

STATE POLICY AFFAIRS REPRESENTATIVES (SPAR) REGULATORY PROCESS

ASSOCIATION LIAISON

One of the most vital aspects of being an NPMA State Policy Affairs Representative (SPAR) is your volunteer role as the liaison between NPMA and your state association's work in state legislative and regulatory matters.

Our SPARs have varied levels of experience with engaging their local officials and regulators; some are new to the role and are growing their networks, while others proactively engage with their elected officials and have longstanding relationships with their regulators. The purpose of this document is to assist you with general regulatory processes that will be commonly referenced in your work as a SPAR.

PESTICIDE REGULATION

In the United States, pesticides are regulated and registered under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA). Under FIFRA, the U.S. Environmental Protection Agency (EPA) oversees the federal regulation, sale, and distribution of pesticides. Once a pesticide is federally registered, state agencies act as co-regulators with the EPA. These departments are referred to as State Lead Agencies (SLAs). For most states, this agency is the Department of Agriculture, but in some states, it is the Department of Environmental Protection. SLAs can have additional requirements or restrictions on pesticides, licensing, etc., but cannot have less than the federal standard for any regulations. SLAs are also responsible for licensing all applicators within the state.

RULEMAKING PROCESS

The rulemaking process is where an agency can create or amend rules and regulations. To initiate this process, SLA's will post some type of notice or proposal to a register. From the initial publication, there will be times for public comment and engagement where NPMA and the state association will comment on the proposed rule. Like all state processes, each state can have its own nuances and specific processes. NPMA is here to assist

the SPAR and state association during rulemaking, from understanding the process to drafting comments to making introductions with certain regulators.

NPMA regularly works with regulators who are part of the Association of Structural Pest Control Regulatory Officials (ASPCRO). These are regulators who specifically work within their department's branch on structural pesticides. As a SPAR, curating and maintaining relationships with your state regulators will prove valuable when tasked to engage in current rulemakings that impact the industry.

INDUSTRY RESPONSE

There is so much information to keep track of as a SPAR; however, NPMA is here to help! As you are first getting started, we recommend you find this information:

- State Lead Agency website
- State pesticide board website
- State Register where rulemakings are published
- State Lead Agency newsletter or regular publication

NPMA provides the following services to assist in the regulatory rulemaking process:

- Tracking regulations and alerting SPARs of any relevant rulemakings
- Drafting state and national comments
- Communicating with other stakeholders and facilitating partnerships

If you have any questions about the regulatory processes in your state, please reach out to the public policy team at NPMA. We are happy to work with you to find resources and/or examples of previous rulemakings in your state.

NPMA CONTACTS

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