

US EPA ARCHIVE DOCUMENT

# Pesticide Worker Safety Program: Enhancements in Protections



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representing  
American Association of Pesticide Safety Educators (AAPSE)

# *Input/Process: Safety Educators*

- ◆ **Three AAPSE members serve on the Workgroup:**
  - Kerry Hoffman, Penn State Pesticide Safety Education Program (PSEP)**
  - Carol Ramsay, Washington State PSEP**
  - Amy Brown, U. Maryland PSEP**
- ◆ **Work as a team to get input from AAPSE membership**
  - certification personnel**
  - trainers (mostly, but not all, Extension Pesticide Safety Educators)**
- ◆ **Drafted document for review by AAPSE members after first Workgroup meeting in February 2006**
- ◆ **Met with members of AAPSE Executive Committee plus additional AAPSE members in early March 2006; resulted in input provided to EPA on March 14, 2006**

# ***AAPSE Input: Overarching Comments***

- ◆ **Very difficult to provide meaningful, substantive comment in this early stage because few issues have been defined to the point where we could truly assess**
  - ◆ **(1) whether the change would actually improve personal safety, environment, security**
  - ◆ **(2) the impact in terms of resources (personnel, time, funds) on training/education/certification and allied programs**
- ◆ **Areas not identified as having a HIGH level of benefit may still be viable options that AAPSE would support**
- ◆ **Properly implementing changes will necessarily call for additional resources.**

# AAPSE's comments on C&T regulation changes

| Proposed C&T Change                                      | Most Benefit | Most Significant Programmatic Impact |
|--|--------------|--------------------------------------|
| Expand scope of users required to demonstrate competency | High         | Extremely high impact on Ext & SLA   |
| Better define "under the supervision"                    | High         | Extremely high impact on Ext & SLA   |
| Require RUP dealers to prove competency                  | --           | High impact on SLA                   |
| Require persons training workers to be competent***      | --           | High impact on Ext & SLA             |
| Set minimum age for occupational users                   | --           | --                                   |
| Require testing for all occupational users               | --           | High impact on SLA                   |
| Set standard requirements for testing                    | --           | High impact on SLA                   |

*Orange font indicates issue needs most discussion*

\*\*\* Issue changed since discussion and comment by AAPSE

# AAPSE's comments on C&T regulation changes

| Proposed C&T Change (red font indicates most discussion needed)   | Most Benefit | Most Significant Programmatic Impact |
|---|--------------|--------------------------------------|
| Set competency requirements consistent with risk  | High         | --                                   |
| Define requirements for recertification of applicators (ensure continued competency)                      | --           | --                                   |
| Establish process to update content of recertification programs (ensure maintenance of current knowledge) | High         | --                                   |
| Update plan requirements for states/tribes/territories  | --           | --                                   |
| Develop standard certification categories   | --           | High impact on Ext & SLA             |
| Assure program accountability   | --           | --                                   |

*Orange font indicates issue needs most discussion*

# AAPSE's comments on WPS regulation changes

| Proposed WPS Change (red font indicates most discussion needed) | Most Benefit | Most Significant Programmatic Impact |
|---|--------------|--------------------------------------|
| Ensure meaningful hazard communication                          | --           | High impact on Ext & SLA             |
| Ensure meaningful training                                      | --           | --                                   |
| Require trainers to demonstrate competency                      | High         | High impact on SLA                   |
| Establish training verification system                          | --           | High impact on SLA                   |
| Protect children from pesticide-treated fields                  | High         | --                                   |
| Clarify vague WPS provisions                                    | --           | --                                   |
| Clarify exceptions  | --           | --                                   |
| Exempt certified crop advisors & aerial applicators             | --           | --                                   |
| Require handlers to demonstrate competency                      | High         | Extremely high impact on Ext & SLA   |
| Express regulation in plain language                            | --           | --                                   |
| Assure program accountability                                   | --           | --                                   |

*Orange font indicates issue needs most discussion*

# *AAPSE's Continuing Role*

- ◆ **AAPSE members on the PPDC workgroup will continue to solicit and compile input from members on these issues**
- ◆ **Advance distribution of materials will be critical to obtaining broad, meaningful feedback**
- ◆ **AAPSE remains concerned about the diminution in federal funds to support state Pesticide Safety Education Programs under current regulations. How will additional responsibilities of both Extension and SLAs be conducted without a very significant increase in funds?**