



March 27, 2021

Megan Patterson
Director, Board of Pesticides Control
28 State House Station
Augusta, ME 04333-0028
megan.l.patterson@maine.gov

Re: Concerns with Delay in Pesticide Product Registrations

Dear Director Patterson,

On behalf of the Household & Commercial Products Association¹ (HCPA) and its members, we wanted to convey our concerns with what appears to be noticeable delays in registration approvals for pesticidal products within your state. The products of HCPA members include antimicrobial cleaning products, insecticides and repellent products, many of which have moved through your office and have played an essential role during the pandemic. Due to the unprecedented number of applications for registration received in your state, there is a growing backlog of delays for registration of both conventional and minimum risk pesticides. The associated delays are causing significant challenges for industry to manage supply and distribution of products. I also wanted to thank you and the AAPCO Board for taking the time to listen about the impending challenges associated with label changes required by Interim Registration Review Decisions and the impact this could have upon the states in general but especially to states, like yours, struggling with a backlog of registrations.

Given the significant disruption to the market, we would like to engage in a conversation with your Department to understand the root cause of these delays and work together to uncover opportunities for improvement, share best practices and coordinate on what we as an industry can do to assist your team in the performance of your regulatory activities.

Our members are reporting the following issues:

- Delays in application reviews often exceeding 3-13 months

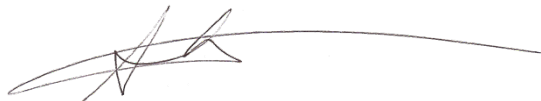
¹ HCPA is the premier trade association representing the interests of companies engaged in the manufacture, formulation, distribution and sale of more than \$180 billion annually in the U.S. of familiar consumer products that help household and institutional customers create cleaner and healthier environments. 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.

- Minimum risk (25(b)) products are 11-13 months.
- Section 3 products are 7-9 months.
- Missing seasonal product launches
 - The long and unprecedented review times are especially challenging for manufacturers of seasonal-based products which have to meet deadlines for shipping and retail distribution.
 - When registrations aren't approved in a timely or predictable fashion, consumers lack access to products for the entire season.
 - Delays in one state often preclude launch of product into retail or other states.

These issues have made it problematic for registrants who traditionally expect registrations in your state to take less than 6 months, but which are now taking much longer. These delays combined with the lack of predictability in timelines for registration approvals are causing significant market delays and disruption making it difficult for companies to meet market demands for products. This is especially challenging for products that need to meet seasonal demands and timelines for national distribution.

We would appreciate a conversation with you at your earliest convenience to better understand the issues and to explore opportunities for improvement. We thank you for this opportunity to share our comments on this important issue.

Sincerely,



Steven Bennett, Ph.D.
Executive Vice President, Scientific & Regulatory Affairs

CC: Mary Tomlinson Mary.e.tomlinson@maine.gov