

**Addendum to SFIREG -POM Report**  
for  
AAPSE Board of Directors Meeting  
August 10, 2003

**SUGGESTED ISSUES TO CONSIDER FROM POM**

**1. Multiple Restricted Entry Intervals under WPS on pesticide product labels.** This issue has surfaced twice in POM. Richard Dumas (EPA Special Review & Reregistration Division) reported multiple REIs surfaced in 2003 from a request by California. Since then grower groups and industry have supported the use of MREIs. This process is occurring as pesticides go through the reregistration process. Each reregistration group is making these decisions. Dumas says the longest REI would be the REI on the product label in the Agricultural Use Box for WPS. Then exceptions could be listed. EPA has high quality exposure data for certain worker tasks. It would be from this data set that exception would be listed. Also, EPA has identified worker task that EPA says workers do not come into contact with the treated areas.

Exceptions would be based on:

C development stage of the crop; examples could be prior to bud break, before the third true leaf develops, prior to lapping in the row, after the 5th Feekes stage;

C a specific work task; no examples were given for this.

**Issues:**

- a. How does one educate on MREIs and maintain WPS compliance?
- a. How will MREIs fit in greenhouse or nursery production systems under WPS?
- b. How are the posting and notification requirements under WPS for education & enforcement be affected?
- c. How does one tell when enough of a planting meets the "development" stage to allow use of the MRI? This is both an education and enforcement issue. One must always consider different crop management systems throughout the United States and how does one handle this in the off years when development is not normal and produces erratic plant growth.
- d. If this process as proposed (through the reregistration process) proceeds, it is very likely that two different sets of label would be on the market at the same time. Those with MREIs and those without. 6. How doe MREIs affect WPS recordkeeping?

Does AAPSE want to take a position on MREIs?

Does AAPSE want to provide comment on MREIs?

**2. Pesticide Use in Greenhouses.** Presently, EPA allows the use of any pesticide in a greenhouse if a) the label allows the use on crops being produced in the greenhouse and b) the label does not disallow the use of the product in the greenhouse.

Issues:

- A. WPS: Many small greenhouse growers are using homeowner type products in their production systems. This is done to avoid WPS regulations as WPS is not on residential products. These products are also used because the business sells these products and they are available to the grower at what appears to be a reduced cost. The main issue is WPS compliance. Presently EPA states these growers are not in violation of WPS because the product label does not have WPS wording.
- B. This situation does expand the availability of products for greenhouse users.
- C. The use of products not intended for greenhouse use can lead to crop damage when used in a greenhouse. Herbicides used in greenhouses or certain insecticides.
- D. PPE wording on many pesticides is not targeted towards greenhouse use. Greenhouse use of these products may require more PPE than field use.
- E. How does one know if the user is in compliance?
- F. How does one do education programs without creating potential harm to users, workers, plants?
- G. This does provide researchers a greater arsenal of pest management products for use on non-typical greenhouse plants, i.e. cotton, coffee, wheat, etc.

Does AAPSE want to take a position on pesticide greenhouse labeling?

Does AAPSE want to make further formal input on greenhouse labeling?