

## Q1 Please provide your contact information

Answered: 34 Skipped: 0

ANSWER CHOICES	RESPONSES	
Name	100.00%	34
Agency	94.12%	32
Address	0.00%	0
Address 2	0.00%	0
City/Town	0.00%	0
State/Territory/Tribal Program	97.06%	33
ZIP/Postal Code	0.00%	0
Country	0.00%	0
Email Address	100.00%	34
Phone Number	100.00%	34

#	NAME	DATE
1	Toby Primbs	8/16/2022 8:36 PM
2	Micah Raub	8/16/2022 3:23 PM
3	Hollie Ezze	8/15/2022 3:10 PM
4	John Feagans	8/15/2022 3:01 PM
5	Patrick Jones	8/15/2022 10:47 AM
6	Jennifer Wren	8/15/2022 12:02 AM
7	Stephen M Vantassel	8/12/2022 10:53 AM
8	Roger Mackedanz	8/12/2022 8:40 AM
9	Tamara James, Neil Richmond	8/11/2022 9:54 PM
10	Brad Beaver	8/11/2022 6:09 PM
11	Fidel Perez	8/11/2022 3:36 PM
12	Kathy Booker	8/11/2022 3:02 PM
13	Tom Gere	8/11/2022 2:21 PM
14	Michael Weyman	8/11/2022 1:39 PM
15	Tim Schultz	8/11/2022 1:28 PM
16	Otto Oemig	8/11/2022 11:15 AM
17	Anthony Lamanno	8/10/2022 8:33 AM
18	Joe Herrera	8/9/2022 12:57 PM
19	Perry Cervantes	8/5/2022 1:19 PM
20	Tim Drake	8/4/2022 1:34 PM

## Label Mandated Training

## SurveyMonkey

21	Chad Carpenter	8/3/2022 8:10 AM
22	Henry Nahalewski	8/2/2022 4:58 PM
23	John Scott	8/2/2022 3:50 PM
24	Karin Hendrickson	8/2/2022 2:40 PM
25	Lukas Wagner	8/2/2022 11:56 AM
26	Kory Hubbard	8/2/2022 9:55 AM
27	Dawn Wall	8/2/2022 8:36 AM
28	Jian (Jim) Zhang	8/1/2022 7:16 PM
29	Tim Creger	8/1/2022 4:48 PM
30	Bret Allen	8/1/2022 4:45 PM
31	Sherman Takatori	8/1/2022 3:58 PM
32	Juan C Munoz	8/1/2022 3:54 PM
33	TONY L Cofer	8/1/2022 3:38 PM
34	Matt Kohan	8/1/2022 3:22 PM
<b>#</b>	<b>AGENCY</b>	<b>DATE</b>
1	ODA	8/16/2022 8:36 PM
2	Virginia Department of Agriculture and Consumer Services	8/16/2022 3:23 PM
3	Dept. of Environmental Protection	8/15/2022 3:10 PM
4	NCDA&CS	8/15/2022 3:01 PM
5	NCDACS	8/15/2022 10:47 AM
6	Georgia Department of Agriculture	8/15/2022 12:02 AM
7	MT Department of Agriculture	8/12/2022 10:53 AM
8	Department of Agriculture	8/12/2022 8:40 AM
9	Florida Department of Agriculture and Consumer Services	8/11/2022 9:54 PM
10	Illinois Department of Agriculture	8/11/2022 6:09 PM
11	California Department of Pesticide Regulation	8/11/2022 3:36 PM
12	TN Dept of Agriculture	8/11/2022 3:02 PM
13	Agriculture and Natural Resources	8/11/2022 2:21 PM
14	Clemson Regulatory	8/11/2022 1:39 PM
15	WA State Dept. of Agriculture	8/11/2022 1:28 PM
16	DATCP	8/11/2022 11:15 AM
17	NYS Department of Environmental Conservation	8/10/2022 8:33 AM
18	Yakama Nation Environmental	8/9/2022 12:57 PM
19	Department of Agriculture	8/5/2022 1:19 PM
20	Clemson University Regulatory Services	8/4/2022 1:34 PM
21	West Virginia Department of Agriculture	8/3/2022 8:10 AM
22	Utah Department of Agriculture and Food	8/2/2022 4:58 PM
23	Colorado Dept of Agriculture	8/2/2022 3:50 PM

## Label Mandated Training

SurveyMonkey

24	NDDA	8/2/2022 11:56 AM
25	Department of Ag	8/2/2022 9:55 AM
26	Missouri Department of Agriculture	8/2/2022 8:36 AM
27	Nevada Department of Agriculture	8/1/2022 7:16 PM
28	Nebraska Dept. of Agriculture	8/1/2022 4:48 PM
29	NV Department of Agriculture	8/1/2022 4:45 PM
30	Idaho State Department of Agriculture	8/1/2022 3:58 PM
31	Puerto Rico Department of Agriculture	8/1/2022 3:54 PM
32	Pennsylvania Department of Agriculture	8/1/2022 3:22 PM
#	ADDRESS	DATE
	There are no responses.	
#	ADDRESS 2	DATE
	There are no responses.	
#	CITY/TOWN	DATE
	There are no responses.	
#	STATE/TERRITORY/TRIBAL PROGRAM	DATE
1	OR	8/16/2022 8:36 PM
2	State Program	8/16/2022 3:23 PM
3	NJ	8/15/2022 3:10 PM
4	NC	8/15/2022 3:01 PM
5	North Carolina	8/15/2022 10:47 AM
6	Georgia	8/15/2022 12:02 AM
7	MT	8/12/2022 10:53 AM
8	Minnesota	8/12/2022 8:40 AM
9	Florida	8/11/2022 9:54 PM
10	State Dept. of Agriculture	8/11/2022 6:09 PM
11	CA	8/11/2022 3:36 PM
12	TN	8/11/2022 3:02 PM
13	South Dakota	8/11/2022 2:21 PM
14	SC	8/11/2022 1:39 PM
15	Pesticide Management Division	8/11/2022 1:28 PM
16	Wisconsin	8/11/2022 11:15 AM
17	New York	8/10/2022 8:33 AM
18	Yakama Nation	8/9/2022 12:57 PM
19	Texas	8/5/2022 1:19 PM
20	State Lead Agency	8/4/2022 1:34 PM
21	WV	8/3/2022 8:10 AM
22	Utah	8/2/2022 4:58 PM
23	CO	8/2/2022 3:50 PM

