

2024

*Committee, Workgroup, and Liaison
Reports to the Membership*

Check Sample Program Committee

Ping Wan

2/20/2024

General summary of work group/liaison activities for the year:

The 2024 AAPCO Check Sample Program was successfully conducted by the Pesticide Laboratories, Office of Indiana State Chemist. Annual subscription fees are kept unchanged at \$200 per year for U.S. labs and \$250 per year for international labs. This has been the fee structure set by the AAPCO board since 2008. The AAPCO treasurer collects payments from the program participants and the entire proceeds of around \$20,000 is donated to the AAPCO general fund.

Check sample program 2024 attracted a total of 64 laboratories from the U.S. and all over the world. Interests in the program remain strong from both U.S. domestic labs and labs oversea. The 33 international labs come from 25 countries across four continents.

Three commercial pesticide products containing five pesticide active ingredients were offered in the 2024 program. We continue to offer a variety of analytes, matrices, and fortification levels each year to help labs gain experience testing many different types of formulation samples on the market. Homogeneity tests were performed by the hosting lab to guarantee the high quality of the test samples offered.

Future activities:

1. Ping will give a program update at the upcoming Lab Director's meeting during the AAPCO annual conference in March 2024.
2. Analytes of interest to be offered for the 2025 program will be selected in September 2024.
3. Samples for the next round of testing will be shipped to participants during January 2025.

Respectively submitted,

Ping Wan

Office of Indiana State Chemist

AAPCO Standing Committee Report to Annual Meeting

Standing Committee or Work Group: **Laboratory Committee**

Chair Person's Name: **Tom Phillips**

Date of Report: **02/12/2024**

Issues to be raised for discussion by AAPCO Board or General Session: These are the issues the working group or standing committee wishes to raise for specific deliberation by the AAPCO Board of Directors and/or the AAPCO General Session at the annual meeting. (Note: This section can also include a self-assessment by the committee as to the effectiveness and continued need for this committee function.)

The Laboratory Committee has no issues to be raised at this time.

The Laboratory Committee requests approval of the followings by the AAPCO Board or General Session:

New Committee Chair and SFIREG liaison for the 2024-2025 term

- Chair: Ashley Pierce at Virginia Department of General Services; Division of Consolidated Laboratory Services (resume, Attachment #1)
- SFIREG Liaison: Jona Verreth at Montana Department of Agriculture (resume, Attachment #2)

General summary of work group/liaison activities for the year:

This summary will be included in the General Session meeting folder.

(Note: Reports that contain specific recommendations will be acted upon individually.)

AAPCO Laboratory Committee Annual Meeting Break-out Session

The Laboratory Committee meets annually during the AAPCO spring meeting. The following report outlines activities from last year's meeting.

The Laboratory Committee met on Monday, March 6 and Tuesday, March 7, 2023 during the AAPCO annual meeting. Virtual attendance option was also provided. There were approximately 35 participants from 20 state laboratories, a few were from EPA.

Ping Wan of the Indiana State Chemist's Office provided an update on the AAPCO Formulation Check Sample Program. In 2023, eighty-one (80) laboratories participated in the program (more than half are international labs than domestic ones), including regulatory/government and private industries. Difficulties of international shipping due to complicated shipping requirements for was mentioned. Refer to the AAPCO Check Sample Program Report for details.

An update on the Wisconsin Residue Check Sample Program was given by Matt Gramse of Wisconsin's Department of Agriculture, Trade and Consumer Protection. There were 30 labs participated in the program in 2023. Two rounds of samples were sent out, one set of soil in the spring and another set of foliage in the fall. The program currently has five testing groups; glufosinate, glyphosate and metabolite, imidazolinones or strobilurins, pesticides, herbicides. There is also a plan to have unknown pesticides in soil and paraquat/diquat in vegetation samples as a pilot in 2025.

Craig Vigo from EPA's repository gave an update on their activities. The Newsletter continues to serve as good communication tool between the repository and the labs. Important reminders to the labs are:

- Do not throw away expired standards. Check with the repository for new Certificates of Analysis (COA). Request the new COA on the order form with the expired analyte and its lot number.
- The repository is unable to provide the standards that are no longer registered for use in the United States. Those standards may be available from a commercial supplier.
- For requesting analytical methods, contact Thuy Nguyen or Gregory Verdin.

Updates were giving on the EPA National Pesticide Laboratory Analyst Workshops. Minnesota and Wisconsin are the host in 2023. Minnesota will be in the summer at USDA ARS ERRC with the help from Dr. Steven Lehotay and his team. Wisconsin will be hosting in the fall. Michigan is unable to host in 2023 due to personnel changes etc. Colorado and Nevada will be hosting in 2024.

Amy Mysz, Stuart Willison, Lukas Oudejans (EPA R5) gave presentations of their articles:
Remediating Indoor Pesticide Contamination from Improper Pest Control Treatments: Persistence and Decontamination Studies (2020)
Evaluating Wipe Sampling Parameters to Assess Method Performance and Data Confidence during Remediation of Hazardous Pesticide Misuse Chemicals on Indoor Materials (2022)

Other topics discussed in the meeting includes 25(b) product testing, Laboratory relocation and continuance of operations (an example by the Office of Indiana State Chemist), difficult compounds/matrices and solutions, and ISO accreditation. At the ISO discussion, the participants shared recent assessment findings & solutions and answered questions on implementation and other related issues.

EPA/AAPCO Lab Committee Conference Calls

The Laboratory Committee also meets quarterly at EPA/AAPCO Lab Committee Conference Call hosted by EPA. Issues that need FIFRA labs attention more frequently than annually are discussed in the calls. It provides the opportunity for analyst level employees to participate in

*nationwide discussions. The labs who are unable to attend the annual meeting for financial reason can attend the calls and directly communicate with other labs.
The following report outlines main activities.*

The hosting state for the EPA National Pesticide Laboratory Analyst Workshops were recruited for FY2024. Minnesota and Wisconsin volunteered for FY2021 and FY2022 respectively. The current plan is to have two workshops in a year to cover the postponed workshops due to the COVID-19 pandemic. The most updated plan is below:

FY2019 workshop	Nevada	conduct in 2024
FY2020 workshop	Michigan	(currently unable to conduct)
FY2021 workshop	Minnesota	conducted in 2023
FY2022 workshop	Wisconsin	conducted in 2023
FY2023 workshop	Colorado	conduct in 2024

The Lab Committee continued discussions on the following topics in the quarterly calls in 2023: Maintenance cost, funding for instruments, challenging analytes, ISO accreditation, and pesticide formulations and PFAS.

The Laboratory Committee meeting in 2024

The Laboratory Committee is meeting in person and virtually during the 2024 AAPCO meeting in the afternoons of Monday, March 4 and Tuesday, March 5. Agenda topics include discussions on use of 3rd party company for instrument maintenance, update presentation on honeybee research, updates from the check sample programs, EPA Pesticide Standards Repository, and National Workshop and PREP lab course. The new Chair and SFIREG Liaison for the next term are going to be announced and approve by the Committee members at the meeting.

Respectfully submitted,
Yoko Johnson, Minnesota

ASHLEY F. PIERCE

GROUP MANAGER

803-984-5603

ASHLEYNF11@GMAIL.COM

OVERVIEW

I am a high performing manager with a passion for continual process improvement. Progressively more responsible supervisory experience has allowed me to create impactful positive organizational changes at a managerial level through group collaboration, critical yet creative thinking and improved workflow analyses. I have a successfully collaborated with teams to solve complex, high-stakes problems.

EXPERIENCE

EDUCATION —

M.S. Forensic Science
Virginia Commonwealth
University
Richmond, VA

B.S. Medical Technology
Minor: Chemistry
Winthrop University
Rock Hill, SC

KEY SKILLS —

Chemistry
Process Improvement
Quality Assurance
Problem Solving
Organization
Strategic Thinking
Collaboration
Communication

REFERENCES —

Available upon request

July 2018-present (40+hr/wk.)

Group Manager, Trace Organics and Pesticide Testing • Virginia Department of General Services; Division of Consolidated Laboratory Services (State Public Health and Environmental Testing Laboratory)

- Demonstrate effective supervision of a diverse group of scientists and laboratory specialists by:
 - clearly and concisely setting expectations and goals and holding staff accountable
 - ensuring goals are met by coordinating and prioritizing workloads.
 - providing guidance, instruction, and frequent constructive feedback through clear and professional communication.
 - performing evaluations and counseling when appropriate.
- Build morale through responsible leadership, professionalism, and promoting fairness through open lines of communication in the workplace.
- Develop and demonstrate effective fiscal management for personnel, capital investment and operating expenses by monitoring and tracking expenditures and revenue, prioritizing and scheduling replacement of resources, as needed.
- Maintain instrument, equipment, and chemical inventory control logs.
- Prepare cost analysis information for analyses performed by the Organics testing group.
- Collaborate with customers to implement continuous improvement processes to increase pre-analytical and post analytical efficiencies.
- Successfully interpret and communicate complex methodologies as well as state and federal regulations to trainees and clients.
- Proactively manage human resources, anticipate, and mediate/resolve issues and concerns in a fair manner to build trust among a diverse team.
 - recruit, hire, onboard and train new employees.
- Act as project manager to coordinate on-going and new projects to minimize production losses while still maintaining effective working processes, ensuring consistent output and deliverables are met in a timely manner.

- Meet with employees monthly at a minimum, to discuss and document all significant quality, safety, and customer issues as well as important work practices to all employees.
- Effectively implement agency and group initiatives, policies, and procedures to ensure the group is consistently working towards continual improvement and furthering the Division's mission (workforce, technical and professional development).
- Participate in annual management review process to ensure continued improvement of laboratory and quality assurance through agency risk identification and growth opportunities.
- Perform quarterly safety inspections to ensure a safe and healthy workplace for employees. Investigate safety instances in a timely manner and work to reduce work related injuries.
- Maintain an effective quality assurance program by ensuring the compliance of group members with all QA policies and/or procedures. Ensure staff competency is documented and training files maintained.
- Review data produced by scientists, provide interpretations, conclusions, and guidance. Review and approve work of group members as defined by division standard operating procedures and policies.
- Initiate, when necessary, investigations into non-conformances to determine a root cause and provide guidance and workflow changes as needed to ensure no reoccurrences of nonconformities.
- Perform a documented review, biennially, of all group standard operating procedures, forms, and job aids.
- Generate Memorandums of Understandings (MOUs), contracts, and quality assurance project plans (QAPPs) to delineate testing needs and responsibilities with various state and federal agencies.
- Manage the various test areas sample backlog to allow test completion within customer/division defined workload requirements and turnaround times.
- Ensure compliance with accreditation (TNI/ISO) and/or federal, state, and local regulatory requirements (CWA, SDWA, EPA).
- Proficient in Microsoft Office Suite, data management systems, LIMS, Qualtrax document control software, various inhouse database systems.
- Familiar with VITA, Oracle PeopleSoft.

Feb. 2006-July 2018 (40+hr/wk.)

Toxicology Group Supervisor • Virginia Department of Forensic

- Progressively more responsible roles with the Department as promoted from Fellow to Forensic Laboratory Specialist to Scientist I to Scientist II to a Senior Scientist level and eventually Supervisor.
- Received and analyzed biological evidence for the presence or absence of alcohol and other drugs and poisons. As a controlled substances examiner, performed analyses on submitted evidence for the presence or absence of controlled substances and marijuana.
- Generated reports attesting to the results of those analyses and examinations and testified in court when needed.

- Responsible for proper handling of evidentiary samples with accurate chain of custody.
- Communicated in an effective, professional manner with internal and external customers by providing status updates and resolution to inquiries as needed.
- Analytical techniques utilized include color tests, microscopy, thin layer chromatography (TLC), direct analysis real time mass spectrometry (DART), infrared spectroscopy solid phase extraction, liquid-liquid extraction, protein crashes, ultraviolet/visible (UV/VIS) spectroscopy, enzyme linked immunosorbent assays (ELISA), gas chromatography with various detectors, mass spectrometry, and liquid chromatography while functioning as primary operator of multiple instruments.
- Responsible for the proper destruction of evidence and/or transfer of evidence to independent laboratories for court ordered testing.
- Acted as an internal auditor for the Department of Forensic Science yearly internal audits, as required for accreditation by the American Society of Crime Laboratory Directors/Lab Accreditation Board (ASCLD/LAB) (ANAB).
- Acted as the quality control liaison for toxicological pipettes, diluters, and balances as well as act as the uncertainty of measurement champion for the central toxicology laboratory.
- Served as a technical resource for the section, and for trainees, when needed.
- Participated in the training of and acted as training coordinator for new forensic scientists and forensic laboratory specialists.
- Coordinated scientists' testing rotation schedules.
- Assigned testing and discussed with medical examiners case statuses.
- Discussed with user agencies Department's capabilities.
- Supervised employees to ensure expectations are clear, communicated and met.
- Provided frequent feedback and performance evaluations of employees.
- Ensured a safe and healthy workplace for employees.
- Ensured quality by monitoring the compliance of section members with all QA policies.
- Monitored section workload, case priorities and coordinated scheduling and transfers.
- Effectively implemented agency and group initiatives, policies, and procedures.
- Proficient in Microsoft Office Software, data management systems, LIMS and Qualtrax document control software.
- Assisted with compliance of accreditation standards (ISO 17025).

Sept. 2002-July 2004 (40+hr/wk.)

Medical Technologist • Medical University of South Carolina

- Received and ordered testing for specimens received in the fast flow laboratory.

- Performed testing of specimens at a moderate to complex level for the operating room (blood gas and electrolyte levels), chemistry and hematology laboratories and certain microbiology procedures.
- Instrumentation used included several immunoassay techniques and analyzers, flow cell cytometric analyzers, nephelometers, spectrophotometers, coagulation analyzers and blood culture systems.
- Performed troubleshooting, quality control and maintenance of laboratory instrumentation.
- Ensured proper handling of blood products, such as red blood cells (RBCs), fresh frozen plasma (FFP), and cryoprecipitate.

HIGHLIGHTS

- Saved organization over \$30,000 yearly recurring costs through contract addendums to reduce fiscal impact of supply costs with client.
- Provided quoting, financing documentation and instrument installation coordination for over \$2 million dollars in instrumentation purchases during a multi-year project.
- Successfully applied for and received laboratory approval for EPA methods 537.1 and 200.7 UCMR5 reporting. Only 60 labs (public and private) in the country received this approval.
- Implemented a motor fuels recycling program to decrease disposal costs and offer free gas for state agency fleet use.
- Cohosted an EPA Pesticide Residue workshop.
- Implemented process improvement for specific analytical testing that showed an overall 50% increase in efficiency with no loss of quality.
- Created laboratory training manual to ensure cohesivity of knowledge base and continuity of operations through successful succession planning.
- Through collaboration with IT staff and APHL grants, implemented website improvements to the laboratory's environmental website.
- Brought in over \$200k in revenue in one year with the implementation of new testing capabilities.
- Provided testimony in general district, circuit, and federal courts.
- Initiated process improvements for evidentiary sample tracking and inventory.

PROFESSIONAL AFFILIATIONS/ AWARDS

- The NELAC Institute, 2023-current
- Society of Forensic Toxicologists, Inc., 2012-2019
- Mid-Atlantic Association of Forensic Scientists, 2007-2019
 - Professional Development Award 2016
 - Criminalistics Chair 2018

Resume Jona Verreth

Personal Data

407 Sanders Ave
Bozeman, MT 59718

Phone: 406-600-4430

Languages

English (fluent), Dutch (native), French (basics)

Experience

Laboratory Manager, Montana Department of Agriculture, Bozeman, Montana (05/2018 – present)

- Manages and directs all analytical laboratory programs and activities including Pesticide Compliance, Agricultural Groundwater Monitoring, Feed and Fertilizer, Hemp and Agricultural Experiment Station Analytical Services as well as a variety of special analytical projects. Develops short- and long-term plans and program objectives to ensure programs comply with federal, state and other national and international standards and to develop cost-effective plans for programs.
- Develops laboratory policies, procedures, and guidelines that comply with all federal and state requirements.
- Identifies staffing needs and recruits and hires employees. Evaluates the performance of all positions directly supervised.
- Directs and coordinates all administrative details related to laboratory programs to ensure cost-effective expenditures as well as compliance with state and federal requirements.

Supervisor: Ian Foley 406 444 2945
40 hrs./week

Technical Program Manager/Database Manager, Montana Department of Agriculture, Bozeman, Montana (02/2014 – 04/2018)

- Oversees the pesticide testing services at the lab in support of our pesticide enforcement program, groundwater program and AES program.
- Manages 3 people as technical program manager.
- Manages all computer and software related issues in conjunction with ITSD, including the lab's LIMS system.
- Assist the bureau chief with consulting services the lab provides regarding pesticide testing.

Supervisor: Heidi Hickes 406 548 4228
40 hrs./week
Reason for leaving: pursuing promotion

Chemist/QAO/Database Manager, Montana Department of Agriculture, Bozeman, Montana (02/2013 – 02/2014)

- Oversees the Quality Management System at the analytical lab. In charge of the ISO 17025 accreditation process.
- Manages all computer and software related issues in conjunction with ITSD, including the lab's LIMS system.
- Provides assistance to the Feed & Fertilizer Technical Program Manager.

Supervisor: Angela Schaner 406 585 8375

40 hrs./week

Reason for leaving: promotion

LC/MS analyst, Eurofins, Nazareth, Belgium (10/2012 –01/2013)

Application of LC/MS expertise in analyzing environmental samples.

Supervisor: Johan Schaep +32 9 222 77 59

40 hrs./week

Reason for leaving: moving back to Montana

Chemist, Montana Department of Agriculture, Bozeman, Montana (01/2006 – 08/2012)

Varied residue analysis on vegetation, soil, water, clothing and other samples using LC/MS/MS and GC/MS/MS.

Analysis of feed and fertilizers for the presence of inorganic elements using ICP-OES and other applicable instruments.

Developing and validating new methods and method write up.

Performing of routine equipment and instrument maintenance and repair.

Directs laboratory technicians and part time personnel as a lead worker.

Evaluation committee member for the purchase of our MS systems (Waters XEVO in 2009, Agilent GC/MS/MS 7000 in 2010 and Waters XEVO TQ-S in 2011).

Supervisor: Angela Schaner 406 585 8375

40 hrs./week

Reason for leaving: moving to Belgium

Technician, ChevronTexaco Technology, Ghent, Belgium (2002 - 2005)

Analysis of oil and coolant samples using ICP-OES, X-Ray fluorescence, titration, viscosity, density, ferrography and a wide variety of smaller tests.

ISO 9002 certified lab.

Supervisor: Marc Proot +32 478 78 76 03

40 hrs./week

Reason for leaving: moving to Montana

Technician, Aventis Cropscience, Ghent, Belgium (2001-2002)

DNA extraction, PCR, Western blot, radioactive labeling.

Supervisor: -

40 hrs./week

Reason for leaving: better opportunity at ChevronTexaco

Technician, ChevronTexaco Technology, Ghent, Belgium (2000)

Supervisor: Marc Proot +32 478 78 76 03

40 hrs./week

Reason for leaving: took a 9-month School of Biblical Studies course

Technician, P. Bruggeman NV, Ghent, Belgium (1999)

Quality control of alcoholic beverages.

Technician, Aventis Cropscience, Nazareth, Belgium (1998)

Responsible for in vitro laboratory growing Canola plants.

Education

Bachelor of Science of Biomedical laboratory technology,
KaHo Sint-Lieven, Ghent, Belgium, 1995-1997

Thesis: "The Influence of Different Additives towards the Leaching Behavior of Urea
Pesticides in Soil" at ADAS laboratories, Wolverhampton, UK.

State FIFRA Issues Research and Evaluation Group (SFIREG) Report for AAPCO

Chairperson Gary Bahr, WA

March 3 - 6, 2024

The State FIFRA Issues Research and Evaluation Group (SFIREG) is a permanent committee of the Association of American Pesticide Control Officials (AAPCO) and provides a mechanism for states/territories to communicate directly with EPA. It enables states/territories to play a meaningful role in the development of pesticide policies and regulations. SFIREG is composed of one state/territorial pesticide regulatory official from each of the ten EPA regions.

SFIREG held excellent meetings in June 2023 and December 2023 in Jackson, TN and Alexandria, VA respectively. SFIREG has had outstanding membership and participation from the designated SLAs from the ten EPA regions in the nation. The SFIREG Chair thanks the SFIREG representatives from 2023 and the new members that joined in 2023 and going into 2024. The SFIREG Regional representatives are all very experienced and veteran pesticide SLAs that are well respected in their states, regions, and also nationally. SFIREG appreciates all the participation from SLAs, tribes, and pesticide safety educators during the pre SFIREG meetings. SFIREG has successfully coordinated with EPA OPP, EPA OECA, EPA OCSPP, NASDA, EPA Regions, AAPCO, ASPCRO, TPPC, AAPSE, CTAG, Laboratory Directors, and other standing committees or workgroups such as the Technology and ESA workgroups. SFIREG has also successfully represented SLAs and AAPCO while attending and working with other agencies and groups including while attending professional meetings such as ACS, SETAC, and TPSA. SFIREG presentations on ESA and Pesticides were provided at these meetings and conferences including two ACS conferences, and also at SETAC and TPSA. The SFIREG Chair also represented SFIREG and SLAs at the CropLife Rise Pesticide Regulatory Conference in April 2023, and provided a presentation as part of the PRIA 5 Bilingual Label Language Panel with EPA OPP and CropLife Rise representatives. The SFIREG Chair provided a presentation as a part of an ESA Pesticide Panel during the TPSA conference in St Louis in February 2024.

During 2023, Full SFIREG held the June meeting in Jackson, Tennessee and the December meeting in Alexandria, Virginia. Each meeting was preceded by successful pre-SFIREG meetings managed by the Regional SFIREG representatives and their respective EPA Regional partners. The SFIREG Chair provided the Regional Representatives with pre-SFIREG topics and questions to discuss with the State Lead Agencies, EPA Regions, Tribes, Pesticide Safety Educators (PSEPs), and other partners. The June meeting was a unique opportunity to meet at a major university experiment station and learn from pesticide and crop production researchers and local growers, while learning about research findings and land management mitigation and best management practices that have been implemented on the west Tennessee landscape. The farmers in western Tennessee have implemented a significant number of successful practices for soil and water protection and the practices have been positive examples of pesticide mitigation. The meeting was successful due to the coordination and support from the University of Tennessee and other local and regional agricultural and pesticide industry partners. A number of EPA Office of Pesticide Program leaders attended the meeting and benefited from the opportunity to learn about the research and agricultural successes in the region. SFIREG

especially thanks Dr. Kim Pope Brown, Dr. Larry Steckel, and the University of Tennessee College of Agriculture and Extension. The June meeting started the prior Friday with a virtual component to provide time for some EPA presentations and also the Full SFIREG Regional Reports. This unique approach allowed SFIREG to focus on research findings and field tours while in Tennessee. The December SFIREG meeting in Alexandria was a more traditional meeting with a variety of excellent presentations by EPA OPP, USDA OPMP, the Joint Working Committee (JWC) Co-Chairs, the full SFIREG representatives, and other Associations and partners.

