PUBLIC CODE CHANGE PROPOSAL FORM
FOR PUBLIC PROPOSALS IN THE INTERNATIONAL CODES

2007/2008 CODE DEVELOPMENT CYCLE
CLOSING DATE: All Proposals Must Be Received by August 20, 2007
The 2007/2008 Code Development Hearings are tentatively scheduled for
February 18 – March 2, 2008, location TBD.

1) Name: Tom Neltner
   Jurisdiction/Company: National Center for Healthy Housing
   Submitted on Behalf of: National Center for Healthy Housing and Alliance for Healthy Homes
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   City: Silver Spring State: Maryland Zip Code: 21044
   Phone: 443-539-4160 Ext. Fax: 443-539-4150 E-mail address: tneltner@nchh.org

2) Copyright Release: In accordance with Council Policy #28 Code Development, all Code Change
   Proposals, Floor Modifications and Public Comments are required to include a copyright release. A copy of the copyright release form
   is included at the end of this form. Please follow the directions on the form. This form as well as an alternative release form
   can also be downloaded from the ICC website at www.iccsafe.org. If you have previously executed the copyright release,
   please check the box below:

3) Indicate appropriate International Code(s) associated with this Public Proposal – Please use Acronym: IPMC
   If you have also submitted a separate coordination change to another I-Code, please indicate the code: N/A
   (See section below for list of names and acronyms for the International Codes).

4) Be sure to format your proposal and include all information as indicated on Page 2 of this form.

5) Proposals should be sent to the following offices via regular mail or email. An e-mail submittal is preferred, including an electronic
   version, in either Wordperfect or Word. The only formatting that is needed is BOLDING, STRIKEOUT AND UNDERLINING.
   Please do not provide additional formatting such as tabs, columns, etc., as this will be done by ICC. REMOVE TRACKING
   CHANGES, AUTOMATIC NUMBERING, OR ANY OTHER ADVANCED FORMATTING TOOLS THAT ARE
   PROVIDED BY WORD, FROM FILES CONTAINING YOUR CODE CHANGE PROPOSAL THAT YOU SEND TO ICC.

Please use a separate form for each proposal submitted. Note: All code changes received will receive an acknowledgment.

Please check here if separate graphic file provided. ☐

Graphic materials (Graphs, maps, drawings, charts, photographs, etc.) must be submitted as separate electronic files in .CDR,.IA,.TIF
or .JPG format (300 DPI Minimum resolution; 600 DPI or more preferred) even though they may also be embedded in your Word or
Wordperfect submittal.

<table>
<thead>
<tr>
<th>Code</th>
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<tr>
<td>IBC - International Building Code</td>
<td>International Code Council</td>
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<tr>
<td>IEBC - International Existing Building Code</td>
<td>Chicago District Office</td>
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<tr>
<td>IFC - International Fire Code</td>
<td>Attn: Diane Schoonover</td>
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<tr>
<td>IFGC - International Fuel Gas Code</td>
<td>4051 West Flossmoor Road</td>
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<td>IPC - International Plumbing Code</td>
<td>Country Club Hills, IL 60478-5795</td>
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<td>IPSDC - International Private Sewage Disposal Code</td>
<td>Fax: 708/799-0320</td>
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<td>IPMC - International Property Maintenance Code</td>
<td><a href="mailto:codechanges@iccsafe.org">codechanges@iccsafe.org</a></td>
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<td>IWUIC - International Wildland-Urban Interface Code</td>
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<td>IZC - International Zoning Code</td>
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<td>IECC - International Energy Conservation Code</td>
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<td>IMC - International Mechanical Code</td>
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<td>IRC - International Residential Code</td>
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International Code Council
Birmingham District Office
Attn: Annette Sundberg
900 Montclair Road
Birmingham, AL 35213-1206
Fax: 205/592-7001
codechangesbhms@iccsafe.org
### Proposal

**NOTE:** PLEASE READ ITEM 5) of the first page of this form for formatting instructions.

Revise as follows:

**EXTERMINATION.** The control and elimination of insects, rodents or other pests by eliminating their harborage places; by removing or making inaccessible materials that serve as their food or water; by trapping; and, when necessary, by use of registered pesticides consistent with label instructions in a manner that effectively controls the pest with the lowest exposure to occupants. 

### Supporting Information

The current language has several shortcomings:

1. It does not address the need to restrict pests’ access to water. Pests such as cockroaches and mice rely on regular sources of moisture to survive. Because many pests eat standard building materials, controlling food without controlling water is not effective extermination.
2. The term “poison spraying” is too narrow: some effective pesticides are not poisons. Pesticide is the more common and appropriate term.
3. In the United States and in most countries, pesticides must be registered by the federal government and used in a manner consistent with the label instructions.
4. The specification of spraying and fumigating suggests that those methods are preferred over other methods and may be interpreted as a requirement. However, current research indicates that many pests are more effectively controlled by baits containing pesticides or insect growth regulators. Spraying and fumigating are not particularly effective methods for controlling rodents and cockroaches, and exposure to pesticides through spraying and fumigation endangers human health. See Comparison of Costs and Effectiveness for Cockroach Control Case Study at [http://www.healthyhomestraining.org/ipm/Case_Study_Costs.pdf](http://www.healthyhomestraining.org/ipm/Case_Study_Costs.pdf) to compare the latest research.

The proposed language addresses these shortcomings by adding water to the list of materials that should be inaccessible; by using updated terms; by requiring compliance with the label instructions; and by setting performance standards for the selection of the pesticide. The pesticide needs to effectively control the pest and reduce exposure to occupants. Exposure is a reasonable surrogate for risk to occupants and is more easily assessed by a code inspector.

### Referenced Standards

None

### Cost Impact

The proposal will not increase the cost of construction or the cost of maintaining and operating existing buildings. If implemented, it should reduce the costs of maintaining and operating existing buildings.