

Q1 Please provide your contact information.

Answered: 37 Skipped: 0

ANSWER CHOICES	RESPONSES	
Name	94.59%	35
Agency	100.00%	37
Address	0.00%	0
Address 2	0.00%	0
City/Town	0.00%	0
State/Province	0.00%	0
ZIP/Postal Code	0.00%	0
Country	0.00%	0
Email Address	97.30%	36
Phone Number	97.30%	36

#	NAME	DATE
1	Laura Castro	12/24/2020 1:32 PM
2	Otto Oemig	12/18/2020 4:57 PM
3	Jeanine Broughel	12/7/2020 11:14 PM
4	Matthew Bucy and Kachadoorian	12/6/2020 11:04 PM
5	Garnet Cooke	12/4/2020 5:52 PM
6	Daniel Duer	12/4/2020 8:52 AM
7	Christopher Wade	12/3/2020 4:40 PM
8	Matt Sunseri	12/2/2020 9:43 AM
9	Patrick Jones	12/1/2020 3:11 PM
10	Grant Bishop	12/1/2020 3:09 PM
11	Kristia Thomas	12/1/2020 2:51 PM
12	Lukas Wagner	12/1/2020 12:43 PM
13	Taryn LaScola-Miner	12/1/2020 12:04 PM
14	Donna Marciano	12/1/2020 11:44 AM
15	Tony Cofer	12/1/2020 11:10 AM
16	Michael Williams	11/30/2020 12:58 PM
17	Courtney Frazier	11/30/2020 9:58 AM
18	Ryan Okey	11/30/2020 8:28 AM
19	Tulio Macedo	11/24/2020 12:51 PM
20	Laura Quakenbush	11/23/2020 11:50 AM
21	Victor Mason	11/23/2020 11:16 AM
22	tom phillips	11/23/2020 10:39 AM
23	Liza Fleeson Trossbach	11/23/2020 9:15 AM
24	Howard Brown	11/20/2020 6:35 PM
25	Kelle Davis	11/20/2020 3:20 PM
26	Kathy Booker	11/20/2020 3:08 PM
27	Tim Creger	11/20/2020 2:54 PM
28	Karin Hendrickson	11/20/2020 2:09 PM
29	Jack Peterson	11/20/2020 1:07 PM
30	Dawn Wall	11/20/2020 11:48 AM
31	Stephen Baca	11/20/2020 11:43 AM
32	Henry Nahalewski	11/20/2020 11:09 AM
33	dave scott	11/20/2020 10:42 AM
34	David J. Rousseau	11/20/2020 10:37 AM
35	Robby Personette	11/20/2020 10:24 AM

#	AGENCY	DATE
1	Iowa Dept Agriculture & Land Stewardship	12/24/2020 1:32 PM
2	WI DATCP	12/18/2020 4:57 PM
3	NYS Department of Environmental Conservation	12/7/2020 11:14 PM
4	Maine Board of Pesticides Control	12/7/2020 12:45 PM
5	Oregon Department of Agriculture	12/6/2020 11:04 PM
6	Oregon OSHA	12/4/2020 5:52 PM
7	PA Dept. of Agriculture	12/4/2020 8:52 AM
8	Delaware Department of Agriculture	12/3/2020 4:40 PM
9	Minnesota Department of Agriculture	12/2/2020 9:43 AM
10	NCDACS	12/1/2020 3:11 PM
11	West Virginia Department of Agriculture	12/1/2020 3:09 PM
12	South Dakota Department of Agriculture	12/1/2020 2:51 PM
13	ND Dept. of Ag	12/1/2020 12:43 PM
14	Massachusetts Dept.of Agricultural Resources	12/1/2020 12:04 PM
15	Department of pesticide Regulation, State of Calif.	12/1/2020 11:44 AM
16	Alabama Department of Agriculture and Industries	12/1/2020 11:10 AM
17	Kentucky Department of Agriculture	11/30/2020 12:58 PM
18	Florida Department of Agriculture and Consumer Services	11/30/2020 9:58 AM
19	Pesticide Regulation - Clemson University	11/30/2020 8:28 AM
20	Hawaii Dept. of Ag	11/24/2020 1:20 PM
21	CDPR	11/24/2020 12:51 PM
22	Colorado dept. of Agriculture	11/23/2020 11:50 AM
23	Idaho State Dept of Agriculture	11/23/2020 11:16 AM
24	State Chemist Section, Maryland Department of Agriculture	11/23/2020 10:39 AM
25	Virginia Department of Agriculture and Consumer Services	11/23/2020 9:15 AM
26	DC Dept. of Energy & Environment	11/20/2020 6:35 PM
27	Washington State Department of Agriculture	11/20/2020 3:20 PM
28	TN Dept of Agriculture; Div. of CIS	11/20/2020 3:08 PM
29	Nebraska Department of Agriculture	11/20/2020 2:54 PM
30	Alaska dept of environmental conservation	11/20/2020 2:09 PM
31	Arizona Department of Agriculture	11/20/2020 1:07 PM
32	Mo Dept of Ag	11/20/2020 11:48 AM
33	NM Dept of Agriculture	11/20/2020 11:43 AM
34	Utah Dept Ag & Food	11/20/2020 11:09 AM
35	office of indiana state chemist	11/20/2020 10:42 AM
36	New Hampshire Division of Pesticide Control	11/20/2020 10:37 AM
37	WDATCP	11/20/2020 10:24 AM

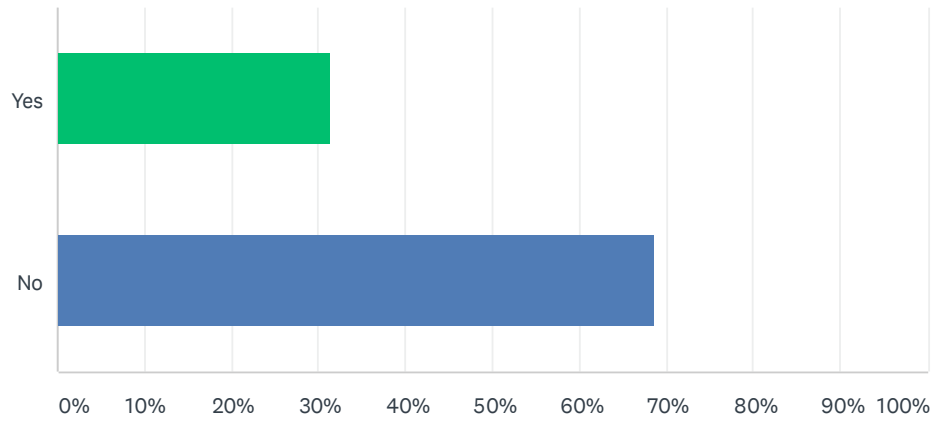
#	ADDRESS	DATE
	There are no responses.	
#	ADDRESS 2	DATE
	There are no responses.	
#	CITY/TOWN	DATE
	There are no responses.	
#	STATE/PROVINCE	DATE
	There are no responses.	
#	ZIP/POSTAL CODE	DATE
	There are no responses.	
#	COUNTRY	DATE
	There are no responses.	

