



Issue: **Registering New/Existing/Legacy Pesticides for the Professional Market for the Control of Bed Bugs**

Background: Experts cite four primary reasons for the resurgent bed bug population: (1) increased international travel and a generally more mobile society; (2) loss of pesticide products that effectively controlled bed bugs; and (3) more targeted, precise application techniques; and (4) resistance to current pesticide products.

The lack of a “silver bullet” product to manage bed bugs means that multiple treatments are usually necessary to gain effective control. Multiple treatments and non-chemical methods are costly and unaffordable for persons living on lower and fixed incomes. Oftentimes they are forced to throw out mattresses, furniture and other valuable possessions they lack the means to replace. Further, when done improperly, such disposal actually spreads and exacerbates the bed bug problem. Experts believe the problem will continue to grow as bed bug populations become even more deeply entrenched throughout the country and additional bed bug strains develop resistance.

This scenario is ripe for pesticide misuse, similar to the situation that occurred in the mid to late 1990s when unlicensed applicators in several states applied an agricultural pesticide indoors to control ants and cockroaches, displacing thousands of lower income persons and costing the federal government approximately \$75 million to clean up.

Position: **The National Pest Management Association urges the U.S. Environmental Protection Agency to review the pesticide registration process and eliminate or minimize barriers to introducing new bed bug pesticide products, such as accelerated review of new products, adjustment of registration fees, and determine if those changes can be made administratively or require a statutory fix.**

In addition, when EPA registers new bed bug pesticide products, alters or reevaluates the registration of existing products as to whether or not they may be used to control bed bugs or considers petitions for emergency exemptions, it should consider factors such as (1) the impact on Americans' "quality of life" when residential and other pests are not able to be controlled; (2) the risks that arise when consumers resort to over applying ineffective products or using unregistered products or other homemade remedies; and (3) the opportunity for the proliferation of dangerous, inefficacious or "snake-oil" type products when affordable, effective products do not exist.

Furthermore, Congress should require efficacy data for all pesticide products claiming to control bed bugs including 25b or minimum risk pesticides to discourage the marketing of inefficacious products by unscrupulous companies and to provide assurances to the professional industry, consumers, and federal and state regulatory officials that such products work as advertised. This is especially important for bed bug control products because it is not immediately obvious when a product does not work.

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