

January 4, 2021

Susan Jennings, Immediate Office (7506P)
Office of Pesticide Programs
Environmental Protection Agency
1200 Pennsylvania Ave. NW, Washington, DC 20460-0001

Re: Draft Guidance for Pesticide Registrants on the List of Pests of Significant Public Health Importance

Dear Ms. Jennings,

On behalf of the Household & Commercial Products Association¹ (HCPA) and its members, we are submitting comments on the *Draft Guidance for Pesticide Registrants on the List of Pests of Significant Public Health Importance*. HCPA member companies register many products impacted by this list and agree that an update is warranted to facilitate the safe and necessary use of chemical, biological and other methods to control pests of public health importance. We do, however, want to address a few areas for improvement and to provide additional clarity to registrants and stakeholders.

HCPA appreciates the efforts that have gone into updating the determinations, but the basis for why an individual pest was removed or added is unclear. Undoubtedly, new information on these pests have been developed that support the change in status. HCPA recommends the Agency incorporate a synopsis of the basis for the determinations in the final version of the guidance.

HCPA appreciates that the proposal notes the “publication of the updated list does not affect the regulatory status of any registration or application for registration of any pesticide product, therefore, registrants do not need to take any action.” However, once the proposal is finalized EPA and state regulatory agencies may initiate actions that would require registrants to take an action. For example, additional efficacy testing could be required for products making label

¹ HCPA is the premier trade association representing the interests of companies engaged in the manufacture, formulation, distribution and sale of more than \$180 billion annually in the U.S. of familiar consumer products that help household and institutional customers create cleaner and healthier environments. HCPA member companies employ hundreds of thousands of people globally. HCPA represents products including disinfectants that kill germs in homes, hospitals and restaurants; air fresheners, room deodorizers, and candles that eliminate odors; pest management products for pets, home, lawn, and garden; cleaning products and polishes for use throughout the home and institutions; products used to protect and improve the performance and appearance of automobiles; aerosol products and a host of other products used every day.

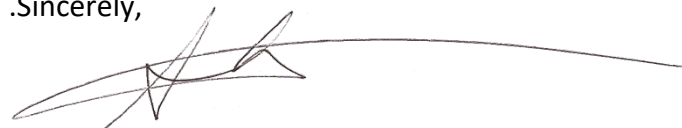
claims for a pest that changed from a non-public to public health pest. Similarly, minimum risk pesticides can make claims for non-public health pests; Federal registration could be required if one of the claims changed to a public health pest. HCPA recommends EPA expand the final guidance to better describe the potential impact upon EPA, state regulatory bodies and registrants.

HCPA provides the following comments and concerns on specific Pests of Significant Public Health Importance:

- The basis for inclusion of horn flies is unclear. While it is established that they bite cattle, it is not clear this occurs with humans.
- HCPA recommends inclusion of *Leptotrombidium spp.* as this is a primary vector of scrub typhus under *Trombidiformes* (Common Chiggers, *Eutrombicula spp.*). While not an issue in North America, scrub typhus is of concern to deployed military personnel abroad, and US military bases are considered US territories.
- HCPA agrees with the decision to remove Hobo Spider, *Tegenaria agrestis* from *Araneae*, Spiders. This removal would align EPA with CDC non-listing and the lack of evidence supporting claims that bites of the Hobo Spider cause necrosis.
- HCPA recommends adding “dysentery” to the list of “public health importance/possible clinical significant” associated with Blow flies, *Calliphoridae*, including *Phaenicia* and *Calliphora spp.*
- HCPA recommends ensuring Mosquitoes, Culicidae be adjusted to better describe the category. Many of the pest and scientific names do not align.
- HCPA recommends EPA determine if the Giant hornet, *Vespa cabro* is of public health importance even if it is not established in North America, e.g., U.S. military bases.

We thank you for this opportunity to share our comments on this important issue.

.Sincerely,

A handwritten signature in black ink, appearing to read 'Steven Bennett', with a long horizontal flourish extending to the right.

Steven Bennett, Ph.D.
Senior Vice President, Scientific & Regulatory Affairs
Household & Commercial Products Association