## Label Mandated Training

SurveyMonkey

24	AK	8/2/2022 2:40 PM
25	State	8/2/2022 11:56 AM
26	Missouri	8/2/2022 9:55 AM
27	Missouri	8/2/2022 8:36 AM
28	State	8/1/2022 7:16 PM
29	Nebraska	8/1/2022 4:48 PM
30	Nevada	8/1/2022 4:45 PM
31	State Applicator Licening/Product Registration	8/1/2022 3:58 PM
32	Puerto Rico	8/1/2022 3:54 PM
33	State	8/1/2022 3:22 PM
#	ZIP/POSTAL CODE	DATE
	There are no responses.	
#	COUNTRY	DATE
	There are no responses.	
#	EMAIL ADDRESS	DATE
1	toby.primbs@oda.oregon.gov	8/16/2022 8:36 PM
2	micah.raub@vdacs.virginia.gov	8/16/2022 3:23 PM
3	hollie.ezze@dep.nj.gov	8/15/2022 3:10 PM
4	john.feagans@ncagr.gov	8/15/2022 3:01 PM
5	patrick.jones@ncagr.gov	8/15/2022 10:47 AM
6	jennifer.wren@agr.georgia.gov	8/15/2022 12:02 AM
7	svantassel@mt.gov	8/12/2022 10:53 AM
8	roger.mackednz@state.mn.us	8/12/2022 8:40 AM
9	tamara.james@fdacs.gov	8/11/2022 9:54 PM
10	brad.beaver@illinois.gov	8/11/2022 6:09 PM
11	fidel.perez@cdpr.ca.gov	8/11/2022 3:36 PM
12	kathy.booker@tn.gov	8/11/2022 3:02 PM
13	tom.gere@state.sd.us	8/11/2022 2:21 PM
14	mweyman@clermson.edu	8/11/2022 1:39 PM
15	tschultz@agr.wa.gov	8/11/2022 1:28 PM
16	otto.oemig@wisconsin.gov	8/11/2022 11:15 AM
17	anthony.lamanno@dec.ny.gov	8/10/2022 8:33 AM
18	joe_herrera@yakama.com	8/9/2022 12:57 PM
19	Perry.Cervantes@texasagriculture.com	8/5/2022 1:19 PM
20	tdrake@clermson.edu	8/4/2022 1:34 PM
21	ccarpenter@wvda.us	8/3/2022 8:10 AM
22	hnahalewski@utah.gov	8/2/2022 4:58 PM
23	Johnw.scott@state.co.us	8/2/2022 3:50 PM

## Label Mandated Training

## SurveyMonkey

24	karin.hendrickson@alaska.gov	8/2/2022 2:40 PM
25	ljwagner@nd.gov	8/2/2022 11:56 AM
26	kory.hubbard@mda.mo.gov	8/2/2022 9:55 AM
27	Dawn.Wall@mda.mo.gov	8/2/2022 8:36 AM
28	jianzhang@agri.nv.gov	8/1/2022 7:16 PM
29	tim.creger@nebraska.gov	8/1/2022 4:48 PM
30	bret.allen@agri.nv.gov	8/1/2022 4:45 PM
31	sherman.takatori@isda.idaho.gov	8/1/2022 3:58 PM
32	jcmunoz@agricultura.pr.gov	8/1/2022 3:54 PM
33	tony.cofer@agi.alabama.gov	8/1/2022 3:38 PM
34	mattkohan@pa.gov	8/1/2022 3:22 PM
#	PHONE NUMBER	DATE
1	503-986-4646	8/16/2022 8:36 PM
2	8047864845	8/16/2022 3:23 PM
3	609-984-6666	8/15/2022 3:10 PM
4	984-236-5604	8/15/2022 3:01 PM
5	3364967106	8/15/2022 10:47 AM
6	4046564958	8/15/2022 12:02 AM
7	14065383004	8/12/2022 10:53 AM
8	651-201-6400	8/12/2022 8:40 AM
9	850-617-7876	8/11/2022 9:54 PM
10	217-785-2427	8/11/2022 6:09 PM
11	9166037701	8/11/2022 3:36 PM
12	16158375133	8/11/2022 3:02 PM
13	6057736668	8/11/2022 2:21 PM
14	18644144757	8/11/2022 1:39 PM
15	15099940936	8/11/2022 1:28 PM
16	608-294-0815	8/11/2022 11:15 AM
17	518-402-8727	8/10/2022 8:33 AM
18	(509)865-5121 ex.6043	8/9/2022 12:57 PM
19	512-463-7692	8/5/2022 1:19 PM
20	8646462153	8/4/2022 1:34 PM
21	3045582209	8/3/2022 8:10 AM
22	3854089131	8/2/2022 4:58 PM
23	3035492879	8/2/2022 3:50 PM
24	9073761856	8/2/2022 2:40 PM
25	ljwagner@nd.gov	8/2/2022 11:56 AM
26	573-751-5511	8/2/2022 9:55 AM

