do on their own. OSU created a list of low-impact pesticides that meet the requirements of the law (go to osuipm.org and click on the “Pesticides” tab for a copy of the list).

Section 634.705 (1) requires schools to adopt an IPM plan, designate a plan coordinator, provide notification on pesticide applications, keep records, and provide a process for responding to complaints about noncompliance with the plan.

Section 634.720 covers responsibilities and required training the coordinator must receive. These are:

- “(a) Giving notice and posting warnings under ORS 634.740;
- (b) Overseeing pest prevention efforts;
- (c) Providing for the identification and evaluation of pest situations;
- (d) Determining the means of appropriately managing pest damage that will cause the least possible hazard to people, property and the environment;
- (e) Ensuring the proper and lawful performance of pesticide applications;
- (f) Evaluating pest management results; and
- (g) Keeping records as required by ORS 634.750.”

To be able to handle these responsibilities, the coordinator will need to know about pest identification, pest biology, pesticides, and pest prevention. That is why the law requires the coordinator receive six hours of training per year on IPM and the key requirements of ORS 634.700 to 634.750.

Section 634.725 requires any pesticide application on school property be made by a licensed pesticide applicator. If a public school employee makes the application they will need to have a Public Pesticide Applicator license. If a private school employee makes the application they will need to have a Commercial Pesticide Applicator license. Examples of applications requiring a Public or Commercial Pesticide Applicator license include:

- Applying weed control products with a backpack sprayer
- Applying over-the-counter pesticides like wasp killers or ant baits
- Placing mouse or rat bait in any school property location
- Spraying for yellow jackets, cockroaches, or other pests inside or outside of a school building

Section 634.730 describes application restrictions and provisions for “pest emergencies.” If the labeling of a pesticide does not specify a reentry time, the pesticide cannot be applied to an area of a campus where the school expects students to be present before a reentry time that the IPM coordinator determines to be appropriate based on specific criteria.

The coordinator may declare a pest emergency after consultation with school faculty and administration. If necessary, a pesticide other than a low-impact pesticide may be used to mitigate the emergency, but afterwards the coordinator will have to review the IPM plan to determine whether modification of the plan might prevent future pest emergencies.

Section 634.740 covers notification and posting of signs before applying pesticides. Written notice (to parents, teachers, and others) of any proposed pesticide application has to be received at least 24 hours before an application. Warning signs also have to be placed around the application site no later than 24 hours before an application, and removed no earlier than 72 hours after the application occurs.

Section 634.750 covers record keeping requirements. Records need to be kept of “Pest condition that prompted the application,” “Approximate amount and concentration of pesticide applied,” “Dates and times for placement & removal of warning signs,” and others.

-Where can we go to get more information and help?

The OSU School IPM Program provides a wide variety of assistance to schools to improve pest management while reducing costs, workload, and pesticide use (It’s our mission!). The Program provides the required coordinator training and creates fact sheets on pests and IPM. Law required us to develop a model plan for use in Oregon schools. For more information about the above and other forms of assistance, visit our website at osuipm.org or contact Program Coordinator Tim Stock at (541) 737-6279.