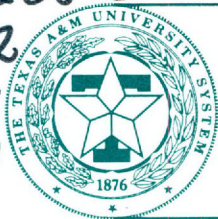


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Studies Estimate FQPA's Economic Impact on Texas Vegetables by Kent D. Hall

Two recent Texas studies project an economic impact that could be very damaging to our state's vegetable production as a result of the Food Quality Protection Act (FQPA). The 1996 Act requires an EPA review of all existing pesticide labels by the year 2006. Organophosphates (OPs), carbamates and those on EPA's B2 carcinogen list (here referred to as FQPA target pesticides) are under review first. Potentially, current uses of these pesticides could be revoked.

Rodney Holloway and I examined the economic impact if certain FQPA target pesticides were withdrawn from use on potatoes, cabbage, spinach and carrots in the Winter Garden area. Jason Johnson, Juan Anciso, Lynn Brandenberger and Stormy Sparks looked at the loss of FQPA target pesticides on onions, melons, carrots, crucifers (cabbage and broccoli) and peppers produced in the Lower Rio Grande Valley.

In the Winter Garden, potato growers would lose an estimated \$11.5 million (32% of crop value) if phorate, an OP insecticide, were not available. Negative impact on the state economy: about \$43.6 million.

Cabbage, spinach and carrot growers collectively would lose an estimated \$5.4 million if the OP diazinon was withdrawn. Negative impact on the state economy: about \$20.5 million. For the same three crops, loss of methomyl, a carbamate insecticide, would cost growers and the state an estimated \$2 million and \$7.7 million, respectively.

In the Lower Rio Grande Valley, without either chlorothalonil or iprodione, farm revenue losses would likely exceed \$19 million (over 20% of the entire farm value of the vegetables and melons considered). The greatest negative effect would

result from removal of FQPA target fungicides, followed by insecticides, herbicides and fumigants. Loss of chlorothalonil alone would cause melon production in the Lower Rio Grande Valley to become economically infeasible.

The impacts estimated in these two studies would be sufficient, if realized, to significantly disrupt current price and cropping pattern equilibriums. Assuming similar impacts elsewhere, the withdrawal of FQPA target pesticides from use on all crops throughout the nation would cause a huge disruption in national production. Consumers would pay much higher prices for agricultural commodities. And the U.S. agriculture balance of trade would decline substantially.

"Prescription Use" Looked at as New Pesticide Classification

The Council for Agricultural Science and Technology (CAST) released an issue paper (No. 9, Aug. 1998) on the feasibility of a U.S. prescription system for pesticides that might be canceled under the FQPA. The paper states, "Prescription use could be a mechanism by which certain valuable but high-risk pesticide uses could be maintained while addressing the public's concern for safe use of those products. However, ...(this) will require a new level of infrastructure ...(which) would take time to put in place and considerable resources to maintain." For more, click on publications at <www.cast-science.org>.

Pesticide Recommendations Must Be Consistent with the Label

by Don L. Rennie

Many of us respond daily to questions about pest control products. At some time you may have wondered, may I recommend a pesticide for a

crop or home site that is not listed on the label, when I know it will control the pest?

The answer is **NO**. The Texas Pesticide Regulations (Section 7.71) state, "it shall be a violation for any person to use or *cause to be used* a pesticide in a manner inconsistent with its label or labeling." To clarify what is consistent with a label, refer to Section 2ee (stated as "2 double E") of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA). It allows the following:

- use of a pesticide -- on a labeled site -- for a pest that is not listed on the product label.
- use of a pesticide at a frequency less than the label specifies (14 days vs. 10), or at a rate less than the label specifies (1/2 lb. vs. 1 lb.).

Section 2ee does *not* allow pesticides to be used more frequently, at higher rates, or on sites not listed on the label. For example, you would violate these rules if, based on your recommendation, diazinon was used in a vegetable garden to control armyworms when the particular product label listed only ornamentals, turf and indoor uses. Furthermore, with no EPA-approved residue tolerance for the pesticide, the gardener could not legally sell the vegetables and should not consume them without conducting a residue analysis.

Remember, states can set stricter rules. The Texas Dept. of Agriculture (TDA), prohibits manufacturers from recommending a 2ee-type use without first filing the recommendation in writing with TDA. In Texas, the end user of a pesticide acts entirely at his own risk when making a 2ee-type application that is not registered with TDA. In the event of a nonperformance claim, the manufacturer may not be held responsible.

Here's some advice about your role in helping clientele make informed decisions:

First, never recommend or condone use of a pesticide for an off-label site. Advise that such applications are unlawful.

Second, unless you have substantiating data, avoid discussions about the efficacy of pesticide uses

allowed under Section 2ee. Though legal, such unlabeled uses may not be backed by the product manufacturer. If you recommend them, you may become the main target for recourse by your client if a problem occurs. Upon hearing "my neighbor did it and it worked for him," respond with just the facts: while the neighbor's story may be true, the product may or *may not* be efficacious in the client's case. Ultimately, the best service you can offer is to simply inform a client of his or her options under the law, and to warn of the risks associated with those options.