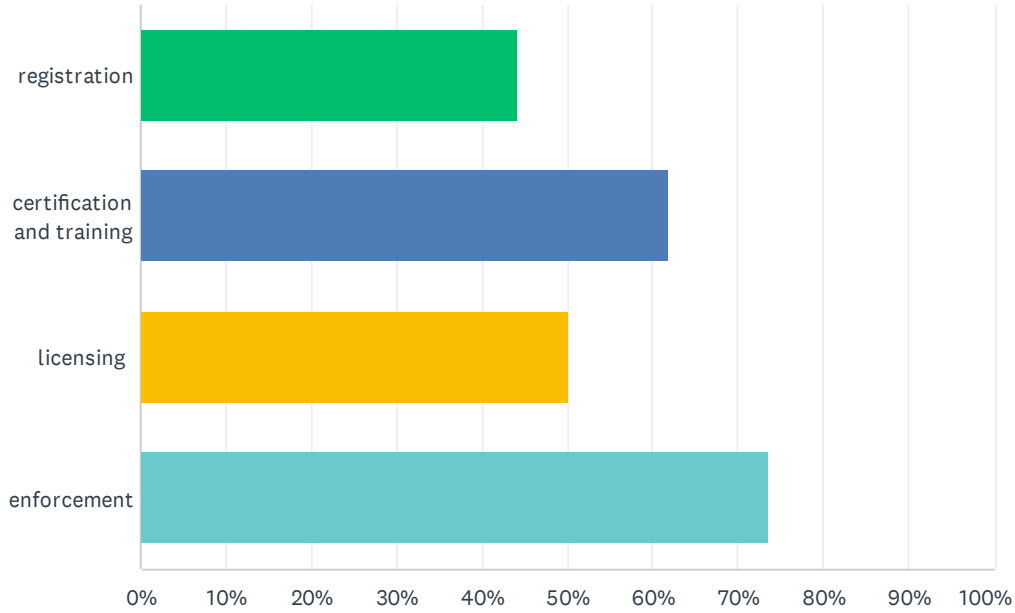
Label Mandated Training

SurveyMonkey

27	573 751 5510	8/2/2022 8:36 AM
28	7753533778	8/1/2022 7:16 PM
29	14024716882	8/1/2022 4:48 PM
30	775-353-3715	8/1/2022 4:45 PM
31	208-332-8609	8/1/2022 3:58 PM
32	7876786587	8/1/2022 3:54 PM
33	13342407237	8/1/2022 3:38 PM
34	7177725217	8/1/2022 3:22 PM

## Q2 What program area do you work in? Please encourage other program area staff to answer if applicable.

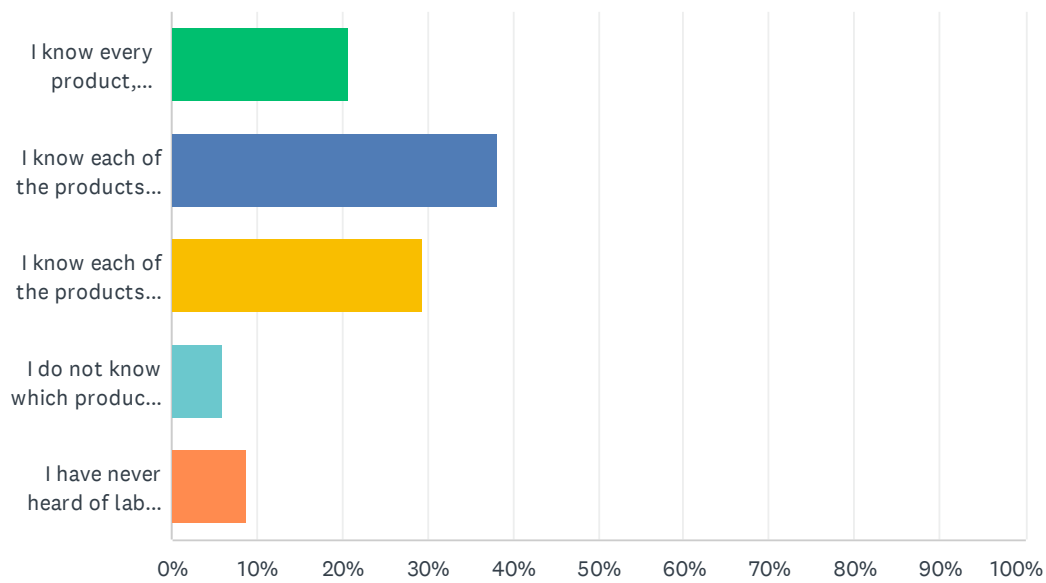
Answered: 34 Skipped: 0



ANSWER CHOICES	RESPONSES	
registration	44.12%	15
certification and training	61.76%	21
licensing	50.00%	17
enforcement	73.53%	25
Total Respondents: 34		

### Q3 How would you rate your knowledge of label mandated training?

Answered: 34 Skipped: 0

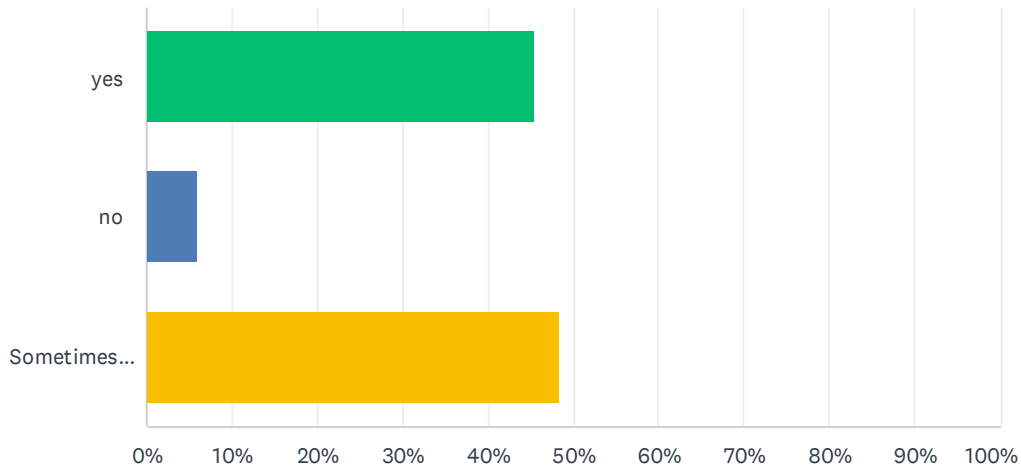


ANSWER CHOICES	RESPONSES	
I know every product, requirement, and currently have a program in place for training and enforcement.	20.59%	7
I know each of the products that require training, but don't feel a robust program is in place.	38.24%	13
I know each of the products that require training, but don't have any program in place currently.	29.41%	10
I do not know which products require training, nor is a plan in place.	5.88%	2
I have never heard of label mandated training and I assumed our certification and licensing program was all that was needed.	8.82%	3
Total Respondents: 34		



## Q4 Does label mandated training serve EPA's purpose for informing applicators about the potential hazards and safety measures associated with a specific product?