#	EMAIL ADDRESS	DATE
1	Laura.Castro@IowaAgriculture.gov	12/24/2020 1:32 PM
2	otto.oemig@wisconsin.gov	12/18/2020 4:57 PM
3	jeanine.broughel@dec.ny.gov	12/7/2020 11:14 PM
4	pesticides@maine.gov	12/7/2020 12:45 PM
5	mbucy@oda.state.or.us	12/6/2020 11:04 PM
6	garnet.c.cooke@oregon.gov	12/4/2020 5:52 PM
7	daduer@pa.gov	12/4/2020 8:52 AM
8	Christopher.wade@delaware.gov	12/3/2020 4:40 PM
9	matthew.sunseri@state.mn.us	12/2/2020 9:43 AM
10	patrick.jones@ncagr.gov	12/1/2020 3:11 PM
11	gbishop@wvda.us	12/1/2020 3:09 PM
12	kristia.thomas@state.sd.us	12/1/2020 2:51 PM
13	ljwagner@nd.gov	12/1/2020 12:43 PM
14	taryn.lascola@mass.gov	12/1/2020 12:04 PM
15	donna.marciano@cdpr.ca.gov	12/1/2020 11:44 AM
16	tony.cofer@agi.alabama.gov	12/1/2020 11:10 AM
17	Michael.R.Williams@ky.gov	11/30/2020 12:58 PM
18	courtney.frazier@fdacs.gov	11/30/2020 9:58 AM
19	rokey@clemson.edu	11/30/2020 8:28 AM
20	tulio.macedo@cdpr.ca.gov	11/24/2020 12:51 PM
21	laura.quakenbush@state.co.us	11/23/2020 11:50 AM
22	vic.mason@isda.idaho.gov	11/23/2020 11:16 AM
23	tom.phillips@maryland.gov	11/23/2020 10:39 AM
24	liza.fleeson@vdacs.virginia.gov	11/23/2020 9:15 AM
25	howard.brown@dc.gov	11/20/2020 6:35 PM
26	kmdavis@agr.wa.gov	11/20/2020 3:20 PM
27	kathy.booker@tn.gov	11/20/2020 3:08 PM
28	tim.creger@nebraska.gov	11/20/2020 2:54 PM
29	karin.hendrickson@alaska.gov	11/20/2020 2:09 PM
30	jpeterson@azda.gov	11/20/2020 1:07 PM
31	Dawn.Wall@mda.mo.gov	11/20/2020 11:48 AM
32	sbaca@nmda.nmsu.edu	11/20/2020 11:43 AM
33	hnahalewski@utah.gov	11/20/2020 11:09 AM
34	scottde@purdue.edu	11/20/2020 10:42 AM
35	david.rousseau@agr.nh.gov	11/20/2020 10:37 AM
36	robby.personette@wisconsin.gov	11/20/2020 10:24 AM

#	PHONE NUMBER	DATE
1	5152816597	12/24/2020 1:32 PM
2	608-294-0815	12/18/2020 4:57 PM
3	518-402-8768	12/7/2020 11:14 PM
4	2072872731	12/7/2020 12:45 PM
5	(503) 986 - 4775	12/6/2020 11:04 PM
6	(503)930-4204	12/4/2020 5:52 PM
7	717-772-5211	12/4/2020 8:52 AM
8	302-698-4570	12/3/2020 4:40 PM
9	6512016292	12/2/2020 9:43 AM
10	3364967106	12/1/2020 3:11 PM
11	3045582209	12/1/2020 3:09 PM
12	605.773.4432	12/1/2020 2:51 PM
13	7013924922	12/1/2020 12:43 PM
14	617-626-1776	12/1/2020 12:04 PM
15	1 916 889-3470	12/1/2020 11:44 AM
16	3342407237	12/1/2020 11:10 AM
17	502-782-9240	11/30/2020 12:58 PM
18	850-617-7914	11/30/2020 9:58 AM
19	8642938647	11/30/2020 8:28 AM
20	916-324-3527	11/24/2020 12:51 PM
21	303-068-0123	11/23/2020 11:50 AM
22	12083328628	11/23/2020 11:16 AM
23	410841-2754	11/23/2020 10:39 AM
24	804-371-6559	11/23/2020 9:15 AM
25	202-535-2288	11/20/2020 6:35 PM
26	360-902-1851	11/20/2020 3:20 PM
27	615-837-5133	11/20/2020 3:08 PM
28	402-471-6882	11/20/2020 2:54 PM
29	9073761856	11/20/2020 2:09 PM
30	602-542-3575	11/20/2020 1:07 PM
31	(573) 751-5510	11/20/2020 11:48 AM
32	575-646-2733	11/20/2020 11:43 AM
33	801-864-2900	11/20/2020 11:09 AM
34	765-413-1242	11/20/2020 10:42 AM
35	6032713640	11/20/2020 10:37 AM
36	6082940854	11/20/2020 10:24 AM

Q2 Have you had cases of “spray on” surface disinfectant misuse?

Answered: 35 Skipped: 2



ANSWER CHOICES	RESPONSES	
Yes	31.43%	11
No	68.57%	24
TOTAL		35

Q3 If yes to Q2, how many?

Answered: 16 Skipped: 21

#	RESPONSES	DATE
1	n/a	12/24/2020 1:32 PM
2	two	12/7/2020 11:14 PM
3	We have cases pending.	12/7/2020 12:45 PM
4	1	12/6/2020 11:04 PM
5	2 in FY2020	12/4/2020 5:52 PM
6	0	12/1/2020 3:11 PM
7	2	12/1/2020 12:43 PM
8	5 as of this date	12/1/2020 11:44 AM
9	3	11/30/2020 9:58 AM
10	2	11/30/2020 8:28 AM
11	a few, haven't counted how many cases	11/24/2020 1:20 PM
12	0	11/23/2020 11:50 AM
13	NA	11/23/2020 9:15 AM
14	4	11/20/2020 3:20 PM
15	Several (normal misuse cases in Alaska are 0-1 per year)	11/20/2020 2:09 PM
16	2	11/20/2020 11:09 AM

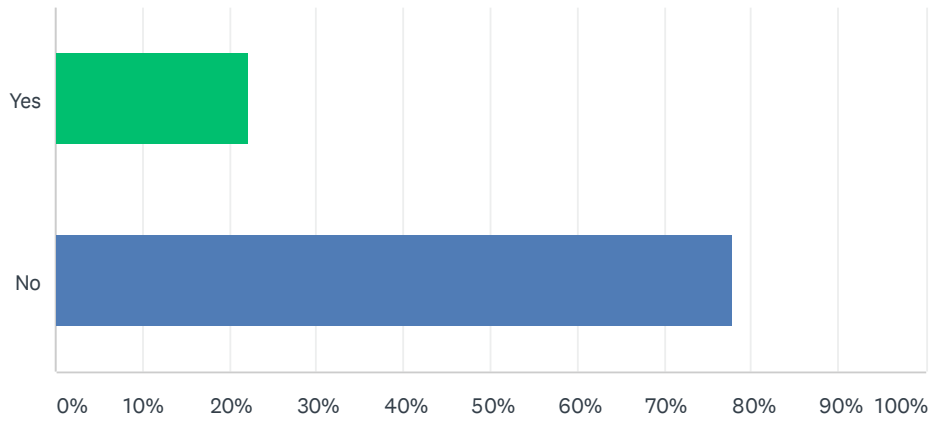
Q4 If yes to Q2, what was the outcome?

Answered: 13 Skipped: 24

#	RESPONSES	DATE
1	n/a	12/24/2020 1:32 PM
2	Enforcement for use not according to label directions.	12/7/2020 11:14 PM
3	We had a case where a school district used an electrostatic mister to apply a disinfectant in violation of the label directions.	12/6/2020 11:04 PM
4	Headaches and nausea	12/4/2020 5:52 PM
5	outreach performed and users educated on proper use and product selection	12/1/2020 12:43 PM
6	We are still in the investigation period on many, others are becoming licensed with the state to do business as a Pest Control Operator	12/1/2020 11:44 AM
7	Administrative actions (2 warning letters, 4 administrative fines) taken for issues with state registrations (fine total, \$5600 to registrants and distributors) and 2 advisory letters were issued for misuse.	11/30/2020 9:58 AM
8	Label violations	11/30/2020 8:28 AM
9	Currently, TBD	11/24/2020 1:20 PM
10	NA	11/23/2020 9:15 AM
11	1 was referred to EPA. 1 school and 2 store locations changed application policies	11/20/2020 3:20 PM
12	Stop use orders	11/20/2020 2:09 PM
13	Compliance assistance	11/20/2020 11:09 AM

Q5 Have you had cases of “fogging” disinfectant misuse?

