THE AMERICAN MOSQUITO CONTROL ASSOCIATION

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February 10th, 2025

The Honorable Joseline A. Pena-Melnyk
240 Taylor House Office Building
Annapolis, MD 21401

RE: AMCA Comments on MD HB 386

Dear Delegate Pena-Menyk:

It has come to the attention of the American Mosquito Control Association (AMCA) that there is suggested legislation, Maryland HB 386 (cross-filed with: SB345), being considered that may unintentionally adversely impact the ability for mosquito control operations to protect the health and well-being of the residents of Maryland. We oppose HB386 in its current language, as the definition of PFAS Chemicals being used in Section A (3) does not meet the EPA definition and would thereby create confusion.

AMCA is a not-for-profit professional association of 1,200 public health officials, academicians, county trustees/commissioners, and mosquito control professionals dedicated to providing leadership, information, and education thus enhancing the health and quality of life through the suppression of mosquito and other vector activities including annoyance and burden of disease transmission. This is accomplished using integrated mosquito management techniques and best management practices carried out by trained and licensed professionals. At times it is necessary to contract commercial mosquito control professionals to assist with combating certain mosquito and vector related issues.

Maryland mosquito control programs use integrated mosquito management techniques to protect the health and welfare of Marylanders, meaning that they use surveillance data-driven thresholds to determine when to treat and with what treatment method. To carry out that public health mission we need to have as many tools available for specific treatment responses as possible. This integrated approach helps Maryland programs target specific species of mosquitoes and other vectors, as well as helping to avoid overly using active ingredients thereby reducing the possibility for resistance issues. One treatment response for mosquito control that specifically targets *Aedes aegypti* and *Aedes albopictus* mosquitoes, the species that are responsible for the transmission of Zika, dengue, chikungunya, and yellow fever viruses, relies on specific treatments. There are very limited active ingredients available for these treatments, but these include bifenthrin, lambda-cyhalothrin and deltamethrin. Similar active ingredients are needed to reduce species that transmit malaria., and this legislation would limit or eliminate those tools.

According to HB386, two of those active ingredients meet the legislation's definition of PFAS Chemicals - those chemistries that include at least one fully fluorinated carbon atom with a molecule. **This definition, however, does not meet the definition of PFAS as identified by the Environmental Protection Agency (EPA).** While we understand the risks that PFAS present as "forever chemicals", or those chemicals that are persistent in the environment, we also understand that the definition of PFAS in Maryland HB386 and EPA's definition are not the same. EPA has a narrower definition of a PFAS. Using the definition of PFAS Chemicals in HB386 would complicate regulatory efforts nationally and within the State. The EPA definition only includes compounds with longer carbon-fluorine molecule chains because the Agency has concluded that those chemicals are generally less likely to accumulate in the food chain and are potentially less toxic. If not revised, HB386 would ban certain essential tools in our tool box, that are currently registered by EPA, that we may need to combat specific disease outbreaks in Maryland. These current active ingredients have gone through a rigorous EPA registration process and have been approved for use.

In addition to the impact on mosquito control products, HB386 will have other far-reaching effects. For instance, ticks and tick-borne diseases have become a national concern, impacting public health, veterinary care, and economic productivity in Maryland. Although there are alternative methods of managing ticks such as biological approaches, including natural predators and entomopathogenic fungi, and physical interventions, such as habitat modification, integrated tick management programs still rely on residual acaricide treatments to successfully manage ticks and reduce the spread of tick-borne diseases. The definition for PFAS chemicals in HB386 would ban several of these important tick products used by homeowners and pest management professionals.

AMCA proposes that HB386 be amended to define PFAS Chemicals and adhere to EPA's definition: "PFAS Chemicals means a class of fluorinated chemicals that contain longer carbon-fluorine molecule chains, including Perfluoroalkyl and Polyfluoroalkyl substances". This will avoid putting the health and welfare of Maryland's citizens at risk. We appreciate the opportunity to provide these comments.

Sincerely,

Daniel Markowski, PhD
Technical Advisor
American Mosquito Control Association

cc: HB386 Sponsors