



FLORIDA DEPARTMENT OF AGRICULTURE AND CONSUMER SERVICES
COMMISSIONER ADAM H. PUTNAM

February 1, 2012

Steven Bradbury
Director, Office of Pesticide Programs
U.S. EPA
2777 South Crystal Drive
Arlington, VA 22202

Via Electronic Mail

Dear Mr. Bradbury:

At the December 5, 2011 meeting of the State FIFRA Issues Research and Evaluation Group (SFIREG), Ms. Susan Jennings, Public Health Coordinator of the Office of Pesticide Programs, presented the Agency response to the September 6, 2011 letter forwarding the Bed Bugs Issue Paper developed by the Environmental Quality Issues subcommittee. We appreciate the attention to the issues raised in the paper, and welcome the efforts of the Agency to address the issue of efficacy of bed bug products. We recognize the investment of significant resources that the Agency has made by convening a Scientific Advisory Panel on this issue and are wholly supportive of this effort. We look forward to the development of the efficacy guideline on bed bug efficacy testing.

We also appreciate the initiative of Region V in developing guidance on clean-up and remediation of pesticide misuses, and, will participate in that effort through the Environmental Quality Issues subcommittee's efforts.

There is one issue that we feel was not addressed in the Agency's response. The evaluation of risk associated with the use of a pesticide does not currently appear to include the risks that occur from the misuse of other pesticides that may be used instead. The issue we were attempting to identify in the issue paper was the situation that occurs when a less efficacious product is over used in lieu of a more effective product. The case in point is that of propoxur, which was removed from use due to risk concerns. In the absence of this product, or any other carbamate, the currently registered pyrethrins have been overused, in attempts to control severe infestations. We believe that the risk of these overuses should be considered when considering the overall risk from a product such as propoxur.

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Upon review of the issue paper, it appears that we did not express this concern clearly enough. We would welcome the opportunity to discuss this issue further. If you could identify the appropriate staff for this discussion, we can set that up prior to the next EQI and SFIREG meeting.

Sincerely,

ADAM H. PUTNAM
COMMISSIONER OF AGRICULTURE

A handwritten signature in blue ink, appearing to read 'Adam H. Putnam', written over a horizontal line.

Steven E. Dwinell, SFIREG Chair