

US EPA ARCHIVE DOCUMENT

# WPS Changes Comments From Ag Sector

Commodities

Registrants

Trade Group



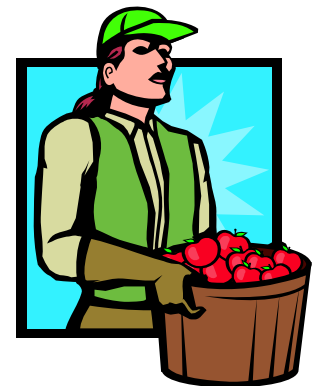
# Labor is Important

- Worker availability is critical
- Specialty crops and major crops
- Great incentives to protect
- Stewardship goals



# Support Certification and Training

- Training critical to safety
- Need to determine what works best
- Certification at appropriate levels
- Optimal training intervals
- Use of new technology
  - Timely outreach
  - Adjust to audience
  - Native language
  - Cost effective



# Harmonization: State and Federal

- All states not equal on requirements
- Cross terminology
- Certification vs competency
- Credentialed vs certified
- Group agreed to look at this area and document

# Economic Studies Being Done

- Cost of WPS changes currently being assessed
- EPA has contracted work out
- Should evaluate relative values of regulations, training, certification, and communication in WP
- Request review of methodology
- Request presentation at Full PPDC

# Concerns

- Effectiveness
- Fact sheets – liability issues
- Availability of infrastructure at LG, state, local levels to deliver training materials
- Cost of increased training and regulation

# Consider Training as Incentive

- Can reduce insurance costs
- Increases recognition of personal responsibility