Answered: 33 Skipped: 1



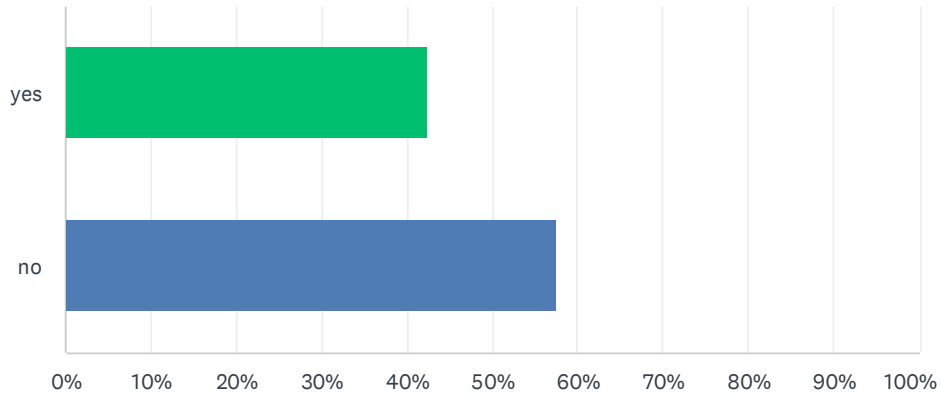
ANSWER CHOICES	RESPONSES
yes	45.45% 15
no	6.06% 2
Sometimes...	48.48% 16
<b>TOTAL</b>	<b>33</b>

#	SOMETIMES...	DATE
1	Label mandated training can vary on who provides the training and where it is located (e.g. registrant vs say SLA). Thus is important for the applicator to know where to find it and when to take it with potentially different state rules or different labels in marketplace.	8/16/2022 8:36 PM
2	As long as the approved training includes the content that EPA wants the applicators to be informed of, then LMT would serve to expose them to the information. Without the mandated training they may not be aware of those specific hazards or safety measures.	8/15/2022 3:01 PM
3	NCSU has always felt that state specific training was necessary for dicamba products, and yes that training has helped us in NC. However, for paraquat, we did go with the national training option. We also completed our own training for the Soil fumigants back in the day.	8/15/2022 10:47 AM
4	Sometimes label-mandated training is not enough to adequately ensure compliance.	8/15/2022 12:02 AM
5	when the labels are complex, and EPA wants to have additional training to improve/check the competency of commercial and private applicators so that they can make safe applications and better understand the label language because sometime label language can be ambiguous. These trainings serve the purpose ONLY if applicators IDENTITY is confirmed and secondly, applicator KNOWLEDGE is checked during the training. Otherwise, these trainings are of NO value! Please keep in mind these applicators have already been tested for their competency when they got their licensure or certification.	8/12/2022 8:40 AM
6	Much of this depends on the applicator. Individuals wanting to learn will take something away from the course. We've seen that annual training leads to complacency in some individuals.	8/11/2022 6:09 PM

	Must strike a balance on how much training is too much.	
7	The required annual dicamba training has dropped considerably since it was first implemented. We have issued several settlement agreements because applicator did not take dicamba specific training. The companies have been doing the training.	8/11/2022 2:21 PM
8	While the main applicators will take the trainings, they are not always sharing the proper information with all Handlers involved nor are they ensuring that the Handlers are following the requirements and safety measures.	8/11/2022 1:28 PM
9	While it is effective for certain products, requiring it on many different products becomes overwhelming for applicators.	8/11/2022 11:15 AM
10	Maybe. Since I'm not aware of all the products which require training, I can't provide an opinion. If using paraquat as an example, then I would answer "yes".	8/2/2022 4:58 PM
11	Where I do believe additional instruction can provide additional information and some applicators will find value, I do believe that LMT also creates additional confusion to the end user and in some cases makes the label difficult to comply with.	8/2/2022 3:50 PM
12	we have very few products registered in Alaska that have label mandated training requirements, so it is difficult for us to gauge.	8/2/2022 2:40 PM
13	As more trainings become required it becomes difficult for the end-user and enforcement agents to keep track of them.	8/2/2022 11:56 AM
14	There are instances when someone can complete the training only to allow purchase of the product that will be used by someone else, "quick-clicking" through the training that results in little educational impact by the learner, or taking training on behalf of someone else who actually uses the product.	8/1/2022 4:48 PM
15	I believe it does but I have not taken the training.	8/1/2022 4:45 PM
16	In terms of content, I believe the training is adequate when the training is EPA approved.	8/1/2022 3:58 PM

# Q5 Do you believe label mandated training should be used for more products?

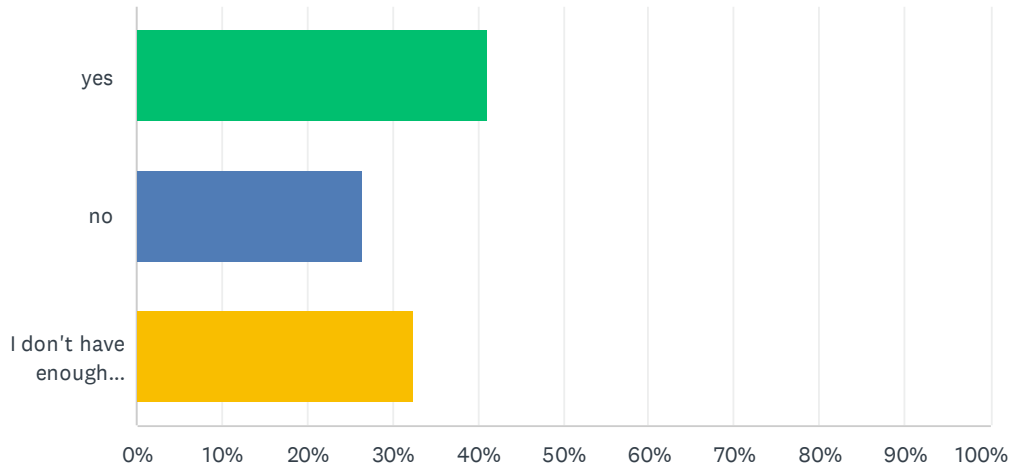
Answered: 33 Skipped: 1



ANSWER CHOICES	RESPONSES	
yes	42.42%	14
no	57.58%	19
TOTAL		33

### Q6 Do you feel the current examples for label mandated training are consistent and accessible to pesticide applicators?