Answered: 36 Skipped: 1



ANSWER CHOICES	RESPONSES	
Yes	22.22%	8
No	77.78%	28
TOTAL		36

Q6 If yes to Q5, how many?

Answered: 12 Skipped: 25

#	RESPONSES	DATE
1	One misuse investigation	12/24/2020 1:32 PM
2	1 in FY 2020	12/4/2020 5:52 PM
3	1	12/1/2020 3:11 PM
4	3	12/1/2020 11:44 AM
5	1 with a complete review and 2 others pending review	11/30/2020 9:58 AM
6	1	11/30/2020 8:28 AM
7	two that I can recall	11/24/2020 1:20 PM
8	0	11/23/2020 11:50 AM
9	NA	11/23/2020 9:15 AM
10	N/A	11/20/2020 3:20 PM
11	Na	11/20/2020 2:09 PM
12	1	11/20/2020 11:43 AM

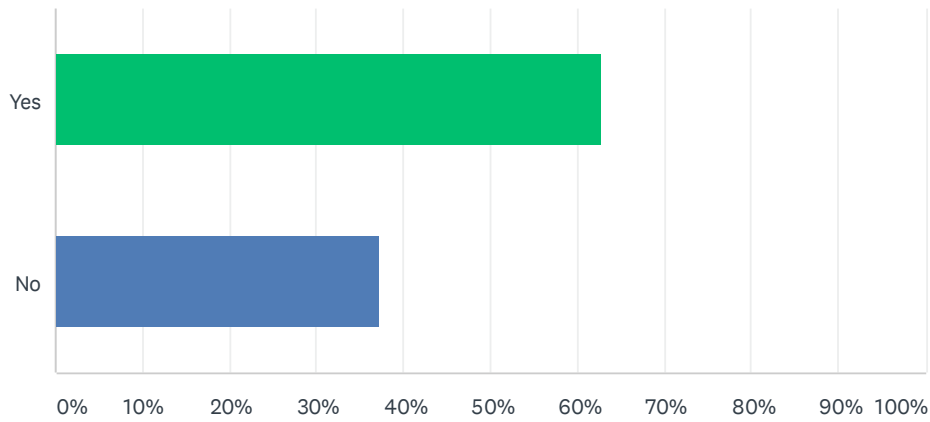
Q7 If yes to Q5, what was the outcome?

Answered: 11 Skipped: 26

#	RESPONSES	DATE
1	Applicator received a Warning Letter	12/24/2020 1:32 PM
2	headaches	12/4/2020 5:52 PM
3	No apparent misuse	12/1/2020 3:11 PM
4	still under investigation, many of these business have franchises located throughout the state and DPR is coordinating with our Local Agricultural Commissioners and some of the local DA's are interested as well.	12/1/2020 11:44 AM
5	Administrative action (2 warning letters) issued for misuse.	11/30/2020 9:58 AM
6	Making claims beyond the label.	11/30/2020 8:28 AM
7	EPA took action. The state is taking action.	11/24/2020 1:20 PM
8	NA	11/23/2020 9:15 AM
9	N/A	11/20/2020 3:20 PM
10	Na	11/20/2020 2:09 PM
11	The group stopped using fogging as an application method	11/20/2020 11:43 AM

Q8 Have you had cases regarding unregistered disinfectants or improper SARS-CoV-2 claims?

Answered: 35 Skipped: 2

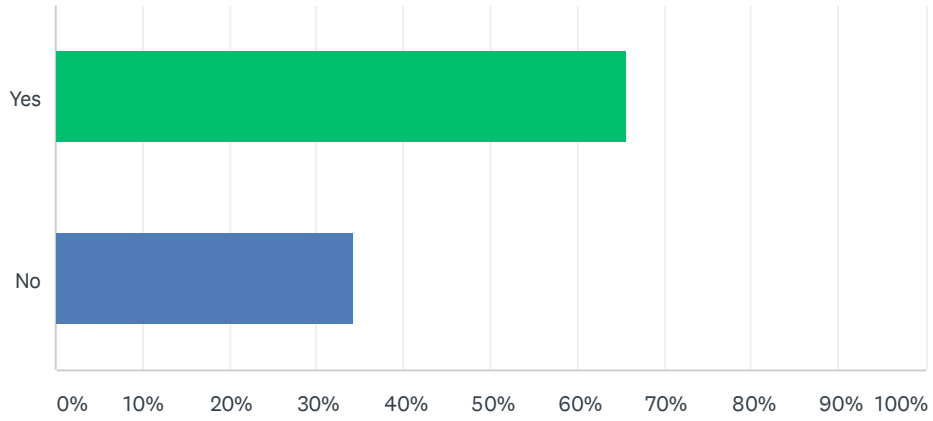


ANSWER CHOICES	RESPONSES	
Yes	62.86%	22
No	37.14%	13
TOTAL		35

#	ADDITIONAL COMMENTS	DATE
1	Two complaints were followed-up as target record inspections (for-cause) and both allegations included improper SARS-CoV-2 claims. One of the allegations also includes an application method that may not be approved by the label (electrostatic spraying). Both complaint remain open (pending action).	12/24/2020 1:32 PM
2	DATCP referred 4 such products to EPA Region 5.	12/18/2020 4:57 PM
3	Many products have been found and reported to be in the channels of trade with false and misleading SARS-CoV-2 claims. There are always entities that are anxious to take advantage of a situation and prey on people's fears. It has been seen with MRSA, Ebola, Influenza, etc.	12/7/2020 11:14 PM
4	Enforcement: During the first part of 2020, we had a case that involved an unlicensed company that was part of a nationwide franchise applying an unregistered product claiming to be a mold and mildew control, act as a general disinfectant and to "fight against COVID-19." In October of 2020 we noted two antimicrobial pesticides; one a surface disinfectant, the other an antimicrobial surface protectant that appeared to be making off-label and misleading claims. Lastly, in November of 2020, we noted a product that appeared to make claims to control Covid-19 in its advertising without EPA approval. July 2020, licensing check on devise making covid claims using heat Registrations: We had an applicant withdraw their submission of what they referred to as a "revised secondary/amended label" for a disinfectant that contained inappropriate coronavirus claims. They were also potentially trying to become a supplemental distributor of a supplemental distributor product. The company withdrew their submission upon our request. We have also encountered issues regarding registrants using the "human coronavirus" claims on their EPA labels in potentially misleading ways. For example, we have received revised label requests to add the claim "kills human coronavirus" in very large text to the front panel, or to bold "coronavirus" in the list of controlled organisms. On a case-by-case basis we have either asked for these labels to be edited, or had to accept them because they aligned with the EPA label.	12/6/2020 11:04 PM
5	We have encountered a handful of companies selling treated articles and representing them as effective against SARS-CoV-2	12/4/2020 8:52 AM
6	Several phone calls and emails about heat treatments and other products.	12/1/2020 3:11 PM
7	We have issued "stop sales" on unregistered products.	12/1/2020 2:51 PM
8	2 referrals from the Region 4 Office to follow up with to check the status and sale of disinfectant claim products. In addition, an Inspector discovered a product being distributed as a disinfectant in a 5-gallon container and not properly labeled. After investigated, labels with directions for use were properly attached to containers. Product was being applied properly.	11/30/2020 12:58 PM
9	Administrative action (2 warning letters, 1 referral to EPA) issued for two cases with improper COVID-19 claims. Administrative action (6 administrative fines, totaling \$8600, 3 warning letters) issued for 5 cases with unregistered products.	11/30/2020 9:58 AM
10	Too many to count.	11/24/2020 1:20 PM
11	One case is being handled by the WA State Attorney General's office	11/20/2020 3:20 PM
12	Product used is not registered.	11/20/2020 3:08 PM
13	All cases were referred to EPA Region 7 for enforcement.	11/20/2020 2:54 PM
14	Outcome - EPA referral and stop use orders	11/20/2020 2:09 PM
15	One company had released an advertising e-mail and label that had claims that went against the emerging pathogen rule at the time. The company corrected this and retracted the advertising after we performed a Producer establishment inspection. We reviewed the label when the company received their federal registration as part of our state registration process.	11/20/2020 11:43 AM
16	False claims, unregistered products, illegal repackaging, etc. These kinds of issues are where most of our time is spent.	11/20/2020 11:09 AM

Q9 Has your state done any outreach regarding proper disinfectant use for SARS-CoV-2?