During CY 2023 and during the first few months of CY 2024, Full SFIREG considered a number of issues, taking several actions to address those issues. Specific issues include:

- SFIREG created a new Issue Paper, received Issue Paper updates, and received findings and/or conclusions from EPA. There have been ongoing discussions with EPA on various Issue Paper topics. SFIREG has the following updates:
- February 2024 - [SFIREG to EPA: Comments for Review of Requirements Applicable to Treated Seed and Treated Paint Products, EPA-HQ-OPP-2023-0420-0001](#)
- October, 2023 - [SFIREG to EPA: Comments on the Herbicide Strategy, EPA-HQ-OPP-2023-0365-0001](#)
- September 2023 - [SFIREG to EPA: Issue Paper – Mosquito Adulticide Mist Blower Use in Residential Settings](#)
- August 2023 - [SFIREG to EPA: Comments on PRIA 5 Bilingual Labeling, EPA-HQ-OPP-2023-0270](#)
- August 2023 - [SFIREG to EPA: Comments on Vulnerable Species Pilot Project, EPA-HQ-OPP-2023-0327](#)
- August 2023 - [EPA to SFIREG: Response to Extension Request for EPA-HQ-OPP-2023-0327 Comment Period](#)
- August 2023 - [SFIREG to EPA: Request to Extend Comment Period for EPA-HQ-OPP-2023-0327 \(Vulnerable Spps Pilot Project\)](#)
- June 2023 - [EPA to SFIREG Response to Treated Seed Issue Paper](#)
- May 2023 - [POM: Updated Paraquat FAQs](#)
- March 2023 - [SFIREG to EPA Docket EPA-HQ-OPP-0004-0115, EPA’s proposed interim registration decisions for the following pesticides: Docket EPA-HQ-OPP-2016-0141 DCNA Proposed Interim Registration Decision, Docket, EPA-HQ-OPP-2012-0565 Norflurazon Proposed Interim Registration Review Decision Docket, EPA-HQ-OPP-2014-0004 Thiophanate-methyl and Carbendazim Proposed Interim Registration Review Decision](#)
- February 2023 - [EPA to SFIREG: Response to Request to extend comment period for PIDs on several pesticides](#)
- February 2023 - [SFIREG to EPA: Request to extend comment period for PIDs on several pesticides](#)
- February 2023 - [SFIREG to EPA: ESA Workplan comments](#)
- February 2023 - [SFIREG to EPA: Rodenticide PIDS comments](#)

- SFIREG continued to work with Full SFIREG, the JWC, and the AAPCO Board to work with EPA on a variety of ongoing issues and topics.
- Both the Pesticide Operations and Management (POM), Chaired by Amy Brown (FL) and the Environmental Quality Issues (EQI), Chaired by Hotze Wijnja (MA) provided exceptional support to Full SFIREG and were instrumental in bringing these issues to fruition. Both working group teams also have new members beginning in the summer of 2023. The Joint Working Committees (JWC) held successful meetings in Spring 2023 and the Fall 2023. SFIREG thanks the JWC Chairs and Amy Sullivan (AAPCO) for organizing the meetings. The 2023 JWC meetings were very successful and the JWC Chairs are providing outstanding leadership, and the JWC members of EQI and POM are highly respected and appreciated.

Throughout the year there were also considerable accomplishments from the JWC. The POM Working Committee is focused on registration, certification, and enforcement related pesticide issues of national or regional importance. The EQI Working Committee is involved with pesticide issues related to water quality, threatened and endangered species, human health and the environment, risk assessments, and technical aspects of the implementation of pesticide programs.

Both EQI and POM have active and terrific members and they're successfully led by Amy Brown (FL, POM) and Hotze Wijnja (MA, EQI). The Chairs of EQI and POM held regular meetings with their working committee members. The JWC held successful meetings in Arlington in April and September. The agendas were packed with many important topics, including Dicamba, Pet Products and the Modern Approach to EPA and FDA Product Oversight, PFAS, Chlorpyrifos, Endangered Species Act, Registration Review, Seed treatment, Chlorine Gas RUP designation, Rodenticides, PRIA 5 Bilingual labeling, Endocrine Disruptor Screening Program, and Certification & Training. Participating partners included, EPA, USDA, U.S. Fish & Wildlife Service and many other stakeholders.

POM welcomed three new members in 2023: Patrick Farquhar (NC); Alexander Peacock (ME) and Ernesto Lugo (AZ). POM worked on many issues this year, including the draft FIFRA 24(c) Guidance document, making significant progress towards its completion. The final 24(c) Guidance should be available in early 2024. EQI welcomed Pam Bryer (ME/VT) as a new member. EQI worked on various topics and issues throughout the year including the drafting of an issue paper on mosquito control mist blower use in residential settings, evaluating methomyl fly bait and misuse incidents, following developments related to the treated seed regulation issue paper, ESA and pesticides, water quality and pesticides, PFAS and pesticides, and various pesticide active ingredients.

The JWC significantly contributed to the various SFIREG comment letters to EPA during the year. SFIREG provided comments to EPA on nearly every topic that was open in the federal register for comment. There was a tremendous amount of coordination with the SFIREG representatives, and other groups such as AAPSE, USDA OPMP, WSSA, industry, and other groups. The SFIREG Chair participated in the AAPCO Conference during the session related to providing public comments to EPA, and also participated in a number of other meetings such as with TPPC, AAPSE, and professional conferences and panel presentations.

For additional information regarding SFIREG or the working committees, including roles and responsibilities, current members and meetings, please visit the SFIREG and Working Committee blocks on aapco.org.

SFIREG continued to actively participate in meetings of the Tribal Pesticide Program Council (TPPC), which affords the opportunity to work on issues of mutual interest and leverage both resources and expertise. SFIREG also participated as a presenter at EPA's National Program Managers Meetings providing both headquarters and regional staff information regarding its activities and the resources available to them through AAPCO/SFIREG.

Looking ahead in 2024, Steve Dwinell (VT) will take over as the Chair of SFIREG and will lead SFIREG and will work with the JWC (POM & EQI) and the AAPCO Board. SFIREG will continue with normal pre SFIREG meetings and the Full SFIREG meetings in June and December 2024. SFIREG will continue to have regular coordination calls with EPA OPP and OECA. SFIREG will continue to work on issues brought up in 2024 related to a variety of topics. SFIREG will work to develop thorough processes for providing comments to EPA on a variety of topics and also work to resolve outstanding Issue Paper topics.

The next meeting of the Joint Working Committee will be in Annapolis, MD in April 2024. The next Full SFIREG meeting will be in June 2024 and is planned for the DC area. The fall SFIREG meeting will be in December in the DC area. The SFIREG Chair will attend the TPPC annual meeting planned for March 2024 and fall 2024.

Additional information regarding Full SFIREG and the Working Committees, including roles and responsibilities, current members and meetings is available at www.aapco.org.

Respectfully submitted,



Gary Bahr (WA) and SFIREG Chair

2024 AAPCO Annual Meeting – Worker Protection Committee Report

Work Group/Committee: Worker Protection Committee

Lead Person's Name: Kelly Friend

Members:

Member	Agency	Email Address
Amy Sullivan	AAPCO	aapco.sfireg@gmail.com
Tony Cofer	Alabama Dept of Agriculture Industries	tony.cofer@agi.alabama.gov
Jack Peterson	Arizona Dept. of Agriculture	jpeterson@azda.gov
Donna Marciano	California Department of Pesticide Regulation Enforcement Branch	Donna.Marciano@cdpr.ca.gov
Kelly Friend	Florida Dept. of Agriculture and Consumer Services	kelly.friend@fdacs.gov
Neil Richmond	Florida Dept. of Agriculture and Consumer Services	neil.richmond@fdacs.gov
Ricardo Davalos	Florida Dept. of Agriculture and Consumer Services	Ricardo.Davalos@FDACS.gov
Nick Sumner*	Georgia Dept. of Agriculture	nicholas.sumner@agr.georgia.gov
Antonio Castro-Escobar	Michigan Dept. of Agriculture and Rural Development	escobara@michigan.gov
Jasper Cobb	Mississippi Dept. of Ag and Commerce	Jasper@mdac.ms.gov
Laura Vollar	Mississippi Dept. of Ag and Commerce	LauraV@mdac.ms.gov
Kristin Lashley	Alabama Department of Agriculture	kristen.lashley@agi.alabama.gov
Robin Tutor-Marcom	Nort Carolina Agromedicine Institute	tutorr@ecu.edu
Patrick Farquhar	North Carolina Dept. of Agriculture and Consumer Services	Pat.Farquhar@ncagr.gov
Patrick Jones	North Carolina Dept. of Agriculture and Consumer Services	patrick.jones@ncagr.gov
Carmina Hanson	North Carolina Dept. of Agriculture and Consumer Services	Carmina.Hanson@ncagr.gov
Leo Reed	Office of the Indiana State Chemist	reedla@purdue.edu
Dave Scott	Office of the Indiana State Chemist	scottde@purdue.edu
Kaci Buhl	Oregon State University – NPIC	buhlk@ace.orst.edu
Jessica Lenker	Pennsylvania Dept. of Agriculture	jeslenker@pa.gov
Kathy Booker	Tennessee Dept. of Agriculture	kathy.booker@tn.gov
Richard Strickland	Tennessee Dept. of Agriculture	richard.strickland@tn.gov
Perry Cervantes	Texas Dept. of Agriculture	Perry.Cervantes@texasagriculture.gov
Helene Ambrosino	US Environmental Protection Agency	Ambrosino.helene@epa.gov
Carolyn Schroeder	US Environmental Protection Agency	Schroeder.Carolyn@epa.gov
Ryne Yarger	US Environmental Protection Agency	Yarger.Ryne@epa.gov
Matthew Lloyd	US Environmental Protection Agency	Lloyd.Matthew@epa.gov
Royan Teter	US Environmental Protection Agency	Teter.Royan@epa.gov
<i>*New Members</i>		

Issues to be raised for discussion by AAPCO Board or General Session:

None noted.

General summary of committee activities for the year:

Committee Meeting

The Worker Protection Committee met virtually on April 20, 2023. Four topics were discussed:

1. PERC Materials Update

Kaci Buhl provided an overview of WPS Resources that are available. Here are some helpful links that were provided during the presentation:

- PERC: <https://pesticideresources.org/lists.html>
- How to Comply: <https://pesticideresources.org/wps/htc/index.html>
- How to Comply "Light": <https://pesticideresources.org/wps/guide/agemp.html>
- Does it Apply to Me?: <https://pesticideresources.org/wps/doesitapply.html>
- WPS Training Materials: <https://pesticideresources.org/wps/training/index.html>
- Central Posting Poster: <https://pesticideresources.org/wps/cp.html>
- Where to go to get the WPS Thumb Drive: <https://npsecstore.com/collections/wps-resources-mega-thumb-drive>
- Compliance Assistance Library: <https://pesticideresources.org/wps/index.html>
- Just for You Pages – specific for ag workers, handlers, employers, etc.: <https://pesticideresources.org/wps/jfy/index.html>
- Manual for Trainers: <https://pesticideresources.org/wps/ttt/manual/index.html>
- Complete WPS Training Resources Library: <https://pesticideresources.org/wps/inventory.html>
- Social Media Toolkit: <https://pesticideresources.org/wps/socialmedia/>
- Certification and Training Information: <https://pesticideresources.org/ct/>
- PERC Newsletter: <https://pesticideresources.org/lists.html>

2. PRIA 5 – Bilingual Labeling

The Worker Protection Committee compiled a list of questions for the U.S. Environmental Protection Agency (EPA) regarding PRIA 5 bilingual labeling provisions. The group was interested in having a call for state lead agencies (SLAs) with EPA regarding the questions and next steps.

Here is a list of questions that the Committee compiled:

1. Do the requirements for Spanish labeling apply to the entire label, or just certain sections?
2. Who is responsible for ensuring the accuracy in the translation/labeling? What do SLAs do if we find issues with the translation and scannable codes, or lack thereof?
3. Who is responsible for monitoring and ensuring that the scannable codes/technology are compliant with labeling requirements. Does this scannable code align with website review for labeling (according to EPA, websites are not part of labeling if the website link is not on the actual label)?

4. Does the EPA have a plan to address these issues (translation and codes) when states submit problematic labels? If so, what is it? How quickly can it be implemented?
5. As it relates to the antimicrobial exception and directing a user to the Safety Data Sheets (SDS) for translation; does this mean that the SDS becomes part of labeling? Does this mean EPA will review SDS for compliance?
6. What about supplemental distributor products? Technically, according to the regulations for these products, they cannot have anything on their labeling that is not on the master label. So, if the master label does not include the translation and/or notification to the reviewer that the product labeling can be translated into another language, the supplemental distributor cannot include another language.
7. PRIA 5 states that “In carrying out this paragraph, the Administrator shall cooperate and consult with State lead agencies for pesticide regulation for the purpose of implementing bilingual labeling as provided in this paragraph as expeditiously as possible.” What does that look like? How will EPA coordinate with SLAs?
8. Farmworker availability of bilingual labels is a part of this requirement. Will that be a responsibility under WPS?
9. As EPA updates the translation guide with additional translations over time, would this automatically change the label language that needs to be translated, or would there be a timetable for phasing these in?

3. Enforcement and Compliance History Online – EPA/State Pesticide Dashboard

The Committee discussed the online EPA/State Pesticide Dashboard. EPA was interested in any ideas for clarification. Clarification could be done through the HELP link. It was discussed that more detail would be beneficial. Michael Bauman, Interdisciplinary Scientist, Office of Enforcement and Compliance Assurance Division, EPA shared changes coming to the dashboard. The pie charts will be removed and there are plans to make the Help Page more prominent. It will also explain where the data comes from.

4. AEZ – Update

Carolyn Schroeder, Chief, Certification and Worker Protection Branch, Pesticide Re-Evaluation Division, Office of Pesticide Programs, EPA provided an update on the Application Exclusion Zone (AEZ) and the following links were shared with the Committee, as well as AAPCO/SFIREG members.

- Proposed rule published in the Federal Register:
<https://www.federalregister.gov/documents/2023/03/13/2023-03619/pesticides-agricultural-worker-protection-standard-reconsideration-of-the-application-exclusion-zone>
- The docket for public comments: <https://www.regulations.gov/docket/EPA-HQ-OPP-2022-0133>
- Updates on the AEZ and associated litigation: <https://www.epa.gov/pesticide-worker-safety/worker-protection-standard-application-exclusion-zone>

The proposed rule was published in the Federal Register and comments needed to be posted on or before May 12, 2023.

EPA/SLA Webinar

At the request of the Worker Protection Committee and AAPCO, EPA hosted a webinar for SLAs on July 6, 2023, regarding PRIA 5 and Bilingual Labeling. Linda Arrington, Branch Chief, Pesticide Re-Evaluation Division, Office of Pesticide Programs, EPA led the webinar and many of the questions identified by the Worker Protection Committee were addressed.

2024 Pesticide Inspector Residential Training (PIRT) AAPCO Report

PIRT Coordinator: Kelly Engle, EPA Office of Compliance

Date of Report: February 20, 2024

2023-2024 Steering Committee Members:

Aaron Brown, Washington State Dept. of Agriculture

Africa Dorame-Avalos, Inter Tribal Council of Arizona

Kelly Friend (AAPCO Representative), Florida Dept. of Agriculture & Consumer Services

Shawn Hackett, EPA Region 7

Rick Hayes, Georgia Department of Agriculture

Kristen Lashley, Alabama Dept. of Agriculture & Industries

Greg Takeshima, Hawaii Department of Agriculture

Tom Phillips, Maryland Department of Agriculture

Neil Richmond, Department of Agriculture and Consumer Services

George Saxton (ASPCRO), Office of Indiana State Chemist

Dawn Wall, Missouri Dept. of Agriculture

Kelly Engle (PIRT Coordinator), EPA Office of Compliance

Cindy Wire (PREP Liaison), EPA Office of Pesticide Programs

Issues to be raised for discussion by the AAPCO Board or General Session: N/A

General summary of activities for the year:

In 2023 there were three national PIRT courses held in-person. The PIRT steering committee met regularly and was kept up to date on the status of the RFA process. A second request for applications (RFA) for the management of the PIRT program was published on grants.gov in the summer of 2023. This request included a substantial increase in funding for PIRT courses plus the number of courses would be doubled. Moving forward there will be four to five National PIRT courses with a Tribal PIRT held every other year.

2023 PIRTs

All three PIRT courses were highly rated, and attendees provided useful comments via evaluations.

Enforcement and Use Concerns PIRT

- The Massachusetts Department of Agricultural Resources hosted the course in Northampton, Massachusetts from May 8-12, 2023.
- Attendees: More than 60 participants from 32 states, four tribes, two territories, and two EPA regions.
- This PIRT was originally scheduled for 2020 but was postponed multiple times due to the pandemic.

Basic Pesticide and Use Concerns PIRT

- The North Carolina Department of Agriculture and Consumer Services hosted this course from July 31-August 4, 2023, in Asheville, North Carolina.
- Attendees: 18 states, two tribes, and two EPA region plus two EPA headquarters staff were represented for a total of 32 attendees.

Basic PIRT

- The Georgia Department of Agriculture hosted this course from December 3-7, 2023, in Savannah, Georgia.
- Attendees: 24 states, two tribes, and two EPA regions plus two EPA headquarters employees were represented for a total of 38 attendees.

Upcoming 2024 PIRTs

- Pollinator Issues PIRT: Raleigh, North Carolina – July 14-18, 2024
 - This course will focus on pollinator health and the legal use of pesticides in and around hives to control pests. We were hoping to have several national speakers present on pollinator health, pesticide use, pesticide registration, residue lab analysis and many other issues during the week. Our intended audience is pesticide inspectors teamed with their apiary inspectors from states, tribes, and territories across the US.

PREP Steering Committee Report

PREP Administrator: Lisa Blecker, Colorado State University

PREP Coordinator: Cindy Wire, US EPA Office of Chemical Safety and Pollution Prevention

Date of Report: February 21, 2024

2024 PREP Steering Committee:

Voting members

- Liza Fleeson-Trossbach, AAPCO Immediate Past President, Steering Committee Chair
- Megan Patterson, AAPCO President
- Gretchen Paluch, AAPCO President Elect
- Kelly Friend, AAPCO Director
- Colton Bond, AAPCO Director
- Kimberly Pardue Welch, EPA Region 8
- Kaitlin Picone, USEPA Intergovernmental and Community Relations Branch
- Mike Bellot, USEPA OECA/Office of Compliance
- Liz Vizard, USEPA OECA/Office of Compliance

Non-voting members:

- Africa Dorame-Avalos, TPPC Representative
- Brian Verhougstraete, AAPCO Director-at-large
- Vacant, AAPCO Director-at-large
- Allison Cuellar, ASPCRO Liaison
- Kelly Engle, EPA PIRT Liaison
- Cindy Wire, EPA PREP Project Officer

Issues to be raised for discussion by the AAPCO Board or General Session:

No issues.

General Summary of activities for the 2023 Season:

Continued Microsoft Teams PREP Network

We continued to expand our Microsoft Teams site for the PREP Network. For each course, there is a subject matter-specific channel. All attendees are added to a channel, but also have access to the entire site. We post course documents, pose discussion questions brought up during the courses and in the evaluations, and post participant-filmed videos discussing issues they encounter in their work. This is designed to be an additional avenue for networking and sharing strategies. This site has remained active for online and in-person courses.

Continued Work on the PREP Website

The PREP Network website was improved in the following ways:

- The landing page was updated to add an overview of 2024 courses, specific links to each course page, and an updated list of Steering Committee members
- A page for each of the four planned courses was added. Information contained on these pages include: course location, target audience, course goal, planning group members, and information for nominees and participants
- The PREP mailing list was continually updated. This mailing list is comprised of key contacts at state, tribe, and territory regulatory agencies, and U.S. EPA that we use to distribute course and nomination announcements

Continued PREP Network YouTube Channel

We continued growing our YouTube channel, which only the PREP community has access to. It serves as an archive for all the videos developed for the 2020, 2021, 2022, and 2023 courses, including the participant-filmed videos, videos of PREP Co-founders Jake and Dennis, and the mask fashion show videos.

Continued PREP Archive

We continued growing our PREP Archive, which only the PREP community has access to. It contains all the content from every course, including presentations, discussion notes, and participant resources. Participants have access to the entire archive, not just the materials from their course.

Section 18 Course Improvements

The PREP Team worked with Suzanne Forsyth, PREP Advisor, at UC Davis Continuing and Professional Education to transition the [FIFRA Section 18 Emergency Exemption Program Information and Training Resource](#) to a functional format. The interactive training portion of this course was offline for an extended period of time because of its reliance on Adobe Flash, which is no longer supported. The updated version of this training was published September 2023. This online training tool was originally developed through a PREP Cooperative Agreement.

Continuous Improvement Efforts

Now that we have hosted a season of in-person courses at Colorado State University (CSU), there are some adjustments we are making for 2023. We are working with CSU's Conference and Events Services (CES) to initiate hotel contracts and travel arrangements earlier in the planning process. We have made improvements to the travel process by pre-filling travel forms and negotiating with the travel office certain details of the receipts (i.e., paper receipts are no longer required).

Highlights from 2023 PREP Courses:

1. New Pesticide Managers PREP Course, April 17-20, 2023, Fort Collins, Colorado

We convened three, 1.5-hour and four 1-hour long planning group meetings between November 15 and January 27, 2023, to refine the target audience and course goal, to identify major topic areas. We have three additional meetings planned in January to refine the agenda and to finalize selection of nominees.

The **target audience** is new pesticide program managers, and staff who are on a managerial track, working under a FIFRA cooperative agreement.

The **goal of the course** is to provide information and resources on pesticide program management and issues related to federal, state, tribal, and territory pesticide regulatory programs.

Major topic areas for the course are:

- Management basics related to the FIFRA cooperative agreement guidance
- Worker protection, certification and training, and other key pesticide topics
- Pesticide registration basics
- Basic enforcement considerations
- Leadership training for new pesticide program managers

Key data points for this course:

- We received 41 total nominations for this course: 35 state, 0 territory, 3 tribal, and 3 EPA.
- We hosted 29 total participants: 23 state, 0 territory, 3 tribal, and 3 EPA
- We hosted 30 speakers: 13 EPA, 3 state, 2 private, and 2 university

This course was well received. Ninety one percent of final survey respondents (N=23) indicated they would recommend this course to others in their organization. When asked to provide more details, one respondent said, “I learned so much in just four days! This course gives a great overview, I would highly recommend it to any of our new managers – even those that might have been in their role a while and could use a refresher.”

2. Comprehensive WPS PREP Course, June 26-29, 2023, Davis, California

We convened 3, 1.5-hour long and 4, 1-hour long planning group meetings between February 2 and April 5, 2023, to refine the target audience and course goal, and to identify major topic areas.

The **target audience** is state, territory, and tribal managers and supervisors, as well as staff with higher level responsibilities for worker protection under FIFRA cooperative agreements.

The **goal of the course** is to create a better understanding of the administration, implementation, and enforcement of the federal WPS requirements.

Major topic areas for the course are:

- Review the federal Worker Protection Standard (WPS) regulation components and implementation requirements
- Share the successes and challenges of implementing and enforcing the revised WPS rule

- Discuss current training and outreach materials; share what is working and what materials are still needed
- Talk about best practices and approaches related to WPS enforcement and investigations

Key data points for this course:

- At the request of EPA, we made arrangements to invite up to 10 EPA participants, whereas in a typical course we would invite only 3. We received 53 total nominations for this course: 28 state, 3 territory, 8 tribal, and 14 EPA.
- We hosted 32 total participants: 18 state, 1 territory, and 3 tribal, and 10 EPA.
- We hosted 23 speakers: 8 EPA, 9 state participant, 2 university, 2 state, 1 territory participant, and 1 tribal.

All final survey respondents (N=27) indicated they would recommend this course to others in their organization. When asked how they plan to use the information they received in this course, one participant replied “incorporating some of the topics discussed during the PREP course into my program’s in-house annual training later this year, expanding the WPS trainings and resources my program provides, using the information provided to better target my inspections and to conduct more focused inspections.”

3. Compliance and Enforcement Management PREP Course August 28-31, 2023, Denver, Colorado

We convened 3, 1.5-hour and 4, 1-hour planning group meetings between April 5 and June 1, 2023, to refine the target audience and course goal, to identify major topic areas.

The **target audience** is state, territory, or tribal pesticide compliance and enforcement program managers, and experienced staff that work under a FIFRA cooperative agreement.

The **goal of the course** is to increase knowledge of current and emerging pesticide compliance and enforcement issues to improve effectiveness of state, tribal, and territory pesticide enforcement programs

Major topic areas for the course are:

- Tribal and state enforcement communication and coordination
- Coregulator pesticide enforcement and compliance monitoring successes and challenges
- Enforcement considerations and challenges related to label language
- Emerging pesticide enforcement issues and hot topics

Key data points for this course:

- At the request of EPA, we made arrangements to invite up to 10 EPA participants, whereas in a typical course we would invite only 3.
- We received 59 nominations for this course: 33 state, 2 territory, 8 tribal, and 16 EPA
- We hosted 33 total participants: 20 state, 1 territory, 4 tribal, and 8 EPA
- We hosted 25 speakers: 9 EPA, 4 state participant, 6 state, 1 private, 1 tribal, 2 tribal participant, 2 EPA participant

This course was well received. Ninety-five percent of final survey respondents (N=22) indicated they would recommend this course to others in their organization. When asked why they would recommend this course to

others, one participant replied “The course provided varying programs of both general interest to pesticide issues as well as discussions to attempt to find answers to certain challenges within the industry. Opportunities to develop relationships with other states and tribes is critical to improving work methods and understanding, especially for those of us who are newer in our roles.”

