

US EPA ARCHIVE DOCUMENT

# PESTICIDE WORKER SAFETY REGULATORY DEVELOPMENT

PERSPECTIVES FOR  
ANTIMICROBIALS AND CONSUMER  
PRODUCTS

Pesticide Program Dialogue Committee  
November 8, 2006

# Background

- Currently general use antimicrobials are not subject to pesticide training and certification programs in any state
- In industrial settings use of biocides or other antimicrobial products not distinguished from other chemical use
- OHSA exempts use of consumer products used in the same manner as consumer uses
- FIFRA exempts from the definitions of maintenance applicators and service technicians those who use antimicrobial pesticides and consumer ready-to-use products

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# Considerations

- Inclusion of antimicrobials and consumer ready to use products would expand scope of regulations to virtually every business operation
  - Essentially no evidence that there are any issues with workplace use of antimicrobials specific to product as an antimicrobial
  - Currently, lack of full engagement of user community that would be impacted
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# Considerations

## ■ Regulatory burden and costs

- ❑ Additional regulatory burden on every business operation, including manufacturing, food processing, restaurants, hotels/motels, retailers
- ❑ Burden on institutions, including schools, healthcare, nursing homes, any public facility
- ❑ Burden on states to insure compliance increases exponentially
- ❑ Little benefit for workers or for public health
- ❑ Possible negative public health impact

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# Current Positions

- It quickly became apparent that issues involving antimicrobials quite distinct from conventional pesticides and separate subgroup and issues discussed pursued
  - Awaiting Agency determination on scope of inclusion
  - From industry perspective, do not believe there is enough stakeholder awareness and engagement
  - Benefit of expanding scope to include antimicrobials and incidental occupational use of consumer ready to use products is not apparent to justify huge regulatory and compliance assurance burdens
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