



*Individuals enhancing the health and quality of life
through the suppression of mosquitoes, other vectors
and pests of public health importance.*



A Partner in the EPA's Pesticide Environmental Stewardship Program

2004-2005

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June 29, 2004

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James J. Jones, Director
Office of Pesticide Programs (7501C)
USEPA Headquarters
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Dear Mr. Jones:

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I am writing on behalf of the membership of the American Mosquito Control Association (AMCA) to express our concern with the sale of outdoor time-released insecticide misting systems to homeowners and businesses as a means to control mosquitoes. These systems utilize various synergized formulations of natural pyrethrins that are dispensed into the environment at intervals determined by the user. There are several websites advertising the sale and installation of these systems and the number appears to be growing. Our Technical Advisor and many of our members have received inquiries requesting comment on these systems. The position of the AMCA is that the practice of dispensing pesticides at predetermined intervals without surveillance data guiding the treatment is not consistent with the sound Integrated Mosquito Management practices that underlie our valued partnership with USEPA in the Pesticide Environmental Stewardship Program. We are concerned that application of pesticides through these misting systems will have several undesirable effects.

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Users of these systems would not commonly have the resources to monitor the local mosquito species and density, or to evaluate the other parameters used to establish control thresholds in professional mosquito control operations. Thus, timed space sprays may result in unnecessary insecticide use and lead to increased costs to the consumer and unnecessary environmental impacts. They will negatively impact beneficial insect populations and other non-target organisms on site and through uncontrolled off-site drift. The indiscriminate application of pyrethrins will continually select for resistance to the whole pyrethroid class of mosquitocides, all of which utilize the same fundamental mode of action.

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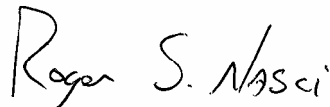
• Phone: 732-544-4645 • Fax: 732-542-3267 • E-mail: amca@mosquito.org • <http://www.mosquito.org>

The synthetic pyrethroids currently play an essential role in the mosquito adulticiding component of integrated mosquito management programs. The potential loss of these compounds from our suite of control methods, resulting from widespread development of resistance, would seriously compromise our capability to control adult mosquito populations responsible for disease transmission or severe annoyance.

It appears that safeguards to minimize the risk of direct contact with pesticide sprays by residents are lacking from these systems. Pyrethrins, though relatively safe compounds, bear the signal word "Caution" on the label, and the precautionary statements indicate that they may be harmful if inhaled. Labels also advise that pets and birds be removed and aquaria covered before spraying. Assuring homeowner compliance with these stipulations would be difficult, given that application of the pesticides is automated.

The level of hands-off, automated control these systems promise may result in homeowners neglecting to use other methods to reduce local mosquito populations. Practices such as removing mosquito larval habitats from the property or using personal repellents are essential to reducing human/mosquito contact. Neglecting these practices would, in turn, increase reliance upon the use of broadcast adulticides and propagate the unsound, one-dimensional approach to mosquito control these systems provide.

In summary the AMCA position is that the automated interval misting systems are not consistent with sound practices to promote public and environmental health and should be discouraged. We request the USEPA support this position and take appropriate action to limit the use of these products for mosquito control.

A handwritten signature in black ink that reads "Roger S. Nasci". The signature is written in a cursive, slightly slanted style.

Roger S. Nasci, Ph.D.
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