4. New and Emerging Technology PREP Course October 16-19, 2023, Davis, California

We convened 6, 1.5-hour and 1, 1-hour planning group meetings between May 24 and August 8, 2023, to refine the target audience and course goal, to identify major topic areas.

The **target audience** is personnel working under a FIFRA cooperative agreement.

The **goal of the course** is to share information on new and emerging technologies and pest issues related to pesticide program management and enforcement.

Major topic areas for the course are:

- Explore the landscape of pesticide use, monitoring and oversight for new and emerging pest control technologies
- Define the challenges and regulatory needs associated with new and emerging pest control technologies
- Discuss certification and training concerns for new and emerging pest control technologies
- Discuss the role of new and emerging pest control technologies to address changing pest pressure due to climate change

Key data points for this course:

- We received 37 nominations for this course: 31 state, 1 territory, 4 tribal, and 1 EPA
- We hosted 25 total participants: 21 state, 1 territory, 2 tribal, and 1 EPA
- We hosted 23 speakers: 5 EPA, 1 USDA, 10 state, 4 private, and 3 university.

Evaluations showed that the course was well-received, and we got feedback to help us improve subsequent PREP courses. Ninety-five percent (N = 23) indicated they would recommend this course to others in their organization. When asked why they would recommend this course to others, one participant replied, “the topics were timely in addressing implementation issues arising from new technology emerging in the states.”

2023 PREP Course Participant Data

PREP Course and Dates	# nominations received					# participants attended (invited, if different from attended)				
	Total	State	Ter.	Tribe	EPA	Total	State	Ter.	Tribe	EPA
New Pesticide Managers April 17-20, 2023	41	35	0	3	3	29 (31)	23 (25)	0	3	3
Comprehensive WPS June 26-29, 2023	53	28	3	8	14	32 (36)	18 (19)	1 (2)	3 (5)	10
Compliance and Enforcement Management August 28-31, 2023	59	33	2	8	16	33	20	1	4	8
New and Emerging Technology October 16-19, 2023	37	31	1	4	1	25 (28)	21 (23)	1	2 (3)	1

PREP Courses Planned for 2024:

1. Certification and Training, April 22-25, 2024, Fort Collins, Colorado

The goal of this course is to discuss needs, potential strategies, approaches, and communications to effectively implement changes to certification and training programs. The target audience is personnel that work under a FIFRA cooperative agreement involved in certification and training program management.

2. Compliance and Enforcement Management, June 24-27, 2024, Davis, California

The goal of this course is to increase knowledge of current and emerging pesticide compliance and enforcement issues for effective state, tribal, and territory pesticide enforcement programs. The target audience is state, territory, or tribal pesticide compliance and enforcement program managers, and staff that work under a FIFRA cooperative agreement.

3. Pesticide Labels from Registration to Enforcement, August 1-5, 2024, Fort Collins, Colorado

The goal of this course is to explore the intersection between pesticide product registration and compliance with pesticide labels. The target audience is personnel that work under a FIFRA cooperative agreement.

4. Laboratory Issues, September 23-26, 2024, Denver, Colorado

The goal of this course is to share knowledge, expertise, pesticide program communication strategies, and best practices to enhance competency and quality for managing a modern pesticide laboratory. The target audience is lab managers, directors, quality assurance personnel, or senior analysts who work under FIFRA cooperative agreements.

AAPCO LIFE MEMBERSHIP/MEMORIALS COMMITTEE

2024

RECOMMENDATIONS

Respectfully submitted by

Life Membership and Memorials Committee

J. Patrick Jones

February 21, 2024

LIFE MEMBERSHIP NOMINATION:

David E. Scott

Pesticide Administrator

Office of Indiana State chemist

Nominated by

Leo A. Reed
Manager, Certification & Licensing
Office of Indiana State Chemist

Sarah K Caffery
Pesticide Product Program Manager
Office of Indiana State Chemist

Jack Peterson
Associate Director, EPSD
Arizona Department of Agriculture

Tony L. Cofer
Division Director
Alabama Dept. of Agriculture and Industries

John W. Scott
Pesticides Section Chief
Colorado Dept. of Agriculture, DPI

Brian Verhougstraete
Pesticide Section Manager
Michigan Dept. of Agriculture & Rural Development

Liza Fleeson Trossbach
Program Manager,
Office of Pesticide Services
**Virginia Department of Agriculture
and Consumer Services**

Gary Bahr
Science Liaison, SFIREG Chair
Washington State Department of Agriculture

01/29/2024

To: AAPCO Life Membership Committee
Patrick Jones
Amy Sullivan

AAPCO Life Membership and Memorials Committee Report, 2024

AAPCO Life Membership Committee,

The undersigned nominate David E. Scott (Dave), of the Office of Indiana State Chemist (OISC) for AAPCO Life Membership.

Mr. Scott has been an active member of AAPCO for over 40 years. His service to the organization is extensive. Mr. Scott has served as AAPCO president and board member. He has also served on POM, SFIREG and is a current member of EQI and the ESA workgroup. Mr. Scott also spent weeks at EPA headquarters working as a “Regulator in Residence”, offering his insight to EPA management.

Although Dave has a more than full time job managing the pesticide section in Indiana, he has consistently volunteered his time to the betterment of the organization and to other State Lead Agencies (SLA). SLAs often seek his input when grappling with FIFRA issues. Dave is known as a leader who is able to build consensus on even the most complex issues.

Dave has taken the lion’s share of many complex pesticide issues to ensure that SLAs are all able to provide consistent answers to industry. Even when Dave was not on a specific committee, he has volunteered to take lead for SLAs on issues that impact the greater community. He has led many Q&A documentation requests for technologies that are needed for growers but have confusing labels/applicator restrictions. He has also brought forth many issues to the SFIREG joint working committees, such as labeling inadequacies Mosquito Backpack Sprayer. Knowing that issues are not specific to just one state but likely seeing an impact to many, Dave’s focus for the safety of the user and the environment is the cornerstone for the work that he does for the greater good of the American public.

Dave is a mentor to many SLAs across the country. Dave’s continuous contributions to the pesticide regulatory community makes him a perfect candidate for AAPCO Life Membership.

Liza Fleeson - Trossbach
Program Manager
Virginia Dept. of Agriculture

Nominated by
Leo Reed
Manager, Certification & Licensing
Office of Indiana State Chemist

02/15/2024

To: AAPCO Life Membership Committee
Patrick Jones
Amy Sullivan

AAPCO Life Membership Committee,

The undersigned nominate Liza Fleeson Trossbach, of the Virginia Department of Agriculture and Consumer Services, for AAPCO Life Membership.

Liza has been an active member of AAPCO for 30 years. Her service to the organization has been immense. She has served as SFIREG chair, PPDC representative and as AAPCO president. Liza has also served as ASCPRO president.

As someone who has known Liza since her early days with VDACS we can attest to her constant hard work and dedication. In all our interactions with Liza, we have consistently been impressed by their dedication, enthusiasm, and contributions to our organization. Her commitment to environmental and human safety has been unwavering, and her passion for making a difference is inspiring.

Liza has demonstrated exceptional leadership skills, taking on key roles and leading initiatives that have significant impacts for the regulated community.

In summary, through both her counsel and deeds, Liza has made AAPCO a more effective association by, among other things, continually reminding state regulators that we can consistently attract more bees and positive outcomes with honey than we can with vinegar.

Respectively Submitted,



Leo Reed & Dave Scott

Amy (Bamber) Sullivan
AAPCO Executive Secretary
AAPCO

Nominated by
Cary Giguere
Vermont Dept. of Agriculture (Retired)

Amy started with the Montana Department of Agriculture in 2003 as an enforcement specialist in Western Montana.

In 2004-2010 she became the Section Supervisor for Special Pesticide Registrations, Vertebrate Pest Control, Threatened and Endangered Species, and Agricultural Chemical Groundwater Protection. Highlights included significantly increasing the state's monitoring well network, incorporating surface water/sediment/precipitation monitoring into the water program, developing a program for the legislature to assess groundwater availability and quality for development and industrial permitting,

In 2005 she joined the SFIREG (Water Quality) now EQI working committee, with the highlight of working with the chair Joe Zachmann, MN, Betsy Behl and Tom Steeger, EPA on establishing aquatic life benchmarks. In 2009 joined Full SFIREG as the Region 8 Representative.

From 2010-2014 Amy was the Bureau Chief overseeing all pesticide programs in the state. Highlights include hosting a Water Quality PREP, developing a childcare IPM technical assistance program, reorganizing the bureau to provide subject matter expertise in the Certification, Licensing and Registration programs, and serving on over 30 different technical and policy committees in the state, region and nationally.

In 2010 she joined the AAPCO Board of Directors.

In December 2014 Amy was selected to replace Grier Stayton as the AAPCO Executive Secretary.

In 2015 joined the Pesticide Educational Resources Collaborative (PERC) as an Advisory Board Member and in 2019 began as the Certification and Training Assessment Group (CTAG) Executive Secretary, which continued until January of this year.

Throughout her career, she has brought people together to produce high quality work supporting the pesticide programs and always aware of the importance of the public's trust in our work. Being a part of the larger community with diverse relationships has been important part in her journey. Amy has always held a reverence for the history and culture of AAPCO, and has always held a strong faith in AAPCO's ability to be forward thinking and constructive as we take on new challenges.

AAPCO has been honored to have Amy's participation for the better part of the last 20 years. I would like to Nominate Amy for lifetime membership to AAPCO.

Cary Giguere
Director of the Public Health and Agricultural Resources Management Division
Vermont Dept. of Agriculture (Retired)
AAPCO

Nominated by
Jeff Comstock
Vermont Dept. of Agriculture (Retired) and Past AAPCO President

February 26, 2024

Dear Mr. Jones,

We respectfully submit a nomination for life membership to AAPCO for Mr. Cary Giguere. Cary has recently retired in December 2023, with over 30 years of service to state government with an extensive focus on agricultural chemistry and pesticide regulation. Cary began his career with the Vermont Agency of Agriculture shortly after graduating from college, working in the animal feed and fertilizer laboratory. From the feed and fertilizer lab he quickly expanded his expertise into the complicated and intricate world of pesticide formulation and residue analysis.

With characteristic energy and curiosity, Cary continued to grow professionally as a chemist and a manager and advanced within the Agency, eventually completing his career as the Director of the Public Health and Agricultural Resources Management Division. As Division Director, Cary was responsible for leading and growing the state's pesticide enforcement, certification, registration and water quality programs in addition to the animal feed, fertilizer, seed and cannabis programs as well as many others.

As an extension of his career skills and focus in Vermont, Cary dedicated a significant portion of his professional life working at the regional and national level with EPA and AAPCO. Early in his management career, Cary was drawn to the work of SFIREG and was selected as a member of the POM Committee and eventually served two terms as the POM Committee Chair. As an energetic and respected collaborator with his neighboring states, Cary was selected as the Region 1 SFIREG Representative many times over. Having earned a tenured chair at the SFIREG table, Cary was selected to serve two terms as SFIREG Chair and was then elected by the AAPCO membership to serve a term as an "At-Large" member, then later a full member of the AAPCO Board of Directors.

As the Chair of POM and SFIREG and a member of the AAPCO Board, Cary demonstrated the quality of exemplary leadership and the ability to support the regional and national pesticide program by creating effective partnerships and long-standing relationships with state control officials, registrants, EPA program staff and leadership and the applicator industry.

MEMORIAL RECOGNITION:

Bob Rosenberg

National Pest Management Association, including serving as CEO (2013 – 2016)

Nominated by Steve Dwinell Director, Public Health & Agricultural Resource Management Division

Bob Rosenberg passed away on September 10, 2023, in Ft. Lauderdale, Florida. Bob Rosenberg was recognized as an ally of State Lead Agencies while ably representing the pest management industry. Bob was a member of the Association of Structural Pest Control Regulatory Officials (ASPCRO) Hall of Fame, and a frequent attendee at AAPCO meetings. He served as CEO of the National Pest Management Association (NPMA) from 2013 to 2016, when he retired. Prior to that he was Government Affairs Director for NPMA. In that role he got to know and work closely with many of the state regulators around the country. Bob was known for always trying to find a way to work together to promote professional pest management while meeting the needs of the state regulatory programs to achieve fair and effective regulation. As noted by Dominique Stumpf, Bob's successor as CEO of NPMA, *"Bob had a true knack for connecting with people and rallying them to a common cause, which was integral to his success in government affairs and NPMA leadership."*

Bob frequently worked with SLAs on general pesticide issues, had good relationships with the USEPA and other Federal Agencies, and served on the Pesticide Program Dialog Committee (PPDC) or multiple terms.

Many AAPCO members knew and worked with Bob, and he will be missed.

FAIRFAX, Va. — Bob Rosenberg, who spent 27 years with the National Pest Management Association, including serving as CEO (2013 – 2016), passed away on Sept. 10, at 72.

Rosenberg, who spent the bulk of his childhood in Miami, graduated from the University of Florida in 1974 with a business degree. He later earned post-graduate political science degrees from Florida State University and the University of Chicago, and his early career aspirations were to become a lawyer.

Although most in the pest control industry know Rosenberg for his advocacy work, he actually started as regulator, working for the state of Florida as director of state's Division of Pari-Mutuel Wagering — which regulates horse racing, dog racing and jai-alai industries. Rosenberg supervised a staff of 150 full-time and 250 season employees and administered a budget of \$250 million.

Following a government administration change, Rosenberg was let go from that position and he decided to explore lobbying opportunities in Washington, D.C. He joined NPMA (then NPCA) in 1989, and much of his time at NPMA was spent in government affairs, where he worked to make sure the pest control industry's point of view received a fair hearing in the halls of Congress. As he recounted in his 1996 PCT Leadership profile, "It may sound weird, but sometimes the way to measure your success as a lobbyist is by what didn't happen, as opposed to what did happen."

Mike Katz, former president of Western Exterminator, and longtime member of NPMA's Government Affairs committee, said Rosenberg helped NPMA become more assertive and take less of a defensive posture. "Bob helped us get out more in front on issues. He was a good consensus-builder, who got us more involved with groups like ASCPRO (Association of Structural Pest Control Regulatory Officials) and AAPCO (Association of American Pesticide Control Officials). This allowed us to extend our sphere of influence and enhance our ability to work with those who ultimately regulate us."

Another important NPMA development that occurred under Rosenberg's tutelage was the growth of Legislative Day, said industry consultant Norman Goldenberg. "Members began paying registration fees, major sponsorships were developed amongst NPMA's valued registrants and well-known speakers were brought to inform our members. We entered a new era of gaining respect for stating our case on Capitol Hill. Bob was the key to bringing hundreds of participants to Legislative Day every year."

John Longenecker
Bureau of Plant Industry
Pennsylvania Department of Agriculture

Nominated by Donn Lott, EPA

John headed the Bureau of Plant Industry in the Pennsylvania Department of Agriculture and was quite active in AAPCO and SFIREG throughout his tenure. He had been a Life Member of AAPCO since 1995. I know he had established many close friends through his work with other states involved in AAPCO, so I'm sure many members will remember him.

John passed away on January 6, 2024, at his home, Berry Patch Farm, Elizabethtown, PA.....just a few miles away from where I live. His wife, Patricia, and a daughter, Elizabeth Norton, survive him. John was 85 years old.

Obituary:

John L. Longenecker passed away January 6 at his home, Berry Patch Farm, Elizabethtown, PA. Born in Harrisburg, October 1, 1938, he was the son of John B. and Helen Longenecker. He graduated from Elizabethtown High School, class of 1956 and earned BS and MS degrees from the University of Michigan. He was a United States Air Force veteran. He was retired from the Pennsylvania Department of Agriculture and held a position over several years with Penn Ag Industries. He was a member of the Elizabethtown Church of the Brethren. He will be remembered as a loyal coworker and friend.

John is survived by his wife of 58 years, Patricia J, a daughter, Elizabeth (Ronald) Norton), Wake Forest, North Carolina, and three granddaughters, Taylor Paige, Lilly Grace, and Molli Claire Norton. Sisters Lois Morelen, Suffolk, VA. And Susan Harper, Newport, PA, also survive. He was predeceased by his son, John Bradley Longenecker in October 2023.

Laszlo Torma
Montana State Laboratory Director

Obituary of Laszlo Torma

Laszlo, nickname Laci, passed away January 18, 2023. Laci was born in Polgar, Hungary to Laszlo and Ilona Torma on June 22, 1935. He was the oldest of two siblings. Growing up in Hungary during WWII and with different political regimes resulted in a unique and challenging childhood. Much of his childhood was spent away from his family playing soccer for the national teenage soccer team.

In October 1956, at the age of 21, while attending University, he and thousands of Hungarians gathered in defiance of the new communist government demanding freedom from Soviet oppression. The fight lasted until November when the communist party regained control, forcing him and other freedom fighters to flee Hungary. Laci fled to Austria leaving behind his parents, sister, and many relatives. Once in Austria he was provided transportation to New York City and eventually was offered the opportunity to attend Colorado College. While in school, his fraternity brothers tried to help him learn English, but it was difficult for him. He decided to take a break from his studies and took a job at The Broadmoor Hotel in Colorado Springs to expand his knowledge of English. At The Broadmoor he worked as the personal waiter for Charles L Tutt, Jr., owner of The Broadmoor, until he graduated from Colorado State University with a degree in Analytical Chemistry. He was considered a valued employee.

After graduation from College, Laci was hired by Montana State University, and this began a 35 year career at the Analytical Laboratory on the Montana State University Campus. After a period as the Analytical Chemist, he was appointed Laboratory Bureau Chief. As Bureau Chief, the lab grew and became recognized as one of the finest in the country. The Laboratory was recognized for its leadership and groundbreaking programs such as Pesticide Quality Assurance and Control Program, and development or improvement of analytical methods for pesticide residue analysis. Laci held many seminars which brought scientists from across the world to Bozeman for training. Laci received many awards during his 35 years, both nationally and from the state of Montana. At retirement he was honored with an honorary Doctor of Science degree from Montana State University.

After retirement Laci worked part time for Pickering Laboratories. This job allowed him and his wife Sondra to travel the world for work, visiting many countries and having great adventures. It was also a time where he and Sondra were able to travel back to Hungary allowing him to reconnect with his sister and remaining family.

While living in Bozeman, Laci helped found the AYSO soccer program. He spent his winters taking his children to Bridger Bowl skiing. He made sure they were on the best skis available by working an extra job at the Beaver Pond. Laci shared his passion for the outdoors with his children and grandchildren through hiking, photography, fishing, hunting, camping and his favorite sport, skiing. He remained an avid outdoorsman and a big Bobcat fan. If you sat near him in the bleachers, you could not miss his booming Hungarian-English voice.

Laszlo became a naturalized citizen on August 24, 1962. He had much love for this country and the opportunities he was provided from the time he arrived with nothing but the clothes on his back.

Laszlo is survived by his wife of 49 years, Sondra Torma; sister, Boglarka Kiss of Budapest Hungary; children: Christopher Torma of Boise, ID, Cynthia (Donald) Murray of Boise, ID, Peter Torma of

Boise, ID; step-children: Renee (Todd) Horat of Culver, OR, Franklin (Amy) Frazer of Fallbrook, CA; grandchildren: Zachary Zent, Makenzi Zent, Karmen Horat, Jake Horat, TJ Bunnell, Nick Bunnell, Logal Fraizer.

AAPCO Life Membership Committee,

The undersigned nominate David E. Scott (Dave), of the Office of Indiana State Chemist (OISC) for AAPCO Life Membership.

Mr. Scott has been an active member of AAPCO for over 40 years. His service to the organization is extensive. Mr. Scott has served as AAPCO president and board member. He has also served on POM, SFIREG and is a current member of EQI and the ESA workgroup. Mr. Scott also spent weeks at EPA headquarters working as a “Regulator in Residence”, offering his insight to EPA management.

Although Dave has a more than full time job managing the pesticide section in Indiana, he has consistently volunteered his time to the betterment of the organization and to other State Lead Agencies (SLA). SLAs often seek his input when grappling with FIFRA issues. Dave is known as a leader who is able to build consensus on even the most complex issues.

Dave has taken the lion’s share of many complex pesticide issues to ensure that SLAs are all able to provide consistent answers to industry. Even when Dave was not on a specific committee, he has volunteered to take lead for SLAs on issues that impact the greater community. He has led many Q&A documentation requests for technologies that are needed for growers but have confusing labels/applicator restrictions. He has also brought forth many issues to the SFIREG joint working committees, such as labeling inadequacies Mosquito Backpack Sprayer. Knowing that issues are not specific to just one state but likely seeing an impact to many, Dave’s focus for the safety of the user and the environment is the cornerstone for the work that he does for the greater good of the American public.

Dave is a mentor to many SLAs across the country. Dave’s continuous contributions to the pesticide regulatory community makes him a perfect candidate for AAPCO Life Membership.

Liza Fleeson - Trossbach
Program Manager
Virginia Dept. of Agriculture

Nominated by
Leo Reed
Manager, Certification & Licensing
Office of Indiana State Chemist

02/15/2024

To: AAPCO Life Membership Committee
Patrick Jones
Amy Sullivan

AAPCO Life Membership Committee,

The undersigned nominate Liza Fleeson Trossbach, of the Virginia Department of Agriculture and Consumer Services, for AAPCO Life Membership.

Liza has been an active member of AAPCO for 30 years. Her service to the organization has been immense. She has served as SFIREG chair, PPDC representative and as AAPCO president. Liza has also served as ASCPRO president.

As someone who has known Liza since her early days with VDACS we can attest to her constant hard work and dedication. In all our interactions with Liza, we have consistently been impressed by their dedication, enthusiasm, and contributions to our organization. Her commitment to environmental and human safety has been unwavering, and her passion for making a difference is inspiring.

Liza has demonstrated exceptional leadership skills, taking on key roles and leading initiatives that have significant impacts for the regulated community.

In summary, through both her counsel and deeds, Liza has made AAPCO a more effective association by, among other things, continually reminding state regulators that we can consistently attract more bees and positive outcomes with honey than we can with vinegar.

Respectively Submitted,



Leo Reed & Dave Scott

Amy (Bamber) Sullivan
AAPCO Executive Secretary
AAPCO

Nominated by
Cary Giguere
Vermont Dept. of Agriculture (Retired)

Amy started with the Montana Department of Agriculture in 2003 as an enforcement specialist in Western Montana.

In 2004-2010 she became the Section Supervisor for Special Pesticide Registrations, Vertebrate Pest Control, Threatened and Endangered Species, and Agricultural Chemical Groundwater Protection. Highlights included significantly increasing the state's monitoring well network, incorporating surface water/sediment/precipitation monitoring into the water program, developing a program for the legislature to assess groundwater availability and quality for development and industrial permitting,

In 2005 she joined the SFIREG (Water Quality) now EQI working committee, with the highlight of working with the chair Joe Zachmann, MN, Betsy Behl and Tom Steeger, EPA on establishing aquatic life benchmarks. In 2009 joined Full SFIREG as the Region 8 Representative.

From 2010-2014 Amy was the Bureau Chief overseeing all pesticide programs in the state. Highlights include hosting a Water Quality PREP, developing a childcare IPM technical assistance program, reorganizing the bureau to provide subject matter expertise in the Certification, Licensing and Registration programs, and serving on over 30 different technical and policy committees in the state, region and nationally.

In 2010 she joined the AAPCO Board of Directors.

In December 2014 Amy was selected to replace Grier Stayton as the AAPCO Executive Secretary.

In 2015 joined the Pesticide Educational Resources Collaborative (PERC) as an Advisory Board Member and in 2019 began as the Certification and Training Assessment Group (CTAG) Executive Secretary, which continued until January of this year.

Throughout her career, she has brought people together to produce high quality work supporting the pesticide programs and always aware of the importance of the public's trust in our work. Being a part of the larger community with diverse relationships has been important part in her journey. Amy has always held a reverence for the history and culture of AAPCO, and has always held a strong faith in AAPCO's ability to be forward thinking and constructive as we take on new challenges.

AAPCO has been honored to have Amy's participation for the better part of the last 20 years. I would like to Nominate Amy for lifetime membership to AAPCO.

