



State of Wisconsin
Scott McCallum, Governor

Department of Agriculture, Trade and Consumer Protection

James E. Harsdorf, Secretary

October 3, 2002

Mr. Brian Swingle
Wisconsin Landscape Federation
12342 West Layton Avenue
Greenfield, WI 53228

Dear Brian:

Thank you for your comments and your offer of assistance from the Wisconsin landscape industry regarding the recent decision on mosquito pest management.

What you see as the abrupt nature of the decision to only allow commercial mosquito control by applicators certified in category 5.0, Aquatic and Mosquito Control, was brought about by the spread of West Nile Virus. The rapid spread encountered this year coupled with a shift in industry's advertising caused us to evaluate what we were telling people about mosquito control. We did consult with other states, agencies, the EPA and persons in industry. In fact the question about allowing persons in Turf and Landscape to make mosquito applications came from one of our field staff.

The key to mosquito control lies in knowing mosquito biology. Only category 5.0 provides sufficient scientifically-based education on both lifecycles and habitats. It is necessary for all mosquito control applicators to have this training in order to provide proper pesticide use for the public, applicators and the environment. It is therefore, an improvement over former training. As it now stands, all of the required components of s. ATCP 29.30, Wis. Adm. Code (General Certification Standards) are in the existing 5.0 manual. If deemed necessary, a supplement will be added to the 5.0 training manual. I will also be rewriting the 5.0 exam so that it will include more questions on mosquito control.

There is no need to revise or clarify the provisions of s. ATCP 29.31 Wis. Adm. Code on what category is appropriate for mosquito control. The rule is very clear. Section ATCP 29.31 (5) entitled Turf and Landscape Control states, "This category includes individuals who use or direct the use of pesticides to control pests affecting turf or landscape."

Section 29.31 (8), Wis. Adm. Code entitled Aquatic and Mosquito Control states, "This category includes individuals who do either of the following:

1. Use or direct the use of any pesticide in standing or running surface water, or below the high water mark, to control pests.
2. Use or direct the use of any pesticide to control mosquitoes in water or on land."

The rationale for how we had previously dealt with the issue is that applications of some insecticides to control pests affecting turf may also suppress mosquitoes. While this is true, and will continue to be true, it does not justify the rule interpretations that persons trained to treat for pests affecting turf can advertise and solicit business to treat for mosquitoes. Nor should it be construed to mean that the individual had sufficient science-based training to assure proper application for all settings.

You are correct, there is an educational outreach issue and it is being addressed. Moreover, you are also correct in that a phase-in approach should be taken - it is being done. The 2002 mosquito control season is almost at an end, and making the announcement now, allows for a smooth transition into the next control year. Commercial pesticide businesses will have a minimum of 8 months to prepare for 2003 mosquito control. The extensive mailing of the three West Nile Virus fact sheets was part of our outreach. I sent every company with a pesticide business license in categories 3.0 or 5.0 the information (about 1000). Articles in the *Green Side Up* and *The Pest Dispatch* are also outreach tools, and I thank you for allowing me to publish articles. We will continue throughout the winter months to provide information and training.

In making our decision on what will be required of persons offering to provide mosquito control, we have considered the existing rule, the training materials available and how to address future needs. Looking at these factors it is clear that only category 5.0 is the appropriate certification category for all mosquito control.

As you are well aware, mosquitoes are no longer just a nuisance - they can and do carry deadly diseases. Protecting the health and environment of the people in Wisconsin is our main priority. I look forward to working with you and your industry to ensure that this happens.

Again, thank you for your comments.

Sincerely,

Anne M. Parrish, Ph.D.

Cc: Lori Bowman
Dave Fredrickson
Roger Flashinski
Nick Neher
Ned Zuelsdorff