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Cc: [Lloyd Knight](#); [Denise Lauerman](#)
Subject: IDAPA Rulemaking - Industrial Pest Categories Commodity and Non-Commodity
Date: Tuesday, June 6, 2023 3:13:10 PM
Attachments: [image001.png](#)

Good afternoon,

As we discussed during the negotiated rulemaking session on May 22nd, there was interest in separating the Industrial Pest category into two categories. The categories would be defined by the application of pesticides to a commodity, or a non-commodity. I have created a draft of the two category descriptions as seen below.

Industrial, Institutional, and Structural Pest Control – Commodity (CP)	For commercial applicators who use or supervise the use of pesticides on manufactured products or commodities in the following: Food handling establishments, packing houses, and food-processing facilities; and industrial establishments, including commodity storage facilities, grain elevators, and any other similar areas, public or private, for the protection of stored, processed, manufactured products, or commodities. Applicators must demonstrate a practical knowledge of pests associated with manufactured products or commodities, including recognizing those pests and signs of their presence, their habitats, their life cycles, biology, and behavior as it may be relevant to problem identification and control. Applicators must demonstrate practical knowledge of types of formulations appropriate for control of pests associated with manufactured products or commodities, and methods of application that avoid contamination of food, minimize damage to and contamination of areas treated, minimize acute and chronic exposure of people and pets, and minimize environmental impacts.
Industrial, Institutional, and Structural Pest Control – Non- Commodity (IP)	For commercial applicators who use or supervise the use of pesticides in, on, or around the following: Food handling establishments, packing houses, and food-processing facilities; human dwellings; institutions, such as schools, hospitals, and prisons; and industrial establishments, including manufacturing facilities, warehouses, and any other structures and adjacent areas, public or private, for the protection of stored, processed, or manufactured products. An applicant will demonstrate competency standards outlined in 40 CFR 171.103(d)(7).

If the modification to the category descriptions are acceptable, they will be added to the draft rule.

If there is interest in forming a workgroup for additional discussion to further modify the Industrial Pest Categories prior to the 6/29 rulemaking meeting, please respond to this email by the end of business on 6/13/23.

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