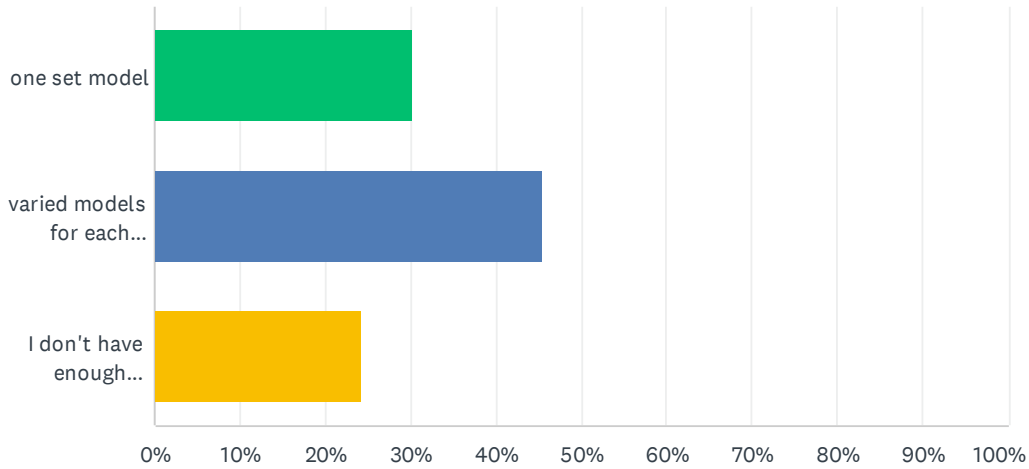
Answered: 34 Skipped: 0



ANSWER CHOICES	RESPONSES	
yes	41.18%	14
no	26.47%	9
I don't have enough information	32.35%	11
<b>TOTAL</b>		<b>34</b>

### Q7 Do you feel there should be one model for label mandated training or should it vary depending on the product?

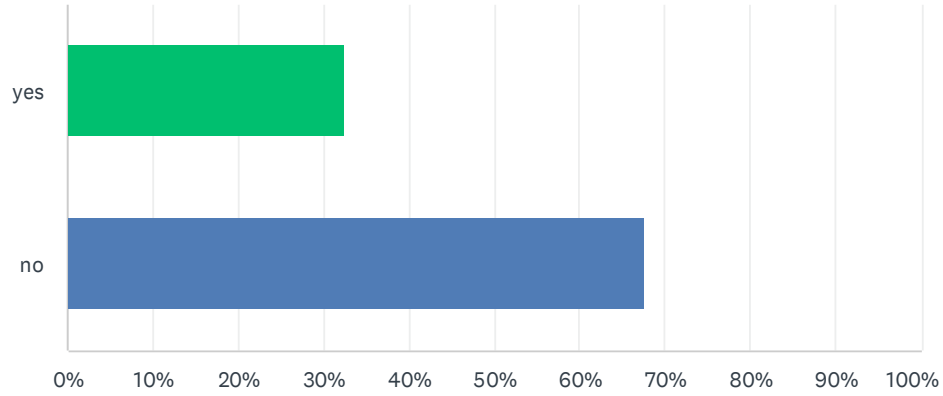
Answered: 33 Skipped: 1



ANSWER CHOICES	RESPONSES	
one set model	30.30%	10
varied models for each product	45.45%	15
I don't have enough information	24.24%	8
<b>TOTAL</b>		<b>33</b>

### Q8 Have you performed any training record inspections specifically focused on label mandated training?

Answered: 34 Skipped: 0



ANSWER CHOICES	RESPONSES	
yes	32.35%	11
no	67.65%	23
TOTAL		34

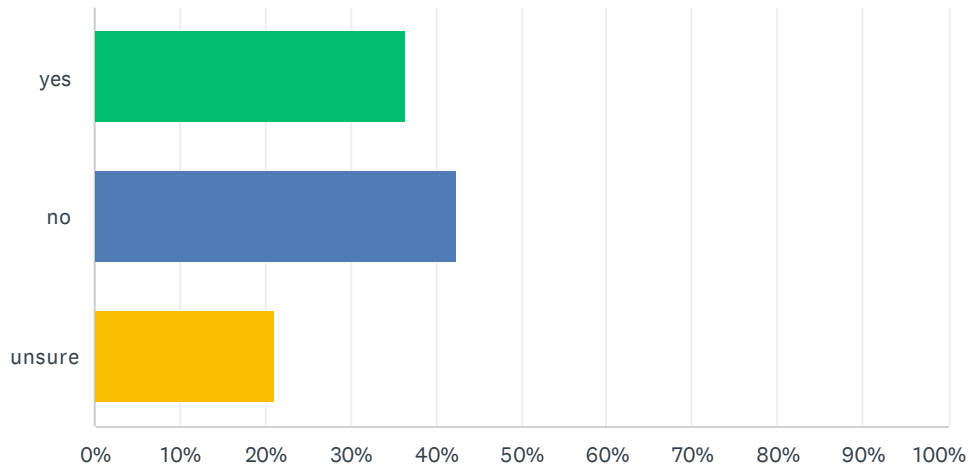
## Q9 If yes.....how did you ensure compliance?

