

SFIREG Policy Operations and Management (POM)

Liaison: Jim T Criswell

Report prepared on 2-14-02

Committee Members:

Jack Peterson, AZ, Chair; Ken Davis, AZ, Charlie Clark, FL; Sharron Stewart, NC; George Robinson, ID; Phil Tham, TX; Dave Fredrickson, WI; Mary Ellen Setting, MD; Jim Leland, VT; Ken Davis, AZ; Jerry Kirbach, IL; and Bob Lazzara, NY. Tim Creger, NE, , Sandy Wells, OK, Kennan Garvey, Jim Roelofs, and Georgia McDuffie, Field & External Affairs Division (FEAD), Office of Pesticide Programs (OPP), EPA; Jack Neylan, Office of Compliance (OC), EPA; Jeaneanne Gettle, EPA Region IV

Statement of Committee Purpose:

Liaison between EPA and AAPCO on pesticide management and operation issues.

Summary since July 2001:

POM met in Charleston, SC and Arlington, VA in 2001. The full minutes can be found at <http://aapco.ceris.purdue.edu/>. We would encourage you to review these minutes. They are posted with the attachments. A number of CTAG issues were discussed at the meetings.

Within POM the major issues include the harmonization of pesticide labels between Canada and the U.S. various label issues, WPS and e-commerce. These are best reviewed at the above web site.

Issues for AAPSE Board consideration:

From my personal viewpoint, there are several issues I would suggest the Board consider. They all stem from EPA's risk assessments and Pesticide Registration Notices and resulting label changes. These issues can will be divided into two groups - label wording and EPA's move to ignore homeowner responsibility for proper pesticide use.

Regarding label wording, I will use two examples. First is the proposed label wording "Used under a comprehensive IPM program". My concern is how do SLAs and Extension people define a "comprehensive IPM program" for each use of a product. I believe I understand the intent of the wording, however, the day to day practicality is lost. The second example is having split WPS REIs for worker practices and non-worker practices. The issue being such wording is greatly complicating pesticide safety education and enforcement without really gaining any increased protection to the environment or humans. There are many other examples.

The homeowner issue is in many EPA risk assessment documents. EPA has repeatedly stated EPA does not believe homeowners follow label directions and therefore EPA does not use the required PPE (long sleeve shirt, long legged pants, shoes & socks) in doing outdoor residential exposure assessments. This is followed up by EPA's removal of the Caution statement from Class IV pesticides. The issue is homeowner responsibility for proper pesticide use. If EPA believes this is not the case, then pesticides should not be used by homeowners.