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11/06/06
Stephen L. Johnson
Administrator
Environmental Protection Agency

Dear Mr. Johnson,

The American Association of Pesticide Safety Educators (AAPSE) wishes to offer our support of the submitted resolution by the American Association of Pest Control Officials (AAPCO) and petition by the Consumer Specialty Products Association (CSPA) concerning the registration of 25(b) public health pesticide products. Our membership of approximately 160 pesticide safety educators nationwide agrees wholeheartedly with the concerns raised in the two documents. We feel that it is critical that EPA closely monitor and regulate minimum risk pesticides that claim to control, repel, or otherwise mitigate pests of public health importance. The risk to consumer health because of illegal 25(b) pesticide products in the marketplace is a potentially serious problem that our organization feels needs immediate attention by your agency.

In addition, we would like to emphasize our support of the concerns raised in the following statement from the AAPCO resolution: "Whereas fifty state pesticide regulatory programs are investing in the conduct of duplicative 25(b) enforcement/compliance activities with limited resources of personnel and funds that greatly reduce their ability to meet existing regulatory requirements on fully registered Section 3 labels;". This unnecessary investment of resources and personnel at the states' level should be eliminated. The duplicative SLA actions could be mitigated by EPA requiring public health 25(b)-related pesticide products to undergo a cursory review at the federal level to conform to already established EPA requirements. For example, a cursory label review would confirm that the active and other/inert ingredients are EPA approved and no false or misleading statements under 40 CFR 156.10 (a)(5)(i)-(viii) may appear on an exempted product's label.

Thank you for your attention to this matter.

Yours Truly,

Joanne Kick-Raack
President
American Association of Pesticide Safety Educators