

Consensus Statement on the Public Health, Food Safety, and Regulatory Implications of Banning Insect Sticky Traps

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We, the undersigned entomologists and pest management professionals, write to express serious concern regarding the decisions by the Cities of Culver City, Ojai, and West Hollywood to ban the use of sticky traps for insects.

Sticky traps are a **foundational component of Integrated Pest Management (IPM)**, a science-based framework adopted globally to protect public health, food safety, and the environment while minimizing reliance on pesticides. The primary function of sticky traps is **monitoring and assessment**. They provide objective data on pest presence, species identity, population density, spatial distribution, and treatment efficacy. This information allows practitioners to apply **targeted, minimal, and evidence-based interventions**, reducing unnecessary chemical exposure.

Sticky traps are widely recognized by public health agencies, food safety authorities, regulatory bodies, and academic institutions as **safe, non-toxic, and essential tools**. Their removal fundamentally compromises the integrity of IPM programs and produces predictable, harmful downstream effects.

Public Health Implications of Specific Vermin

German Cockroaches

German cockroaches are among the most significant indoor public health pests. Cockroach allergens are a well-established trigger for asthma, particularly in children, and are associated with increased emergency department visits, hospitalizations, and missed school days. Effective management requires **early detection, precise mapping of infestations, and continuous verification of control success**—all of which depend on sticky traps.

Research led by Dr. Dini Miller has demonstrated that **assessment-based pest management programs (APM)** can rapidly eliminate German cockroach infestations. These programs rely on sticky traps to guide treatments. Banning sticky traps makes implementation of this proven, evidence-based approach impossible, directly undermining efforts to reduce indoor allergen loads and protect vulnerable populations.

Flies

Flies are mechanical vectors capable of transmitting pathogens associated with foodborne illness. In food service, healthcare, and other sensitive environments, **insect light traps using sticky boards** provide non-chemical population suppression and essential monitoring data. These devices are a standard component of sanitation programs and regulatory compliance.

Eliminating sticky traps from fly management predictably increases reliance on **aerosol sprays and residual insecticides**. This outcome directly contradicts the California Department of Pesticide Regulation's **Sustainable Pest Management (SPM)** goals, which prioritize prevention, monitoring, and reduced pesticide exposure.

Food Safety and Supply Chain Risks

Pheromone-Based Insect Monitoring in Food Manufacturing and Distribution

Sticky traps are integral to **pheromone-based monitoring systems** used throughout food manufacturing, processing, storage, and distribution facilities. These systems detect stored-product pests such as moths and beetles at extremely low population levels, often **before product contamination or regulatory violations occur**.

These traps function primarily as **early warning and verification tools**, enabling localized intervention, preventing widespread infestations, and avoiding unnecessary chemical applications in food environments. Removing them eliminates a critical preventive control measure, increasing the risk of undetected infestations, product loss, recalls, regulatory enforcement actions, and disruptions to food supply chains. Ironically, banning these non-toxic monitoring tools increases the likelihood that more aggressive and intrusive interventions will be required later.

Non-Pheromone Stored-Product Pests and General Monitoring

In addition to pheromone-targeted species, many stored-product pests—including flour beetles (*Tribolium* spp.), sawtoothed grain beetles (*Oryzaephilus* spp.), drugstore beetles, and cigarette beetles—are routinely monitored using non-pheromone sticky traps. These pests can infest a wide range of finished goods and packaging materials and may not be reliably detected through visual inspection alone. Sticky traps provide continuous, low-level monitoring that allows facilities to identify emerging infestations early, verify sanitation and exclusion efforts, and demonstrate compliance during food safety audits. Eliminating these monitoring tools increases the likelihood that infestations will go unnoticed until contamination occurs, at which point corrective actions become more disruptive, costly, and chemically intensive, increasing risks to both food safety and supply chain stability.

Regulatory and Professional Conflicts

Conflict With Established IPM Standards and Professional Practice

Sticky traps are embedded throughout **professional standards, academic curricula, and best management practices** for Integrated Pest Management in structural, institutional, and food-handling environments. They are routinely taught in university entomology and extension programs, incorporated into professional certification and licensing training, and relied upon in routine practice by pest management professionals, facility managers, and public health officials (including the CDC, EPA, and HUD).

As monitoring and assessment tools, sticky traps are foundational to IPM decision-making: they provide objective evidence needed to identify pest species, determine infestation severity, establish action thresholds, and evaluate the effectiveness of interventions. Municipal bans that prohibit these tools disrupt the basic workflow of science-based pest management and create a disconnect between how professionals are trained to operate and what local policy allows them to do. Practitioners are placed in untenable positions where compliance with municipal ordinances directly conflicts with accepted standards of care, professional responsibility, and evidence-based practice.

Conflict With California Department of Pesticide Regulation's Sustainable Pest Management (SPM) Framework

California's Department of Pesticide Regulation (DPR) has adopted **Sustainable Pest Management (SPM)** as a guiding framework for reducing risks to human health and the environment. SPM emphasizes prevention, monitoring, informed decision-making, and the use of **least-toxic and non-chemical tools** before resorting to pesticide applications.

Monitoring is a core pillar of SPM. Without reliable monitoring data, pest management decisions become reactive rather than preventive, and pesticide use becomes broader, less targeted, and more frequent. Sticky traps are among the most widely used and effective monitoring tools precisely because they are **non-toxic, passive, and highly informative**.

By banning sticky traps, municipal policies directly undermine the principles of SPM by:

- Eliminating non-chemical monitoring tools
- Increasing reliance on indoor pesticide applications
- Reducing the ability to verify whether treatments are necessary or effective

This creates a regulatory contradiction in which local ordinances promote outcomes that conflict with state-level goals and guidance. Facility managers and pest management professionals are left navigating inconsistent policy signals, increasing compliance challenges and weakening the overall effectiveness of California's pest management framework.

Impact on Sensitive and Regulated Environments

Sticky traps are especially critical in environments where chemical controls are restricted or undesirable, including:

- Schools and childcare facilities
- Healthcare and long-term care facilities
- Public housing
- Laboratories
- Animal care facilities

In many of these settings, sticky traps represent the **least intrusive and lowest-risk option** for monitoring pest activity. Their removal forces managers to choose between regulatory non-compliance or higher-risk interventions.

Equity and Environmental Justice Impacts

The consequences of reduced monitoring and increased pesticide use are not evenly distributed. Asthma, allergen exposure, and pest-related health burdens disproportionately affect children, low-income communities, and residents of multi-unit housing. Banning the use of sticky traps risks **exacerbating existing health inequities**.

Conclusion

By banning sticky traps, these cities have removed a **proven, non-toxic public health and food safety safeguard**, undermined science-based IPM, and increased reliance on indoor insecticides. These actions elevate risks of asthma exacerbation, disease transmission, food contamination, chemical exposure, and regulatory non-compliance in the very environments these policies are intended to protect.

We urge municipal decision-makers to reconsider these bans and to engage meaningfully with entomologists, public health experts, food safety professionals, and pest management practitioners. **Effective pest management begins with monitoring, assessment, and prevention**. Policies that eliminate these foundational tools are incompatible with public health protection and sustainable pest management.

Signed,

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