

July 29, 2012

Chair and OPM Task Force,

I would like to comment on the proposed regulatory changes discussed at the July 18, 2012 OPM (Office of Pest Management) Task Force meeting. You will find a video of the meeting at:

<http://its-our-turn.com/OpmTaskForce.html>

and I will reference the time stamps in the video so you can conveniently go back and listen to everything that was said.

It is clear that the OPM Task Force has failed to reach an industry consensus. Joe Sigg of the Arizona Farm Bureau points this out at 1:52:18. The only thing there is clear consensus on is that structural pest control should fall under the Department of Agriculture.

The OPM Task Force was tasked with reviewing and streamlining the structural pesticide regulatory environment. Instead of streamlining regulations, the OPM Task Force went in the opposite direction - increasing the amount and complexity of pesticide regulation. OPM has consistently done the bidding of AzPPO (Arizona Pest Professional Organization) who has consistently lobbied for more regulation while ignoring the independent pest control operators who have submitted 294 petitions asking for reformed regulations as well as the individuals who have spoken at OPM Task Force meetings for streamlined regulation.

During his presentation, Joe Sigg said: "Regulation limits business automatically. But regulation shouldn't exist to limit business."

Going back to the October 2011 OPM Task Force meeting, at 1:54:00 Will Rousseau said: "This is still America and there shouldn't be a huge barrier to entry in getting into business". But then Will Rousseau went on to say at 2:10:50 that if small businesses don't show up, they will be ignored. Small businesses came to the meetings and did speak up and did sign 294 petitions asking for reformed regulations - and the OPM Task Force still ignored them.

The OPM Task Force has refused to consider any stakeholder other than AzPPO. The latest proposals force political subdivisions to have QPs and that was done without ever contacting the political subdivisions that will be regulated. In fact, over the last 6 - 8 years, the structural pest control regulators have tried several times to force QPs on political subdivisions and the regulators were told each time by the legislature NOT to impose QP regulations on political subdivisions. Yet here you go trying to do exactly that - again.

This behavior is not new, nor it is accidental. It is, in fact, well planned. It started

before Senate Bill 1194 was even passed - by eliminating the paragraph that prohibited ex-SPCC (the corrupt Structural Pest Control Commission) board members from being on OPM advisory committees. That paragraph was put there when OPM was created to keep out the old corrupt culture. That paragraph excluded Jack Peterson, Dave Burns and Kirk Smith from sitting on advisory committees - and the OPM Task Force is an advisory committee. So obviously that paragraph had to be removed.

The behavior continued when Jack Peterson selected the members of the OPM Task Force - apparently approved by Don Butler (Director of the Department of Agriculture), selecting two AzPPO board members to sit on the OPM Task Force while excluding any representation by independent small pest control operators.

And, of course, there has never been any interest in listening to the most affected group in all of this - the consumer. I know of one consumer who has regularly attended the OPM Task Force meetings and spoken up and the OPM Task Force has generally ignored his comments.

No, there has been a systematic exclusion and ignoring of stake holders who do not agree with AzPPO. The AzPPO lobbyist has been doing her job and AzPPO effectively owns the OPM Task Force - the best Task Force money can buy. AzPPO has also effectively taken over the OPM Pest Management Advisory Committee.

Its-Our-Turn.com has been called the "vocal opposition" by AzPPO members. We will take that as a complement. We were instrumental in sunsetting the SPCC and we will work hard to stop this latest attempt at fascism.

Sincerely,

Phyllis M. Farenga
Its-Our-Turn.com