MEMORIAL RECOGNITION:

Bob Rosenberg

National Pest Management Association, including serving as CEO (2013 – 2016)

Nominated by Steve Dwinell Director, Public Health & Agricultural Resource Management Division

Bob Rosenberg passed away on September 10, 2023, in Ft. Lauderdale, Florida. Bob Rosenberg was recognized as an ally of State Lead Agencies while ably representing the pest management industry. Bob was a member of the Association of Structural Pest Control Regulatory Officials (ASPCRO) Hall of Fame, and a frequent attendee at AAPCO meetings. He served as CEO of the National Pest Management Association (NPMA) from 2013 to 2016, when he retired. Prior to that he was Government Affairs Director for NPMA. In that role he got to know and work closely with many of the state regulators around the country. Bob was known for always trying to find a way to work together to promote professional pest management while meeting the needs of the state regulatory programs to achieve fair and effective regulation. As noted by Dominique Stumpf, Bob's successor as CEO of NPMA, *"Bob had a true knack for connecting with people and rallying them to a common cause, which was integral to his success in government affairs and NPMA leadership."*

Bob frequently worked with SLAs on general pesticide issues, had good relationships with the USEPA and other Federal Agencies, and served on the Pesticide Program Dialog Committee (PPDC) or multiple terms.

Many AAPCO members knew and worked with Bob, and he will be missed.

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Industry Relations Workgroup Report February 20, 2024

Co-Chair, Derrick Lastinger (GA)
Co-Chair, Becky Langer-Curry (Bayer CropScience)

The AAPCO Industry Relations Workgroup submits the following report for the 2023 Board of Directors annual meeting.

The AAPCO Industry Relations Workgroup (IRWG) was established to maintain an open dialogue with the pesticide industry and provide a forum to discuss industry issues and concerns with pesticide regulatory officials. The workgroup maintains communication with the AAPCO board to ensure efficient and effective efforts between the groups.

Activities

Meetings

The workgroup met on December 4, 2023, in Alexandria during the Full SFIREG Meeting. The meeting included ~20 attendees. Kristen Spatz hosted the lunch meeting that was sponsored by RISE and CLA. The workgroup discussed the following items:

1. 2024 AAPCO Conference Agenda to be held March 4-6 at the Hilton Old Town Alexandria, Virginia. The group noted topics that may benefit with industry participation and provided a few speaker suggestions for AAPCO to consider including Dr. Frank Wong with Bayer and FIFRA Endangered Species Task Force.
2. The group discussed potential topics for the 2024 Industry Relations Forum scheduled for Tuesday, March 5th. Since ESA was already on the conference agenda, the IRWG did not select this topic.
 - Industry Relations Forum: *Digital Labels*
 - Description- This session will start with what is and what is not Digital Labeling.
 - The session will use Mentimeter to create an interactive “digital moments” during the session.
 - The expert speakers, who represent the CLA Digitization Task Force and PPDC, will include Sarah Hovinga, Bayer, Regulatory Policy and Outreach; Christi Keating, BASF Corporation, Federal Registration Team Leader ;Lisa Dreilinger, Arxada, Global Head of Regulatory, Consumer Microbial Control and Michelle Arling, USEPA.

The workgroup met on June 14, 2023 on Microsoft Teams. The meeting included 22 attendees. The workgroup discussed the following items.

- History and role of the working group since 2013
- The goal of IRWG is to be a resource for issues that affect both industry and regulators.
- Julie Spagnoli -an instrumental participant in the workgroup has recently retired.
- FIFRA Events calendar on AAPCO.ORG lists all upcoming events.
 - March 4-6, 2024 AAPCO - Annual meeting.
 - December 4-5, 2023 - Full SFIREG Meeting
 - The IRWG will plan to meet for lunch at this meeting (as has been tradition)
 - Sept 18 - 19, 2023 - SFIREG Joint Working Committee Meeting
 - IRWG plans/hosts the Industry forum at the annual conference.
- Potential Topics for 2024 Industry Relations Forum
 - Word cloud (image at end of document) was used to capture topical ideas from the group.
 - Insight into the PFAS topics idea. It was raised that perhaps a summary of testing, results, methodologies, could be beneficial.
 - It was also raised that issues might be worked on by many industry associations (e.g., CLA, RISE, WPH, HCPA) so it would be good to coordinate and make sure efforts are not duplicated and messages are consistent.
 - Derrick will share the ideas with the AAPCO Planning committee and share insights back with the IRWG.
 - Derrick and Becky will work with the group to refine ideas with group (likely via email) in the coming months and can then be discussed at the Dec JWC meeting)



Future activities

The workgroup hopes to meet later in 2024.

FIFRA 25(b) Workgroup

Chair: Sarah K Caffery (Office of Indiana State Chemist)

Members: Currently 78 SLAs, 3 EPA, and 64 Industry Representatives

Date of Report: February 22, 2024

The workgroup's mission is to facilitate the collaboration of states and industry in order to share information, provide guidance, foster label consistency, and reduce the duplication of efforts in the review and registration of Minimum Risk Pesticide products.

General Summary of Activities for 2023:

There were no meetings with the 25(b) Workgroup in 2023.

Due to the February 2024 updated guidance from EPA on "Absence of an Ingredient" claims, the 25(b) workgroup will be updating the following documents:

- Absence of Ingredient Claims (Feb 2022)
- Label Guidance (Dec 2021)

A big THANK YOU to the new Industry leaders that have stepped up to help manage this workgroup. The Industry leaders will be connecting with Industry to identify needs, concerns, and meetings. Our new Industry leaders are:

- Kim Nemeth (P&G)
- Chris Zemanek (ScottsMiracle-Gro)
- Susan Lofton (ScottsMiracle-Gro)
- Angus deWalt (Compana Pet Brands/Manna Pro)

To join the workgroup, please email Sarah Caffery (scaffery@purdue.edu)

To view our current guidance documents: <https://aapco.org/2015/07/02/fifra-25b-workgroup/>

AAPCO Technology Work Group Report 2024
A Summary of Collaborative Meetings & Surveys
Conducted by
The AAPCO Technology Workgroup
Dwight E. Seal

Activity in 2023 concerning UAVs used for pesticide applications increased significantly. Several manufacturers have increased production and sales of UAVs to the end user. There is a wide range of knowledge and skills among people wanting to employ this technology on their farms and commercial businesses. The states are still developing policy and pending regulations concerning UAV technology. This report will be broken into major headings and the advancement in each area.

FAA

The FAA (Federal Aviation Administration) has taken a restrained approach to regulating UAVs used for applying pesticides. The FAA will continue to require the appropriate license and certifications but have put more of the burden on the applicators. The Part 107 license (operating a UAV) is still required of all commercial pilots. This requires going in person to a (FSDO) Field Services District Office at a nearby airport. This license has not changed.

The significant change is regarding the Part 137 certificate for applying economic poisons. FAA contends that an uncrewed aircraft is a lower risk than a crewed aircraft. They base this on the facts of there is no pilot, carrying a smaller payload, no flammable fuel, and no reported accidents since 2015 with 178 operators. When applying for a Part 137 UAS Certificate there's a new streamlined process for those applying for a Part 137 UAS certificate. This allows the FAA to streamline both the Part 137 agricultural UAS certification and the drone exemption process for visual line of sight (VLOS) operations conducted within the altitude and airspeed limitations stipulated by the exemption. Applicants are no longer required to submit documents to their local Flight Standards District Office. Instead, the applicant must complete FAA Form 8710-3 and submit their exemption number to UAS137Certificates@faa.gov for the FAA to begin the certification process. There is no longer a skills and knowledge test, it is now self-administered. There is no regular surveillance for uncrewed operations. There now is a newly required manual for uncrewed operations, these manuals cover safety, Hazmat, accident reporting and flight duties and responsibilities. Any previously approved 40 USC 44807 (exemptions for UAV's weighing over 55 pounds) are still approved. The last change is that uncrewed pilots have a third-class medical clearance instead of a second class as previously required. As the FAA website states, this change is described as a newly required self-created, self-administered self-documented training program.

Conferences

As the Chair of the Technology Workgroup, I attended the 2nd RPAAS (Remotely Piloted Aerial Application Systems) Conference. This conference was held at UC Davis on October 6-10. This conference was attended by numerous stakeholders involved with this emerging technology. Those in attendance were regulatory officials from California and AAPCO Technology Working Group, Industry manufacturers, Pesticide registrants, Commercial applicators, FAA, Researchers from around the world involved in UAV's used for pesticide applications, Engineers, Crop Life America, and nozzle

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manufacturers. The conference was well attended, and several presentations were made over the 4-day conference. Major emphasis was placed on communication between the stakeholders for the future of the technology. Some discussion was made of forming a national association for unmanned applicators and modeling the new association after the NAAA. Label language and system design was the leading topic of discussion. As originally stated in the OEDC State of Knowledge early on, the developing technology required standardization and using GLP (Good Lab Practices) and standardization when conducting drift modeling and risk management associated with handler exposure and residues. In reading the literature available, this concept has been discussed as a critical need to make research science based and defensible when obtaining Section 3 label language.

On October 15-19 of 2023 an Emerging Technologies: PREP Conference was held at UC Davis. This conference was attended by 25 state regulatory officials and tribal councils. The conference covered the areas of what states were doing with regards to UAV's applications of pesticides. Most all states in attendance agreed the application fell in the aerial application category. States were in different stages of adoption of the technology. Some states do not have an aerial applicator license and will require legislation to adopt the measure. With the new Certification and Training requirement by EPA to establish an aerial method category, most states felt this would be the motivation to get the new license requirement in their states. The attendees were all in question about how to comply with the current regulatory framework since no labels make provisions for UAV applications. As with many PREP Conferences the conference left attendees with more questions that were not answered, but major awareness was brought forward.

I am scheduled to attend the 2nd Annual UAV End User Conference in Gulf Shores, Alabama. This conference is being sponsored by Dr. Stevn Li, Auburn University Extension. I will make a presentation during the conference. The title of my presentation is: A Regulator's Perspective of UAV Technology. The outline for the presentation will cover where we started 3 years ago and where we are today. The advancement we have seen in 3 short years has seen larger capacities, better battery life and the picture is becoming clearer with regulatory agencies regarding license requirements and label compliance. As observed in the past three years we expect the capacities to get larger and therefore better battery life. There are current prototypes of full-size rotary aircraft that are unmanned but have a fuel source. The PYKA Drone developed in California will come online in the coming years. The PYKA is a traditional fixed wing aircraft with an 80-gallon payload capacity that is battery driven.

With the industry of safety as a critical factor, future aerial applications could be a majority unmanned, opening the industry to a more diverse applicator. A major concern expressed at many conferences is the fact that operating a UAV and being a pesticide applicator require different skill sets. To be effective the operator must merge

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these disciplines. A major effort must be made to ensure competence before pesticides are applied.

Research

A comprehensive research paper by Jane A.S. Bonds, Naresh Pai, Sarah Hovinga, Katie Stump, Rebecca Haynie, Shelia Flack, and Travis Bui was published in the ASABE Journal. This paper is the most concise compilation of the published research around pesticide applications by UAV. The following link will open the published article.

SPRAY DRIFT, OPERATOR EXPOSURE, CROP RESIDUE AND EFFICACY: EARLY INDICATIONS FOR EQUIVALENCY OF UNCREWEDAERIAL SPRAY SYSTEMS WITH CONVENTIONAL APPLICATION TECHNIQUES

<https://elibrary.asabe.org/pdfviewer.asp?param1=s:/8y9u8/q8qu/tq9q/5tv/J/zqIGIK/MN/H/ciHLMKM.5tv¶m2=I/P/IGIK¶m3=HNJ.IHI.O.JH¶m4=54532>

HIGHLIGHTS

- Initial data shows UASS spray drift is greater than ground, less than aerial, and similar to an airblast application.
- Operator exposure with UASS is less than that of a backpack sprayer.
- No current data shows that residues on crops from UASS applications would be different than conventional applications.
- UASS applications generally have similar efficacy as their conventional counterparts

ABSTRACT

Uncrewed Aerial Spray Systems (UASS) are being adopted at a rapid pace in agricultural applications of crop protection products. The data required to effectively regulate their use must be gathered to position UASS in terms of equivalency with other conventional practices. In Fall 2021, the CropLife America Drones Working Group initiated an effort to collect published information on establishing the equivalency of UASS applications with conventional application types as it relates to spray drift, operator exposure, crop residue, and efficacy. Based on the published literature, our comparison demonstrated that UASS spray drift is lower than aerial, higher than ground boom, and similar to orchard air blast applications. However, this comparison is based on limited data and needs further confirmation. Individual use cases and other application variables will need to be considered to determine if this generalization applies (e.g., adjuvant use, rotor, and nozzle configuration, etc.). For operator exposure,

AAPCO Technology Work Group Report 2024
A Summary of Collaborative Meetings & Surveys
Conducted by
The AAPCO Technology Workgroup
Dwight E. Seal

this work supported the current consensus that applications with UASS have less potential for exposure in some respects (e.g., compared to backpack applications), but for other job steps that are unique to UASS (such as mixing and loading) more information is needed. With respect to crop residue, UASS applicators follow the label for conventional application techniques with the same directions for use (i.e., application rate, pre-harvest interval, and number of applications), but there is no evidence that pesticide residues resulting from a UASS application are any different to conventional application techniques. In terms of efficacy, applications with UASS tend to be equivalent to conventional methods; however, more information is needed, especially where good coverage is a requirement. The assessment of published literature on UASS demonstrates potential equivalency in certain key areas and supports the responsible use of this emerging technology, while more information on spray distribution within the target zone, off-target droplet movement, operator, and bystander exposure, and pesticidal efficacy continues to be generated.

Keywords. Drone, Efficacy, Emerging technology, Operator exposure, Pesticide, Residue, Spray drift, UASS

2024 REPORT TO AAPCO E-COMMERCE WORKGROUP

While e-Commerce and pesticides are not something new, with the pandemic, several related issues came to light. These issues include EPA's differentiation between an "inspection" vs "offsite compliance monitoring" and reporting of these activities under the Cooperative Agreement and the routine incorporation of "virtual" activities as part of inspections/investigations by several states/tribes/territories (states) well before the pandemic.

To address these and related issues, in 2022, the AAPCO Board put together a small workgroup including states and EPA's Office of Enforcement and Compliance Assurance to identify and discuss the issues. A survey was developed and distributed in 2023. From the information collected from the survey, in addition to discussions at the 2023 AAPCO Annual Conference and PreSFIREG and SFIREG Meetings, the following were identified as focus areas for consideration:

1. Including eCommerce as a Picklist in FY26-29 Cooperative Agreement Guidance;
2. Identifying Interim Reporting - how best for SLAs to report eCommerce activities for current grant cycle;
3. Developing eCommerce Inspection Guidance; and
4. Messaging to Regions and Grantees Regarding eCommerce and Grant Negotiations.

In part in response to the above, the workgroup has expanded. Current participants include:

State Lead Agencies

Pat Farquhar, North Carolina Department of Agriculture and Consumer Services
Tabatha Komar, North Carolina Department of Agriculture and Consumer Services
Kristen Lashley, Alabama Department of Agriculture and Industries
David Huber, Vermont Agency of Agriculture, Food and Markets
Garret Creason, Office of the Indiana State Chemist
Toby Primbs, Oregon Department of Agriculture
Trisha Leaf, Minnesota Department of Agriculture
Liza Fleeson Trossbach, Virginia Department of Agriculture and Consumer Services

EPA Office of Enforcement and Compliance Assurance:

Helene Ambrosino
Royan Teter
Michael Bellot
Michael Bauman
Liz Vizard

Looking ahead, it is hopeful the workgroup can be further expanded to include EPA Regions.

To begin to address the focus areas identified above, the SLA members of the workgroup drafted proposals for #1 & #2 and made them available to EPA for review and comment at its January

Meeting. The proposals reflect SLA members initial thoughts to EPA on how to best) include eCommerce activities in the FY26-29 grant cycle; and, 2) report eCommerce activities during the current grant cycle given EPA's desire for grantees to report Total Program Accomplishments. "Telling the whole story" includes eCommerce activities. After review by EPA and any revisions to the draft, these proposals will be shared more broadly for additional input.

For #3, the workgroup is gathering any inspection guidance from states that are currently conducting eCommerce inspections. EPA is drafting guidance for their inspectors and states have indicated they would like guidance. Ideally, guidance could be developed for use by both EPA and grantees or at least developed in parallel.

Finally, for #4, assuming grant funding can be used for eCommerce activities, there is a need for messaging from EPA HQ to all Regions and grantees about the ability to negotiate these as part of their cooperative agreements and encourage them to do so (assuming the grantee is interested in conducting eCommerce inspections). Central to this is EPA allowing states to use their grant funding to support these activities (i.e.: reduce in person marketplace and add some eCommerce inspections).

Respectfully Submitted,



Liza Fleeson Trossbach, AAPCO Past President
Program Manager, Office of Pesticide Services
Virginia Department of Agriculture and Consumer Services

AAPCO Endangered Species Act (ESA) Work Group Report

2/21/2024

Chairpersons: Gretchen Paluch and Steve Dwinell

The AAPCO Endangered Species Act (ESA) Work Group was formed in November of 2022 to more closely follow the evolving issues related to the ESA and its future impacts on pesticide regulatory programs. There are currently 11 active workgroup members and 1 industry participant that offer perspectives representing the Northeast, Southeast, North Central, Midwest, and Pacific Northwest regions of the US.

The workgroup has met 20 times since December 2022, and the workgroup members have met 5 times with EPA pesticide program offices (includes 3 virtual meetings on March 10, 2023, May 25, 2023, August 3, 2023; and 2 in-person meetings on March 6, 2023 and January 24, 2024).

The biweekly/monthly meetings of the workgroup have included efforts to collect information for EPA consideration and develop questions regarding implementation of EPA's ESA workplan strategy including pesticide label enforcement and applicator education and training needs. The workgroup has more recently initiated an effort to collect information on enforcement and compliance of existing label mitigation developed under ESA.

Deliverables from the workgroup include:

Jan 2023

- **AAPCO ESA Workgroup Summary**, prepared for SLAs looking to comment on the proposed mitigation language in the EPA's "Appendix to ESA Workplan Update".

This document facilitated information exchange related to aspects of USDA-NRCS conservation practices.

June 2023

- **Interim Ecological Measures Questionnaire and Response Summary**, provided to US EPA program offices.

State-compiled information was to inform future decision-making on the application of the proposed Interim Ecological Measures (IEM)s to the pesticide registration process. IEMs include such measures as vegetative filter strips, use of conservation tillage, field terracing/ contour buffer strips, cover cropping, etc.

August 2023

- **Workgroup Feedback on DRIFT: Wind Directional Buffers & Buffers to Aquatic/Conservation Areas**, provided to U S EPA program offices.

- **AAPCO to EPA: Comments and Extension Request for the Vulnerable Species Pilot Project, EPA-HQ-OPP-2023-0327**. Workgroup participated and supported.

February 2024

- **AAPCO ESA Workgroup Survey 2024 on Compliance with Label Restrictions & Requirements Intended to Protect the Forage and Habitat**, sent through AAPCO listserv.

The new labels for the Enlist Herbicide products include specific requirements and restrictions for mitigation of both spray drift and runoff. The purpose of this brief survey was to collect information from pesticide state lead agencies (SLAs) regarding experiences and efforts to-date in implementing compliance with the new label mitigation measures in 2022 and 2023.

Documents and a listing of the AAPCO ESA Workgroup and SFIREG activities relating to ESA are accessible on the AAPCO Endangered Species Website - <https://aapco.org/2015/07/21/esa/>

The upcoming workgroup activities include the collection of State Level Conservation Program information that can be provided to US EPA programs offices. As EPA moves forward to implementing ESA strategies, more organized information on state conservation program criteria, common practices, definitions, acres in use, cost, etc. will be essential. This involves input from multiple groups including USDA/OPMP and Minor Crop Farmer Alliance, etc.

When more information on conservation practices, spray drift mitigation, and EPAs' ESA strategy are finalized, the workgroup acknowledges the importance of coordinating and disseminating this information throughout EPA regions. This includes education and outreach to pesticide applicators. Engagement and support of regional Pesticide Safety Education Professionals will be necessary to build a successful implementation plan.

In September 2023, AAPCO workgroup chairs brought forth a proposal for a third SFIREG joint working committee to focus on ESA strategy implementation. Given the scope and continued expansion of ESA discussions, this would enable POM and EQI time to adequately focus and still address other non-ESA pesticide regulatory topics. If supported, the new working committee would become effective in July 2024 and utilize the SFIREG structure and mechanism.

The AAPCO workgroup members remain interested in building future opportunities for AAPCO membership to engage in a regular dialogue with EPA, SFIREG, industry and other relevant regulatory agencies involved in pesticide program impacts from the endangered species act. Please reach out to the workgroup co-chairs if you have questions or interest in the workgroup (Steve Dwinell Steve.Dwinell@vermont.gov and Gretchen Paluch Gretchen.paluch@iowaagriculture.gov).

February 2024



Certification Training & Assessment Group (CTAG) Report to the Association of American Pesticide Control Officials (AAPCO)

CTAG is a group of representatives from state lead agencies (SLA), pesticide safety education programs (PSEP), and tribal certification programs that can rely on each other for collaboration, eliminate duplication of effort and maximize the utility of existing solutions for pesticide applicator certification and training (C&T).

CTAG Meetings

- CTAG had continued to hold monthly virtual meetings throughout the year.
- CTAG voted not to have an in-person meeting this fiscal year, and to have the meeting funds directed towards a workshop of interest to support Certification and Training implementation.

CTAG Membership

Members serve staggered three year terms. Terms end January 31st each year. CTAG strives for balance between SLAs and PSEPs and with representation from four US regions (West, Southern, Northeast, North Central). When all board positions are filled, CTAG is composed of 13 members including: 6 SLA representatives, 6 PSEP representatives, 1 tribal representative, and 2 ex-officio members.

CTAG recently lost our Executive Secretary due to lack of funding. Additional members were lost when their terms ended. Currently CTAG is comprised of 8 members (5 SLA representatives, 3 PSEP representatives, 1 tribal representative) and 1 ex-officio member. As CTAG is no longer funded past June 2024, we will not be soliciting for new membership. Current membership is as follows:

- Co-Chair – Lindsey House (SLA), Washington State Department of Agriculture
- Co-Chair- Vacant (PSEP)
- **Western Region**
 - Lindsey House (SLA), Washington State Department of Agriculture
 - Stephen Vantassel (SLA), Montana Department of Agriculture
 - Jennifer Weber (PSEP), University of Arizona
 - Vacant (PSEP)

- Vacant (SLA)
- **Northeast Region**
 - Amanda Couture (SLA) – Maine Department of Agriculture, Conservation and Forestry
 - Vacant (PSEP)
- **North Central Region**
 - Gurinderbir (G.) Chahal (SLA), Minnesota Department of Agriculture
 - Vacant (PSEP)
- **Southern Region**
 - John Feagans (SLA), North Carolina Department of Agriculture and Consumer Services
 - Brett Bultemeier (PSEP), University of Florida
 - Dana Beegle (PSEP) – Virginia Tech
- **Tribal Representative**
 - Jim Mossett, Three Affiliated Tribes, North Dakota
- **Ex-officio**
 - Jeanne Kasai – EPA HQ
 - Vacant (CTAG Executive Secretary)

Current Topics

CTAG has three current issues slated as high priority.

- Label Mandated Training (LMT) White Paper to EPA (see attachment)
 - CTAG created a white paper that describes the issues pesticide safety educators experience related to LMT. The paper includes the following sections:
 - Background description
 - Pesticides currently requiring LMT (soil fumigants, paraquat, dicamba)
 - Alternate examples (structural fumigants, rodenticides)
 - Feedback from SLA's and PSEP's (questionnaires sent out through AAPCO and AAPSE)
 - Thoughts from the LMT committee
- CTAG Documents (see attachment)
 - 18 documents
 - Prioritized documents for updating from Low, Medium, High or Archive
 - 10 High
 - 1 Medium-High

- 1 Low,
 - 5 Archived (create new version or N/A)
 - 1 No changes
- Documents were divided amongst CTAG membership
- Goal: have documents completed by early spring 2024
- Upcoming 2024 Workshop
 - CTAG was interested in funding/supporting another manual development workshop in the spring of 2024 and members were working towards making this happen. However, CTAG is no longer confident in the funds that were budgeted for this workshop.

