



PO Box 5989, Virginia Beach, Virginia, 23471 ● 757-464-1004 ● Email: [virginiaturf@gmail.com](mailto:virginiaturf@gmail.com)

---

January 09, 2024

Liza Fleeson Trossbach, Program Manager  
Office of Pesticide Services  
Virginia Department of Agriculture and Consumer Services  
102 Governor Street, Room LL18,  
Richmond VA 23219 |

Dear Ms. Fleeson,

The lawn and landscape industry utilizes pesticides, including weed-controlling herbicides, selected and applied by persons trained, tested, and certified according to stringent standards set by the Virginia Department of Agriculture and Consumer Services (VDACS). Those standards include at least forty hours of training, testing, and continuing education in courses approved by VDACS.

We are opposed to allowing persons not meeting VDACS' rigid standards to apply pesticides, as would be allowed by HB320. Risks to the environment, the applicator, and anyone exposed to the applied pesticides are too high to circumvent those standards. If enacted, HB320 will weaken the pesticide applicator regulations – these regulations were established and are enforced by experts who understand the intricacies of pesticide usage.

Proper pesticide usage requires proper training as well as experience identifying and utilizing products. Herbicides, like all pesticides, are one component of an extensive site-specific integrated pest management program using several methods, not just chemicals. Additional considerations include personal protective equipment, plant identification, selection, maintenance of application equipment, rinsate disposal, storing pesticides, and mixing, loading, and transporting chemicals. VDACS' regulations and training cover all those considerations for certified applicators.

HB320 is a highly misinformed proposal, which ignores the intricacies of pest management and assumes training volunteers will produce quality results or behavior that is safe for the participant and the environment. You would not see such a proposal for dental hygienists to get volunteers to clean teeth or paralegals to get volunteers to prepare legal briefings for criminal defense, and yet both of those tasks require licensing and registration with the state.

A practical question that must be answered is who will be held accountable for illicit discharge, personal injury, leakage, or spills. The volunteer applicator? The supervisor? The local government?

If passed, House Bill 320 would cause undue harm to the environment, the applicator, and anyone exposed to herbicides applied by persons circumventing requirements set by VDACS.

Sincerely,

Phil Bailey, President

Wes Bray, Vice President

Bruce Sheppard, Legislative Chair

Tom Tracy, Executive Director