Answered: 15 Skipped: 19

#	RESPONSES	DATE
1	n/a	8/15/2022 3:01 PM
2	Not training records specifically, but during the season we routinely ask NPSEC for a list of attendees for NC to help with ag use inspections. .	8/15/2022 10:47 AM
3	We verified that training completion through the registrant.	8/15/2022 12:02 AM
4	Requested verification of said training.	8/11/2022 9:54 PM
5	Inspectors checked for certificates of completion.	8/11/2022 6:09 PM
6	requested the applicator to prove compliance	8/11/2022 3:36 PM
7	applicator would show inspector proof they took training or we look on the excel spreadsheet the companies provide on who took training.	8/11/2022 2:21 PM
8	Field inspections, distribution record reviews, verified if label mandated training were kept on field and documented.	8/11/2022 1:28 PM
9	The department requires a certificate be attained fom training, that certificate is verified during the inspection process.	8/5/2022 1:19 PM
10	We've asked for training records as part of application record inspections.	8/2/2022 4:58 PM
11	proof of completion	8/2/2022 9:55 AM
12	verified the training was completed.	8/2/2022 8:36 AM
13	Requested evidence of training completion, as required by label-mandated record keeping.	8/1/2022 4:48 PM
14	Use inspections and result compare to the training requirements.	8/1/2022 3:54 PM
15	They must possess the credential proving they have successfully completed the training.	8/1/2022 3:38 PM

**Q10 Is the completion of label mandated training currently counted towards continuing education/recertification credit in your state or territory? (If some sources are allowed but others aren't, answer yes. Only answer no if the training never counts towards recertification credit)**

Answered: 33 Skipped: 1

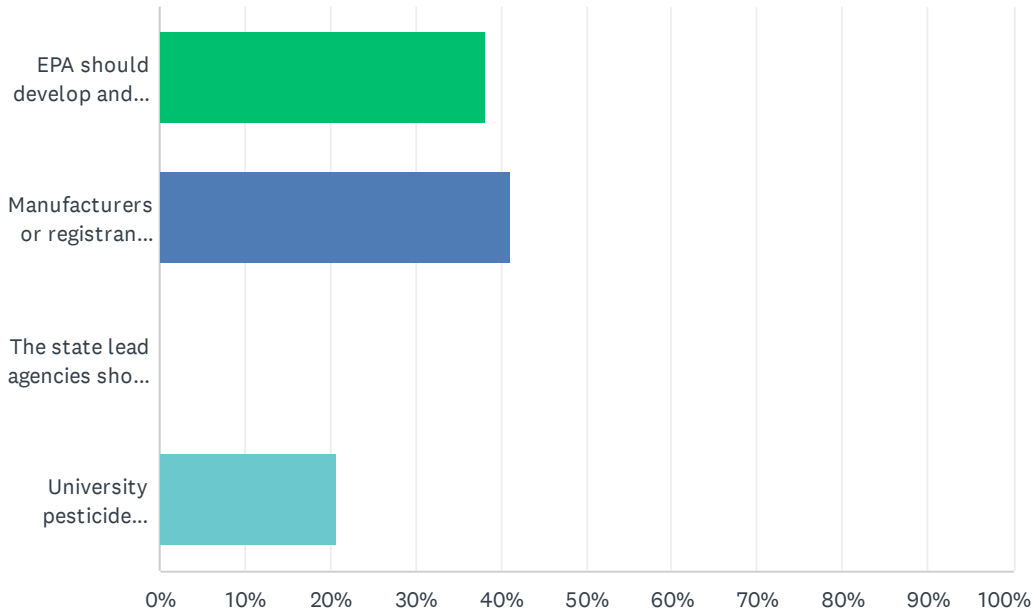


ANSWER CHOICES	RESPONSES
yes	36.36% 12
no	42.42% 14
unsure	21.21% 7
<b>TOTAL</b>	<b>33</b>



### Q11 Who should be responsible for developing training materials related to label mandated training? Please only select one answer.

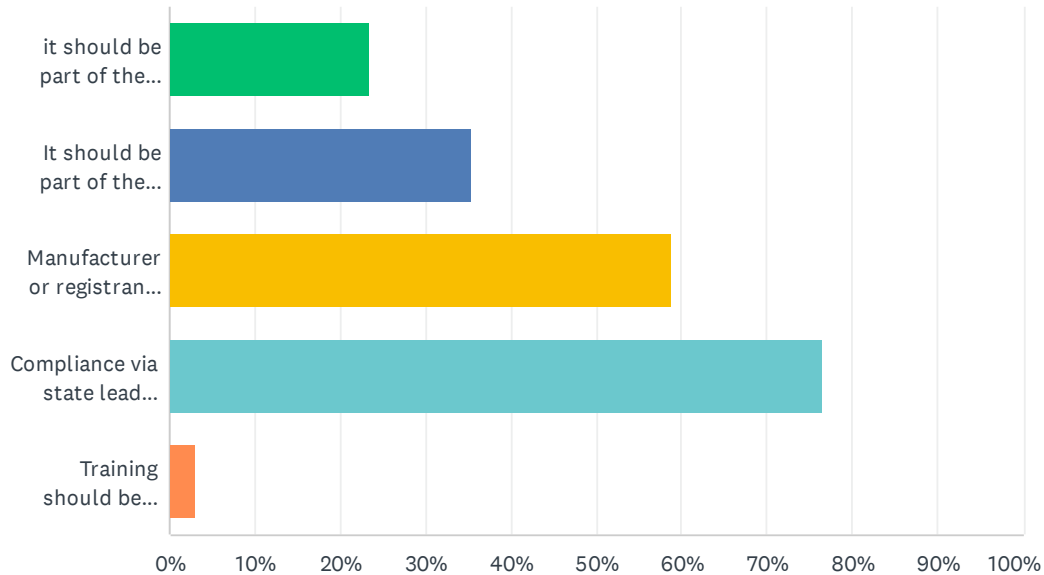
Answered: 34 Skipped: 0



ANSWER CHOICES	RESPONSES	
EPA should develop and distribute all standards and materials.	38.24%	13
Manufacturers or registrants should be required to create training materials for their products.	41.18%	14
The state lead agencies should develop all materials.	0.00%	0
University pesticide safety education programs should develop all materials.	20.59%	7
<b>TOTAL</b>		<b>34</b>

