US EPA ARCHIVE DOCUMENT

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Precautionary Labeling of Bt Products for Use in Forests

FROM: James Akerman, Chief
Ecological Effects Branch (H7507C)

TO: Donna Williams
Special Review and Registration Division (H7508C)

The Ecological Effects Branch (EEB) of the Office of Pesticide Programs has attempted to provide label statements which not only alert users to those classes of organisms that are sensitive to a pesticide, but also how to reduce exposure to adjacent untreated areas. EEB agrees with the registrant's statement that "Bt. poses no significant threat to non-target aquatic organisms under either direct or indirect application to aquatic sites at currently registered rates." However, Bt like all other pesticides used out of doors, other than to control a pest found in water, bears the statement "Do not apply directly to water or wetlands (swamps, bogs, marshes and potholes)." This sentence is intended to minimize unnecessary contamination of water while applying or disposing of pesticides.

EEB recognizes that some people may interpret this statement to be incompatible with aerial applications to forests. Therefore a second statement "Aerial application over such sites is permissible only over the forest canopy" was added to allow for the unavoidable, but unnecessary (from an efficacy standpoint) contamination of water.

If you have further questions regarding precautionary labeling, we will address them when you submit them.

cc: David Kimball - PSPS
Mike Mendelsohn - RD

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