

MEMORANDUM

To: Licensed Pest Control Operators

From: Michael D. Weyman, Ed.D., Assistant Department Head, DPR

Date: 31 October 2012

Re: Mosquito Control Guidance Document

Please allow this document to serve as guidance on the Department's position regarding pest management professionals making applications for the control of mosquitoes, *Culicidae*. Mosquitoes pose a greater threat to human health than any other animal; therefore, it is paramount the pest control industry have the ability to protect their customers. It is the Department's responsibility to facilitate that ability while making certain the applications are made according to label directions and within the confines of the appropriate licensing category. Often changes in industry or adaptations of best practices out paces legislation. Until we can effect changes in the regulations to address the discrepancies pragmatism must be the deciding factor.

The Department recognizes that in recent years the treatment of mosquito populations in residential environs has significantly gained in popularity due to a true public health concern as well as the effectiveness of these applications. South Carolina law administered by the Clemson University Department of Pesticide Regulation (DPR) requires these applications to be made by or under the direct supervision of a Licensed Commercial Pesticide Applicator. Under these aforementioned regulations, one is required to be licensed to perform the following categories of pesticide applications: Turf and Ornamental Pest Control (Category 3), Aquatic Pest Control (Category 5), Structural Pest Control (Category 7) and Public Health Control (Category 8).

Recently questions have arisen pertaining to the applicator license required to make applications to control mosquitoes. Traditionally, the expectation and interpretation of the regulations were mosquito control should be performed by individuals licensed in Category 8, due to the obvious public health component of that specific category and the many potential disease-causing agents mosquitoes are capable of vectoring. With that said, the intent of the regulations was to address those traditional applications made to control a specific pest over broad areas (i.e. large scale vector control pesticide applications for mosquito control commonly performed by a State, County or government entity).

With the advent of the popularity of residential mosquito control programs performed by Commercial Pest Control Companies, it is apparent the existing licensing structure does not adequately address the nature as well as need of these residential treatments. As previously inferred, when one reviews the study materials for the category 8 license examination it becomes clear, the intent of this category is geared toward large scale application programs focused on protecting human health over relatively large geographical areas.



When a residential mosquito program is evaluated critically it becomes self-evident that the application is made directly to ornamental plants on private property to control mosquitoes most often under some type of contractual agreement between the pest management professional, PMP, and the property owner. As a result of this, the nature of these applications poses the same inherent risk present with any traditional turf and ornamental or custom ground Category 3 application. Furthermore, these applications require the same competency and skill set addressed within the examination to obtain a Category 3 license. Although a Category 3 license is an acceptable measure of competency demonstrating the appropriate expertise required to make mosquito control applications to the landscape, certainly a Category 8 license would demonstrate equal competency and allow residential applications for the protection of public health.

The terms of this guidance document would also be applicable to individuals licensed in or working under the direct supervision of persons licensed in both Category 3 and Category 8 in regards to the treatment for mosquitos to commercial establishments, condominium complexes and apartment buildings, provided the application was confined to the immediate grounds of said establishments.

It is important to note, any mosquito control applications made to areas other than a privately owned residence or business or to those aforementioned locales must be made under the direct supervision of one licensed in Category 8. Furthermore, applications made to industrial facilities, factories, hospitals, schools, college campuses, etc. in which the settings are primarily wide open spaces with retention ponds or other bodies of water would also require the skill set of Category 8.

Additionally, it is the Department's position that an applicator licensed in Category 7a, utilizing an appropriately labeled product, does have the ability to treat for mosquitoes as part of a general pest control regimen; provided, they remain within the confines of immediately adjacent to the structure, which will be interpreted as not to extend beyond the structure's drip line. This reasoning is based on the descriptors utilized in the Category 7a verbiage, which states, "*Category 7a, Industrial, Institutional, Structural, and Health Related Pest Control*". Furthermore, Category 7a applicators are prohibited from the use of mosquito misting systems. The Category 7a license is not appropriate for wide scale mosquito treatments extending away from the structure, nor is it appropriate for dedicated residential mosquito applications.

The application of larvicides to bodies of water requires individuals working directly under the supervision of one licensed in Category 5 or Category 8.

Worthy of note, regardless of the license category pertaining to this document, ALL of the aforementioned categories are subject to the mandatory recordkeeping requirements as detailed in Section 27-1083 A (3) SCRR, as well as the direct supervision requirements as detailed in Section 27-1083 D SCRR.

In closing, it is the expectation of this Department that ALL dedicated mosquito control applications be made under the direct supervision of a Licensed Commercial Pesticide Applicator licensed in either Category 3 or Category 8. The basis for this position is the long standing precept that the site of the application is the primary consideration given to the type of necessary expertise required to perform the treatment.