CEAs Expected to Maintain License by Suzanne Deatherage

Under a renewed administrative expectation to obtain a TDA noncommercial pesticide applicator license, many agriculture, horticulture and IPM agents have recently taken or will soon take various license exams. Here's the process:

If you have a license, but not the demonstration and research category (#7):

1. Prepare for and take the D&R exam. You are exempted from an exam fee.
2. After you pass the exam, TDA will automatically add the category to your license (no fee and no application).

If you do not have a license or it has been more than one year since your license was last renewed:

1. Prepare for and take the commercial/ noncommercial general exam, laws and regulations exam, demonstration and research exam, and at least one other category exam. You are exempted from exam fees.
2. After passing the exams, apply to TDA for your license within one year. Do *not* pay the \$10 license fee. Cite TAEX as your employer and we will be billed.
3. Those who obtain a license now need not obtain any CEUs until 1999.

Remember, it is *your responsibility* to inform TDA of address changes and to renew your license, whether or not you receive a mailed

TDA Course No: No. of CEUs: Laws/regs _____ IPM _____ Drift min. _____ General _____
Date: Title of event or activity:

Continuing Education Roster - Please PRINT.

Sponsor's name, phone & mailing address:	For CEU Recipients Only (TDA pesticide applicators)
	License OR Social Security No.

1. _____

Mailing address: _____

2. _____

Mailing address: _____

3. _____

Mailing address: _____

4. _____

Mailing address: _____

5. _____

Mailing address: _____

6. _____

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10. _____

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11. _____

Mailing address: _____

12. _____

Mailing address: _____

13. _____

Mailing address: _____

14. _____

Mailing address: _____

15. _____

Mailing address: _____

COURSE DESCRIPTION: To complete this section, you may: 1) enclose a program agenda or outline, or 2) in the space below, briefly describe the CEU subject matter of this program or activity. You need not repeat this information on continuation pages.

INSTRUCTIONS: This form and its instructions pertain to the recertification of pesticide applicators licensed by the Texas Dept. of Agriculture (TDA). You may use this form to sign in all participants at a program, or to sign in pesticide applicators only. CEU recipients must provide their name and *either* their license number or social security number.

An address line is provided for your *optional* use; it is not required by TDA. However, you may have an unforeseen need for addresses later. For example, if you issue the wrong number or type of CEUs, TDA may require you to mail a corrected certificate of completion to each CEU recipient.

Legible hand-printing (not cursive writing), using this form, is acceptable in lieu of computer-printed or typed rosters. If you submit a roster that is incomplete or illegible, it may be returned to you.

As course sponsor: Fill in the blanks at the TOP and very BOTTOM of the form. PRINT or TYPE. Use INK. REPEAT all information on each continuation page. On back of the first page, provide a course description. Always PROOF the roster and certificate of completion to make sure they have matching, accurate information. Retain a copy of the roster. Within 2 weeks after a course, mail the original rosters to TDA at:

Texas Dept. of Agriculture
attn: Recertification rosters
PO BOX 12847; AUSTIN TX 78711

How to Determine Your Course Number

To obtain a course number for Extension programs worth more than 3 CEUs, you must make a 30-day advance request to TDA. Extension courses worth

3 CEUs or less (per day, per applicator) do NOT require advance TDA approval. Use this formula to set a course number:

For county-based faculty: Use 8 + 3-digit Extension county code. Ex: Anderson County = 8001

For district-based faculty: Use 8 + 3-digit Extension district code. Ex: District 1 = 8601

For campus-based faculty: Use 8 + 3-digit Extension unit code. Ex: Ag Engineering = 8730

More about this Form

This form is designed to document that participants completed an entire program or activity. You may choose whether to issue partial credit for partial completion. Suggestion: 1) note variations in CEUs to the side of the person's name or address, if space permits; or 2) transfer the person's name, etc. to a separate continuation page and note the CEU value of the completed portion.

For events with a variety of CEU options, you may design alternative tracking methods. However, you must prepare a *master* roster for TDA. Do NOT send bundles of a single form per participant. Remember to include all required course data.

For a one-person activity, such as viewing a videotape, you may keep a monthly "running" roster. Start and date the roster the first time you assign the activity each month. The start date becomes the official course date by which TDA will file the roster. Add names to the roster until full or until the month's end, and then mail to TDA. *However, back-date each certificate of completion to match the start date on the roster.*

renewal notice. After the annual renewal deadline on February 28, you have one year to renew your license with a late fee. After that, you must retest and re-apply for a license. No exceptions!

Take these steps for basic exam preparation:

1. For the general exam (100 multiple choice questions): Study Extension publication B-5060
2. For the laws/regs exam (100 multiple choice questions): Study B-5056 or review at www.agr.state.tx.us/pesticide/index.htm.
3. For the D&R exam (25 questions, including short answer): Study the tip sheet provided in the resource section of the *Pesticide Applicator Training (PAT) Handbook*. Work practice calibration problems available from your PAT district chair or Dr. Mary Ketchersid. Apply yourself! — this is TDA's most difficult exam.