Answered: 35 Skipped: 2

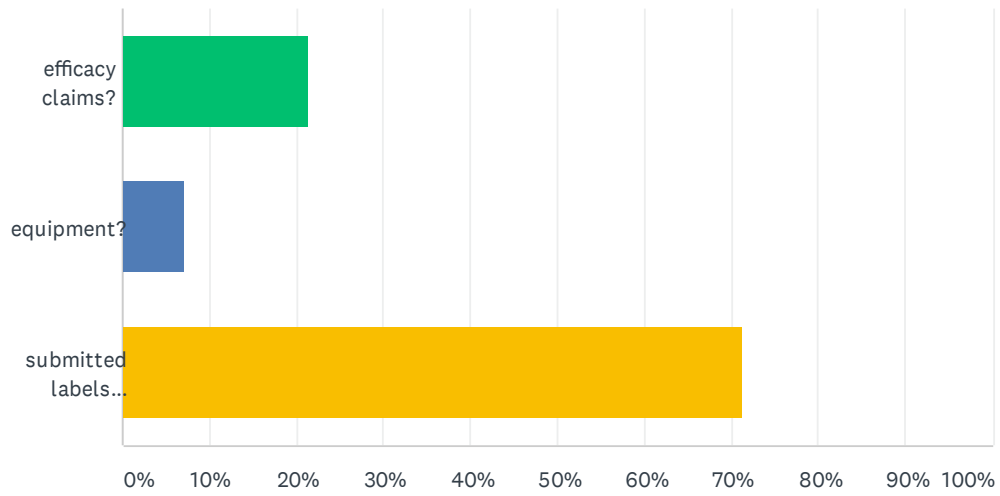


ANSWER CHOICES	RESPONSES	
Yes	65.71%	23
No	34.29%	12
TOTAL		35

#	ADDITIONAL COMMENTS	DATE
1	We have provided a cross-referenced listing of registered pesticide products in Iowa which have a primary registration also listed on EPA's List N: https://iowaagriculture.gov/sites/default/files/2020/COVID%20resources/Disinfectants%20for%20COVID-19_4-7-2020.pdf	12/24/2020 1:32 PM
2	https://datcp.wi.gov/Documents2/DisinfectantsSanitizersFactSheet.pdf	12/18/2020 4:57 PM
3	Our main pesticide webpage has information regarding the products which are registered and properly labeled for use against SARS-CoV-2. Also, a list is posted weekly of products registered in NYS which correspond to EPA's List N products. To date, an updated list has been posted for 41 weeks and currently the list contains over 2,025 products registered in NYS corresponding to EPA's posted list.	12/7/2020 11:14 PM
4	Primarily with schools and licensed applicators.	12/7/2020 12:45 PM
5	We have worked with Oregon OSHA, Oregon Health Authority and have a multi-agency workgroup within the Pesticide and Analytical Response Center.	12/6/2020 11:04 PM
6	NPIC, webinars by various agencies	12/4/2020 5:52 PM
7	We have not had any outreach, although we have answered a lot of questions from the public about disinfectant use	12/4/2020 8:52 AM
8	Webpage for proper use of disinfectants including List N updates.	12/1/2020 3:11 PM
9	School outreach to County IPM Coordinators.	12/1/2020 3:09 PM
10	Inspectors traveled to schools, daycares and other places where frequent disinfection is necessary to check on what was going on there	12/1/2020 12:43 PM
11	DPR has put out a letter to our local Commissioners informing them of the need for these business to obtain licenses to conduct disinfectant services and take a test. Other than that nothing, we probably should as more business are popping up.	12/1/2020 11:44 AM
12	We created a webpage in conjunction with our pesticide registration page for disinfectant outreach https://www.fdacs.gov/Business-Services/Pesticide-Product-Registration/Disinfectant-Use-in-Florida . In addition, we created social media posts regarding disinfectants, directing the public to List N. We also created outreach specific to schools and sent letters to every superintendent in the state.	11/30/2020 9:58 AM
13	Unknown. Our education section handles outreach. They do a good job conducting outreach; however, I am unsure what they have done regarding proper disinfectant use for SARS-CoV-2.	11/24/2020 1:20 PM
14	Mostly done in coordination with Colorado's state health department.	11/23/2020 11:50 AM
15	Information appears on our agency website.	11/23/2020 9:15 AM
16	Outreach materials provided to WA State Department's of Health and Labor & Industries	11/20/2020 3:20 PM
17	This outreach was conducted mostly by our Department's Public Information Office, not by the Pesticide Program.	11/20/2020 2:54 PM
18	Press releases and fact sheets	11/20/2020 2:09 PM
19	We did a round table discussion with a public school organization for the proper use of these types of products.	11/20/2020 11:43 AM
20	Posting EPA links and N list on our web site	11/20/2020 10:42 AM

Q10 Have you denied registration for disinfectants due to label claims regarding:

Answered: 14 Skipped: 23

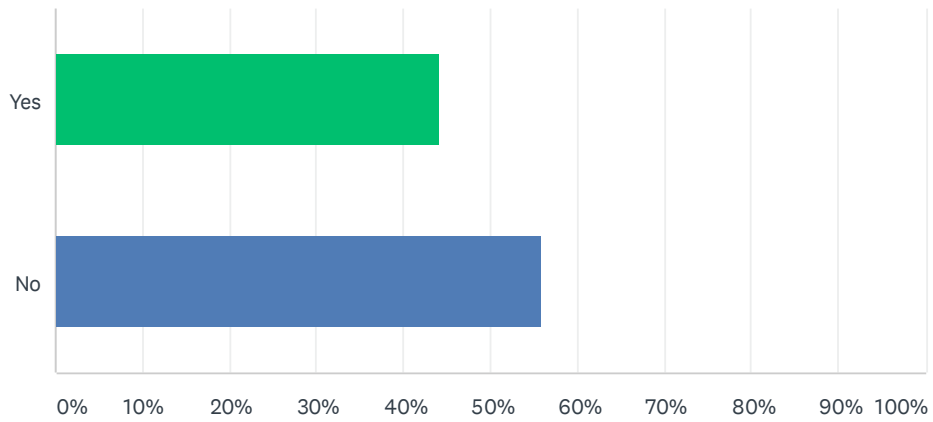


ANSWER CHOICES	RESPONSES	
efficacy claims?	21.43%	3
equipment?	7.14%	1
submitted labels inconsistent with master label?	71.43%	10
TOTAL		14