### Q12 How should enforcement of the training requirements be handled (check all that apply)?

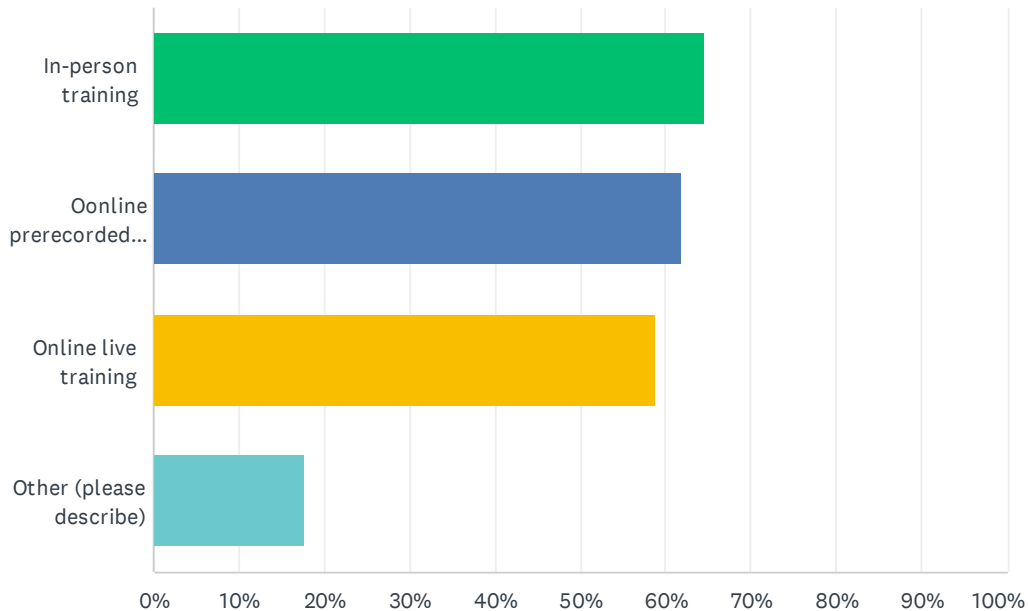
Answered: 34 Skipped: 0



ANSWER CHOICES	RESPONSES	
it should be part of the pesticide license certification process	23.53%	8
It should be part of the pesticide license re-recertification process	35.29%	12
Manufacturer or registrant enforcement before sale (stewardship plan)	58.82%	20
Compliance via state lead agency inspections	76.47%	26
Training should be readily available, but no enforcement or penalty for noncompliance.	2.94%	1
Total Respondents: 34		

### Q13 How should the training be structured/formatted if the EPA requires specific training for additional products? (Please select all that should apply.)

Answered: 34 Skipped: 0



ANSWER CHOICES	RESPONSES
In-person training	64.71% 22
Online prerecorded training	61.76% 21
Online live training	58.82% 20
Other (please describe)	17.65% 6
Total Respondents: 34	

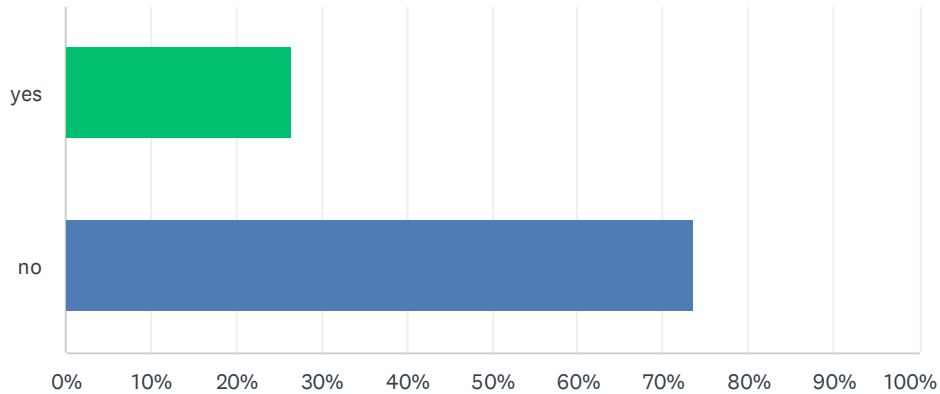
#	OTHER (PLEASE DESCRIBE)	DATE
1	Having In-Person trainings with the online option is what seems to accommodate the greatest number of applicators. There will always be a large number of people who will only go to in person classes and many states may not approve online classes for credit approval. From a Licensing standpoint, we get much less pushback when we can offer pesticide credit for a training that "we're" making them go to. Online is a convenient option for getting large numbers of applicators to complete a training without overwhelming the CES training locations. Unfortunately pre-recorded trainings, available on demand, may or may not be approved in every state for pesticide credit.	8/15/2022 3:01 PM
2	I think the training mode would depend on the information the label mandated training needed to provide. Sometimes, in person training is the proper forum and sometimes, online training can fulfill the job. I think reflection and follow up should be part of the process to ensure that training decisions are based on evidence of efficacy.	8/12/2022 10:53 AM
3	any platform (in person, online live or self-paced), these programs must have strong verification and accountability, otherwise, providing these trainings won't determine the	8/12/2022 8:40 AM

competencies of the individuals who will be using these products. The foundation of these trainings must be based on the checking the applicator's COMPETENCY!!

4	A variety of training options will allow access to a wider range of applicators.	8/11/2022 6:09 PM
5	Have customer support for any questions that may be brought during pre-recorded trainings, have email support mechanism to answer those questions.	8/5/2022 1:19 PM
6	"Online" training should be formatted in a way that requires periodic quizzes to test comprehension before the learner can move on, a minimum passing score to pass the training, and a certificate generated at the end to prove compliance.	8/1/2022 4:48 PM

# Q14 Have you received feedback from employers and/or pesticide applicators about label mandated training?

Answered: 34 Skipped: 0



ANSWER CHOICES	RESPONSES
yes	26.47% 9
no	73.53% 25
TOTAL	34

#	IF YOU ANSWERED YES, WHAT FEEDBACK HAVE YOU RECEIVED?	DATE
1	I've only heard of the difficulties with the paraquat training so far. It is difficult to pass the test and make a 100%.	8/15/2022 10:47 AM
2	Applicators have inquired about the difference in requirements regarding annual vs. multi year training.	8/11/2022 6:09 PM
3	Needs to be in multiple languages. Duplicates what the state requires.	8/11/2022 3:36 PM
4	They take the training in January, but don't make the application until June. Label review is an issue.	8/11/2022 2:21 PM
5	Sometimes difficult to access on line. Language barriers for some demographics. May not actually test the competency and take away knowledge of the person taking the training.	8/11/2022 1:28 PM
6	There is no database to check the training making an encumbrance on both applicator and enforcer.	8/2/2022 11:56 AM
7	Comments run the range from "training is excellent" to "training is inadequate" or "meaningless". Most farmers see it as government overreach, commercial applicators see it as a necessary evil. Anyone who has been harmed by the pesticide that requires label-mandated training will tell you it is inadequate.	8/1/2022 4:48 PM
8	The training was very basic, but the persons taking the training understood the goal of the training. A few people stated the training was a waste of time as it didn't cover anything they had not received previously in applicator training sessions.	8/1/2022 3:58 PM
9	Additional costs and burden to applicators.	8/1/2022 3:38 PM

