

## Chemical Control Subcommittee Update

The Endangered Species Act (ESA) continues to be a source of concern for the AMCA Chemical Control Subcommittee, and could impact our members substantially. We expect major developments in the coming year, and we'll keep you informed.

Local restrictions on mosquito control operations, associated with specific listed species, has long been a fact of life in some areas, but now we all face potentially drastic limitations on pesticide labels and/or more stringent state pesticide enforcement as a result of ongoing consultations between EPA, the US Fish and Wildlife Service (USFWS), and the National Marine Fisheries Service (NMFS). Specifically, a pilot project to assess the risks of malathion and chlorpyrifos to all ESA-listed species in the U.S. has been in development for several years, and has reached a highly controversial and contentious stage. In brief, EPA concluded in 2016 that continuing registration of these AI's for all existing uses was "likely to adversely affect" some 97% of listed species, and NMFS issued draconian mitigation measures, intended to protect listed fish, a year ago.

AMCA and registrants have vigorously opposed some processes and assumptions used in the reviews, the conclusions reached, and the proposed new requirements; and we continue to work to revise the published documents and to improve the review process for the future. Specifically, we are compiling a massive amount of information on adulticide use and deposition to help EPA refine their assessments. We have also reached out to USFWS to provide information for their consideration, and we expect a workshop with them in May, before they issue their own "Biological Opinion" on the species not covered by NMFS. Finally, we are closely following court cases that have been filed against all of the involved agencies, and we work with parties when we see opportunities to influence the decisions.

We will have significant presentations and discussions on this topic at the Annual Meeting in Orlando, and encourage you all to attend the Legislative and Regulatory sessions.