#	ADDITIONAL DETAILS	DATE
1	If a label is making claims which are not listed on the Master Label, or makes claims which differ from the Master Label language, the application is returned for revision or clarification. These claims will be primarily linked to SARS-CoV-2 / COVID-19.	12/24/2020 1:32 PM
2	Have requested corrections with submitted labels inconsistent with master label. Corrections were made and the label was registered.	12/18/2020 4:57 PM
3	We have denied registration for disinfectants for all of the above reasons. We have had problems with labels adding fogging directions and specific fogging equipment that had not been approved by the EPA.	12/7/2020 11:14 PM
4	Yes for all three of the above. Other reasons for denial include: unacceptable claims on websites and collateral labeling, incomplete labeling, incorrect storage and disposal language, unacceptable graphics, and distributors attempting to sub-register disinfectants from other distributors.	12/7/2020 12:45 PM
5	We have not denied any registrations, but we have frequently required label edits prior to registration because the submitted label was inconsistent with the master label. We are receiving a large volume of distributor product labels that are inconsistent with their master label, and/or are developed from old versions of the EPA label.	12/6/2020 11:04 PM
6	Not applicable for my agency.	12/4/2020 5:52 PM
7	We have not had to deny any product registrations for the reasons listed above.	12/3/2020 4:40 PM
8	No.	11/30/2020 12:58 PM
9	Unknown. I am in a different section unrelated to registration.	11/24/2020 1:20 PM
10	We have received applications with labels with COVID or virus claims are not on master label and not on List N. (I could only check on checkbox.)	11/23/2020 11:50 AM
11	NA	11/23/2020 9:15 AM
12	Incorrect/missing signal word, incorrect instructions for use related to contact time.	11/20/2020 3:20 PM
13	Not at this point, although we are trying to watch for misbranded labels.	11/20/2020 2:54 PM
14	As well as efficacy claims.	11/20/2020 2:09 PM
15	Claims not on the master label were seen SARS COVID claims were made before they were tested on SARS COVID-2 on disinfectant products and devices	11/20/2020 11:43 AM
16	efficacy claims too.	11/20/2020 10:42 AM
17	No registrations have been denied	11/20/2020 10:24 AM

Q11 Have you seen a disproportionate number of issues with distributor labels?

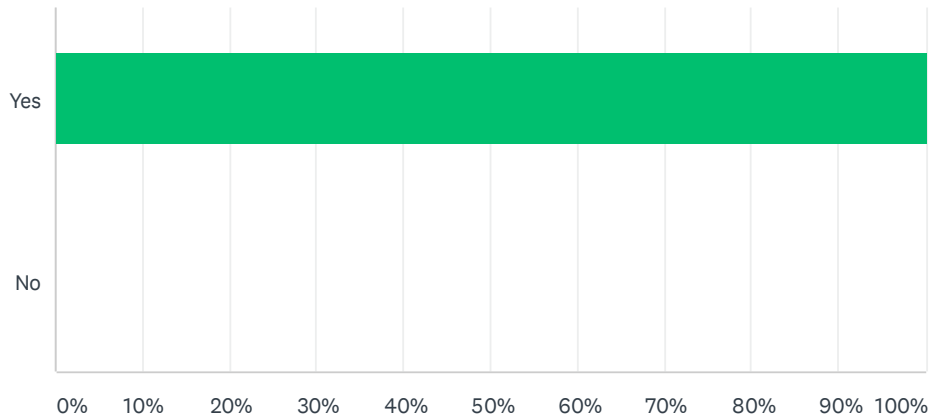
Answered: 34 Skipped: 3



ANSWER CHOICES		RESPONSES	
Yes		44.12%	15
No		55.88%	19
TOTAL			34

Q12 Do you think EPA should have more guidance regarding distributor labels, and require for primary registrants to provide this information to distributors and potential distributors?

Answered: 35 Skipped: 2

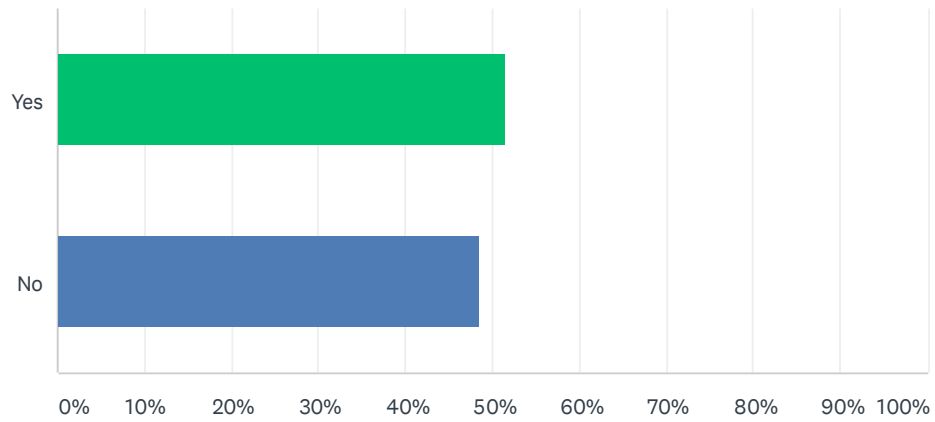


ANSWER CHOICES	RESPONSES	
Yes	100.00%	35
No	0.00%	0
TOTAL		35

#	COMMENTS	DATE
1	Ideally, I believe distributor companies should be submitting labels to the EPA for review or at the least the EPA should provide some guidance to all the registrants (both primary and supplemental distributor). Additionally, as part of the supplemental distributor agreement, the primary registrant should be guiding the distributor in terms of acceptable labels and/or label claims; however, responsibility should be on both parties in terms of meeting the requirements. Again, assistance and guidance from the EPA is crucial because there are systemic problems that states are forced to deal with on an individual basis.	12/24/2020 1:32 PM
2	This would be helpful and bring more consistency to labels. Additional communication and instructions from primary registrants to their distributors is never a bad thing, particularly if the distributor is newer and unfamiliar with the registration process.	12/18/2020 4:57 PM
3	Many distributors have absolutely no clue what they are doing or what is an EPA stamped accepted label. Many registrants do not take the legal responsibility for their distributors and their labels. A reminder to the registrants would be helpful. Perhaps an EPA webpage dedicated to supplemental distributor products would be helpful.	12/7/2020 11:14 PM
4	Many disinfectant labels do not fully comply with 40 CFR 156.10 (i)(2)(ix), location of Storage and Disposal, or with 40 CFR 156.10(a)(5). EPA needs to clearly communicate these requirements to registrants. Unfortunately, many primary disinfectant container labels do not comply with 40 CFR 156.10 (i)(2)(ix) and are also inconsistent with the master label.	12/7/2020 12:45 PM
5	This has been a problem for years which has become much worse. Based on the knowledge level of the distributors, there appears to often be little to no product stewardship by the primary registrant.	12/6/2020 11:04 PM
6	In general we see lots of issue with distributor labels....	12/1/2020 3:11 PM
7	No staff to review all labels so additional guidance to distributors would be beneficial.	12/1/2020 3:09 PM
8	I think many times the distributors are not aware of what is needed in the different states and the distributors are caught off guard when doing business especially in CA. Remind the distributor not to make claims beyond what the label allows.	12/1/2020 11:44 AM
9	distributor labels are quite often a problem in any scenario	12/1/2020 11:10 AM
10	Yes, additional guidance would be most helpful.	11/30/2020 12:58 PM
11	No comment	11/24/2020 1:20 PM
12	Letting the public know what is legal, and what isn't.	11/23/2020 11:16 AM
13	80% of all new disinfectant applications for registration were supplemental distributor labels, 15-20% of these applications had inconsistencies between the EPA approved master label and the distributor label. Most supplemental distributor product registrants elected to amend their label (some withdrew). Skeptical if the amended labels were actually distributed, however.	11/20/2020 3:20 PM
14	Our registration program is if it has an EPA number, proper paperwork and fees it gets registered. It is rare that we find problems. We have seen a significant increase in disinfectant registrations.	11/20/2020 1:07 PM
15	Guidance and some activity of actually reviewing these labels would help, especially in the situation we are in with so many new disinfectants	11/20/2020 11:43 AM
16	Absolutely yes! It seems that many businesses (especially those that produce disinfectants of any kind) don't understand redistribution and the requirements on the registrant and subregistrants. The registrant especially should be made fully aware of what is expected of them and if they don't do it, it's an easy case to take action on. As it sits now, many view registration as a hoop they have to jump through without realizing the regulations and requirements that go with it.	11/20/2020 11:09 AM

Q13 Have you submitted cases or products to EPA headquarters or your EPA Region for follow up or enforcement?