Issues of Concern

- End of CTAG Funding
 - With loss of CTAG's Executive Secretary due to funding issues, and full loss of grant funding when this fiscal year ends, CTAG members are likely to disband. The grant funding for our Executive Secretary position, website fees, and travel budget to hold trainings were all crucial to help CTAG accomplish our mission. The remaining members do not feel able to continue without EPA support.
 - CTAG members do not have confidence that the funds that were allocated towards a spring manual development workshop exist, or will be made available in a timely manner. CTAG is hesitant to move forward with hosting this workshop and is in the process of deciding how to proceed.
- Preservation of CTAG Resources
 - In anticipation of losing website and Basecamp access where our documents are currently housed, CTAG has saved relevant documents on AAPCO's website to keep those resources available.
 - Though CTAG's funding is ending and disbandment is the probable outcome, the CTAG membership still sees great value in the group and would like to see CTAG funded and functioning again in the future. The group is looking at ways to facilitate a seamless reinstatement if funding becomes available. CTAG is in conversation with EPA to attempt to keep some elements afloat (website or leadership) to assist with this goal.



LABEL MANDATED TRAINING WHITE PAPER

November 29, 2023

Background

The United States Environmental Protection Agency (EPA) oversees the registration, sale, distribution, and use of pesticides throughout the United States, Tribes, and Territories. One of the agency's primary tasks is ensuring every registered product label contains clear, accurate, and detailed instructions on proper use to guide pesticide users. The labels are intended to ensure that proper use is defined, and by following instructions pesticides will not pose an unreasonable risk of harm to people or the environment. Use instructions include information on where and how the product can be used; the pests it manages; how to correctly mix, load, and apply the pesticide; measures to protect people and the environment from pesticide contamination; and post application procedures, such as posting requirements and pre-harvest and reentry intervals.

Clearly written label instructions are particularly important when utilizing restricted use pesticides (RUP). The EPA the RUP classification for products that have the potential to harm the environment, pesticides users, and the public if proper instructions or protections are not followed. Due to this concern, there is general support for formal pesticide safety training and competency tools to measure an individual's knowledge and comprehension of how to safely use RUPs.

The Certification and Training requirement developed by the EPA, and enforced by the states, tribes, and territories is the primary mechanism used to accomplish these goals. Many know this as the process required to obtain either an applicator certification or the "pesticide license" needed to purchase or use RUPs. Many states will require this process to be utilized for general use products (GUP) as well as RUPs, particularly for commercial enterprises utilizing pesticides.

As additional issues arise with the use of certain RUPs deemed particularly hazardous to people or the environment, it has become increasingly common for the EPA and some states to require additional label-specific training, referred to on product labels as label mandated training (LMT). These supplemental training requirements go above and beyond those required for initial certification. The intent of this document is to provide an outline of the status of LMT, summarize feedback from various stakeholders involved in pesticide safety and regulation, and provide recommendations for the future of LMT programs.

Pesticides Currently Requiring Label Mandated Training

Soil Fumigants

One of the first examples of label mandated training was designed for individuals who work with soil fumigants. Soil fumigants pose a significant risk to people applying the pesticide, other agricultural



employees assisting with fumigation-related tasks such as removing tarps following the application, and bystanders. Soil fumigant certification and training requirements varied from state to state. In some states a Private Applicator certification allowed the individual to purchase and use all RUP products without additional training or category specific examinations on the unique hazards posed by soil fumigant products.

Due to the unique aspects of each state's Certification and Training plan, it was not feasible for EPA to require that all applicators be licensed in soil fumigation. However, the need for a mechanism to ensure every soil fumigant user was aware of the unique risks posed by their use was recognized. To ensure uniformity in hazard and risk communication, soil fumigant labels required individuals to meet a minimum threshold of competency before purchasing or using these products. Some states' current certification processes met these standards, and no additional training was required to comply with the label demands. Other states had no mechanism in place. To address this, registrants of soil fumigants developed EPA-approved training to ensure all competency standards were met.

For a complete list of states' requirements, discussion about soil fumigants, and access to the EPA-approved training materials and programs, see the [EPA Soil Fumigant Training for Certified Applicators](#) page.

Paraquat

EPA continues to document cases of paraquat poisoning due to ingestion and, the concern about its acute toxicity has led to increased safety measures. These include enhanced packaging and design that requires closed loop systems. Rule changes, such as limiting use to certified applicators and eliminating allowances for direct supervision, offer further protections.

In addition, all individuals using paraquat are required to be certified applicators and must successfully complete label mandated training. There is no provision for direct supervision, or even handling of this product without being certified AND having completed the training. While similar in concept, this required training is significantly different from the model used for the soil fumigants in that only EPA-approved training can be used. The EPA-approved label mandated paraquat training is accessible on a central location on the internet. It was developed for the registrants by a third-party vendor, the National Pesticide Safety Education Center (NPSEC).

As per label directions, individuals must receive a certificate upon successful completion of the training. Once completed, the certification is valid for three years. To satisfy these requirements, the registrants also arranged with NPSEC to house and administer the training, maintain the training records, and issue certificates.

Due to feedback from applicators about accessibility issues associated with the internet, an in-person training component was also developed and is administered by NPSEC. Training materials and further information about paraquat can be found on the [Paraquat Dichloride Page](#) hosted by the EPA.

Over-the-Top Dicamba

Over-the-top dicamba products designed for use with dicamba tolerant cotton and soybeans were the next group of products requiring applicators to obtain additional training. This training was required as



part of the registration of two new over-the-top products and the reregistration decision of a third product in 2018.

Whereas the soil fumigants and paraquat training modules focused on applicator safety due to the concerns about their inherent acute toxicity, dicamba training was created to educate users about the potential for these products to damage non-target plants from spray and/or vapor drift. Additionally, although soil fumigants and paraquat trainings are active-ingredient specific, the dicamba training requirements apply only to the three products registered for use on dicamba resistant crops as an over-the-top application.

Like paraquat requirements, all dicamba handlers and applicators must be certified; there are no provisions for direct supervision. The training requirements for dicamba differ greatly from those of soil fumigants and paraquat. First, dicamba training must be completed annually. Additionally, there is no requirement that EPA approved training be used, merely that the new label requirements and restrictions be covered as listed on product labels. In addition, there are no set forms or certificates of completion. The EPA only states that a certificate *should* be issued so that those purchasing and using products containing dicamba have proof of completion of the training to satisfy the record keeping requirements for these products. Finally, EPA has left it up to each state/tribe/territory to decide what type of training they will require. States, tribes, and territories can opt to develop their own training program, use a combination of their training and the training developed by industry, or use the industry training. For further information about these training requirements, see the page on the [EPA website](#).

Alternate Examples

Structural Fumigants

Structural fumigants provide yet another example of products requiring a label specific training program. Structural fumigant label training differs significantly from the other LMT programs because it is not mandated by EPA. Instead, it is part of a voluntary training and stewardship program offered by the registrants.

In some cases, the registrant achieves this at the point of sale and by internal mechanisms; while other registrants list the training requirement directly on the label. Since these programs are controlled by the registrants, there is no set timeline for training frequency, no standard measure to certify or verify completion of the training requirement, and no standardized content for the training itself. The availability of the structural fumigant label training is strictly at the discretion of the registrant.

Rodenticides

An alternate form of label training has been proposed as part of the reregistration discussions of the rodenticides. The training would not be mandated but would be referenced on product labels as optional training. This makes the information and training readily available to all who use the products, but does not make the label training required, nor enforceable.

Feedback

Prior to the 2021 Pesticide Applicator Certification and Training Meeting (PACT), a collaboration team was assembled to create a scoping document and ultimately bring a diverse group of stakeholders together in Denver to discuss the issue of label mandated training. As part of this discussion, all interested groups including pesticide safety educators, state and federal regulators, private industry, and other interested parties were able to voice their opinions and ask questions about this issue. Following that meeting, a smaller more formal group was established that met monthly to determine the next steps to be taken for addressing the issue.

A key objective identified by the group was to obtain formal feedback from pesticide safety educators and state regulators about their understanding of label mandated training, and their opinions about its use going forward. The collaboration team was able to get this feedback through the Association of American Pesticide Control Officials (AAPCO) and the American Association of Pesticide Safety Educators (AAPSE) using a questionnaire that was sent to their respective groups' members. The full results of the feedback can be found in Appendices A and B for AAPCO and AAPSE respectively.

Below are key take aways identified by these two groups:

- Only 20% and 7% of State Lead Agencies (SLAs) and Pesticide Safety Education Programs (PSEPs), respectively, knew all the products requiring label mandated training (LMT) and felt adequate resources were in place.
- Over 90% of regulators believed label mandated training can or sometimes meets EPA's goal of informing applicators of risk. Only 60% of PSEPs thought it did.
- A majority of both groups did NOT believe there should be LMT for additional products.
- A majority of both groups believed the training was not consistently accessible and available to applicators.
- A majority of both groups had not developed materials or performed regulatory inspections related to LMT.
- Over 80% of SLAs and PSEPs believed either the EPA or registrants should be tasked with developing LMT training materials. None of the respondents believed it should be the responsibility of SLAs.
- Both groups agreed that training materials should be made available in multiple formats, online, and in person.
- Feedback from both groups included multiple comments regarding how applicators find LMT confusing and struggle with finding training materials.

Notably missing from this feedback are responses from the applicators themselves. One author, in discussing LMT with several applicators in their state, found the applicators were unaware of these requirements and found it confusing to have training listed on a label. Applicators expressed an interest in learning more about training but felt it should be part of the certification process or emphasized in continuing education courses, but not required. It was "one more checkbox" applicators must keep up with. If it is simply an item to check off, they said they would be less likely to pay attention.

Thoughts of the Authors

One of the primary questions the authors have been unable to answer is how effectively label mandated training is at reducing the risks associated with each product. In pursuing an answer to that question, it is unclear if there is any data being collected to determine the effectiveness of LMT or even if such data can be produced at all.

For instance, one might be able to compare the number of paraquat deaths due to ingestion prior to training versus those that occurred after training was implemented. If deaths are reduced, one might conclude the training worked. However, the paraquat training was not done as a standalone mitigation measure, as extensive product packaging changes were made that also could have reduced deaths due to ingestion. Likewise, the dicamba measures are not done as standalone requirements. Presumably the goal of the training is to reduce drift and off target damage. If less damage was reported, is that a result of effective training, or are more farmers adopting dicamba tolerant crops to avoid potential damage issues? Without a robust and deliberate method of tracking training efficacy, it will remain unknown if the training is effective at reducing harm, and thus necessary.

As highlighted earlier in this document, there is no consistency in how label mandated training is developed, delivered, and tracked; and who is responsible for its provision. This makes assessing the effectiveness of LMT difficult and makes it challenging for pesticide users, regulators, and trainers alike to focus on effective efforts. An ever-changing model for label mandated training makes it difficult for educators, regulators, manufacturers, and ultimately pesticide users to know what is required to use these products.

Of all the feedback gained from the questionnaire, the clearest agreement was related to who should be vetting and producing label mandated training. Both regulators and educators clearly favored either the EPA or manufacturers overseeing the training. In follow-up discussions and comments, it was clear having training that is vetted, EPA-approved, and consistent across the country, was desired by both groups.

Additionally, regulators and educators desired training developed by the manufacturers as part of their registration requirements. This would most commonly resemble the current paraquat model, with the caveat that the training must be available in formats other than online-only training modules and be of sufficient quality and merit.

A majority of both educators and regulators did not favor the implementation of more label mandated training. In the survey comments and follow up discussions, many educators suggested training “recommendations” could be prioritized and included in states’ training materials when applicable. For instance, a list of concerns or key points related to safety could be provided to pesticide safety education programs, which they could include during recertification trainings or distribute through bulletins to industry members. This would place the focus on safety, not a label mandated requirement.



A concern with the increasing amounts of training and compliance being done separately from the traditional certification process and the label itself, is that it discounts both of those mechanisms. The more users must bounce around to different websites or seek out additional training, the more likely they will wind up confused, making it harder for them to comply with the training requirements. All of this can create “compliance fatigue,” in which users feel so overwhelmed they simply stop attempting to comply with regulations.

Conversations with pesticide users revealed they do not anticipate being caught out of compliance. The lack of enforcement in this area, as indicated by many of the SLAs’ survey responses, supports this. Additionally, there were SLA responses that indicated they themselves may be unclear on all the regulations, making compliance near impossible.

There is also the challenge of finding the training in the first place. For example, the training link listed for dimethyl disulfide (DMDS) on the EPA’s website and referenced on the product labels does not take you to an actual training. It simply takes you to the homepage of the manufacturer which might create confusion, frustration, and a lack of compliance.

Training that is part of regular recertification or PSEP training programs and highlights the safety concerns and methods for reducing risk might be a better approach. This would result in training that is valued and is not viewed as overburdensome or just another box to check. If, however, additional label mandated training will be utilized, it is paramount that there is consistency in the requirements and delivery methods to ensure proper communication, distribution, and expectation to and by pesticide users.



Links Cited in Document

<https://www.epa.gov/ingredients-used-pesticide-products/dicamba-training-requirements-frequently-asked-questions>

<https://www.epa.gov/ingredients-used-pesticide-products/paraquat-dichloride>

<https://www.epa.gov/soil-fumigants/soil-fumigant-training-certified-applicators>

Collaboration Team Members

Brett Bultemeier – UF/IFAS Pesticide Information Office

Amanda Couture – Maine Department of Agriculture, Conservation & Forestry

Bart Clewis – Syngenta

Ed Crow – Penn State University Extension

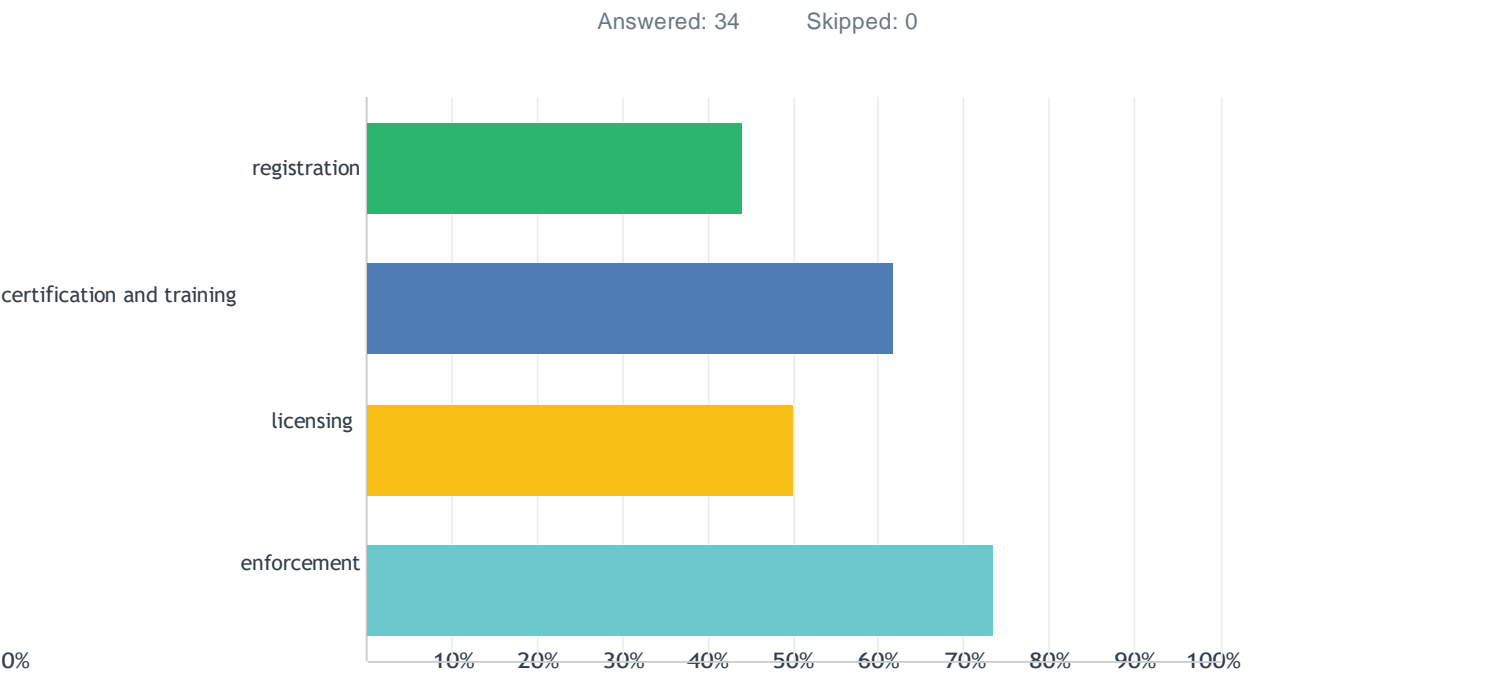
Jennifer Weber – University of Arizona Extension

Linda Johns – University of Minnesota Pesticide Safety and Environmental Education

Pat Farquhar – North Carolina Department of Agriculture and Consumer Services

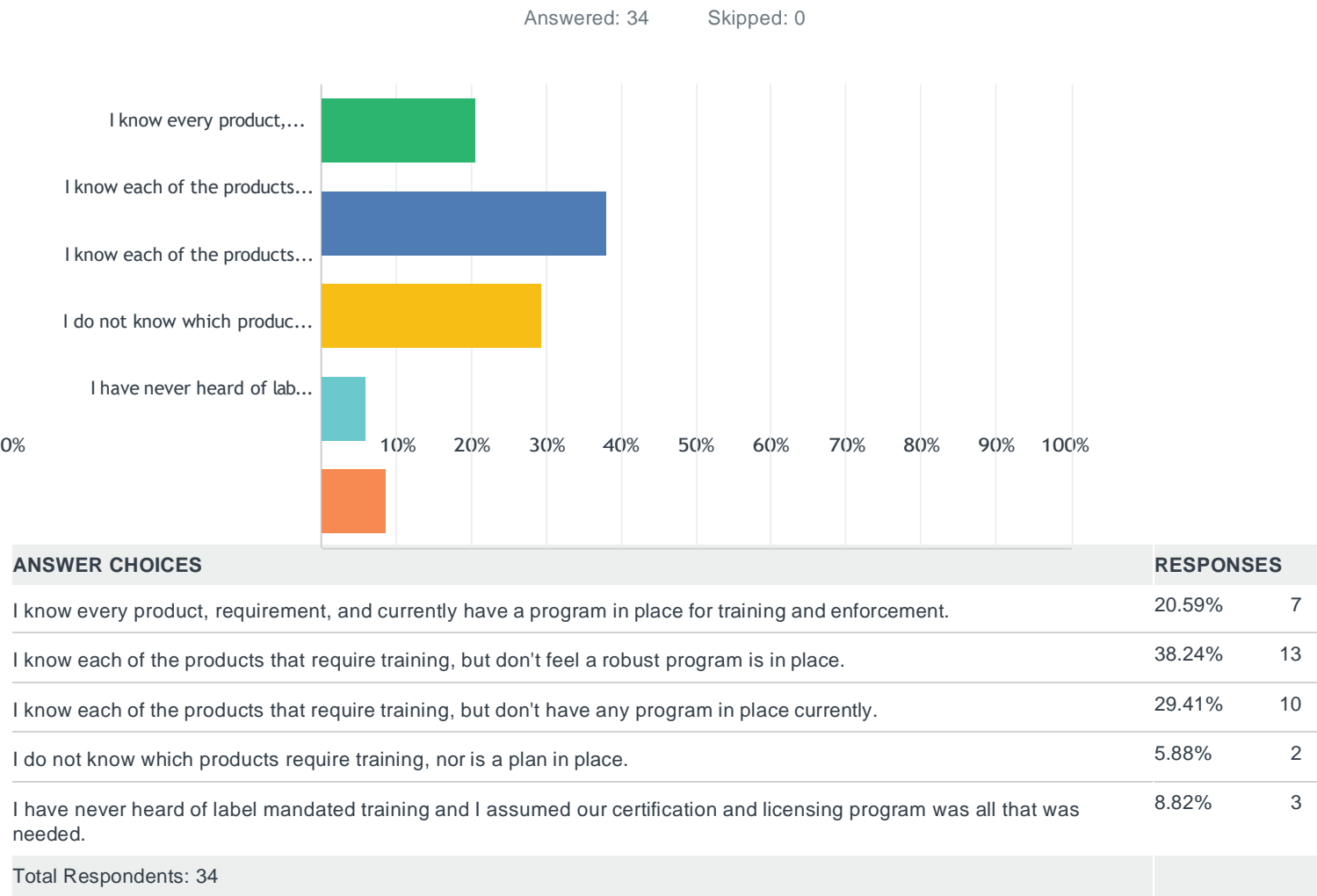
Appendix A – AAPCO Questionnaire

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



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

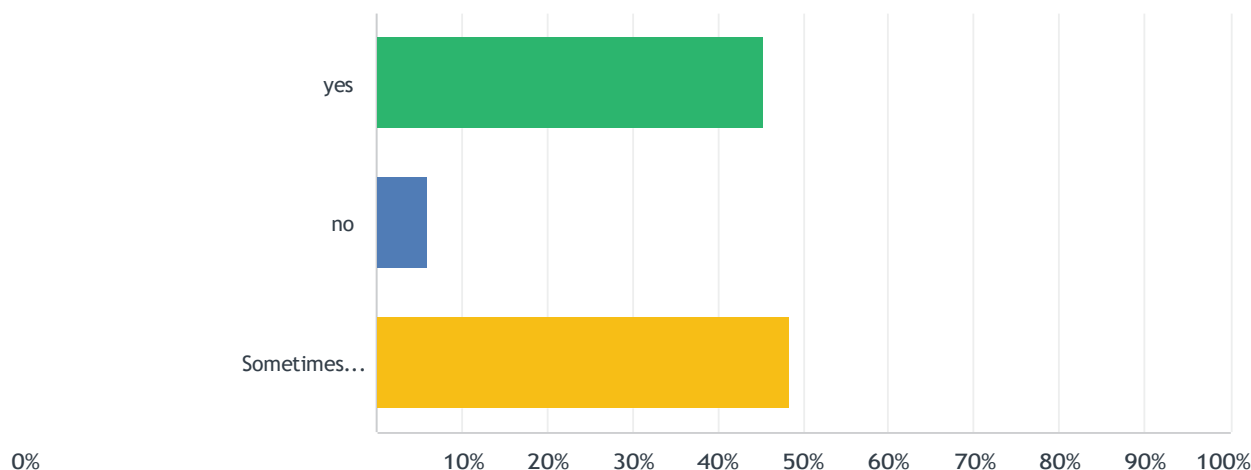
Q3 How would you rate your knowledge of label mandated training?



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
TOTAL		33

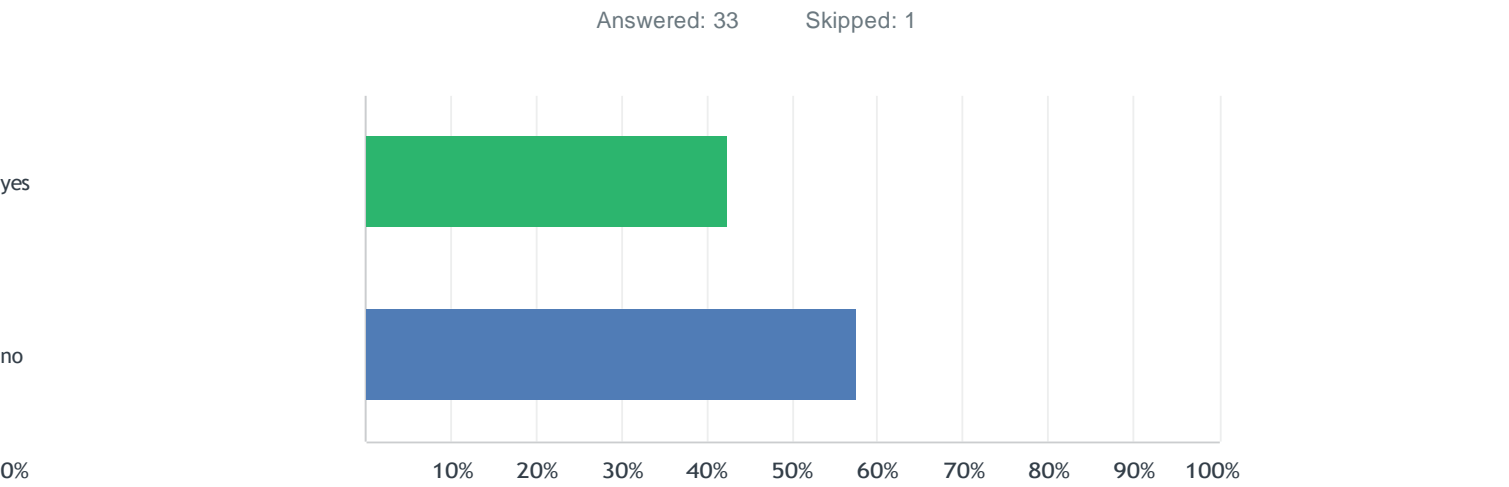
#	SOMETIMES...	DATE
1	Label mandated training can vary on who provides the training and where it is located (e.g. registrant vs say SLA). Thus is important for the applicator to know where to find it and when to take it with potentially different state rules or different labels in marketplace.	8/16/2022 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.

