



FLORIDA DEPARTMENT OF AGRICULTURE AND CONSUMER SERVICES
COMMISSIONER ADAM H. PUTNAM

Delivered via electronic mail

July 8, 2014

Jack Housenger
Director, Office of Pesticide Programs
U.S. EPA
2777 South Crystal Drive
Arlington, VA 22202

Dear Mr. Housenger:

Attached is an issue paper identifying a problem with some existing Environmental Hazard Statements, specifically how these statements apply to products with directions for use intended to mitigate risks to bees. The language in some of the Environmental Hazards Statements can be interpreted to supersede the more specific and more flexible pollinator protection requirements in the Directions for Use portion of the label (including crop specific directions for use that incorporate this language or refer to it). This effectively prevents applicators from taking advantage of the pollinator protection statements in the Directions for Use, which were created to provide applicators flexibility in making applications to protect crops while providing risk mitigation for bees.

The issue paper recommends that USEPA work to incorporate or modify language in the Environmental Hazard section of the labels of products that include pollinator protection provisions so that statements in this section are not more restrictive or prescriptive than the newly established Directions for Use or crop-specific directions for use that are provided to mitigate risks for pollinators. We also recommend that the USEPA Label Review Manual be revised to provide for flexibility in required Environmental Hazard statements to avoid superseding directions for use that are intended to mitigate risks to pollinators.

This issue paper will be posted to the SFIREG website in the near future. Please let me know if you have any questions. Mr. Jim Gray, of the North Dakota Department of Agriculture will be serving as Chair of SFIREG going forward, and correspondence regarding this matter can be addressed to him. Of course, I will be glad to assist in any way.

Mr. Housenger
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Thank you for your continued support of SFIREG. The SFIREG members and I appreciate the effort you and your colleagues are making to improve pesticide regulation.

Sincerely,

ADAM H. PUTNAM
COMMISSIONER OF AGRICULTURE

A handwritten signature in blue ink, appearing to read "Adam H. Putnam", written in a cursive style.

Steven E. Dwinell, SFIREG Chair