



4 January 2021

Susan Jennings
Immediate Office (7506P)
Office of Pesticide Programs
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., NW
Washington, DC 20460-001

Via email and electronic submission to www.regulations.gov

Re: National Pest Management Association comments regarding *Draft Guidance for Pesticide Registrants on the List of Pests of Significant Public Health Importance; EPA-HQ-OPP-2020-0260*

Dear Ms. Jennings:

The National Pest Management Association (NPMA), the only national trade group representing the structural pest management industry, appreciates the opportunity to comment on *Draft Guidance for Pesticide Registrants on the List of Pests of Significant Public Health Importance; EPA-HQ-OPP-2020-0260*.

NPMA, a non-profit organization with more than 5,500 member-companies from around the world, including 5,000 U.S. based pest management companies, which account for about 90% of the \$9.4 billion U.S. structural pest control market, was established in 1933 to support the pest management industry. More than 80% of the industry is made up of small businesses, many of them with 5 employees or less. NPMA acknowledges the important role that pest management professionals play in controlling pests that are threats to public health. Our member companies take their role of protectors of public health, food, and property extremely seriously and welcome further dialogue on the topic. Below we outline specific recommendations that we believe will help improve the guidance document.

Recommendations for Section II

NPMA agrees that arthropod, vertebrate, and microbial pests all play significant roles in impacting public health. With this in mind, we recommend that in addition to the potential for direct human injury, potential to spread disease causing pathogens, and contamination of human food, the description of the impacts of vertebrate pests in Section II should also include allergy and asthma triggers. The allergen Mus m 1 (excreted in mouse urine), along with Mus m 2 (found primarily in mouse hair and dander) are well-documented triggers^{1,2} for asthma and allergies, particularly in inner-city children³.

Recommendations for Appendix A

The following recommendations are made regarding Appendix A:

- Cat flea – Murine typhus is spelled incorrectly.
- Chigger mites – Family name listed is spelled incorrectly. The correct spelling of the family name for chigger mites is Trombiculidae⁴.
- Crab louse (crabs) – Scientific name listed is spelled incorrectly. The correct spelling of the scientific name for the crab louse is *Pthirus pubis*⁴.
- Mice – The column listing public health importance for mice should include allergy and asthma (see above comments).
- Listings for red fox (*Vulpes vulpes*) through mountain lion (*Puma concolor*) are missing information for public health importance/possible clinical significance.

Finally, NPMA recommends that the Asian cockroach (*Blattella asahinai*) be included on the *List of Pests of Significant Public Health Importance*. The Asian cockroach was introduced to the United States approximately 40 years ago through Tampa, Florida and has since spread to the Southeastern U.S., Texas, and Arizona⁴. The Asian cockroach shares allergenic activity with other pest cockroaches included on the list (*Blattella germanica*, *Blatta orientalis*, *Periplaneta americana*)⁵.

¹ Schumacher MJ. Characterization of allergens from urine and pelts of laboratory mice. *MollImmunol*. 1980;17:1087–1095.

² Perry T, Matsui E, Merriman B, Duong T, Eggleston P. The prevalence of rat allergen in inner-city homes and its relationship to sensitization and asthma morbidity. *JAllergy ClinImmunol*. 2003; 112:346–352

³ Ahluwalia SK, Peng RD, Breyse PN, Diette GB, Curtin-Brosnan J, Aloe C, Matsui EC. Mouse allergen is the major allergen of public health relevance in Baltimore City. *The Journal of allergy and clinical immunology*.

⁴ Smith, E. H., Whitman, R. C., & National Pest Management Association. (2007). *NPMA field guide to structural pests*. Fairfax, Va.: NPMA.

⁵ Helm RM, Squillace DL, Jones RT, Brenner RJ. Shared allergenic activity in Asian (*Blattella asahinai*), German (*Blattella germanica*), American (*Periplaneta americana*), and Oriental (*Blatta orientalis*) cockroach species. *Int Arch Allergy Appl Immunol*. 1990;92(2):154-61.

Conclusion

Thank you for the opportunity to provide comments on the *Draft Guidance for Pesticide Registrants on the List of Pests of Significant Public Health Importance*. NPMA welcomes the opportunity for continued dialogue. If you have questions, or need additional information, I can be reached via telephone or email at jfredericks@pestworld.org.

Sincerely,

A handwritten signature in blue ink, appearing to read "J. Fredericks", is placed over a light gray rectangular background.

Jim Fredericks, PhD, BCE
VP, Technical & Regulatory Affairs
National Pest Management Association