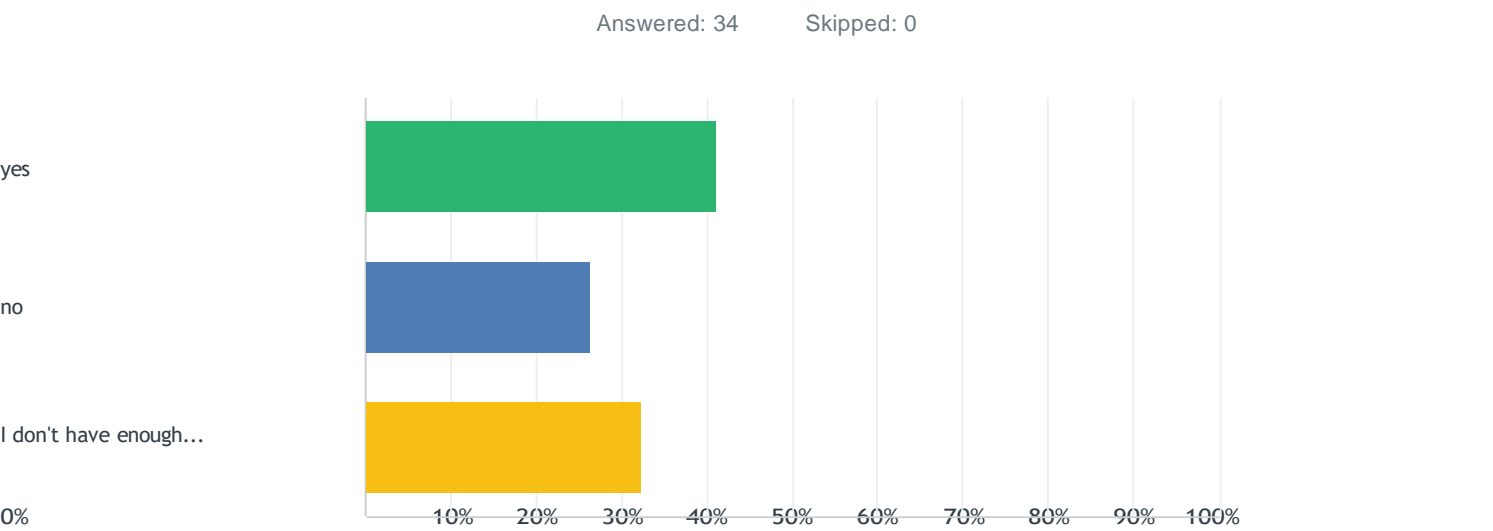
7	The required annual dicamba training has dropped considerably since it was first implemented. We have issued several settlement agreements because applicator did not take dicamba specific training. The companies have been doing the training.	8/11/2022 2:21 PM
8	While the main applicators will take 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?



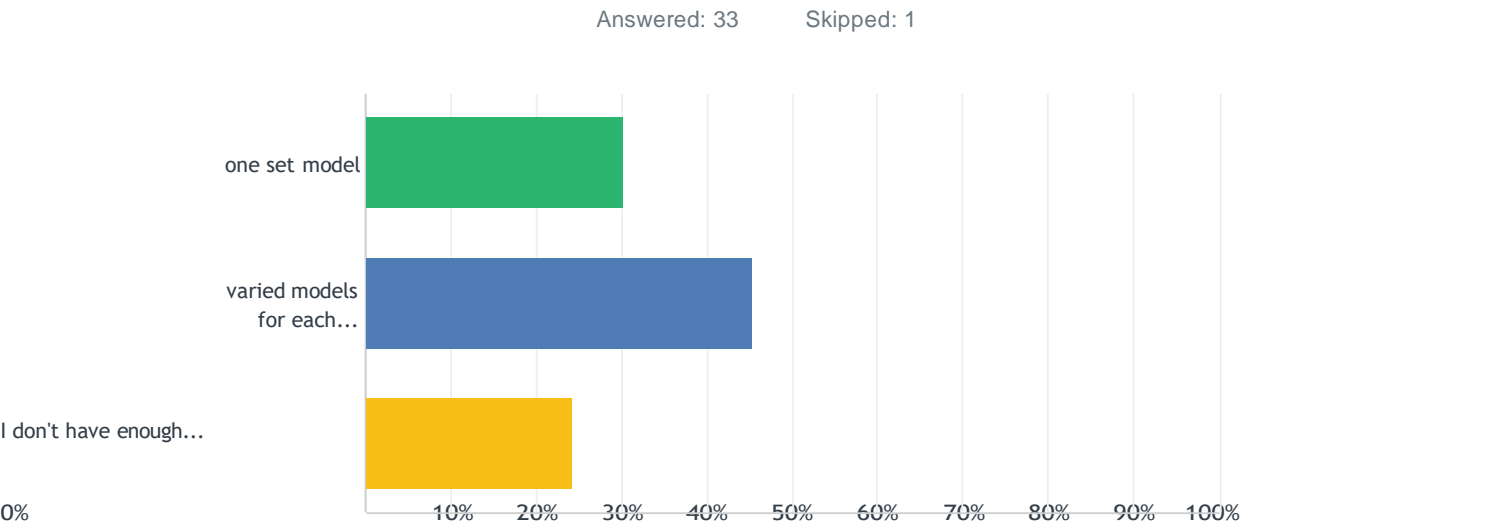
ANSWER CHOICES		RESPONSES	
yes		42.42%	14
no		57.58%	19
TOTAL			33

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



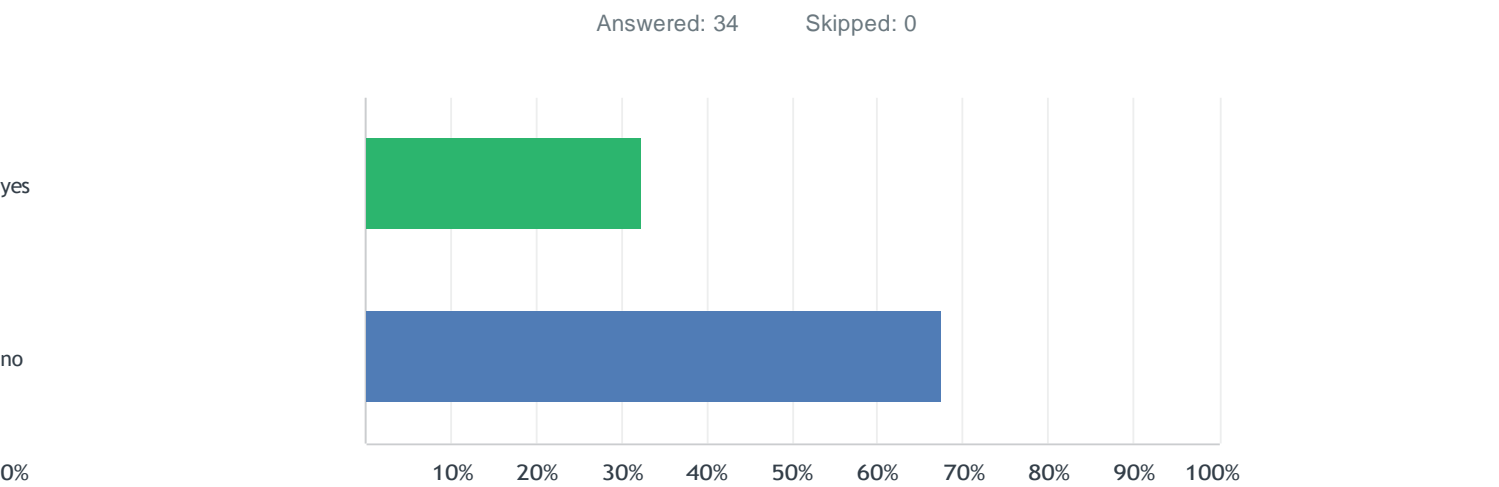
ANSWER CHOICES	RESPONSES	
yes	41.18%	14
no	26.47%	9
I don't have enough information	32.35%	11
TOTAL		34

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



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
TOTAL		33

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



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

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

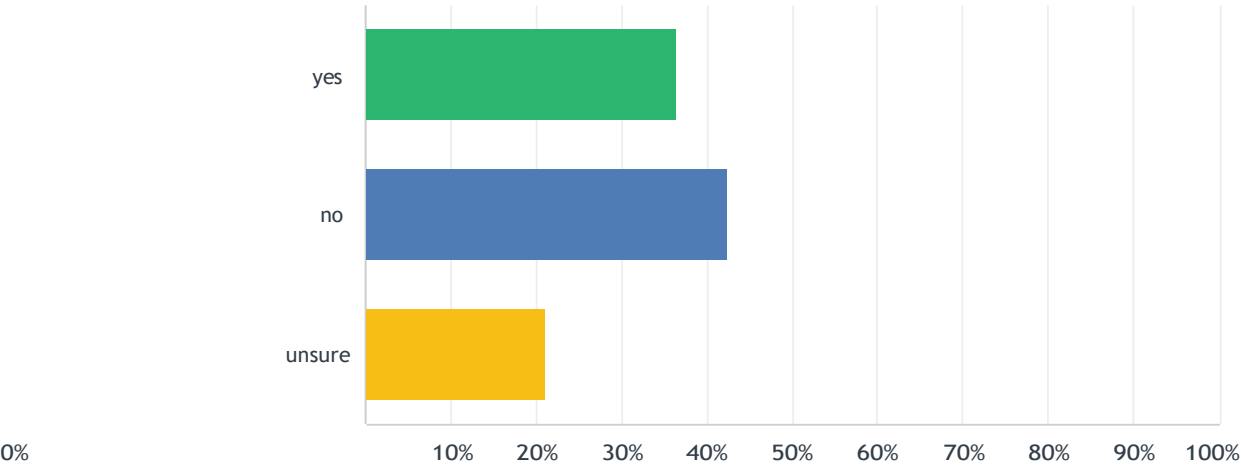
Answered: 15

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 from 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

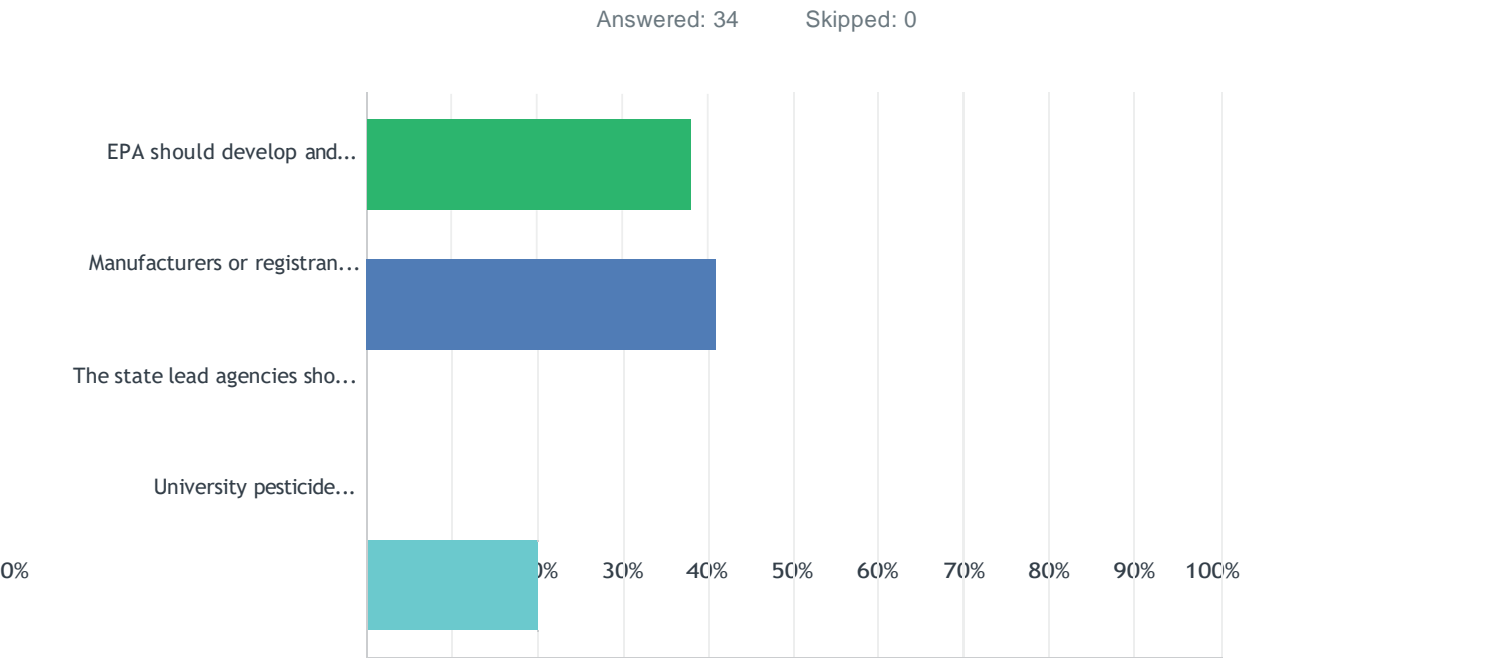
Q10 Is the completion of label mandated training currently counted towards continuing education/recertification credit in your state or territory? (If some sources are allowed but others aren't, answer yes. Only answer no if the training never counts towards recertification credit)

Answered: 33 Skipped: 1



ANSWER CHOICES	RESPONSES	
yes	36.36%	12
no	42.42%	14
unsure	21.21%	7
TOTAL		33

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



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
TOTAL		34

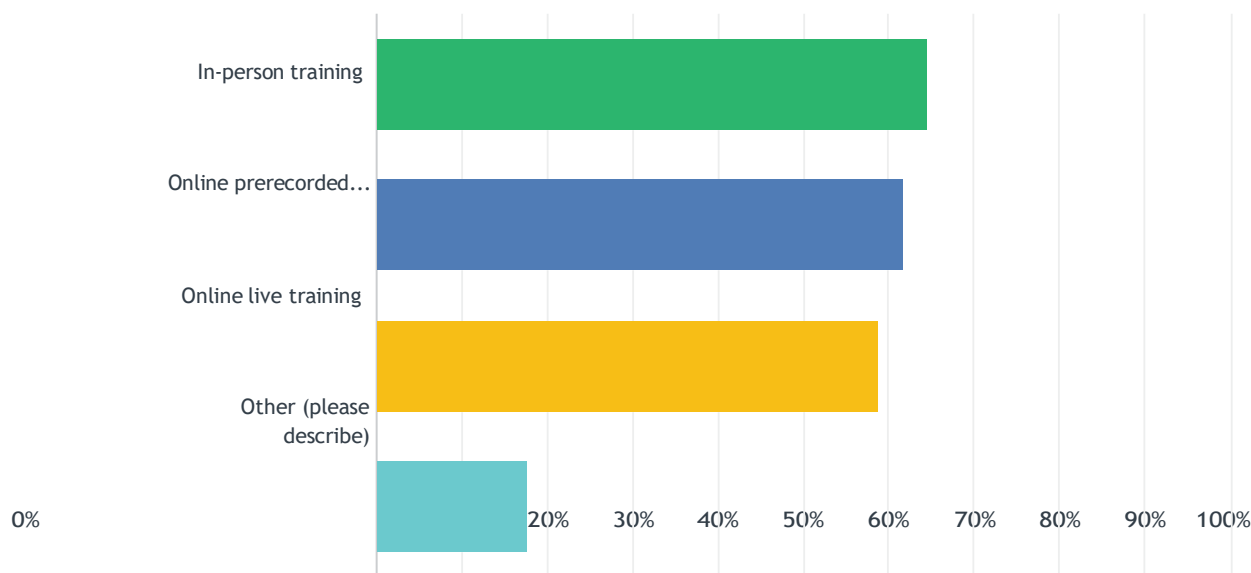
Q12 How should enforcement of the training requirements be handled (check all that apply)?



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

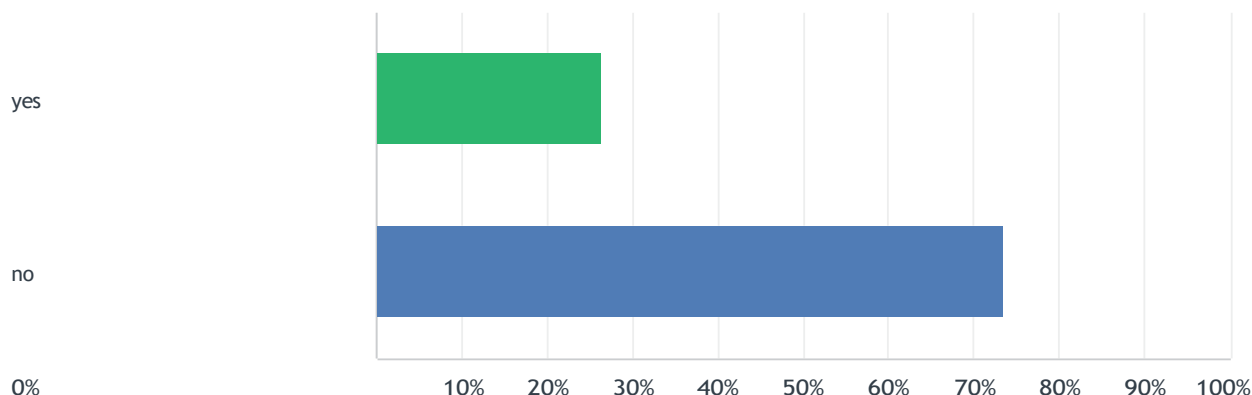
competencies of the individuals who will be using these products. The foundation of these trainings must be based on the checking the applicator's COMPETENCY!!

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 have you received?

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

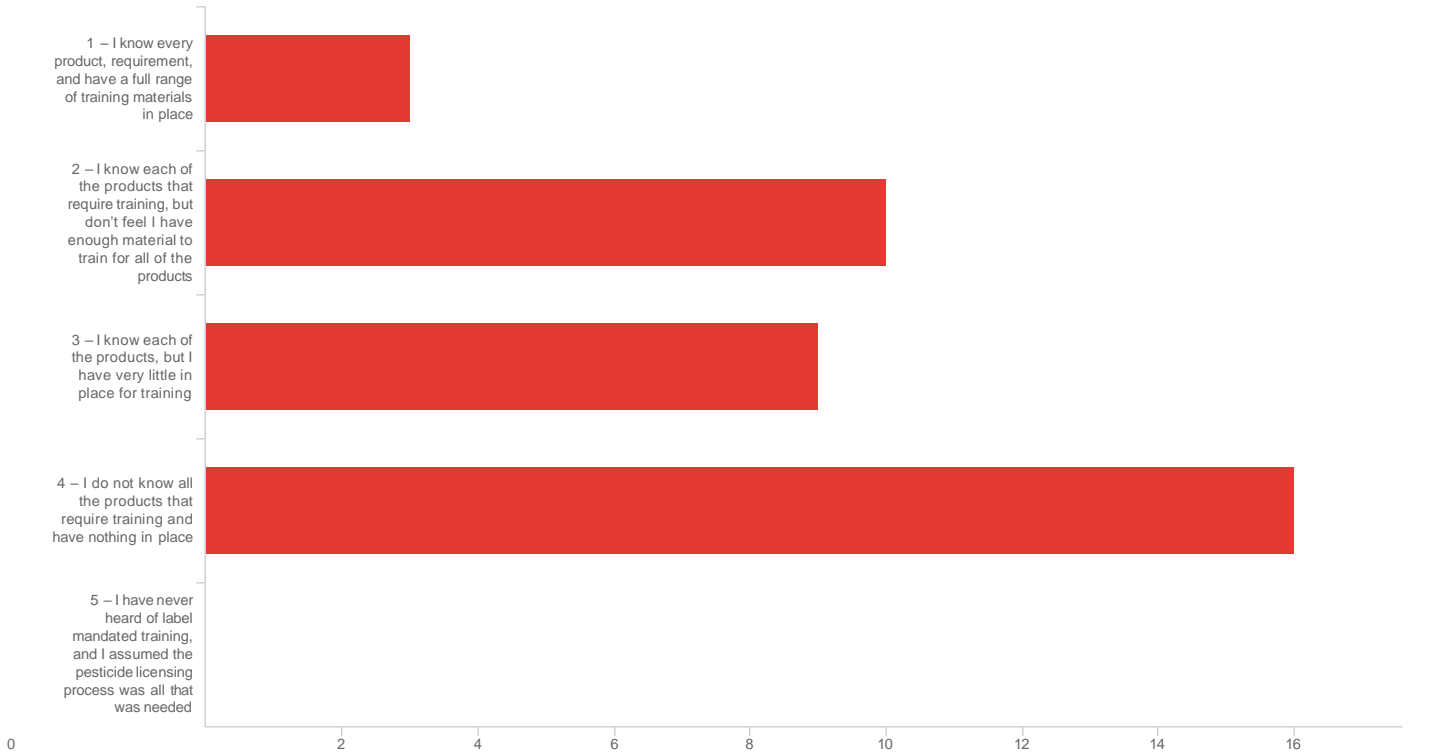
pesticide dealers.

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.

Appendix B – AAPSE Questionnaire

1 - As a Pesticide Safety Education Program (PSEP) rate your understanding of label mandated training?



#	Field	Minimum	Maximum	Mean	Std Deviation	Variance	Count
1	As a Pesticide Safety Education Program (PSEP) rate your understanding of label mandated training?	1.00	4.00	3.00	1.00	1.00	38

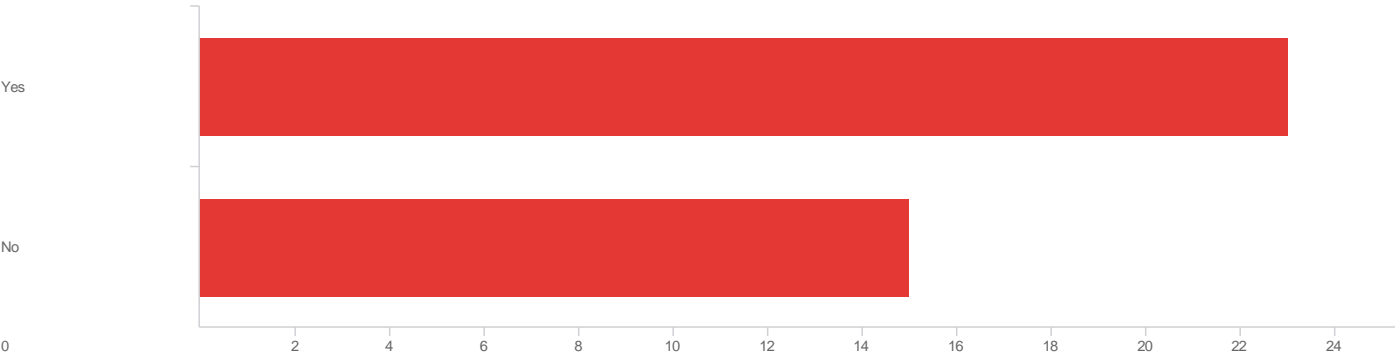
#	Field	Choice Count
1	1 – I know every product, requirement, and have a full range of training materials in place	7.89% 3
2	2 – I know each of the products that require training, but don't feel I have enough material to train for all of the products	26.32% 10
3	3 – I know each of the products, but I have very little in place for training	23.68% 9
4	4 – I do not know all the products that require training and have nothing in place	42.11% 16

#	Field	Choice Count
5	5 – I have never heard of label mandated training, and I assumed the pesticide licensing process was all that was needed	0.00% 0
		38

Showing rows 1 - 6 of 6

2 - Do you feel that label mandated training serves the EPA’s purpose to inform

applicators about the potential hazards and safety measures associated with a specific product?



