


Pesticides: Isocycloseram, EPA-HQ-OPP-2021-0641
Indoor Use: Broad-spectrum contact insecticide to be used as a gel, spray, spot, void, or crack-and-crevice treatment with proposed urban/suburban uses for cockroaches, bed bugs, ants, and termites.
Why we care: Very highly toxic to aquatic invertebrates and toxic to fish.
Actions taken: BACWA submitted a comment letter on the new active ingredient registration decision in June 2025.
Status: EPA published response to comments in November 2025.




Next step: No Federal action until new uses added and/or registration review.

Recommendation: Consider DPR communication.

BACWA Comments to EPA (6/10/25) on Memorandum Supporting Proposed Decision to Approve Registration for the New Active Ingredient of Isocycloseram	EPA Response (Response to Public Comments on EPA’s Registration of the New Active Ingredient, Isocycloseram, Nov. 19, 2025, pp. 74-76)	Did USEPA consider BACWA’s comments?
<p>“Isocycloseram appears to be more toxic than existing pesticides for the same uses...Additionally, in the Endangered Species Act Draft Biological Evaluation, EPA determined that isocycloseram is likely to adversely affect (LAA) listed species or critical habitat. EPA noted that if the registration of isocycloseram moves forward, that it would “likely need to consult with the Services because the draft effects determinations include may affect determinations” (draft ERA, p. 178). BACWA is particularly concerned with this finding because several of the listed fish species with a predicted potential likelihood of future jeopardy include two species native to the San Francisco Bay Area, Chinook salmon and steelhead (draft ERA, Table 15-8, pg. 210).”</p>	<p>EPA acknowledged that BACWA made this comment, but did not respond.</p>	<p>No.</p>

<p>BACWA requests that EPA model indoor and in-sewer uses to ensure that uses affecting POTWs are addressed. POTW modeling is needed to inform POTW-specific mitigation measures.</p>	<p>“EPA expects there to be fewer indoor and overall drain and sewer uses compared to agricultural and outdoor residential uses; EPA does not believe that raw production volume is reflective of the small percentage of down-the-drain type uses. Therefore, EPA’s assessment accounts for the uses of isocycloseram that dominate the risk profile (i.e., agricultural and outdoor residential). In lieu of conducting quantitative down-the-drain modeling, EPA considers the measured concentrations and those modeled for agricultural applications as surrogate concentrations for residential uses. Therefore, mitigation measures prescribed for agricultural and outdoor residential uses are protective of risk associated with indoor uses. Furthermore, as described in response to the following comment, restrictions have been added to labels to reduce down-the-drain exposure.”</p>	<p>Partially. While EPA equating agricultural use of this pesticide with indoor use does not make sense, EPA did add further label restrictions, per BACWA’s comments. (see below)</p>
<p>BACWA requests that the use of isocycloseram in sewers be removed from all proposed pesticide labels.</p> <p>BACWA requests that EPA remove the use of isocycloseram in and around sewers from all proposed pesticide labels including the proposed A22128 Cockroach Gel Bait label:</p> <ul style="list-style-type: none"> In Section 3.0 PRODUCT INFORMATION, BACWA requests the following text be removed (see strikethrough): <i>A22128 Cockroach Gel Bait can be applied indoors or outdoors as a crack-and-crevice, spot, or void treatment in and around residential homes, industrial facilities, offices, warehouses, commercial kitchens, supermarkets, hospitals, schools, nursing homes, hotels/motels, buses, trains, aircraft, retail and commercial establishments, agricultural facilities, sewers, and other areas infested with cockroaches.</i> In Section 3.2.1 Applications in Non-Food Areas, BACWA requests the following text be removed (see strikethrough): <i>Non-food/non-feed areas include areas such as garbage rooms, lavatories, floor drains (to sewers), entries and vestibules, offices, locker rooms, machine rooms, boiler rooms, garages, mop closets, and storage (after bottling or canning). Refer to section below for use directions and restrictions when making applications in food/feed handling areas of Food/Feed-Handling Establishments.</i> In Section 4.1.2 Outdoor Use, BACWA requests the following text be removed (see strikethrough): <i>A22128 Cockroach Gel Bait may also be applied as a spot or thin bead to pest entry sites such as along windows, doors, walls, and between construction elements; drains leading to sewers; adjacent trees that can harbor cockroaches; garbage holding areas; or other placement sites where cockroaches harbor.</i> In Section 5.1 Use Restrictions, BACWA requests that the following text be added as a use restriction: DO NOT apply inside sewers or sewer drains. <p>BACWA requests that isocycloseram pesticides labels</p>	<p>“While products should not be used in sewers or drains, some products may be used around perimeters of sewers or drains. For these products, EPA has added the following statements and graphic to reduce down-the-drain exposure pathways. To be clear, a product could contain one or more of these statements, as appropriate:</p> <ul style="list-style-type: none"> “Do not pour down drains or sewers. Call your local solid waste agency for local disposal options.” “When applying near sewers or drains, only apply using a coarse, low-pressure spray.” {only for A21550 400SC (EPA Reg. No. 100-1707)} “When applying near drains or sewers (that are not storm or runoff drainage systems), only apply to the external perimeters (mouth/rim of sewer) and underside of sewer lids. Do not apply inside sewers or drains.”  “Do not apply to storm drains.” “Do not use on washable textiles or fabrics.” <p>“The Pesticide Registration Improvement Act of 2022 requires certain portions of pesticide product labels to be translated into Spanish. These efforts will foster better understanding and</p>	<p>Yes. EPA added several label warnings, pictograms, and Spanish translations, per BACWA’s request.</p>

