AMCA
AMERICAN MOSQUITO CONTROL ASSOCIATION

LEGISLATIVE PRIORITIES

WHO AND WHAT IS THE AMCA?

The American Mosquito Control Association is a non-profit scientific and educational professional association. Although the majority of our members are in the United States, our members and subscribers to our publications work in more than 50 countries. Our mission is to enhance health and quality of life through the suppression of vector-transmitted diseases and the reduction of mosquitoes and other public health pests by providing leadership, information, collaboration, tools, and education. The AMCA membership is composed of students, researchers, professors, regulators, public, and industry personnel, mosquito control district managers, staff, commissioners, and their trustees.

The Nation's mosquito control professionals that make up the AMCA are responsible for protecting humans and wildlife from diseases transmitted by the world's most dangerous animal – the mosquito. According to the Centers for Disease Control and Prevention (CDC), improved mosquito control capability is needed to prevent the increasing emergence and spread of exotic vector-borne diseases such as Zika and West Nile Virus.

AMCA supports the need for pesticide preemption in the 2023 Farm Bill to maintain state and federal level regulation of a pesticide's use in mosquito control applications.

We recognize that the EPA and state agencies must determine whether pesticide use can adversely affect people and the environment and must regulate pesticide use. Recently, there have been actions from localities and municipalities that directly and unjustifiably contradict EPA's scientific findings on pesticide safety. These actions risk creating an unworkable, inconsistent patchwork of state and municipal labels and regulations that can quickly disrupt our ability to prevent VBD outbreaks that occur over large geographies because mosquitoes do not respect local political boundaries.

Pesticide preemption means that only the designated state lead agency or the U.S. EPA can regulate the sale and use of pesticides, preempting localities and municipalities from banning pesticides used within that locality's borders or establishing a different set of regulations for all pesticide applications. If an applicator, whether it be mosquito control technician or farmer, uses a pesticide that was banned in a locality, the applicator may not even know about the ban or may have already purchased a product for the season. The regulatory certainty that comes from a state lead agency being the coregulator with EPA benefits all users of pesticides, no matter the industry.

AMCA supports efforts to enhance the role of USDA's Office of Pest Management Policy in the 2023 Farm Bill to improve data collection,

analysis, and stakeholder input regarding decisions impacting the sale, distribution and use of pesticides.

Authorization to create USDA's OPMP was enacted as part of the Agricultural Research, Extension, and Education Reform Act of 1998. Section 614 of that act provided that the purpose of OPMP is to provide for the effective coordination of agricultural policies and activities within the Department of Agriculture related to pesticides and of the development and use of pest management tools, while taking into account the effects of regulatory actions of other government agencies. Further, the act provided that one of the 4 principal responsibilities of OPMP is to "[assist] other agencies of the Department in fulfilling their responsibilities related to pest management or pesticides under the Food Quality Protection Act of 1996 ([FQPA -] Public Law 104-170; 110 Stat. 1489), the Federal Insecticide, Fungicide, and Rodenticide Act ([FIFRA -] 7 U.S.C. 136 et seq.), the Federal Food, Drug, and Cosmetic Act ([FFDCA -] 21 U.S.C. 301 et seq.), and other applicable laws."

While the law provides a consultative role for OPMP with EPA and other agencies, the language is vague in that these other agencies are not obligated in all circumstances to solicit or act on the input of OPMP. One caveat is that FIFRA section 25(a)(2)(A) requires the EPA Administrator to provide the Secretary of Agriculture with a copy of any draft proposed rule at least 60 days before signing it in proposed form, as well as a copy of the final regulation at least 30 days prior to signing it. This is designed to allow USDA to review and comment on proposed and final rules before these are made public. Similar requirements for Congressional Agriculture Committee notification are in place. Unfortunately, this process only applies to FIFRA actions. It does not apply to actions taken under other statutes (i.e. FFDCA, FQPA, or the endangered Species Act (ESA)). This issue has been highlighted by recent actions of EPA including tolerance revocations for chlorpyrifos, and the development and publication of an ESA workplan. The American Mosquito Control Association supports efforts in the farm bill to secure a stronger coordination role for OPMP in all pesticide policy actions, including Endangered Species Act implementation. It is important to understand OPMPs perspective on these issues.

