



REDUCING REGULATORY BURDENS ACT

ISSUE: The requirement for duplicative permits under the Clean Water Act offer no environmental or public health protections, but instead add tremendous cost and bureaucracy that only serve to endanger public health. Enactment of the Reducing Regulatory Burdens Act of 2023 will undoubtedly improve public health protections in the United States.

Background: The American Mosquito Control Association (AMCA) strongly supports the “Reducing Regulatory Burdens Act of 2023” (the text of which was introduced as HR 5089) and urges quick consideration in Congress. This legislation will eliminate costly, duplicative, and unnecessary Clean Water Act National Pollutant Discharge Elimination System (NPDES) permit requirements which impact our member’s ability to adequately control mosquitoes.

NPDES pesticide general permits (PGPs) do not add any additional environmental benefits over those included on the pesticide product label, but they add significant costs and paperwork requirements which make it more expensive to protect people from mosquitoes that can vector the Zika Virus, West Nile Virus, Dengue Fever, and other viruses. As you are aware, the robust regulatory program administered cooperatively by the Environmental Protection Agency and state lead agencies includes extensive requirements for registrants to conduct comprehensive scientific studies, and for the EPA and State lead agencies to base final determinations on science-based risk assessment to ensure that the products do not cause adverse effects to the people and the environment.

This review process culminates in the development of a legally binding product label that includes strict use instructions, along with first aid, storage and disposal and other information. Pesticides that are approved for use in, over or near water, require additional studies to ensure that the products are safe for aquatic use. Requirements related to environmental concerns derive from the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) which is the principal statute.

While the NPDES permit process amounts to an administrative nightmare, it does not add to or in any way improve the scientific review and approval process EPA and state lead agencies administer under FIFRA.

NEEDED ACTION:

The American Mosquito Control Association (AMCA) urges passages of the “Reducing Regulatory Burdens Act of 2023” (the text of which was introduced as HR 5089). This legislation will eliminate costly, duplicative, and unnecessary Clean Water Act National Pollutant Discharge Elimination System (NPDES) permit requirements which impact our member’s ability to adequately control mosquitoes.