An office reference copy of B-5060 and B-5056 was mailed to each county when the manuals were published. Watch for supplementary in-service training that may be arranged in your district. To provide an in-service option for future agents, a TTVN training will be conducted in late 1999 by the Agricultural and Environmental Safety unit.

Finally, for current licensees ...

A reminder to: 1) complete your five CEUs, and 2) do NOT pay your next noncommercial renewal fee. Indicate that TAEX (not your county) should be billed.

New PAT Handbook Distributed

by Suzanne Deatherage

By now, district and county agriculture faculty have received the *Pesticide Applicator Training (PAT) Handbook*, a new resource that was distributed at district fall meetings. Other faculty and staff may order one through my office. Here's what you'll find about the handbook:

- It's very comprehensive regarding agricultural PAT — certification and recertification of applicators licensed by TDA. Basic information also is provided about the Worker Protection Standard,

the Texas Right-to-Know law, pesticide record-keeping, and structural pest control training.

- The handbook documents rules and options for you to follow as trainers. An excerpt adapted as a public handout can be found on the web at www-aes.tamu.edu/pat/patinfo.htm.

With no major changes to announce, TDA encourages us to take this time to improve our practice of existing procedures. In a review of Extension course rosters, it seemed most mistakes stemmed from carelessness in completing the forms accurately. However, other mistakes reflected a need for better understanding of guidelines for course content and CEU allocation. This handbook will help new and long-time Extension faculty make sure their pesticide applicator programs conform to current standards.

As always, comments are welcome. Please feel free to direct them to me or your colleagues listed in the handbook's "Who's Who" section.

Regarding comments and questions to date:

- Page 5 — "A Model Minimum Curriculum" is a good source of program ideas and speaker topics.

- Page 10, #3 — The recertification exam (in lieu of CEUs) for private applicators is expensive (\$50 per attempt), very intensive on laws and regulations, and difficult to pass. Not a good option to publicly announce in meetings; better to counsel individuals privately about it if they have a significant CEU shortage. TDA administers the exam at its regular testing locations and dates.

- Page 11, #1 — Regarding appropriate CEU subject matter: Yes, agents may give presentations on laws and regulations. The topics with which most agents are comfortable pertain to applicator certification and pesticide record-keeping. But there is no restriction on the L&R topics you may choose to present.

- Page 11, #2 — Note the distinction between home study and monitored self-study. For CEU

purposes, they're not synonymous. Whether or not to administer home study — checking out materials, replacing lost items, recalling overdue materials — is your choice. However, there's a lack of Extension home study packages. If you devise an assignment of your own, you also must devise a method to confirm completion of the assignment. (If you try this, please let me know so I can share your ideas with others!)

- Page 12, #4 — Note the clarification on Extension authority to issue up to three CEUs without prior TDA approval. **It is limited to three CEUs per applicator per day per event.** Home study assignments for commercial/noncommercial applicators are excluded, by Extension policy, and require TDA approval regardless of CEU value.

- Page 13, #6 — About self-certification: TDA recently conducted its first audit of course rosters since self-certification began. It revealed some kinks in their filing system and some of you received a request for copies of old course rosters. Future audits will be conducted annually. TDA is now scanning course rosters as they are received and saving them electronically.

- Page 14, #5 — About giving CEUs at a *non-Extension* event. It's left to your judgement to decide if your involvement in an event merits Extension CEU sponsorship. Feel free to invoke this rule when someone asks you to issue CEUs at an event in which you had no role in planning.

Miscellanea about PAT Resources

New videotape and slide set

Now available from the Extension Audio-Visual Library and PAT district chairs:

- VHS 2252 *Straight Talk about Minimizing Spray Drift: A Guide for Applicators*, 29 min. — The Coalition for Drift Minimization, 1998.
- SS 1388 *Minimizing Spray Drift*, approx. 50 min. — slides, cassette and script by Dr. Bryan Shaw, 1998.

Enclosed with this Chemogram

D-1431 *Continuing Education Roster (revised)*: This version reflects changes requested by users of the form. It also has improved instructions on the back. You may use either this or past versions.

Forms of interest on TDA's web site

At www.agr.state.tx.us/pesticide/forms.htm:

- Q835 *Recertification Sponsorship Form--NEW*
- Q820 *Regulated Spray Permit*
- Q527F *Pesticide Applicator Record*
- Q493G *Dealer Record of Distribution of SLU/RU/RH*
- Q870A *Direct Supervision Affidavit (English and Spanish versions)*
- Q544A *Workplace Chemical List*

Private Applicator Certification Supplies

Reminder: The 1995 version (substituted for the former slide set version) consists of the four items below. For replacement items, or for information about how to use the items for either classroom or self-study formats, contact the Agricultural and Environmental Safety office.

- Using Pesticides — Private Applicator manual and video, B-1648 and VHS-960, respectively.
- Using Pesticides — Private Applicator Teacher's Guide, and Trainee's Note-Taking Worksheet

Chemogram is an internal Extension newsletter produced quarterly by the Agricultural and Environmental Safety unit. For more pesticide-related information, check our web site at www-aes.tamu.edu or contact us at 409-845-1099.

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