## Q15 If yes, what feedback hve you recieved?

Answered: 3 Skipped: 31

#	RESPONSES	DATE
1	n/a	8/15/2022 3:01 PM
2	This was answered in #14.	8/11/2022 1:28 PM
3	Isn't this the same question as he second block under #14?	8/1/2022 4:48 PM

## Q16 If you have additional suggestions on how to improve label mandated training, or general thoughts on the topic, please include them in the space below.

Answered: 18 Skipped: 16

#	RESPONSES	DATE
1	1. Having a system to track who completed the training and clearly articulate who needs to track it (e.g. employer, employee, SLA, other) to try to make it consistent between SLA trainings and Federal/EPA trainings would help for clarity to regulated public. 2. Along the same lines of tracking the information indicate what a person (again who retains the record, employer, employee?) should retain to prove (e.g. certificate) completion (required record) and for how long, would help for compliance monitoring. 3. Having lots of outreach on where to find label mandated training, what products required it (e.g. some SLAs may also require it) is important.	8/16/2022 8:36 PM
2	Could not answer, for I am not familiar with Label Mandated Training	8/15/2022 3:10 PM
3	If these training are going to continue being the trend, there should be a document created from EPA stating what information they want covered on the mandated training agenda for it to be acceptable. This would allow states to collaborate (SLA & PSEP) and get input from EPA and Registrants if needed to develop trainings specific to a particular state and using state specific crops, pests or locations and hopefully make a training that would be engaging to the applicator. NC did this with the Auxin trainings. The Auxin trainings were a collaboration, and the outcome was excellent.	8/15/2022 3:01 PM
4	I really think training should be a corroborative effort with SLA, PSEP, registrants and EPA. If one group tries to develop training, I'm afraid very valid points may be lost. But a group effort will lead to a better training product.	8/15/2022 10:47 AM
5	As the vertebrate pest specialist, I have dedicated a portion of my training on key aspects of labels that may be missed. I can't call it label mandated training but it does emphasize important points. I guess I don't know why continuing education can't address application issues. If a product is so dangerous or problematic that training/enforcement doesn't resolve the problems, then perhaps the product shouldn't be registered? Otherwise, I would think the answer would be a specific certification that is so rigorous, applicators who passed the certification would be allowed to use these highly volatile products because they could charge enough to make following the guidelines worth their while.	8/12/2022 10:53 AM
6	SLA's should approve all training so that there is assurance that state specific requirements are covered. There should be a higher level of verification and accountability for these trainings. Just attendance does not mean the trainings are affective.	8/12/2022 8:40 AM
7	Short and too the point is always best.	8/11/2022 6:09 PM
8	reading and understanding the label should be completed prior to making any application of a pesticide. The mandated training has not really increased more label reading and understanding by the applicator.	8/11/2022 2:21 PM
9	NA	8/11/2022 1:39 PM
10	As label mandated trainings are planned and developed, the state lead agencies and state pesticide education programs need to be involved with developing or at least providing peer review on drafts of the curriculum for the trainings. The draft trainings need to be vetted via test audiences prior to implementation.	8/11/2022 1:28 PM
11	Training requirements need to be displayed more prominently on labels and more outreach needs to be done by manufactures and retailers specifically for private applicators using paraquat.	8/11/2022 11:15 AM
12	Applicator should have LMT certificate of training in hand when purchasing products from	8/5/2022 1:19 PM

	pesticide dealers.	
13	Training for various products needs to be product-specific, but consistent in the competencies and safety information addressed. EPA cannot expect states to increasingly monitor and enforce product-specific label mandated training for numerous (and an increasing number of) products. States do not have the funding, staff, time, or capability to give, track, monitor, and enforce this type of additional training that goes beyond applicator licensing and recertification training if the trend in the future is going to be requiring this for an increasing array of products.	8/4/2022 1:34 PM
14	There needs to be a up to date easily accessible database of all completed trainings if states are to be expected to effectively enforce them.	8/2/2022 11:56 AM
15	Label mandated training needs to be enforceable.	8/2/2022 8:36 AM
16	I believe there is an unanswered question by EPA as to what standards they use to decide label-mandated training is required, and whether those standards are risk-based or complaint driven. Why is RUP dicamba training required annually when paraquat training required every three years? Are plant damage incidents more important to EPA than human harm incidents? Why is soil fumigant training only required for the person who purchases the product instead of all applicators using the product? Is purchase of a soil fumigant inherently hazardous, or is it the use of the pesticide that presents the risk? These questions speak to the inconsistency of how OPP has used label-mandated training, and while each user group is different, the consistency of the training and pain point (purchase vs. use) is different, and certainly not apparently relevant to the human health risk of the pesticide.	8/1/2022 4:48 PM
17	The training needs to be mandated, it should be part of the certification process, not an additional requirement for certified applicators. If it is something that needs to be emphasized to existing applicators that may not have had the training, then target those applicators specifically and make the requirement part of certification for new applicators.	8/1/2022 3:58 PM
18	All risk mitigation measures placed on labels, including additional training requirements come at a cost to applicators and the state enforcement office. EPA should take into account the cost of enforcing complex measures placed on labels. The time and money spent just on dicamba risk mitigation have been astronomical to state lead agencies without much consideration to the SLA or impact on SLA programs. If the savior to maintaining each chemical is additional workload to the SLA, sooner than later the state will not be able to effectively enforce these measures.	8/1/2022 3:38 PM