Answered: 35 Skipped: 2

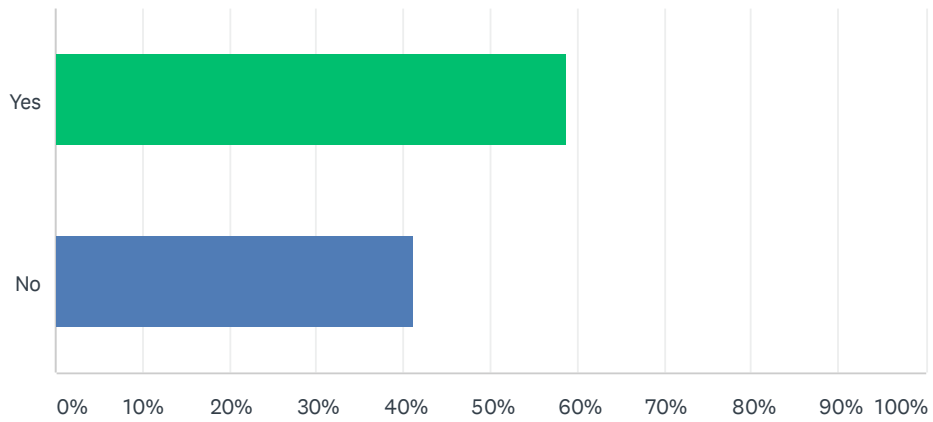


ANSWER CHOICES	RESPONSES	
Yes	51.43%	18
No	48.57%	17
TOTAL		35

#	ADDITIONAL DETAILS	DATE
1	We have not forwarded any products to EPA Region 7 but we requested consultation and guidance.	12/24/2020 1:32 PM
2	Yes, 4 products see answer above.	12/18/2020 4:57 PM
3	We routinely submit information to EPA headquarters regarding problematic products. This has increased greatly for the COVID-19 pandemic.	12/7/2020 11:14 PM
4	A few products were not registered with EPA.	12/7/2020 12:45 PM
5	All cases noted in question 8 were referred to U.S. EPA Region 10. We are in the process of an EPA referral regarding a company claiming on their website that their antimicrobial surface protectant offered residual protection against viruses and made car surfaces "virtually self-sanitizing." We are also referring a different antimicrobial surface protectant to EPA enforcement because their website claims that PPE treated with the product will kill SARS-CoV-2 for 72 hours.	12/6/2020 11:04 PM
6	A company that was sniffing around about a section 18 registration was referred to EPA for claims made on their website and social media	12/4/2020 8:52 AM
7	We sent one disinfectant wipe to the Region for review, they forwarded to Region where product was made.	12/3/2020 4:40 PM
8	It has been the other way around, Region 9 EPA has forwarded us cases.	12/1/2020 11:44 AM
9	We have referred 2 cases to EPA region 4. However, FDACS took action and worked closely with EPA for 2 cases with state violations.	11/30/2020 9:58 AM
10	Have contacted EPA region 8 on at least 14 products, primarily based on labels with applications (also check websites) but a few from other sources.	11/23/2020 11:50 AM
11	A lot of unregistered products.	11/23/2020 11:16 AM
12	Several products making unallowed label claims One case referred needed to be at a federal level for review	11/20/2020 3:20 PM
13	Mostly in the early stages of the pandemic. Two products were discovered through monitoring of internet advertising, the other was discovered when a company offering professional car cleaning services contacted us AFTER they started to distribute a misbranded product as part of their services.	11/20/2020 2:54 PM
14	We purchased disinfectant wipes through our state procurement office and it is an unregistered product from China.	11/20/2020 1:07 PM
15	Several	11/20/2020 11:09 AM
16	Unregistered product concern	11/20/2020 10:37 AM

Q14 Have you had an increase in requests for Section 18's for disinfectants or extended efficacy claims?

Answered: 34 Skipped: 3



ANSWER CHOICES	RESPONSES	
Yes	58.82%	20
No	41.18%	14
TOTAL		34

Q15 If yes to Q14, how many requests for surface disinfectants?

Answered: 22 Skipped: 15

#	RESPONSES	DATE
1	One	12/24/2020 1:32 PM
2	One	12/18/2020 4:57 PM
3	6	12/7/2020 11:14 PM
4	1	12/6/2020 11:04 PM
5	2	12/4/2020 8:52 AM
6	2	12/2/2020 9:43 AM
7	0	12/1/2020 3:11 PM
8	1	12/1/2020 3:09 PM
9	2	12/1/2020 12:04 PM
10	1	11/30/2020 12:58 PM
11	None	11/30/2020 9:58 AM
12	2	11/30/2020 8:28 AM
13	3	11/24/2020 12:51 PM
14	1. SurfaceWise2.	11/23/2020 11:50 AM
15	NA - We have received inquiries but no requests to date.	11/23/2020 9:15 AM
16	N/A	11/20/2020 3:20 PM
17	2	11/20/2020 3:08 PM
18	Na	11/20/2020 2:09 PM
19	4	11/20/2020 1:07 PM
20	1	11/20/2020 11:48 AM
21	3	11/20/2020 11:09 AM
22	4	11/20/2020 10:42 AM

Q16 If yes to Q14, how many air disinfectants?

Answered: 22 Skipped: 15

#	RESPONSES	DATE
1	None	12/24/2020 1:32 PM
2	None	12/18/2020 4:57 PM
3	2	12/7/2020 11:14 PM
4	Unknown, we are still in the initial review process	12/6/2020 11:04 PM
5	1	12/4/2020 8:52 AM
6	One "almost" request. They are trying to get the product registered with EPA but are having communication issues with HQ.	12/3/2020 4:40 PM
7	0	12/1/2020 3:11 PM
8	0	12/1/2020 3:09 PM
9	2	12/1/2020 12:04 PM
10	2	11/30/2020 12:58 PM
11	1	11/30/2020 9:58 AM
12	1	11/30/2020 8:28 AM
13	1	11/24/2020 12:51 PM
14	1. Grignard Pure.	11/23/2020 11:50 AM
15	NA	11/23/2020 9:15 AM
16	N/A, Inquires only	11/20/2020 3:20 PM
17	1	11/20/2020 3:08 PM
18	Na	11/20/2020 2:09 PM
19	1	11/20/2020 1:07 PM
20	0	11/20/2020 11:48 AM
21	0	11/20/2020 11:09 AM
22	none?	11/20/2020 10:42 AM

Q17 If yes to Q14, how many requests for addition of extended efficacy claims

Answered: 21 Skipped: 16

#	RESPONSES	DATE
1	One	12/24/2020 1:32 PM
2	None	12/18/2020 4:57 PM
3	5	12/7/2020 11:14 PM
4	1	12/6/2020 11:04 PM
5	0	12/3/2020 4:40 PM
6	2	12/2/2020 9:43 AM
7	5	12/1/2020 3:11 PM
8	0	12/1/2020 3:09 PM
9	0	12/1/2020 12:04 PM
10	1	11/30/2020 12:58 PM
11	9 inquiries, 3 of which were official requests.	11/30/2020 9:58 AM
12	1	11/30/2020 8:28 AM
13	2	11/24/2020 12:51 PM
14	NA	11/23/2020 9:15 AM
15	N/A	11/20/2020 3:20 PM
16	0	11/20/2020 3:08 PM
17	Na	11/20/2020 2:09 PM
18	4	11/20/2020 1:07 PM
19	0	11/20/2020 11:48 AM
20	0	11/20/2020 11:09 AM
21	4	11/20/2020 10:42 AM

Q18 How many Section 18 requests have you denied?

