

US EPA ARCHIVE DOCUMENT

Improving Labels for Adult Mosquito Control Products

Up-Date for PPDC Meeting
October 30, 2003

Jim Roelofs
Office of Pesticide Programs
US EPA

Overview

- Summary of April 2003 Recommendations
- Comments rec'd from PPDC and Others
- Where we are now – recommendations modified; 2 new issues

Asking PPDC to Comment:

- Process we are using
- Are we heading the right way with new set of recommendations?
- Specific issues that have come up – especially for certain exceptions
- Next steps – PR Notice and/or ??

Recommendations at April PPDC

- Trained applicators, or Restricted Use
- Separate directions for mosquito control
- Qualify “terrestrial use” on mixed labels
- Allow application “over water” if needed to target mosquitoes
- Make hazard language specific as possible
- Consult with State lead agency
- Improve calibration instructions

Trained Applicators or Restricted Use

- THEN – Suggested Restricted Use as one way to insure training.
- Comments were mixed – some said not justified by risk, not likely as voluntary
- NOW – likely to propose something like “for use by public health/vector control, or persons certified in appropriate category for mosquito control or supervised by..”

Clarify mosquito versus other labeling

- THEN -- April recommendations 2 and 3 really same issue -- clarification that m.c. directions and precautions different from non-m.c.
- NOW – merged into one recommendation – content the same – separate directions; qualify “terrestrial uses”

Amending water precaution language

- THEN – looked at Naled model – “do not apply over water, except to target areas where mosquitoes are emerging or swarming...”
- NOW -- same approach – slight wording change to “except to target downwind areas where mosquitoes may be present”

Make Hazard Statements Specific

- THEN – was separate recommendation – no real objections from comments
- NOW -- combined with “water precaution” – species specific statements if possible (based on data)

Consult with State Lead Agency

- THEN -- we thought SLA was most reliable source of info about possible state requirements.
- Some commenters doubted value, thought it would be burden
- NOW -- still think SLA is best, but make it advisory.

Appropriate Calibration Instructions

- THEN – April recommendation was general statement; labels are all over the board in this area.
- NOW – will try to present a consistent approach; registrant identify droplet spectrum; refers user to equipment maker's instructions to achieve it.

NEW ISSUE: “Repeat as needed”

- Appears on nearly all m. c. labels
- Problems – (1) does not comply with label regulations (specify timing and frequency); (2) users, regulators and public may perceive “as needed” differently; (3) does not help EPA do risk assessment
- However – public health protection may require unpredictable retreatments.

“Repeat as needed”, cont.

- Current direction – ask registrants to specify timing and frequency, but allow more treatments if needed for public health protection.
- Please Comment -- How to make allowance?
 - E.g. “when threat to public health declared by State or local health dept.”? And/or vector control agency?
 - Or – “in accordance with recommendations of state or local health dept.?”
 - Or ...???

New Issue: Bee protection language

- Mentioned in April -- no recommendation
- Current language has no exceptions, so any daylight application could be violation
- Our direction – allow an exception for public health or disaster recovery situation;
 - E.g. “... except when threat to public health...or if authorized by the State as part of a natural disaster recovery effort.”

Next Steps

- Comments now, or after meeting
send comments: roelofs.jim@epa.gov
- Additional outreach?
- Pesticide Regulation Notice in draft
 - Could publish for comment this Winter