



Steve Troxler  
Commissioner

North Carolina Department of Agriculture  
and Consumer Services  
*Structural Pest Control and Pesticides Division*

James W. Burnette, Jr.  
Director

MEMORANDUM

To: Licensees, Certified Applicators, Property Managers, Property Owners, Assisted Living Managers, Pesticide Applicators, Code Enforcement Officers, Health Department Officials, etc.

From: Jim Burnette, Director Structural Pest Control and Pesticides Division, NCDA&CS

Subject: Treatment for Bed bug Control

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With the increase in bed bug awareness in North Carolina, the Structural Pest Control Section has received numerous calls from different groups of people about whether or not a license is required to apply pesticides to control bed bugs in the property they own or manage. The Structural Pest Control Law addresses when it is legal to conduct pest control on property you own or property you manage.

The Structural Pest Control Law (Article 4C of Chapter 106 of the General of North Carolina) states:

**106-65.25. Phases of structural pest control; prohibited acts; license required; exceptions.**

(b) It shall be unlawful for any person to:

(1) Advertise as, offer to engage in, or engage in or supervise work as a manager, owner, or owner operator in any phase of structural pest control or otherwise act in the capacity of a structural pest control licensee unless the person is licensed pursuant to this Article or has engaged the services of a licensee as a full-time regular employee who is responsible for the structural pest control performed by the company. A license is required for each phase of structural pest control.

(3) Use a restricted use pesticide in any phase of structural pest control, whether it be on the person's own property or on the property of another, unless the person:

- a. Qualifies as a certified applicator for that phase of structural pest control; or
- b. Is under the direct supervision of a certified applicator who possesses a valid certified applicator's identification card for that phase of structural pest control

(d) A license is not required for any person (or the person's full, time regular employees) doing structural pest control on the person's own property. No fee may be charged for structural pest control performed by any such person.

Before treating for any structural pest (ants, roaches, fleas, bed bugs, etc.), ask the following questions:

1. **Am I the property owner or am I (the applicator) employed by the property owner?** If the answer is yes, you can legally apply the pesticide product on the property owned by you or any property owned by your employer. *See question #2 with respect to applications of restricted use pesticides (RUP's)*

**Structural Pest Control and Pesticides Division**  
Structural Pest Control Section ● Phone: (919) 733-6100 ● FAX: (919) 733-0633  
Pesticide Section ● Phone: (919) 733-3556 ● FAX: (919) 733-9796  
1090 Mail Service Center, Raleigh, North Carolina 27699-1090  
[www.ncagr.com/fooddrug/pesticid/](http://www.ncagr.com/fooddrug/pesticid/)

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2. **May I use a Restricted Use Pesticide (RUP)?** If you are the property owner or the applicator employed by the property, you must obtain a Structural Pest Control Certification before purchasing and applying a RUP.
3. **What if I or my employees manage the property for another?** You can not legally apply any pesticides or use other methods for the control of structural pests without first obtaining a Structural Pest Control License. Any pest control work in this situation must be done by a licensed pest control company.

Having an Ornamental & Turf, Public Health or any other license issued by the Pesticide Section under the North Carolina Pesticide Law **does not allow you to conduct bed bug control.**

Bed bugs are structural pests and their control is regulated under the Structural Pest Control Law.

Bed bugs are a resilient and hard to control insect because they are small and they hide well. If you are not well studied in bed bugs and bed bug control, it is recommended under most circumstance to contract with a professional pest control company to remedy your bed bug problems. If you decide to treat the infestation yourself and you are legal to do so,

**READ and UNDERSTAND the label.**

- **Carefully read the label before applying any pesticide. Apply the product only if you fully understand the instructions, and if you have the appropriate training/certification and equipment.**
- **Do NOT apply any insecticide or pesticide to mattresses or to surfaces that would be in direct contact with a person, unless the label instructions specifically state that the product can be applied in that manner. Some products can be harmful to people and pets.**
- **Do NOT use pesticides labeled for outdoor use only---indoors.**
- **Do NOT apply pesticides in/on sites not specified on the label (off-target)**

As the applicator, you must realize that it is a violation of both federal and state law to use a pesticide inconsistent with its labeling. As the applicator, you are responsible for the methods and materials used when applying any pesticide. A licensed Pest Management Professional may perform these tasks more effectively, safely and legally.

If you have any questions concerning this or other structural pest control regulatory issues, please contact the Structural Pest Control & Pesticides Division.