Answered: 27 Skipped: 10

#	RESPONSES	DATE
1	None, the request has not been approved or denied	12/24/2020 1:32 PM
2	None	12/18/2020 4:57 PM
3	zero officially	12/7/2020 11:14 PM
4	N/A	12/7/2020 12:45 PM
5	None yet	12/6/2020 11:04 PM
6	0	12/4/2020 8:52 AM
7	Only received the inquiry, no official review has been conducted yet.	12/3/2020 4:40 PM
8	0 so far	12/2/2020 9:43 AM
9	5	12/1/2020 3:11 PM
10	0	12/1/2020 3:09 PM
11	none at this time; still reviewing	12/1/2020 12:04 PM
12	None received	12/1/2020 11:10 AM
13	3	11/30/2020 12:58 PM
14	None, but have not approved any either.	11/30/2020 9:58 AM
15	2	11/30/2020 8:28 AM
16	Unknown	11/24/2020 1:20 PM
17	1	11/24/2020 12:51 PM
18	NA	11/23/2020 9:15 AM
19	0	11/20/2020 3:20 PM
20	0	11/20/2020 3:08 PM
21	0	11/20/2020 2:54 PM
22	Na	11/20/2020 2:09 PM
23	all in the works	11/20/2020 1:07 PM
24	n/a	11/20/2020 11:43 AM
25	0	11/20/2020 11:09 AM
26	2	11/20/2020 10:42 AM
27	Currently reviewing one.	11/20/2020 10:37 AM

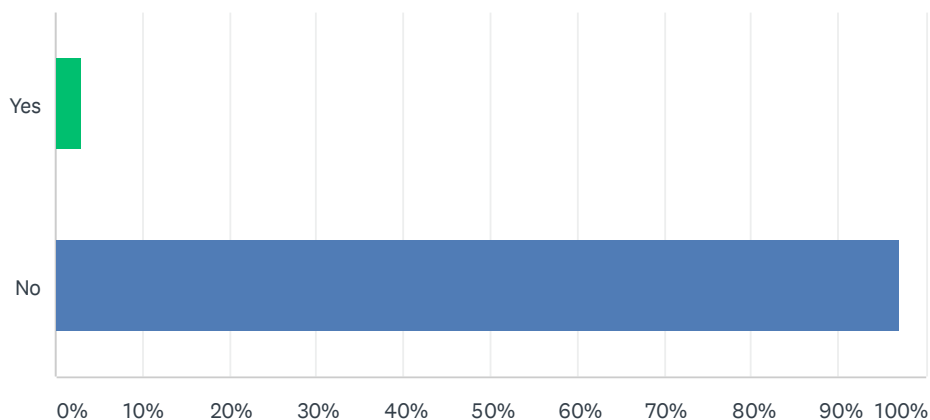
Q19 If you have denied Section 18 requests, please provide additional details.

Answered: 13 Skipped: 24

#	RESPONSES	DATE
1	n/a	12/24/2020 1:32 PM
2	DATCP requested additional information and the request was latter withdrawn.	12/18/2020 4:57 PM
3	Haven't denied any officially but don't want to send them to EPA	12/7/2020 11:14 PM
4	We have not yet denied the request. But EPA should be the agency to review and assess antimicrobials, not each state. Since this is a pandemic (world-wide), why are individual states being contacted and in some instances possibly pressured?	12/6/2020 11:04 PM
5	PDA has received 3 requests officially, however two other applications are floating around in some state of development.	12/4/2020 8:52 AM
6	Did not fit as a Section 18 request - we are unble to substantiate the claims as submitted in the application. We also are not able to ensure all guidance is followed.	12/1/2020 3:11 PM
7	Our response is that we are not approving Section 18 requests for disinfectants. The Section 18 process is in place to approve products that can be used in an emergency situation where no other labeled products are available. List N has over 500 products currently approved for use as a disinfectant against the COVID virus. Additionally, our response is for them to acquire a Section 3 label, then the registrant can register the product for use in Kentucky.	11/30/2020 12:58 PM
8	Registrant did not provided enough evidence for efficacy	11/24/2020 12:51 PM
9	Both of our Section 18 requests are still pending.	11/23/2020 11:50 AM
10	NA	11/23/2020 9:15 AM
11	N/A	11/20/2020 3:20 PM
12	Na	11/20/2020 2:09 PM
13	Registrants seeking shortcuts to sec. 3. not a state specific emergency, nationwide in scope.	11/20/2020 10:42 AM

Q20 Have you sent any Section 18 requests for extended efficacy claims to EPA?

Answered: 33 Skipped: 4

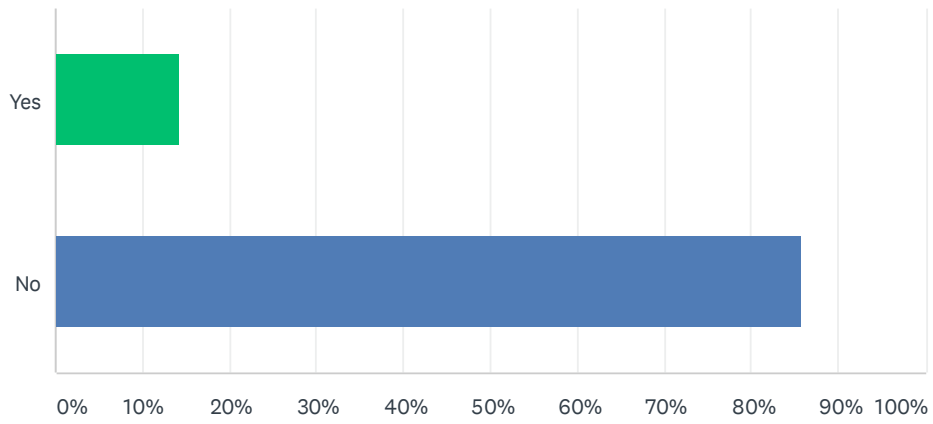


ANSWER CHOICES	RESPONSES
Yes	3.03% 1
No	96.97% 32
TOTAL	33

#	ADDITIONAL DETAILS	DATE
1	AA / SurfaceWise 2 Request pending action	12/24/2020 1:32 PM
2	Have not received any.	12/18/2020 4:57 PM
3	We have many entities anxious for us to "sponsor" a Section 18. However, there are unresolved concerns regarding the actual "emergency" and the lack of available disinfectants. There are also concerns that people will be given a false impression that the products will be the end all be all.	12/7/2020 11:14 PM
4	N/A	12/7/2020 12:45 PM
5	One request was withdrawn by the registrant as they decided to pursue a Section 3 label amendment instead. The other request is currently under review by us.	12/2/2020 9:43 AM
6	Kleen Slate Antimicrobial Tape by Verdegen LLC. Sent to EPA, denied for lack of technical support.	12/1/2020 3:09 PM
7	NA	11/23/2020 11:16 AM

Q21 During the pandemic have you registered pesticide devices, such as UV light?

Answered: 35 Skipped: 2



ANSWER CHOICES	RESPONSES	
Yes	14.29%	5
No	85.71%	30
TOTAL		35

Q22 If yes to Q21, how many?

