## Risk-Mitigation Measures for Safe Use of Paraquat

Paraquat Training and Closed-System Requirements

Patsy Laird AAPCO Annual Meeting March 10, 2020



syngenta

CLASSIFICATION: PUBLIC

### Certification and Training Requirements

Two certifications will be required in order to use paraquat products:

- 1. A certified pesticide applicator's license/permit from the appropriate state or tribal authority
  - Non-certified applicators will no longer be able to legally apply paraquat under the supervision of certified applicators.
- 2. A paraquat-specific training certificate



### How is paraquat use defined?

"'Use' includes pre-application activities involving mixing and loading the pesticide; applying the pesticide; and other pesticide-related activities, including, but not limited to, transporting or storing opened [emphasis added] pesticide containers, cleaning equipment, and disposing of excess pesticides, spray mix, equipment wash waters, pesticide containers, and other paraquat-containing materials."

Source: https://www.epa.gov/pesticide-worker-safety/paraquat-dichloride-training-certified-applicators



### Timeline for EPA-required Training Requirements

- Paraquat users need to become certified applicators <u>and</u> complete the paraquat-specific training *before using any* paraquat product with the new label requirements.
- ➤ However, Syngenta encourages paraquat users to take the paraquat-specific training as soon as possible, even if it is not required by the label of the paraquat product they are using.

Source: Paraquat Dichloride Human Health Mitigation Decision, December 15, 2016 (Amended January 12, 2017): EPA-HQ-OPP-2011-0855-0115



### Paraquat Training Program

- The link to the on-line training program will be/is in the new "Certified Applicator Training" section on all end-use paraquat product labels.
- ➤ A new version of the on-line training program (developed by The National Pesticide Safety Education Center (NPSEC)) is now available at <a href="https://npsec.us/paraquat">https://npsec.us/paraquat</a>.
- ➤ A direct link to the training (<u>www.usparaquattraining.com</u>) is also available on Syngenta's website.
- Training must be successfully completed every three years.



### \*NEW\* - Materials for Face-to-Face Paraquat Stewardship Training

- Covers same content as on-line training
- ➤ Initially intended for extension agents to provide training to paraquat users who, for religious reasons, are not allowed to use computers, or to those in areas without reliable internet access
- May also be used by distributors or others to provide group training (if allowed by their states)
- Safeguards are in place to protect the integrity of the quiz and certificates.
- ➤ Those who complete training this way will have their information added to the national database managed by NPSEC.



### Will paraquat training be available in Spanish?

- ➤ Revisions to the paraquat training delayed the development of Spanish versions.
- ➤ Translation of the English version into Spanish is underway and is expected to be available by early March.
- ➤ Those who complete paraquat training in any language still have to be certified applicators to legally be able to use paraquat.



### How will records of pesticide certification and paraquat training be kept?

- Records for pesticide applicator's licenses and certificates will continue to be maintained by the appropriate state, county, or tribal authority.
- ➤ Records of paraquat-specific training will by maintained by the National Pesticide Safety Education Center (NPSEC).
- > Paraquat users should keep an electronic or paper copy of their certificate of completion for the paraquat-specific training.
- > NPSEC will provide paraquat certificate information to state or tribal authorities *upon request*.



# Will paraquat users be required to present their paraquat training certificates in order to purchase paraquat products?

No, paraquat users will only need to present their certified pesticide applicator's licenses/permits issued by their state or tribe in order to purchase paraquat products, just as they have been doing.



### Closed-System Packaging Requirement

- ➤ All non-bulk (less than 120 gallons), end-use paraquat products will be required to be sold in closed-system packaging that meets specific EPA guidelines.
- ➤ The closed-system packaging will not be required until 12 months after EPA stamps product labels with the requirement.
- For most paraquat products, the requirement is currently estimated to go into effect during the fall of 2020 (subject to change).
- ➤ Note: Personal Protective Equipment (PPE) requirements will not be reduced but will stay the same.



### EPA Requirements for Closed-System Packaging

- ➤ "The closed system must connect to the container in a way that the closed system is the only feasible way to remove paraquat from the container without destroying the container; therefore, a screw cap for the pourable closure on a typical pesticide container is not sufficient; and
- ➤ the closed system must remove the paraquat from its original container and transfer the paraquat to the application equipment through connecting hoses, pipes and couplings that are sufficiently tight to prevent exposure of the mixer or loader to the paraquat (except for the negligible escape associated with normal operation of the system)."

Source: Paraquat Dichloride Human Health Mitigation Decision, December 15, 2016 (Amended January 12, 2017): EPA-HQ-OPP-2011-0855-0115



### **Existing-Stocks Provision**

- ➤ 12 months from the label stamped date, registrants will be prohibited from selling or distributing paraquat products not complying with the closed-system requirement.
- Persons other than the registrant may continue to sell and/or use existing stocks of paraquat products with the previously approved labeling until such stocks are exhausted, provided that such use is consistent with the terms of the previously approved labeling.

Source: Paraquat Dichloride Human Health Mitigation Decision, December 15, 2016 (Amended January 12, 2017): EPA-HQ-OPP-2011-0855-0115



### Syngenta's Closed System: SecuraLink™

- Closed-system cap installed on each 2.5-gallon container
  - Cannot be removed or opened by hand
  - Dispensing rate is approximately 15-20 seconds to empty
  - Dispensing rate is controllable
  - Container is graduated to aid in mixing
  - Container can be rinsed immediately after dispensing through the closed system
- Dispensing from container requires an adaptor mounted to an eductor tank or spray tank



### Closed-System Tank-Mix Compatibility

- Closed-system and handling requirements prevent jar-testing for compatibility.
- ➤ To provide guidance to applicators, Syngenta has conducted compatibility testing and will continue to expand the list of products evaluated.
- Compatibility information will be provided on Syngenta website as an extension of the label.
- Product users should consult the website for specific information regarding mixing instructions and tank-mixcompatible products.
- Gramoxone may be tank-mixed with products not listed, so long as successful tank-mix experience with previous Gramoxone® brands has been demonstrated.

