## State of California

## Memorandum

James W. Wells

Director

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Via: Douglas Y. Okumura, Chief

Pesticide Enforcement Branch Telephone: 4-0606

Pesticide Enforcement Branch

Person Department of Pesticide Regulation Chuck Andrews, Program Supervisor
Pesticide Enforcement Branch

Subject Pesticide Regulatory Requirements for Dibrom Wicks

This memorandum is in response to your request to research whether a regulatory requirement (i.e., Notice) applies to Plant Industry and county agricultural commissioner staff who are using dibrom on wicks placed in Jackson traps.

For your information, San Diego County has requested an interpretation from Don Henry whether trapping personnel must notify homeowners of a pesticide application pursuant to California Code of Regulations Section 6618 (Notice), and whether a warning statement is required to be placed on the body of the trap.

Section 6618 requires a person <u>performing pest control</u> to give notice to the operator of the property prior to making an application. Food and Agricultural Code Section 11403 defines pest control as the use or application of any pesticide. Persons applying dibrom to the wick are performing pest control, and must be properly trained and wear the appropriate safety equipment. However, persons hanging traps in residential yards are not performing pest control. Jackson traps with dibrom are placed in geographical areas for monitoring purposes only, and not for pest control. Therefore, Section 6618 does not apply. I was informed by Plant Industry that dibrom is used to "knock down" the fly because the sticky board will not hold the insect down. If a pest infestation is determined, dibrom is used in a pest control program by treating telephone poles.

In response to San Diego County's question on warning statements, we do not have any specific requirements for placing warning statements on traps or devices holding pesticides, except for service containers. Traps do not meet the definition of a service container. Therefore, warning statements are not required on the body of the trap, unless required by labeling.

If you have any questions, please contact me.





