

# Letter from Washington

## **Managing Bed Bugs. . .The Challenge Continues**

**B**ed bugs are the hot topic of conversation these days. When I discussed this in our last issue, we dubbed the situation the *Bed Bug Frenzy*. The frenzy continues, so we devote most of this issue of *Pesticides and You* to bed bug management that utilizes preventive practices by keeping the insect out of the places where we live, work and recreate, utilizing heat treatment when necessary. In this context, we draw attention to bed bug resistance to pesticides, a biological process that results from the typical pesticide-dependent strategies that conventional pest control relies on.

### **Regulating with alternatives in the forefront**

EPA has stepped up to educate the public on bed bugs and explains on its website that chemical treatment “alone” will not eliminate the insect problem. It is something of a milestone for EPA to suggest that the most effective program incorporates monitoring, inspecting, cleaning, and non-chemical treatments. Still, chemical treatments are mixed in among their suggested tactics, with the important caveat that only an integrated approach works. Meanwhile, EPA acknowledges the fact that pesticides may not even work, stating, “[B]ed bugs populations in different geographic areas of the country have developed resistance to many pesticidal modes of action. If you’re dealing with a resistant population, some products and application methods may only serve to make the problem worse.”

Here’s where we differ with EPA. Because of the hazards, pesticides should only be used as a last resort and then only least-toxic pesticides (which we define on our website as not linked to cancer, birth defects, genetic damage, neurological and respiratory impacts, and environment effects) should be used. EPA always urges people to read the pesticide label, which does not disclose the full range of hazards and uncertainties associated with a pesticide’s use. Comprehensive information on pesticide hazards and uncertainties is not transparent to the consumer, farmer or pesticide applicator who chooses to use a product. And the myth of safety (it’s registered by EPA, it must be safe) is still commonplace in the market. At the same time, an increasing number of consumers (like you the readers of *PAY*) and companies are taking a safer path.

Instead of alerting people to the potential dangers and uncertainties associated with pesticides and urging people to try the non-chemical approach first (sealing cracks, crevices and entryways, use of mattress encasements, etc.), EPA embraces those who say that toxic pesticides are just another tool in the toolbox. In this context, pesticides are given equal standing with cultural practices and non-chemical methods. Creating a prioritized approach would go a long way in helping to prevent the bed bug situation and others like it, brought on, in part, by a regulatory system that promotes pesticides among the preferred solutions alongside other approaches that are known to work without pesticides. This orientation in itself promotes insect, rodent and weed resistance because of extraordinary amounts of unnecessary pesticide use.

In fact, EPA’s charge to protect health and the environment from “unreasonable adverse effects” under federal pesticide law (*Federal Insecticide, Fungicide and Rodenticide Act*, FIFRA) would be best advanced by rejecting the “reasonableness” of the hazardous effect (even a risk below its current threshold of acceptable risk) if there were a method that effectively eliminated that hazard and the uncertainties associated with untested effects and chemical mixtures. Now is a good time to ask EPA officials to use their statutory authority to fully integrate in their determination of “acceptable risk” (under the “unreasonable adverse effects” standard) an analysis of the reasonableness of the risk, in light of the availability of less or non-toxic alternatives. Many people try to do this in the marketplace, when they choose products that do not contain, for example, the hazardous antibacterial triclosan (see p5 in this issue), hazardous cleaners and other products, or buy organic. Until this reform is made, EPA will allow the unreasonable release of toxicants that promote insect resistance, creating a pesticide treadmill effect that requires more toxic pesticides to treat an escalating problem that requires more pesticides, and so on.

### **Organic webpage**

With organic being the solution to pesticide pollution, we need to fully engage the public in the decisions of the National Organic Standards Board (NOSB) in regulating organic and protecting its integrity. In this issue, we launch our *Keeping Organic Strong* webpage to track ongoing issues and encourage the public to weigh in.

Here is the challenge we face. Issues of importance continually emerge before the NOSB that go to central questions, such as allowable products in organic production, the classification of materials as synthetic or nonsynthetic, sulfites in organic wine, animal welfare and stocking rates, to name a few. Sometimes an issue arrives before the board as a petition from a group or manufacturer that wants to allow a new method or material. Other times, the board’s review is a function of a five-year sunset evaluation to consider new developments and science. Regardless, the process, to work effectively, requires public involvement through the public comment period, with written submissions before the meetings or in person at the meeting. With this webpage, we seek to bring larger numbers of consumers and farmers into the decision making process to represent their interests and perspectives on the core values associated with the organic production process.



*A huge thank you to all those who supported Beyond Pesticides during our year-end appeal! Best wishes for the new year.*

*Jay Feldman is executive director of Beyond Pesticides.*