

**ASPCRO Bed Bug Committee  
2012 Annual Committee Report  
August 26, 2012**

**Members:** The Bed Bug Committee welcomed five new members during the reporting period: Jung (Woogie) Kim, North Carolina Department of Agriculture, Jim Warneke, Orkin Pest Control, Steve Sims, Kentucky Department of Agriculture, Karn Manhas, Terramera, Inc., and Gabriel Lee, Terramera, Inc. Committee members also include: Matt Beal, Ohio Department of Agriculture; Dr. Timothy Drake; Clemson; Steve Dwinell, Florida Department of Agriculture and Consumer Services; Eric Pearson, Oklahoma Department of Agriculture; Julie Spagnoli, Exponent®, Inc, Norm Goldenberg, Terminix; Bob Rosenberg, NPMA, and Liza Fleeson, Virginia Department of Agriculture and Consumer Services (Chair).

The Bed Bug Committee (Committee) met in conjunction with the Mid-Year Meeting on April 2, 2012 as well as via conference call and email. Committee priorities moving into 2012 included 1) the development of a dedicated webpage to provide not only information about the Committee to Members and the general public, but, links to, for example, resource materials including fact sheets and NPMA's Best Management Practices; 2) distribution of the final results of the Phase 1 Survey and development of the Phase 2 Survey Instrument for State Lead Agencies; 3) the development of a testing protocol for bed bug products; 4) creation of a clearinghouse of State Lead Agency resources; 5) review of label language for bed bug products; and 6) hosting an ASPCRO EPA Training to include bed bugs. Additional topics resulting from the Mid-Year Meeting include 7) prophylactic treatment for bed bugs; 8) development of treatment specific fact sheets, for example, heat treatment; and 9) alleged health issues from heat treatment. The following items reflect current Committee activities and status:

**Bed Bug Webpage** The Committee submitted to the Board at the Mid-Year Meeting the introductory information to appear on the dedicated webpage as well as an initial listing of links.

**ASPCRO – Survey of States Phase 1** – The Committee finalized the survey and released it on June 27, 2011 with a closing date of July 15, 2011. Liza Fleeson presented the preliminary survey findings during the 2011 Annual Conference. Tim Drake completed the final report which will be distributed to Members and other interested parties at the Annual Meeting and electronically post meeting. It will also be available on the bed bug dedicated webpage on the newly designed ASPCRO website once completed. With the completion of the Phase 1 Final Survey Report, the Committee will begin development of the Phase 2 Survey. Preliminary input into the Phase 2 Survey was requested from both the Federal Bed Bug Workgroup as well as SFIREG's Environmental Quality Issues Working Committee. These groups, in addition to AAPCO, will have additional opportunities to comment on the Phase 2 Survey.

**Testing Protocols** – On March 6-7, 2012, EPA convened a FIFRA Scientific Advisory Panel (SAP) to receive expert opinions and recommendations on the design and scientific soundness of its "*Draft Product Performance Test Guidelines OCSPP 810.3900: Laboratory Testing Methods for Bed Bug Pesticide Products*". This guideline describes approaches to efficacy testing procedures, test methods, data reporting and evaluation of testing results for Section 3 bed bug pesticide product registration. In addition to submitting nominations for candidates to serve as ad hoc members of the SAP, ASPCRO provided written comments to the SAP. Tim Drake and Liza Fleeson also attended and presented oral comments on behalf of ASPCRO during the March 6, 2012 Public Comment period. In summary, ASPCRO concurred with the proposed methods and trusts that the final product of this process will address concerns regarding the efficacy of new conventional bed bug pesticide products, however, did offer the following summary comments to the Panel:

- The proposed guidelines address the concerns regarding the efficacy of new conventional bed bug products. The need, however, to address efficacy for not only those pesticides that are currently registered but also those that are exempt from federal registration remains.
- Notwithstanding the necessity to generate statistically meaningful data by using multiple strains of the test species, we believe that the current requirements may deter new products from entering the marketplace because of the lack of insect availability and high costs associated with maintaining those colonies; and
- Given that bed bug strains maintained in the laboratory have been shown to lose their resistance over time, known resistant strains should be re-tested for resistance at regular intervals and have their levels of resistance documented prior to efficacy testing

Complete comments are available (**Docket Number: EPA-HQ-OPP-2011-1017**).

The Committee believes ASCPRO needs to maintain our efforts to have the EPA address efficacy of 25b products labels for bed bugs. Related to efficacy of 25b products, the Committee has collected information from those States that require efficacy data for 25b products as part of the State registration process. States include NM, IN, WA, and ND.