<p>include drain discharge prohibition language in both English and Spanish as well as simple graphic, as adopted for all pyrethroid products.</p> <p>“Do not pour down the drain or sewer. Call your local solid waste agency for local disposal options.”</p> 	<p>compliance with label instructions. PRIA 5 provides deadlines for having bilingual labeling on pesticide products which range from December 2025 for Acute Toxicity Category II products to December 2030 for non-agriculture, non-restricted use, and products with acute toxicity categories of III and IV.”</p>	
<p>BACWA requests that the use of isocycloseram be forbidden on washable fabrics or textiles.</p> <ul style="list-style-type: none"> • In Section 6.2 Bed bugs, BACWA requests the following text be added: Only apply to non-washable fabrics and textiles. • In Section 6.2 Bed bugs, BACWA requests the following text be added to the existing sentence in this section: Remove all washable items in area such as bed linens, pillows, pet bedding, and rugs, before treating mattresses and allow spray to dry before remaking the bed. • In Section 5.0 USE RESTRICTIONS AND PRECAUTIONS, BACWA requests that the following text be added as a use restriction: DO NOT apply to washable textiles and fabrics, including bed linens, washable rugs, etc. 	<p>“For application to bed bug infestations, the label permits use on mattresses, box springs, furniture, and empty luggage. There are explicit instructions included to remove bed linens before treating mattresses, and to allow spray to dry before remaking the bed. Because there is no direct application to washable fabrics, any exposure because of washing is expected to be residual and not result in exposure concerns.”</p> <p>“For application to bed bug infestations, the label permits use on mattresses, box springs, furniture, and empty luggage. There are explicit instructions included to remove bed linens before treating mattresses, and to allow spray to dry before remaking the bed. Because there is no direct application to washable fabrics, any exposure because of washing is expected to be residual and not result in exposure concerns.”</p> <p>EPA added the following statement to labels: “Do not use on washable textiles or fabrics.”</p>	<p>Mostly. EPA added an explicit statement forbidding use on washable textiles and fabrics, but did not use BACWA’s preferred language which would be more explicit in Sections 6.2 and 5.0 of the labels.</p>
<p>BACWA requests a minimum of 60-day comment periods for future pesticide registration comment periods.</p>	<p>“While not mandated by law, EPA offers an opportunity for public engagement when the proposed decision memo is published for a new active ingredient. A public comment period was held for 30 days based on the normal practice.”</p>	<p>No.</p>