



January 15, 2019

Dr. Kim Vanneman
Commissioner, Department of Agriculture
523 E Capitol Ave
Pierre, SD 57501
agmail@state.sd.us

Re: Addressing the Delay in Pesticide Product Registration

Dear Commissioner Vanneman,

The Household & Commercial Products Association (HCPA) is the premier trade association representing companies that manufacture and sell \$180 billion annually of products used for cleaning, protecting, maintaining, and disinfecting homes and commercial environments. HCPA member companies employ 200,000 people in the U.S. whose work helps consumers and workers to create cleaner, healthier and more productive lives. Although not all of our members are involved in the manufacture and sale of pesticide products, a significant number are.

It has been brought to our attention by our membership that registration of products in South Dakota (SD) has been extensively delayed, especially for Section 3 and 25(b) products. We understand that pesticide registration is a comprehensive task, but failure to do so in a timely manner may pose a public health risk to the SD population. In some cases, members have experiencing dramatic delays of over one year. In addition, failure to register new products prohibits innovation in public health pesticides from entering SD and potentially other States as well if it is a national launch. The products sold by our members control public health pests that include insects (mosquitos, roaches, ants), rodents, and bacteria, viruses and fungi.

We request that you to address this issue in the near term for the reasons stated above. If there is anything our membership can do to help we are happy to partner with SD to facilitate these registrations.

Sincerely,

A handwritten signature in black ink, appearing to read "Allyson Azar", is positioned above the typed name.

Allyson Azar
Manager, State Government Relations

CC: Kyle Holt
Deputy Secretary, South Dakota Department of Agriculture