**Clearinghouse for Resources** – One of the outcomes of the EPA’s National Bed Bug Summits was the clear need to provide a “Clearinghouse” for bed bug related outreach and education materials. ASCPRO offered its assistance in the development of the Clearinghouse. The Committee requested that ASCPRO Members submit bed bug outreach and education materials, for example, Fact Sheets, Posters, Presentations, etc, that could be shared with the EPA and posted in the Clearinghouse. ASCPRO received materials from 15 Members and forwarded them to the EPA. The Committee intends to make these materials available via the ASCPRO website as well. The EPA’s Clearinghouse went “live” on 4/23/12.

**Label Language Review – Bed Bug Products** - The Bed Bug Committee early on identified bed bug label language as one of the items or issues that needs to be addressed and planned to work with ASCPRO’s Label Stewardship Committee to identify particularly problematic label language with the expressed goal of recommending or providing alternative language. The process began with the initial review of products labeled for bed bugs (August 2010) and was further refined (September 2010).). A Joint Meeting of the Bed Bug Committee and Label Stewardship Committee was held on April 2, 2012. In preparation for the joint meeting, the Committee had been tasked to provide examples of problematic language for review and consideration by the Label Stewardship Committee with the goal of recommending or providing alternative language to registrants and EPA. Language identified by the Committee include the following: and “*Repeat as required*” (other similar language includes to repeat ....as necessary....at frequent intervals...thoroughly and repeatedly);” *When treating for bed bug eggs spray each square foot for 13 seconds or until damp*”; and “*Not recommended for use as a safe protection against bedbugs*”. Given the number of products, this is a long-term project and any document that is developed will be a “living” document. A draft document was developed which identifies “problematic” language and offers “preferred” language. Next steps are currently under discussion with both Committees. The EPA, which had previously indicated they were undertaking a similar effort, along with the Membership and other interested parties, will be provided the work product of this effort.

**ASPCRO EPA Field Training** – On November 14 and 15, 2011, ASCPRO hosted field training for EPA Headquarter and Region 3 Staff. The Field Training included presentations and field activities related to: Rodenticide Risk Mitigation Decisions including the challenges in rodent control at the National Zoo and Apple Orchard as a result of the label amendment; **Bed Bug Infestations and Treatment Options including inspections of infested, occupied units and the challenges in effective treatment**; IPM in Schools including the challenges with implementation for both the facility and pest management professionals; and Brown Marmorated Stink Bug including both the Agricultural and Non-Ag Nuisance Pest

issues and the challenges with control. The Field Training took place in the District of Columbia, Virginia and West Virginia.

### **Prophylactic Treatments for Bed Bugs**

Stephen Kells, University of Minnesota, provided information regarding prophylactic treatment for bed bugs, specifically, as part of an Integrated Pest Management Program, in select locations, for example, hotels, low income housing and shelters. Advantages of prophylactic treatments include limited pesticide applications in more confined areas, thus, reducing the both the amount of pesticides used and the potential for exposure. Discussion of the use of prophylactic treatment included concerns regarding the promotion of resistance from high level of pesticides; human health risks, and the need for detailed information and instructions. Regarding the promotion of resistance, Dr. Kells indicated the protocol would include selection of products outside the resistance spectrum and employ rotating chemistries. Further, Dr. Kells noted that there is current resistance from pyrethroids that cannot be avoided. In addition, given this is not broad spectrum treatment, rather crack and crevice, human health risk is minimized substantially. Finally, the protocol would be detailed including caveats and specific instructions.

Dr. Kells is seeking the Committee's assistance with the protocol including review, distribution and acceptance by the States. The Committee agreed to review the protocol and provide comments to Dr. Kells. The protocol has not been received to date.

### **Development of Treatment Specific Fact Sheets**

As a follow-up to previous discussions, the need for non chemical treatment/detection fact sheets was discussed, for example, heat; steam, cold, canine scent detection and vacuuming. In addition, the question of who the target audience is for the fact sheets was raised and if they would be separate documents or one document which included basic information about each with additional resources provided. It was decided that ideally any information developed or provided would be appropriate for multiple audiences. It was suggested and agreed that the most appropriate starting point would be to see what resources are currently available (for example, fact sheets) and determine what if any additional materials may be needed. The information could be provided to interested parties through our dedicated webpage.

### **Heat Treatments – Potential Health Issues**

The issue of alleged health risks associated with the use of heat treatments has been presented to the Committee. One heat equipment manufacturer has suggested that unless persons performing heat treatments use the scrubbing/filtration devices it sells, the treatment method generate unhealthy levels of particulate matter/off-gassing. The Committee intends to do additional research on this issue and determine what, if any role, ASPCRO has in this discussion.

**Other Activities:** In addition to the above, Committee Members have attended and participated in the Pesticide Performance Dialogue Committee's Public Health Working Group Meetings on October 11, 2011 and May 2, 2012.

**Next Meeting** - The Committee is scheduled to meet on August 25, 2012 as part of the Annual Meeting.