AMCA supports the Reauthorization and Appropriations detailed in the Strengthening Mosquito Abatement for Safety and Health (SMASH) Act and the Pandemic and All-Hazards Preparedness (PAPHA) Act

In 2020, the CDC outlined a National Public Health Framework for the Control and Prevention of Vector-Borne Diseases. Why? There is a lower quality of life due to the annoyance that is caused by uncontrolled mosquito populations. Mosquitoes increasingly impact domestic animals and wildlife with over 100,000 cases of just canine heartworm diagnosed annually in the U.S. A changing climate and increased human travel is increasing the ranges of mosquitoes and the diseases they transmit. Invasive mosquito species have already spread to the United States that transmit disease-causing pathogens such as West Nile virus, chikungunya virus, dengue virus, and Zika virus. Mosquitoes can have dramatic impacts on local economies. Did you know that agitation from biting mosquitoes significantly lowers weight gain in beef cattle and milk production in

dairy cows? Disease-carrying mosquitoes can also negatively impact recreational activities and tourism which causes health and economic losses throughout the U.S.

The Nation's Vector Control Professionals need your support of the reauthorization of bills that directly affect our ability to protect the public's health, namely the Strengthening Mosquito Abatement for Safety and Health (SMASH) Act, the Pandemic and All-Hazards Preparedness (PAPHA) Act, and the Kay Hagan Tick Act.

AMCA supports the following funding measures for FY24:

Request for Agriculture Appropriations Bill - Agricultural Research Service – Support Administration request for $376,000,000 for Environmental Stewardship with direction to include $5 million for pesticide spray drift model development applicable to the unique needs of mosquito control.

If allocated, the funding would be instrumental in the development of pesticide spray drift modeling for mosquito control applications. The Agricultural Research Services' Aerial Application Technology Research Unit has been working with mosquito control officials to identify weaknesses in pesticide spray drift models that focus primarily on agricultural and forestry applications and negatively impact the availability of mosquito control pesticides as a result. Improved spray drift modeling would allow the EPA to update its pesticide review methodology for mosquito control applications.

Request for Labor, HHS, Education Appropriations Bill - $698,272,000 for Emerging and Zoonotic Infectious Diseases Account ($50 million for Epidemiology and Lab Capacity, of which $10 million is requested for data modernization. This represents a total plus-up of $10 million from the enacted FY23 omnibus.

We urge the CDC to direct funding from within the Epidemiology and Laboratory Capacity (ELC) budget to coordinate with states, mosquito control districts, universities, and other federal partners to enhance capacity for mosquito control activities and to expand nationwide surveillance of vector-borne disease through an internet-based program called VectorSurv. This funding will support state, local, tribal, and territorial agencies allowing for coordinated surveillance and abatement activities as authorized through SMASH Act provisions, included as section 607 of the Pandemic and All-Hazards Preparedness and Advancing Innovation Act of 2019 (P.L. 116-22).

AMCA supports the use of Integrated Mosquito Management on or near cannabis, hemp, and organic farms.

The growth of organic farming over the years, along with the recent expansion of both cannabis and hemp production across the United States, has presented a new challenge to Vector Control Districts. With very few products labeled for mosquito control use in these farming practices, there is a greater concern with increasing pesticide resistance in mosquito populations. Furthermore, the lack of pesticides that are registered to control mosquitoes on cannabis, hemp, and

organic farms creates a gap in the public health infrastructure to manage future vector-borne public health outbreaks.

AMCA urges the EPA to recognize that Integrated Mosquito Management needs to occur in and around cannabis, hemp, and organic farms. To facilitate this urgent need, we must fund the development of more organic pesticides that are labeled for mosquito control. Simultaneously, research needs to be conducted to develop scientific-based tolerances for cannabis and hemp crops.

AMCA supports the use of Unmanned Aerial Systems (UAS) in vector control programs.

Unmanned Aerial Systems (UAS), better known as drones, for use in the vector control industry provides numerous efficiencies, advantages, and safety over ground or manned aerial applications. UASs for mosquito control require a special provision within future legislation regarding drone use. AMCA is concerned that bills introduced in this legislative session and in States (CA and FL) are too restrictive in limiting the use of UAS for public health and vector control purposes. Vector control already faces many challenges, such as the spread of invasive mosquitoes, and disease outbreaks such as West Nile virus, Eastern Equine Encephalitis, and Zika. UAS technology is helping public agencies develop next- generation tools to meet these challenges and best utilize limited resources to provide continued public health protection to the public.

AMCA is requesting that any legislation concerning this subject matter needs to recognize the legitimate use of UAS by public and private mosquito and vector control entities with a mission to protect public health and safety and not unduly restrict our ability to explore potential future uses of unmanned aircraft for vector control.