#	Field	Minimum	Maximum	Mean	Std Deviation	Variance	Count
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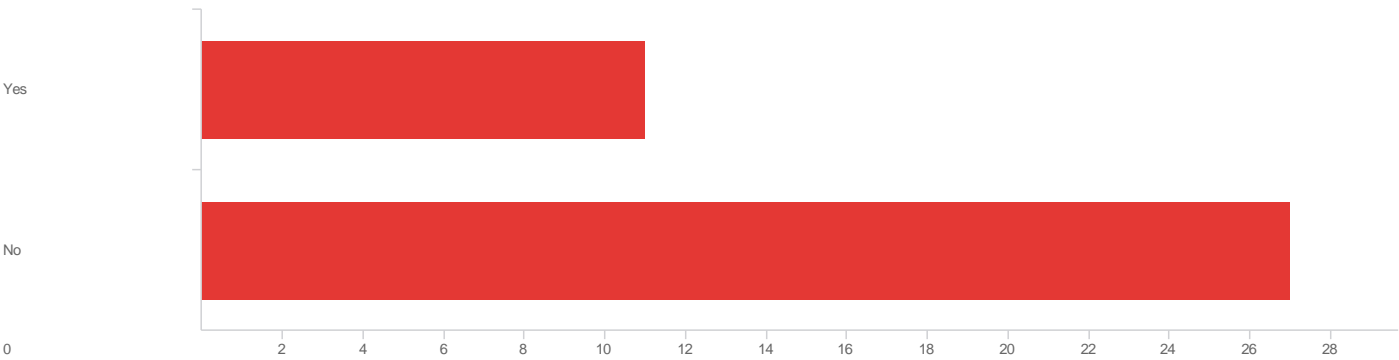
1	Do you feel that label mandated training serves the EPA's purpose to inform applicators about the potential hazards and safety measures associated with a specific product?	1.00	2.00	1.39	0.49	0.24	38
---	---	------	------	------	------	------	----

#	Field	Choice Count
1	Yes	60.53% 23
2	No	39.47% 15

38

Showing rows 1 - 3 of 3

3 - Do you feel label mandated training should be used for more products?



#	Field	Minimum	Maximum	Mean	Std Deviation	Variance	Count
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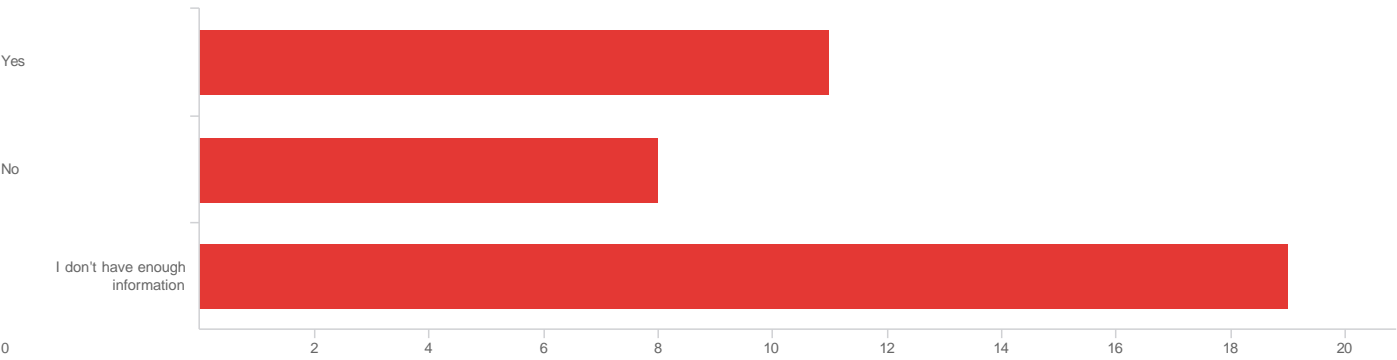
1	Do you feel label mandated training should be used for more products?	1.00	2.00	1.71	0.45	0.21	38
---	---	------	------	------	------	------	----

#	Field	Choice Count
1	Yes	28.95% 11
2	No	71.05% 27

38

Showing rows 1 - 3 of 3

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

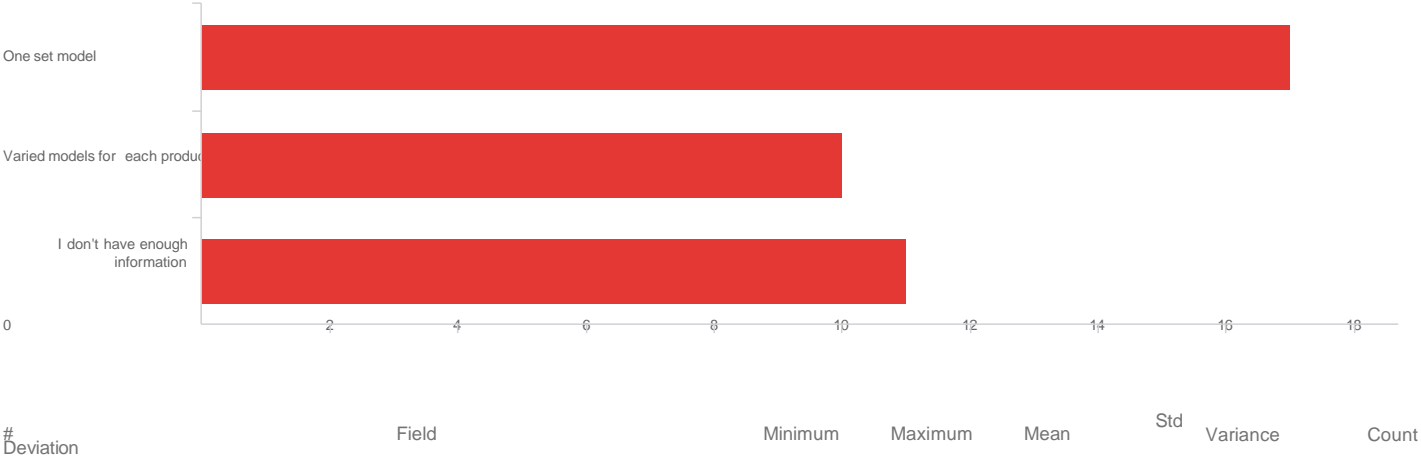


#	Field	Minimum	Maximum	Mean	Std Deviation	Variance	Count
1	Do you feel the current examples for label mandated training are consistent and accessible to pesticide applicators?	1.00	3.00	2.21	0.86	0.75	38

#	Field	Choice	Count
1	Yes	28.95%	11
2	No	21.05%	8
3	I don't have enough information	50.00%	19
			38

Showing rows 1 - 4 of 4

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

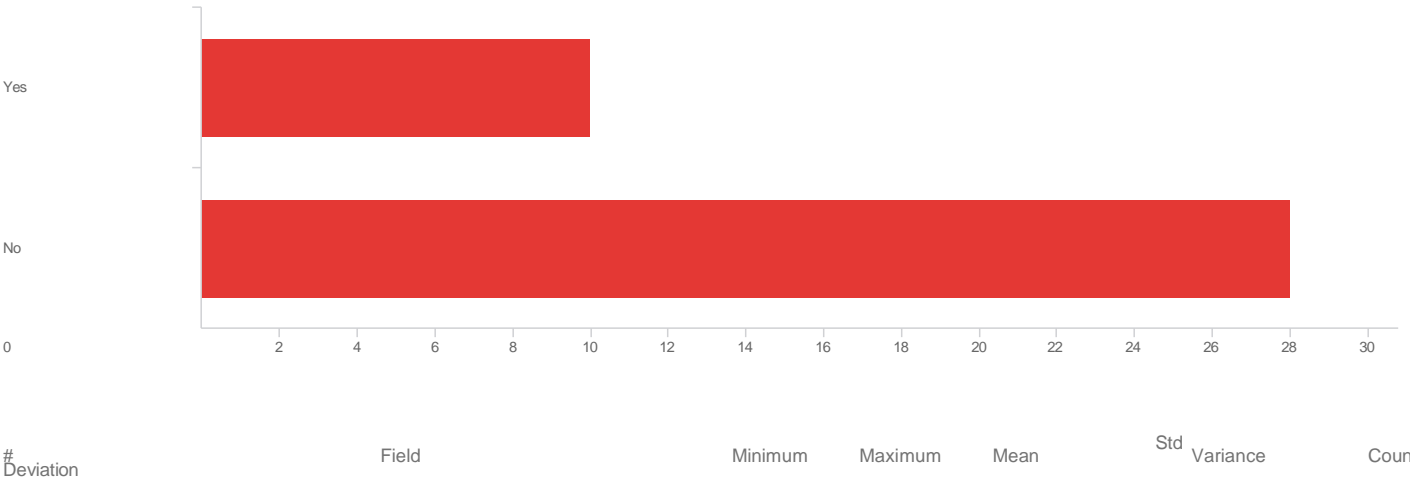


#	Field	Minimum	Maximum	Mean	Std Deviation	Variance	Count
1	Do you feel there should be one model for label mandated training or should it vary depending on the product?	1.00	3.00	1.84	0.84	0.71	38

#	Field	Choice	Count
1	One set model	44.74%	17
2	Varied models for each product	26.32%	10
3	I don't have enough information	28.95%	11
			38

Showing rows 1 - 4 of 4

6 - Has your program developed materials for label mandated training?

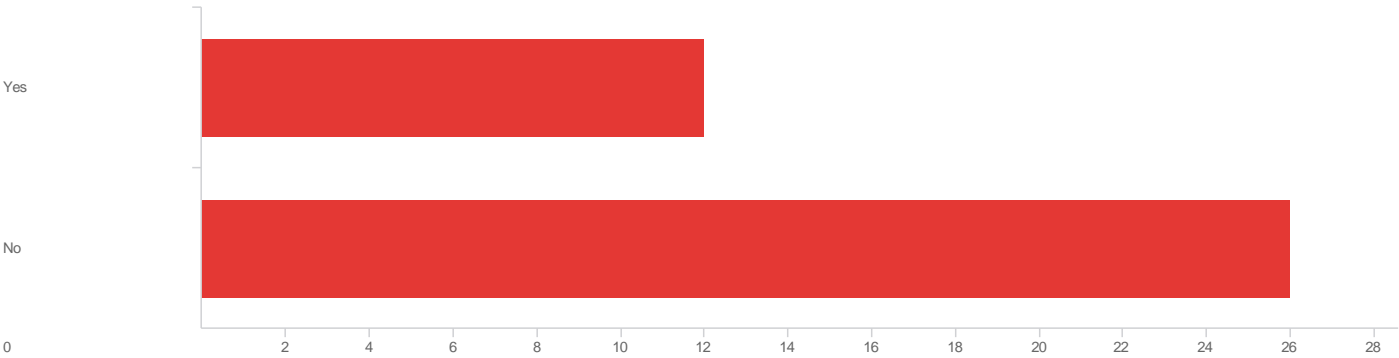


#	Field	Minimum	Maximum	Mean	Std Deviation	Variance	Count
1	Has your program developed materials for label mandated training?	1.00	2.00	1.74	0.44	0.19	38

#	Field	Choice	Count
1	Yes	26.32%	10
2	No	73.68%	28
			38

Showing rows 1 - 3 of 3

Q7 - Have you provided label mandated training as part of your program?



#	Field	Minimum	Maximum	Mean	Std Deviation	Variance	Count
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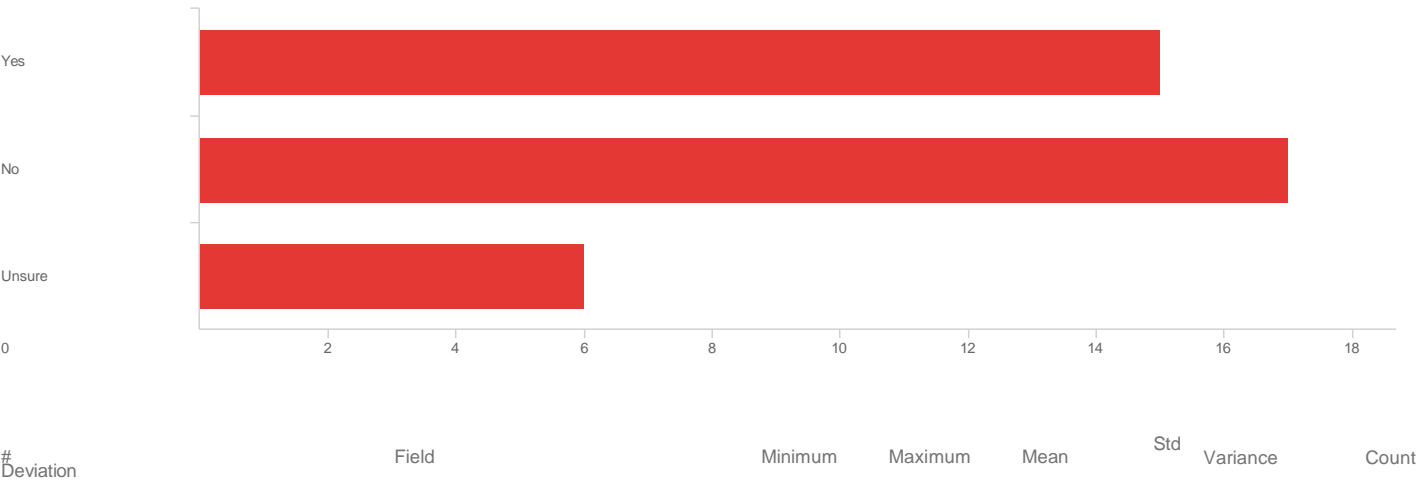
1	Have you provided label mandated training as part of your program?	1.00	2.00	1.68	0.46	0.22	38
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#	Field	Choice	Count
1	Yes	31.58%	12
2	No	68.42%	26

38

Showing rows 1 - 3 of 3

Q8 - Does the completion of label mandated training currently count towards continuing education/recertification credit in your state or territory?



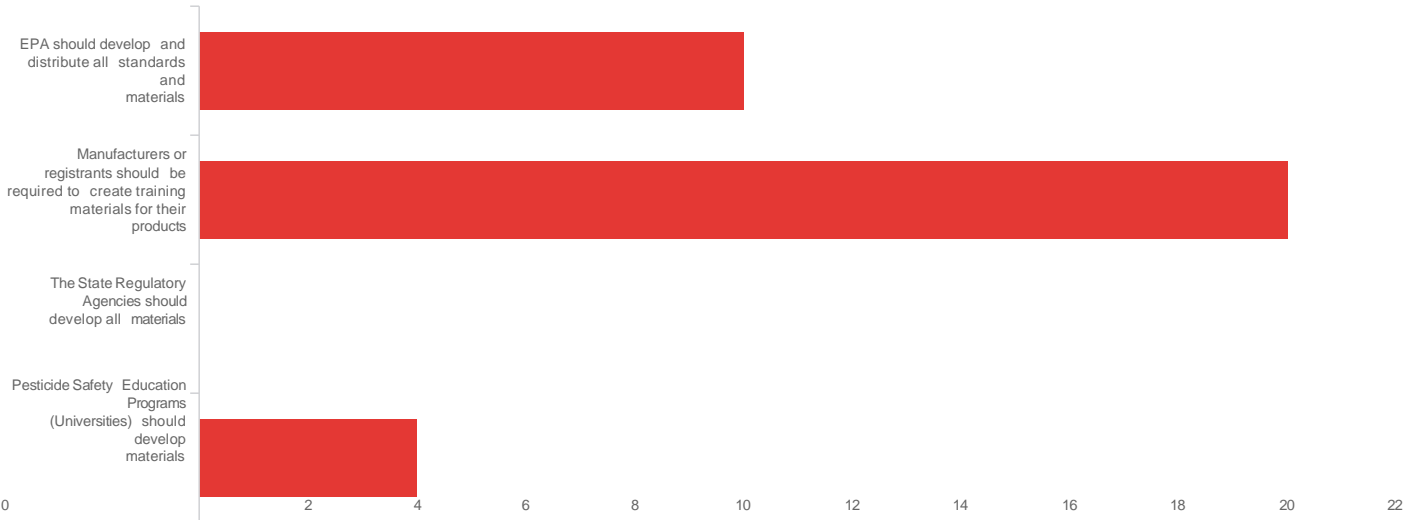
#	Field	Minimum	Maximum	Mean	Std Deviation	Variance	Count
1	Does the completion of label mandated training currently count towards continuing education/recertification credit in your state or territory?	1.00	3.00	1.76	0.70	0.50	38

#	Field	Choice	Count
1	Yes	39.47%	15
2	No	44.74%	17
3	Unsure	15.79%	6
			38

Showing rows 1 - 4 of 4

9 - Who should be responsible for developing training materials related to label

mandated training? (select the one you feel is MOST fitting)



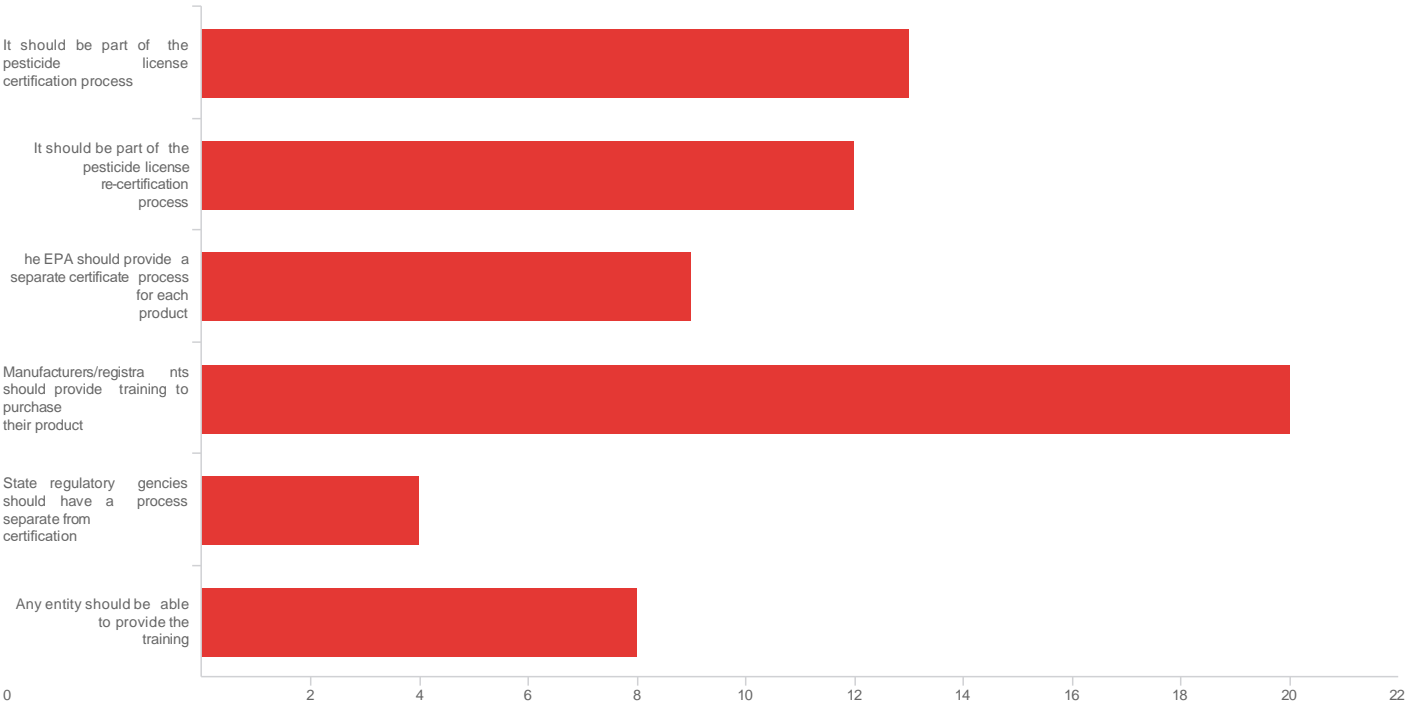
#	Field	Minimum	Maximum	Mean	Std Deviation	Variance	Count
---	-------	---------	---------	------	---------------	----------	-------

1	Who should be responsible for developing training materials related to label mandated training? (select the one you feel is MOST fitting)	1.00	4.00	1.94	0.87	0.76	34
---	---	------	------	------	------	------	----

#	Field	Choice Count
1	EPA should develop and distribute all standards and materials	29.41% 10
2	Manufacturers or registrants should be required to create training materials for their products	58.82% 20
3	The State Regulatory Agencies should develop all materials	0.00% 0
4	Pesticide Safety Education Programs (Universities) should develop materials	11.76% 4

34

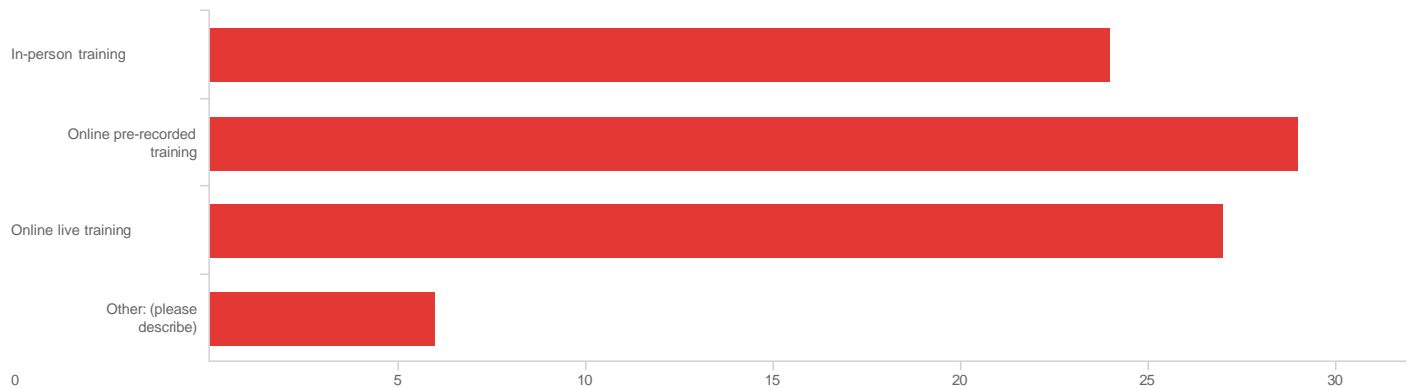
10 - What process should be used to provide label mandated training? (check all that apply)



#	Field	Choice Count
1	It should be part of the pesticide license certification process	19.70% 13
2	It should be part of the pesticide license re-certification process	18.18% 12
3	The EPA should provide a separate certificate process for each product	13.64% 9
4	Manufacturers/registrants should provide training to purchase their product	30.30% 20
5	State regulatory agencies should have a process separate from certification	6.06% 4
6	Any entity should be able to provide the training	12.12% 8

11 - How should the training be structured/formatted if the EPA requires specific training

for additional products? Select all that should apply.



#	Field	Choice Count
1	In-person training	27.91% 24
2	Online pre-recorded training	33.72% 29
3	Online live training	31.40% 27
4	Other: (please describe)	6.98% 6

86

Showing rows 1 - 5 of 5

11_4_TEXT - Other: (please describe)

Other: (please describe)

state if they chose

I do not agree with product specific training. This is a bad road to go down. I think we would be better to focus on quality core training and all pesticide products should be used appropriately

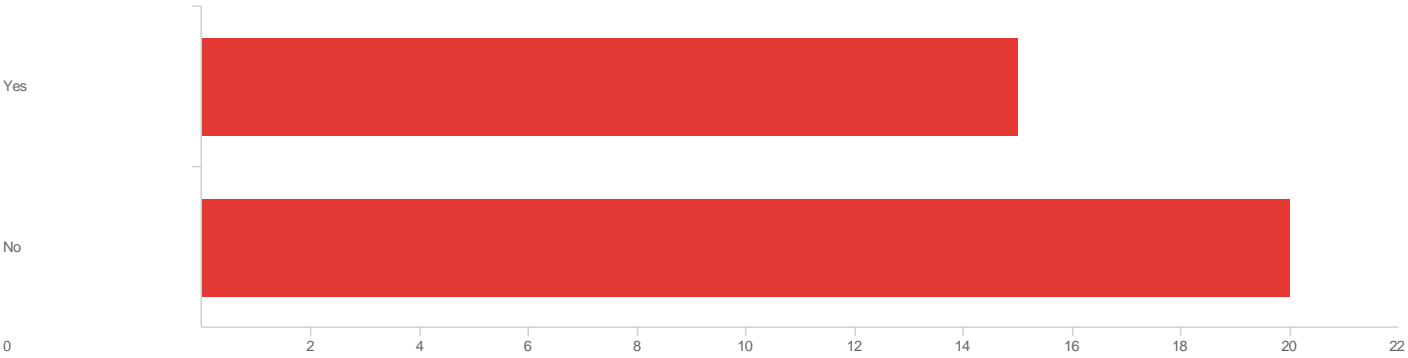
All of the above should have a knowledge test to determine understanding of the products hazards.

in-person or online

It is stupid idea to require label mandated training for products intended for private applicator use. If a product is so problematic that it requires specialized training it probably shoudn't be registered.

