

US EPA ARCHIVE DOCUMENT

Drift Labeling PR Notice

for the Pesticide Program Dialogue Committee
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Guidance for Pesticide Drift Labeling

(PR Notice 2011-X)

- Does not require registrants to amend labels
- Recommends generic, “performance-based” drift labeling statement (sets target for controlling drift)
- Does not recommend incorporation of new product-specific “design-based” drift labeling; does recommend a *format* for product-specific labeling
- Discusses Drift Reduction Technology



Proposed general drift statement

(for agricultural/commercial products*)

- Apply WPS statement to all products within scope of PR Notice:

“Do not apply this product in a manner that will contact workers or other persons, either directly or through drift ...

plus

- (Previously proposed) “...In addition, do not apply this product in a manner that results in spray [or dust] drift that **could cause an adverse effect** to people or any other non-target organisms or sites.”
- (Current) “...In addition, do not apply this product in a manner that results in spray [or dust] drift that **harms** people or any other non-target organisms or sites.”

(* homeowner product label statement differs slightly)



Rationale for change

- PRN originally used “could cause adverse effects/harm” model
- But drift happens—small amounts of spray drift are inevitable in even the most careful applications of pesticides.
- “Zero-drift standard” is not feasible.
- “Could cause” is subjective; how to judge what might have happened under different circumstances?
- Overarching need for protective language that provides clear, objective target for users



Adverse effects vs. Harm

- FIFRA standard: pesticide use must not cause unreasonable adverse effects to man and the environment
- “Unreasonable” adverse effects are those for which overall risks of pesticide use outweigh overall benefits
- Inappropriate to subject one aspect of a pesticide’s use (potential to drift) to FIFRA standard
- Impossible to ascertain drift risk/benefit balance for individual applications of a pesticide
- “Harm” is intended to be interpreted in a common-sense manner, not where impacts are trivial or inconsequential

Examples of “harm”

- Negative physical impact to humans
- Negative effects on the viability of beneficial insects, and non-target fish, birds, or other wildlife
- Damage to agricultural commodities
- Residues that exceed a tolerance and residues on commodities for which there is no tolerance
- Exceedence of an established state water quality standard or other regulatory limitation
- Damage to aquatic or wildlife habitat, or contamination of water or soils at levels that would cause harm to wildlife