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The Idaho Pest Management Association (IPMA) is the state association that promotes professionalism in the lawn care, pest control, and grounds management industries. Providing meaningful and timely education, information, and services to enhance the quality and safety of the services offered by the membership to the public. We are a joint member of the National Pest Management Association of America and abide by their high industry standards and leadership.

IPMA strives for ultimate professionalism and integrity with our members and their employees. It is important that our applicators are competent, well-trained and follow the high standards and requirements of federal and state laws and rules. We endorse the Commercial Apprentice (CA) concept but have some recommendations to stay in line with our high standards of professionalism in our industry. Some recommendations for the General Pest Category are also included.

Commercial Apprentice (CA) Certificate:

Recommendation is that this separate "stand alone" Commercial Apprentice (CA) certificate of training (not a license) that is good <u>for a one full year period from the date of issuance</u> (similar to test scores being good for one year), has an expiration date on the certificate, and cannot be renewed. The one-time certificate fee is \$60.00. Note: This would allow the potential professional applicator to experience important practical on-site training for one full year no matter which season they started, but also provide them with the opportunity to study for the written exams during the slower season(s) like winter. A passing score and payment of the CO exam is required, along with the company insurance requirements. We concur that the supervisor requirements proposed remain the same.

GP vs OI:

General Pest (GP) control is primarily an urban, residential, and commercial business pest control category that applies to structures and adjacent areas for pest insects and rodents excluding application of *termiticide structural destroying pest control products (See Structural Pest (SP) category). Applicators with the GP category may control rodents in and adjacent to buildings *or structures according to label direction but cannot perform rodent control operations in field or non-agricultural locations not adjacent to buildings *or structures.

1. The GP category does not allow for applications of non-soil fumigation pesticide products for the control of burrowing rodents (see AF). The GP category may perform insect barrier applications to the external areas of a building or structure *(including any vegetation within six (6) feet from the foundation of the building or structure, to control harboring pests such as spiders or earwigs) and the area immediately adjacent to the building or structure. *Fogging of landscapes for mosquito control is also permissible in this category, but only as allowed on the labels.

"Adjacent to structure or building" normally is construed as *100 feet or less but will depend upon the label instructions if the label has a limit to where the product may be applied away from the building.

More clarification for the items above:

*These are the EPA label requirements for outdoor rodent bait stations. We should follow those.

*There are other structural destroying pests such as Powder Post Beetles and Carpenter Ants.

*It is standard practice and label recommended to treat the vegetation on the perimeter of the building especially for spiders where webs are often seen.

*Fogging landscapes is a labeled recommendation for proper mosquito control on landscapes.