Answered: 9 Skipped: 28

#	RESPONSES	DATE
1	n/a	12/24/2020 1:32 PM
2	5	12/1/2020 3:09 PM
3	96 new for 2020 antimicrobial devices have been registered	11/23/2020 11:50 AM
4	NA	11/23/2020 9:15 AM
5	50+	11/20/2020 6:35 PM
6	N/A	11/20/2020 3:20 PM
7	Na	11/20/2020 2:09 PM
8	47	11/20/2020 11:43 AM
9	5	11/20/2020 10:42 AM

Q23 Comments related to Q21

Answered: 19 Skipped: 18

#	RESPONSES	DATE
1	Iowa does not register pesticide devices; however, there has been a marked increase in enquiries from companies in relation to UV light and ozone generator devices.	12/24/2020 1:32 PM
2	Wisconsin does not register pesticide devices.	12/18/2020 4:57 PM
3	NYS does not register devices.	12/7/2020 11:14 PM
4	Our state does not register devices but have received many inquiries.	12/7/2020 12:45 PM
5	We would need federal guidance on device registration before we could effectively regulate devices at the state level. The burden to assess efficacy and appropriate claims should not be placed on 50 states and the territories. These devices are being marketed nationally and are being used in hospitals, long term care facilities, schools and in other areas.	12/6/2020 11:04 PM
6	PDA doesn't register	12/4/2020 8:52 AM
7	Have received several inquiries, Delaware does not charge a fee for devices.	12/3/2020 4:40 PM
8	We don't register devices.	12/2/2020 9:43 AM
9	We do not register devices.	12/1/2020 2:51 PM
10	NA. Florida does not register devices.	11/30/2020 9:58 AM
11	California only registers structural pest control devices	11/24/2020 12:51 PM
12	Colorado requires registration of any device that has or should have an EPA est. no. We currently have 431 registered devices with antimicrobial claims (excluding water filters), with 96 first registered for 2020. Not Just UV Lights.	11/23/2020 11:50 AM
13	NA	11/23/2020 9:15 AM
14	A large number of these UV devices are for use on cellular phones and personal devices	11/20/2020 6:35 PM
15	N/A	11/20/2020 3:20 PM
16	We do not register devices.	11/20/2020 2:54 PM
17	Na	11/20/2020 2:09 PM
18	We do not register devices.	11/20/2020 1:07 PM
19	There are approximately 20 more pending at the time of this survey	11/20/2020 11:43 AM

Q24 What can AAPCO/SFIREG do to help you thru this Covid 19 Response period?

Answered: 25 Skipped: 12

#	RESPONSES	DATE
1	- States need to work with EPA to formulate a more concerted response. EPA needs to issue more specific guidance regarding the registration of disinfectants in relation to SARS-CoV-2 / COVID-19 uses. EPA's guidance must address common issues, questions frequently posed by the registrants and concerns expressed by the states. - Provide updates regarding pesticide devices making claims linked to SARS-CoV-2 / COVID-19 – i.e. as and if any regulatory changes occur at a federal level. - Seek clarification of the definition, use, and acceptable claims for antimicrobial preservatives and bacteriostatic active ingredients. Most of the concerns associated with product not found in EPA's List-N and trying to make claims against SARS-CoV-2 / COVID-19 have to do with this type of pesticides. Further, the antimicrobial preservatives and bacteriostatic pesticides encountered do not have any approved use against viruses and somehow the registrants seem to assume that if a product is effective against bacteria, fungi and algae then it must also be effective against pathogenic viruses. - EPA needs to reach out to American Airlines in regards to the cumulative occupational exposure to their workers if they spray SurfaceWise 2 every 7 days. -EPA needs to clarify if the restrictions or conditions outlined in "GUIDANCE TO REGISTRANTS: PROCESS FOR MAKING CLAIMS AGAINST EMERGING VIRAL PATHOGENS NOT ON EPA-REGISTERED DISINFECTANT LABELS" are enforceable. In the response to comments by the Consumer Specialty Products Association (CSPA), EPA wrote: "... the statements authorized under this Guidance are pesticidal claims that do not meet the FIFRA registration criteria..." States need to understand if this is a voluntary guidance and if our enforcement actions on label claims linked to Emerging Viral Pathogens are expected to stand legal challenge. https://www.epa.gov/sites/production/files/2016-09/documents/emerging_pathogens_final_8_19_16_response_to_public_comments.pdf	12/24/2020 1:32 PM
2	Any additional outreach on the EPA's list N.	12/18/2020 4:57 PM
3	Address the Section 18 problem.	12/7/2020 11:14 PM
4	Communicate to EPA the importance of clearer labeling guidance and consistent messaging from EPA when responding to state inquiries. Historically, conflicting feedback received from product managers regarding the same general inquiry has frustrated states ability to gain clarity. That said, this issue has, as of late, improved.	12/7/2020 12:45 PM
5	Keep states in the loop regarding products making potentially inappropriate or dubious claims, and inquiries (e.g., regarding section 18's for disinfectants) etc. – if one state receives it, others are likely to receive it as well. Encourage EPA to work on a guidance document for primary and supplemental distributors regarding their roles, responsibilities and limitations. This has been long needed. Encourage EPA to increase efforts in protecting public health by developing meaningful written standards regarding devices. They should work with FDA and CDC if necessary.	12/6/2020 11:04 PM
6	Need EPA to help states with Section 18 review. A major problem I see is that these section 18 products may kill the virus, but what impact does this really have on COVID19 cases when the main transmission route is from person to person	12/4/2020 8:52 AM
7	In anticipation of the one Section 18 request for air purification, I would like guidance on how to proceed if an unregistered product is requested for a section 18. The only products I have ever issued Section 18's for were EPA Registered already. I don't feel comfortable registering a product that has not already been reviewed by EPA for Registration.	12/3/2020 4:40 PM
8	Encourage EPA to issue Regional or National Section 18 labels instead of individual State requests for a national issue.	12/1/2020 3:11 PM
9	I look forward to the results of this survey.	12/1/2020 3:09 PM
10	Where do we find information about proper disinfectant use, that we can pass along?	12/1/2020 2:51 PM
11	Keep us apprised of any new updates as to products added to the COVID-19 list and discuss at your regional meeting to see what other states are doing, so we maybe able to have a somewhat consistent message.	12/1/2020 11:44 AM
12	To provide any additional guidance on label review for products with disinfectant claims.	11/30/2020 12:58 PM
13	AAPCO/SFIREG can start a dialogue with EPA regarding extended efficacy claims on disinfectants. These requests do not meet the definition of an emergency condition. The definition indicates that such condition exists if there no effective registered pesticides.	11/30/2020 9:58 AM

Although there are no Sec. 3 products that have extended protection claims, there are over 600 products on EPA's List N that are registered for use against SARS-CoV-2. These are alternatives that EPA has deemed efficacious against SARS-CoV-2. If a Sec. 18 is the appropriate route, a Federal Sec. 18 may be more appropriate verses a State Sec. 18, as the sites where these products are intended to be applied are not specific to an individual state. The scope of the pandemic is national/global.

14	I appreciate the emails that I receive	11/24/2020 1:20 PM
15	Section 18's need to be national, with request from an EPA agency. States are not equipped to evaluate these. Colorado could use assistance with the wide variety of antimicrobial devices we are reviewing. Not just UV lights!	11/23/2020 11:50 AM
16	Work together.	11/23/2020 11:16 AM
17	Continue to communicate the issues facing states/territories to EPA requesting assistance as needed and sharing information from EPA to states.	11/23/2020 9:15 AM
18	Coordinate with the EPA to make the List N more accessible to SLA.	11/20/2020 6:35 PM
19	More guidance for supplemental distributors by EPA would be great. WA State expedited applications for products thought to be effective against SARS-CoV-2, but time spent educating/correcting/communicating with supplemental distribution registrants took valuable time away from processing other registrations.	11/20/2020 3:20 PM
20	Nothing at present, all seeking a Section 18 must meet all criteria on the checklist.	11/20/2020 3:08 PM
21	No suggestions.	11/20/2020 2:54 PM
22	Pressure EPA ti provide better guidance on devices, on-site generation, etc.	11/20/2020 2:09 PM
23	This public health exemption should have been done through the CDC or USHHS - until now (naive as it seems) I never thought these types of things would come through 3rd party. This seems to be an end run. This is a national scope crisis or isn't it. If not, the EPA should reject applications so all everyone knows where this stands.	11/20/2020 1:07 PM
24	Maintain communication with EPA and states for any guidance that may come out	11/20/2020 11:43 AM
25	Get EPA to provide specific registration procedures & guidance for all related issues, including devices.	11/20/2020 10:42 AM