

ASPCRO Bed Bug Committee
2013 Annual Committee Report
August 18, 2013

Committee Members: **Dudley Hoskins**, RISE, **Jonathon Berger**, BASF, 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.; 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 2013 Mid-Year Meeting. In addition to those members indicated in bold above, attendees included Jay Kelley, (IN); Linda Johns (MT); Carol Falco (Syngenta); Jan Brill (Bayer); Rick Bell (Arrow Exterminating); and Dr. Davis Daiker (FL). After the welcome and introductions, the meeting began with a brief discussion of the proposed bed bug session focusing on consumer fraud for the 2013 Annual Meeting. The Committee agreed this was both timely and relevant. In addition, the Committee will be polled prior to the meeting to determine if a Committee Meeting will take place during the 2013 Annual Meeting.

CURRENT ACTIVITIES UPDATE

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 worked with ASPCRO's Label Stewardship Committee to identify particularly problematic label language with the expressed goal of recommending or providing alternative language. A draft document was developed which identified "problematic" language and offers "preferred" language. The Committee conducted a final review of the document and provided final comments to the Label Language Stewardship Committee.

Bed Bug Webpage

The Committee submitted the introductory information to appear on the dedicated Committee webpage as well as an initial listing of links and additional documents to be posted. The Communications Committee continues to work on the newly designed website and the development and population of Committee web pages. Once the information that has been submitted to date is available, the Committee will review the webpage and forward additional materials as appropriate.

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. ASPCRO provided written and oral comments to the SAP. The Committee continued to monitor the process for the "*Draft Product Performance Test Guidelines OCSPP 810.3900: Laboratory Testing Methods for Bed Bug Pesticide Products*". EPA will be providing an update of the product performance test guidelines to attendees during 2013 Annual Meeting.
- As part of a joint effort with the Termiticide Standards Committee (TSC), the Committee provided input into the nominations to the SAP as well as written and oral comments to the FIFRA SAP "*Product Performance Data Needs for Pesticide Products Claiming Efficacy against Invertebrate Pests Of Significant Public Health or Economic Importance*". The SAP was held March 19-21, 2013. ASPCRO Committees will continue to monitor the process.

25(b) Products – Proposed Rule & Efficacy Issues

On behalf of ASPCRO, the Committee drafted comments to the proposed 25(b) rule in which EPA is proposing to more clearly describe the active and inert ingredients permitted in products eligible for the exemption from regulation for minimum risk pesticides and to modify the label requirements in the exemption to require the use of specific common chemical names in lists of ingredients on minimum risk pesticide product labels, and to require producer contact information on the label. While supporting the important step the amended regulations represent in addressing the issues with 25(b) products, ASPCRO offered the following considerations:

- Codifying of the inert table could result in a static list, much like the active table which has not had any additions since 1996;
- The lack of a requirement to include “Directions for Use” on 25(b) Exempt products has the potential to lead to the misuse of a pesticide as pest management professionals and consumers are left to make decisions regarding the proper use of a given product to control pests.
- It is imperative that EPA also consider enforcement of the new proposals as well as current requirements for 25(b)s otherwise the benefit to states is lost and the current enforcement issues with 25(b) products will still be a problem
- To ensure effective communication of changes and collection of feedback, EPA should include state officials that currently register 25(b) products in discussions
- Pesticide products with demonstrated effectiveness in a variety of conditions, particularly in residential structures, must be identified and made available for general use. This holds for both conventional and exempt pesticides as the ineffectiveness of these products can lead to misuse including overuse of these products.

The Committee continues to believe that ASCPRO needs to maintain our efforts to have the EPA address efficacy of 25b products labels for bed bugs and continues discussions with EPA regarding future efforts. EPA is interested in collaborating with states (5 or 6 states) to start a dialogue to discuss issues of state registration requirements.

The following were removed from the Committees currently pending activities:

Prophylactic Treatments for Bed Bugs

At the 2012 Annual Meeting, 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. Dr. Kells requested 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. It was noted during the Committee Meeting held during the 2012 Annual Meeting, that in general, EPA does not support prophylactic treatments and that the risk profile would have to allow it. The protocol has not been received to date thus it was decided this is being removed from the activities list moving forward.

Heat Treatments – Potential Health Issues

The issue of alleged health risks associated with the use of heat treatments was presented to the Committee during the 2012 Annual Meeting. One heat equipment manufacturer had 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 did additional research on this issue and was unable to find data validating the concerns. The Committee does not see a role for ASPCRO thus it was decided this is being removed from the activities list moving forward.

ACTIVITIES MOVING FORWARD

In addition to continuing work as appropriate on the above listed activities, the Committee will focus its efforts on the following:

ASPCRO –Development of Phase 2 Survey

The Committee will revisit and review the draft questions that were proposed, however, not included in the Phase 1 Survey and begin the development of the Phase 2 Survey. As with the Phase 1 Survey, preliminary input into the Phase 2 Survey will be 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.

EPA Clearinghouse for Resources – Review of Website

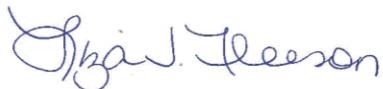
The Committee has received comments or concerns regarding EPA's Clearinghouse and the information presented for bed bug related outreach and education materials. Of particular concern is the list of products and the general public's perception as it relates to these products, for example, safe; efficacious; approved etc. The Committee did inform the EPA of the general concerns and offered their assistance with the review of the website. EPA has indicated their willingness to accept comments or suggestions from the Committee.

25b Products – Collaboration with EPA

The Committee will work with EPA to address the issues Member States continue to experience with 25b products including reports of lack of efficacy of these products and/or efficacy data; false or misleading statements or claims to protect human or public health; and misuse. Working with EPA, the Committee will attempt to determine what mechanisms may exist to address these issues, possible solutions and what, if any, role ASPCRO can play. The Phase 2 Survey of State Lead Agencies may assist in refining the issues experienced by States.

The committee will hold an informal breakfast meeting on Monday, August 19, 2013 at 7 AM in the Atrium. A table has been reserved for those interested in participating.

Respectfully submitted,



Liza J. Fleeson
Chair - Bed Bug Committee

[8/12/13]