This depends on the student. All three would be needed.

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



#	Field	Minimum	Maximum	Mean	Std Deviation	Variance	Count
1	Have you received feedback from employers and/or pesticide applicators about label mandated training?	1.00	2.00	1.57	0.49	0.24	35

#	Field	Choice Count
1	Yes	42.86% 15
2	No	57.14% 20
		35

Showing rows 1 - 3 of 3

13 - If “yes,” what feedback have you received?

If “yes,” what feedback have you received?

Many are confused on where to find it

The same training that is already covered in core training. It is difficult to maintain records of product specific training in addition to the certifications that applicators hold. This is cumbersome and does not really add value to training.

We receive requests for in-person training.

It was difficult for them to understand the technology for on-line instruction.

concerns that there would be an unreasonable number of products requiring label mandated training

They find it hard to find and dont know what they need

that it is too complicated to keep up with all the different renewals

Applicators often reach out because they cannot find where to complete the training, especially as dicamba training moved online.

That it is ridiculous, poorly conceived, and poorly delivered, primarily in regards to the training provided by registrants.

They want more resources

They confuse it with annual recertification and/or complain that they have to complete at least 2 separate trainings a year.

Consensus that is an extra time burden, and confusion about what training is needed and where to get it.

In general, they feel it is repetitive and not helpful. Especially the annual training for dicamba.

It was a bit of a moving train. Hard to create training on something that was changing by the month. We did it at first, but the information was so disjointed and evolving that we had to give it up. We point to industry training now. Training does not always mean people will do it and of course no body wants to do anything more for anything.

They don't know what is required of them and feel very little support in finding this information. They want everything to be found directly on the label and as part of the licensing process.

14 - If you have additional suggestions on how to improve label mandated training, please include them in the space below.

If you have additional suggestions on how to improve label mandated training...

I think classes of products should have the same format - all dicamba products as an example. The EPA should review to ensure it meets the needs for risk reduction. Sellers should not be allowed to sell without proof of training successfully completed.

Label mandated training undermines what PSEPs already do. This is added requirements to applicators that really does not add much value to current core training. This is added, cumbersome training that adds another recordkeeping layer to applicators, PSEP, and SLA. I do not agree with label mandated training in general.

I am not a proponent of label mandated training. Label mandated training for specific products and their use creates many challenges and I'm not convinced the applicator retains enough information to make it worthwhile. What training does is stresses that the product poses special concerns, what they are, and one should pay close attention to the label for specifics. All applicators should be reading the product label and following instructions, regardless. The continued addition of products that require label mandated training will only make for a complicated system of education and record keeping. Not everyone uses or has sufficient bandwidth for online learning, so in-person training will be needed. This presents logistical challenges for everyone involved. If label mandated training continues then it should be created and provided by the manufacturer (registrant) that benefits from the sale of the product and not a financial burden to government or educational institutions. A central database of all label mandated training, for all products should be kept by one entity and shared to the respective states. My first thought would be EPA maintains or supports the central database with access by SLAs.

My concern with label mandated training is the quality. I have attended an industry sponosed training and it felt much more akin to a 'trade-show' than a focus on safety or how to use the product correctly/safely. I am not particularly well-versed in label mandated training but as I mentioned I was concerned after this one particular instance. I do think a regulatory agency should explicitly provide the training minimum contents or else we will likely continue to see product 'show and tell'

Although the process is simple and straight-forward, it does become complex by the manpower needed to deliver, distribute and record the process. We need to find a way to incorporate into pre-certification or recertification programming. Potentially, a supplement to Core or private applicator certification.

Applicators know that enforcement of LMT is unlikely. So why do it?

best to discuss issues of product and how to prevent any possible negative outcomes

I feel very strongly that the product registrants should be responsible for providing this training/training materials. It's an unfunded mandate if these responsibilities are pushed onto state regulatory and/or PSEP programs. I already do not have enough staff to provide the content I need to without adding in the responsibility of dicamba, paraquat, and whatever else

EPA has refused to hold the registrants to the same standards they required state PSEP Coordinators to follow for certification and recertification. Applicators, regulators, and PSEP coordinators are confused and frustrated by additional training requirements that do little to mitigate the hazards posed by certain active ingredients and formulations. Training doesn't solve the problem if the formulation and the label make it almost impossible to apply a particular product. EPA needs to get its head out of the sand and take care of these type products during registration. Label mandated training has not been the answer and will not be the answer. It is a horrible compromise that EPA has reached with certain registrants for certain products. Label mandated training should not be our new normal. The questions on this survey did a poor job of allowing us to address the real issues. We are going to be sorry if we think the only way to handle problematic pesticides is with more training. Some of these products should have never been registered and EPA knows it.

I find the concept of label mandated training to be frustrating. The label is the law and training simply tells people what is on the label. It is the applicators responsibility to read and follow the label and it is the EPA/SLA responsibility to investigate misuse. The emphasis shouldn't be on creating a mandated training, it should be on improved enforcement.

It is a slippery slope. IT would be nice to have 1 training for all, but so many variations. I was contacted by an amish applicator that did not know about the online training or the requirement for Paraquat. So, options need to reach beyond ONLINE!!!

If you have additional suggestions on how to improve label mandated trainin...

I'm not a fan of label mandated training. If we are going to go down this road then there needs to be more consistency, coordination, and funding to make the training impactful. Leaving it up to SLAs and PSEPs to provide the training or fill in the gaps is not a constructive solution. EPA should be leading the charge with help and buy-in from manufacturers/registrants.

I don't have much experience with this subject. We provided a checklist, on our custom pesticide application recordkeeping tool, for soil fumigation requirements

We developed training the first year this came up and offered it both in person and online. At the time, the information and labels were changing so it was difficult to assure our training was accurate. We figured the registrant had the most recent info so we referred it back to them.

It needs to be standardized and provided to all states for integration into their C&T programs.

End of Report

Documents on CTAG Website to Consider Updating (Jennifer Weber's 2023 Summary)

Recommendations:

Let's create a look/feel/branding plan for CTAG documents. They should all look alike – differentiated from EPA/others.
Let's consider moving CTAG documents to a hosted site that isn't WSU or MSU.

Questions:

Who manages the CTAG website when the supporting agreement ends?

Priority	Title	Type	Date	Link	Suggestions/Comments
Med to High It could benefit from updated layout, websites, numbers.	Pesticide Applicator Certification and Training	Fact Sheet	2013	https://ctagroup.us/wp-content/uploads/WhatisCTFINAL-2013.pdf Easy update – Let's remove web links and the specific number of states/tribes/territories. Update formatting to new style (CTAG).	It could benefit from an update. The last section, "Federal and State Contacts" contains outdated websites, including the CTAG web address. Are these numbers current? "EPA works with and provides funding to pesticide regulatory agencies in 50 states, 2 territories, 4 tribes, and the District of Columbia to ensure that pesticide applicators are properly certified to use pesticides."
High Question: This matches the Nat'l Core (format and style) Is formatting a big deal to everyone?	Exam Administration Security Procedures Manual A guide developed by CTAG	Manual	2006	https://ctagroup.us/wp-content/uploads/ExamAdminManual-Hi-Res.pdf It's not well-known, written in 2006, and the timing is perfect for many stakeholders to benefit from it. Update formatting to new style (CTAG).	I remember reading this when I worked for the AZ Dept. of Ag. I really liked it and hope a new version accompanies the updated National Core Manual produced by PERC. The concepts about exam security are broad enough that it might not need an update, but I would be interested in helping to review it more thoroughly if CTAG would like to produce a fresh version. It is 17 years old. An idea would be to also include a chapter with spaces the SLAs can fill in to include

					their own unique policies related to exam validity and security, acceptable forms of identification, items provided to test takers, etc.
No need to update Archive it. It describes a survey from 2010.	Direct Supervision: Summary of Survey Results June 2010	Paper describing survey results	2010	https://ctagroup.us/wp-content/uploads/Direct-Supervision-Survey-Summary-Final-6-2010.pdf	This 2-page document clearly summarizes the fact there is a variation among states' requirements for direct supervision, as was discovered through a survey. While some of the statistics/percentages might be out of date, I don't think this paper needs to be updated.
Low Archive it. It describes a survey from 2008.	Ensuring Continuing Competency of Pesticide Applicators: Survey Summary CTAG Continuing Competency Workgroup	Paper describing survey results	2008	https://ctagroup.us/wp-content/uploads/SummaryContinuingCompetencySurvey.pdf	<p>"Background Federal law requires that applicators of restricted-use pesticides demonstrate a minimum standard of competency through a process called certification. However, there is no federal standard requiring any additional training beyond initial certification."</p> <p>Note: It's too early to work on this topic, but it will soon contain misinformation. Actually, it wouldn't be misinformation since the survey occurred in 2008. We could say it would be historical information.</p>
Archive it. Add bold lettering – this is outdated. New restrictions apply in the	Minimum-Age Requirement for Certification to Use Restricted Use Pesticides (RUP)	Paper	2004	https://ctagroup.us/wp-content/uploads/Age_Dec_2004.pdf WPS and C&T rules have been through changes related to the minimum age.	<p>Question: Do people outside of pesticide education and regulation view the CTAG website and gather data from the papers? If so, we might need to remove this paper as minimum age is now a requirement.</p> <p>If you would like keep it on the site (historical relevance), perhaps adding a lead in sentence about the new minimum age</p>

WPS and C&T arenas.					requirement for pesticide handlers would be beneficial.
<p>High</p> <p>This will be great to do again. Let's review current questions, add new, and find the right person in EPA to answer</p>	<p>Federal Agency Certification Plans</p> <p>John Feagans</p>	<p>It's under documents but is titled "Fact Sheet"</p>	<p>2010</p>	<p>https://ctagroup.us/wp-content/uploads/FINAL-CTAG-Fact-Sheet-Federal-Agency-Plans-8-11-2010.pdf</p> <p>Let's do a new interview with a current C&T leader (Jeanne Kasai?).</p> <p>The format is readable and informative.</p>	<p>This is a Q&A document with Richard Pont as the key contact. The Summary states:</p> <p><i>CTAG developed this fact sheet for interested C&T program stakeholders to provide general information about FACP's and how they operate in conjunction with state and tribal C&T programs. This fact sheet also provides information for states and tribes on how they should address potential issues with FACP's or the misapplication of a restricted use pesticide (RUP) by a federal employee certified under an FACP, and it provides information on who to contact at EPA if you have additional questions.</i></p> <p>I really like this paper and the format of a Q & A. I think it is still relevant, but it's possible responses to a few questions have evolved over the last 13 years. In fact, I read this and it created more questions for me since we often have people from the federal agencies listed in the document (BIA and Forestry) interested in our pre-certification courses.</p> <p>An idea is to ask Jeanne Kasai (or another person at EPA) to review the answers to the questions to see if they are still correct.</p> <p>We can replace Richard Pont's name with Jeanne's (or another person's) as the key contact at the end of the fact sheet.</p>

High	Copyright and C&T	Fact Sheet (but not included under fact sheet section)	2007	<p>https://ctagroup.us/wp-content/uploads/Copyright-Factsheet_July07.pdf</p> <p>... With a little follow up fact checking and updating of sites, this would be a great item to bring to the forefront. Maybe place it in a nice new layout and circulate it widely to PSEPs and SLAs (asking Dan Wixted's input before final product and adding him authorship). We want to make sure study guide collaborations and citations are done correctly.</p> <p>Let's rely on the updated PPTX from Dan Wixted on modern Copyright procedures.</p>	<p>Very important and increasingly relevant topic. The description says:</p> <p><i>The Certification and Training Advisory Group (CTAG) encourages the sharing of pesticide education materials, certification exams, and other related resources among states, tribes, and territories to get the most leverage of funding dollars and existing resources. A universal sharing of materials and ideas increases the overall efficiency of certification and training (C&T) programs nationwide, and often gets sound educational materials and tools in the hands of more educators and regulators sooner than without this flowing exchange of resources.</i></p> <p>The first link to the Pesticide Safety Programs national database of resources (http://pep.wsu.edu/psp/scripts/index.html) goes to an outdated page.</p> <p>U.S. Copyright web site: http://www.copyright.gov. (Still works)</p> <p>Another source is U.S. Department of State's Bureau of International Information Programs: http://usinfo.state.gov (search for "intellectual property") BROKEN LINK</p>
High	Pesticide Applicator Recertification: Verifying Attendance at Training Events	Paper (part of series)	2009	<p>https://ctagroup.us/wp-content/uploads/VerifyingAttendanceFinalAug2010.pdf</p> <p>Needs an update. Keep it broadly applicable, federal. Not state-specific.</p>	<p>I really like this document and it is still extremely relevant. There are a couple of typos, but it is otherwise very well-written.</p> <p>It proposes conducting a sample for attendance and spells out the concept clearly. I also like the inclusion of Oregon's</p>

					list of sponsor responsibilities. I think this is worth keeping on the CTAG website. Other than a quick check for typos, I think it is good as is.
High	Pesticide Applicator Recertification: Online Training – Course Design and Structure	Paper (part of series)	2010	https://ctagroup.us/wp-content/uploads/Recert-Online-Design-Final-12-2010.pdf Still valid. Let's put a note at the top – IT was reviewed in 2023, still relevant...	<p>This is a good paper. Even though it was written 13 years ago, it is still current.</p> <p>The only suggestion is to consider adding a section about a few of the newer ways people are offering online courses, including live courses (drop down quiz questions, breakout rooms, what happens when people lose connections, how to gauge participation, etc.).</p> <p>Also – this is not of major importance but if the paper is edited at some point there is a period missing at the end of the 3rd paragraph on pg. 3.</p>
Archive it – Was this even a final version?	Pesticide Applicator Recertification: Examples of Including Both Core and Category Topics	Paper (Part of a series)	2013	https://ctagroup.us/wp-content/uploads/CTAG-Recert-Examples-of-Including-Core-Category-Topics-May13-FINAL.pdf This topic gets people excited. States approach it in WILDLY different ways. Some states minimize core content in recert, some require tons of it.	<p>Editing note: The document might not be the final version. There is a sentence on page 5 that states: "Additionally, an average of ??? course approvals are made each year."</p> <p>In summary: The information will most likely change for the states mentioned in this paper. Archiving it is still a good idea to reflect back on it if needed.</p>
Good to go.	Pesticide Applicator Recertification: Addressing Both Core and Category Topics in Training	Paper (part of a series)	2011	https://ctagroup.us/wp-content/uploads/CTAG-Recert-Core-v-Cat-FINAL-3-12.pdf Keep it, no need to update. Don't archive it. Reviewed for accuracy in 2023.	<p>This is a nice, short, sweet paper. I don't think it needs an update.</p> <p>It addresses the benefit of including Core topics in recertification courses, even if it seems certified applicators received or learned the information when they were preparing to become certified. The inclusion</p>

					of category-specific topics in recertification courses was also addressed. Examples of broad and audience specific topics were included.
High	Pesticide Applicator Recertification: Content Criteria	Paper (part of a series)	2010	<p>https://ctagroup.us/wp-content/uploads/Recert-Content-Final-12-2010.pdf</p> <p>Update to include examples. It's highly-relevant.</p> <p>Let's update the formatting to new style. Fix typos and describe the updated elements in 2023-2024.</p>	<p>Side note: If CTAG will update this, there are a couple of typos and a formatting adjustment on a list to edit.</p> <p>I really like this paper and see it as very relevant and applicable. It's also a good reminder with excellent content criteria (examples) for people who are designing and approving recertification courses.</p> <p>If anything, we might be able to update it to include a chart/table with different topic titles we've seen with a description of why or why the subject would or would not be approved.</p> <p>For example, I recently saw a 45-minute presentation on how water management contributes to pest problems. It was excellent and stuck to the description! Another person might take the same topic and focus mainly on irrigation needs in the desert, only hinting at pest problems for a few slides when they mention stress on plants makes them susceptible to pest problems.</p> <p>O.K., I'm rambling. In summary, I like this paper.</p>
High	Pesticide Applicator Recertification: Auditing	Paper (part of a series)	2011	https://ctagroup.us/wp-content/uploads/Recert-Program-Evaluations-Final-8-2011.pdf	I like this paper and it is a nice compliment to the other papers in the series.

	Recertification Programs			<p>Great shape. Needs new examples for online training (synchronous and asynchronous).</p> <p>Are there a bunch of examples in the new published C&T plans?</p>	<p>I think the audit checklist examples can be updated to include more items to check, specifically the audit list for the online training. Online training has evolved and I bet there are additional components to evaluate for different scenarios of live vs. on demand/pre-recorded recertification courses.</p> <p>This is a good one to update.</p>
High	Requiring Written Exams for Approval of State Certification Plans. (2 pages)	Paper	2003	<p>https://ctagroup.us/wp-content/uploads/Written-exams.pdf</p> <p>Terms like “open book” and “closed book.” What is proctoring?</p> <p>This content could be wrapped into exam-administration guidance documents.</p> <p>Ask EPA – federal definitions Look at 40CFR Study materials allowed Reference material</p>	<p>This is a very interesting and short (2 pages) read. It was written in 2003 and the concepts of open versus closed book with SLA-provided reference materials were described well. The statistics will eventually be outdated, but I think this is a keeper for historical purposes and definitions.</p> <p>If anything, a modern version of the paper could be created for new SLA and PSEP employees who want to become familiar with terminology used in exam administration.</p> <p>Another idea is when updating the Exam Administration/Security book, a section could be dedicated to terminology (if it isn’t already included)</p>
Archive this version and create a new one, based on a new survey.	Positive Identification Requirement for Pesticide Applicator Certification Exams	Paper	2006	<p>https://ctagroup.us/wp-content/uploads/PositiveID_Exam_Adopted_July_14_2006.pdf</p> <p>Conduct a new survey, or we could survey the newly published C&T plans.</p> <p>Consider expanding to include identification requirements at <i>re-cert</i> events. And the impacts of “real ID.”</p>	<p>The paper states: <i>“People who are candidates for pesticide certification exams should be positively identified before the exam is issued and before any credentials are issued. Currently, there are no national standards for identification of candidates.”</i></p> <p>“Currently, there are no national standards for positive identification (i.e., photographic identification) for candidates taking a</p>

				<p>Write a two-page summary of the results.</p> <p>Focus on requirements for initial certification</p>	<p>certification exam. Until May of 2005, there was not even a national standard on the issuance of drivers licenses. (Now there is with the enactment of the federal “Real ID Act” or Public Law 109-13, see Appendix 1.)”</p> <p>Note: the paper was written in 2006 and statistics were based on a 2002 survey. It’s an interesting paper, which we can place in the “historical” file.</p>
High	Conventional Reciprocity for Issuing Cross-Jurisdictional Pesticide Certifications: Definitions, Concerns and Strategies	Paper	2007	<p>https://ctagroup.us/wp-content/uploads/Reciprocity_July_2007.pdf</p> <p>New tricky issues:</p> <ul style="list-style-type: none"> - If license is revoked in one state, do reciprocating states know? - Where did the conversations lead/end-up in relation to reciprocity with new C&T plans/requirements? - Need to address tribal plans and their relationship to state/territorial plans. 	<p>This paper is excellent!!!</p> <p>There are a few state-specific reciprocity policies included as examples. We could run those by each state’s SLA to make sure the information is still current.</p> <p>There is a small need to correct some grammatical errors, such as change drivers license to either driver license or driver’s license.</p> <p>Mentions “clumpers” and “splitters” without a definition.</p> <p>On page 6, it states: “All appendices are posted to the CTAG Web site.”</p> <p>Unfortunately, pages 6 and 7 contain 12 recommendations with links to documents housed on webpages that no longer exist. They are all pep.wsu.edu/ctag websites.</p>
Low	ADA Considerations in Applicator Certification	Paper	2013	<p>https://ctagroup.us/wp-content/uploads/CTAG-ADA-in-Certification-Exams-FINAL-Nov-2013.pdf</p> <p>We probably have to rely on (refer to) state/agency/University ADA guidelines.</p>	<p>I thought the following description was interesting and explains the purpose of the paper clearly:</p> <p><i>“The ADA does not require states to grant a certification to anyone with a disability. Rather, states must make reasonable accommodations to the exam</i></p>

				Update needed, but low priority. Need to delete/remove broken links.	<p><i>administration process in certain circumstances. A reasonable accommodation is one that would not “fundamentally alter” the licensing program.”</i></p> <p>It also clarifies the “non-reader” exam issue, which will be relevant to those who are working on their C & T packets.</p> <p>The links to forms on pages 3 and 4 are broken: http://askjan.org/media/medical.htm and http://askjan.org/links/adapolicies.html).</p> <p>Page 4: This is followed with a description of “Ask Jan.” This will need to be deleted and a new resource provided when updating. Also link to British Dyslexia Association is also broken.</p> <p>Broken link in footer on pg. 7 http://www.mmb.state.mn.us/policy</p> <p>Appendix B on pages 7-10 of the document describes ADA accommodations for job applicants and employees. I don’t think we would need this section in an updated document focusing on ADA accommodations for certification purposes/exam administration.</p>
High	A Flexible Process for Developing Effective, Integrated Licensure Tests and Pesticide Training Manuals	Paper	2007	https://ctagroup.us/wp-content/uploads/Flexible-ExamManual-Dev-Process_July07.pdf	<p>The authors of this paper state:</p> <p><i>“The ultimate goal of this document is to help states set in motion a process to create a defensible test that supports sound</i></p>

				<p>Worth a read for every CTAG member. This document needs to exist, and it needs to be updated.</p> <p>Does it need to be 20 pages long? This could be a whole book!</p> <ul style="list-style-type: none"> - How to perform task-analysis. - How to develop learning objectives and a prioritized blueprint. - How to develop exam items and content, based on the blueprint. 	<p><i>decisions about who should, and who should not, be a certified pesticide applicator."</i></p> <p><i>"...the purpose of this tool is three-fold: 1) provide the basic components of a flexible process for developing effective licensure tests and training manuals, 2) encourage the implementation of professionally credible testing practices, and 3) ensure that training curricula align with licensure tests."</i></p> <p>This is an excellent and timely resource. It's 2 column, 20 pages and so it's lengthy, but contains excellent information and guidance. I'm planning to print it off and refer to it as I develop manuals.</p> <p>Unfortunately, like many of the papers on the CTAG website, there are links to website/pages that no longer exist. This was written 16 years ago and Michelle DeVaux is listed as the contact. There are also state-specific examples with the words "Current" or "Under Consideration" in the section titles. If we will edit this slightly, we could either find what is current in 2023 for those states or substitute the words with the year 2007.</p>

AAPCO REPORT TO MEMBERSHIP
NASDA Liaison Report
Megan Patterson, AAPCO President
March 4, 2024

AAPCO has been working cooperatively with our valued partners at NASDA and has appreciated their efforts to support programs and policies that impact AAPCO members and our ability to do our jobs effectively. Notably, for 2024, NASDA members have chosen pesticide regulation as one of their five primary policy focus issues.

AAPCO values NASDA's generous support from members like NASDA CEO Ted McKinney and Josie Montoney-Crawford, NASDA's Associate Director of Public Policy. We especially appreciate Mr. McKinney's willingness to participate in the Annual AAPCO Conference and offer his view on the ever-changing pesticide regulatory realm.

AAPCO Directors and the SFIREG Chair have attended virtual NASDA conferences and have benefited from discussions of various topics that enhance the agricultural industry. We look forward to continued engagement via in-person and virtual meetings and conferences.

General Summary of activities for the year:

AAPCO particularly appreciates NASDA's continued support of and discussion of many pressing topics, such as:

- Certification plan approval
- EPA's Vulnerable Species Pilot Project
- EPA's Draft Herbicide Strategy Framework
- Registration of dicamba for other-the-top use
- Registration of chlorpyrifos
- PFAS in pesticides and their packaging

The AAPCO President, President-Elect, and immediate Past President have had many conversations with NASDA about all the topics above that have and continue to impact many of our States.

AAPCO appreciates the routine conversations revolving around topics of mutual interest with our NASDA representatives, their attendance at meetings, and their participation in calls of interest with EPA.

AAPCO Pesticide Program Dialogue Committee (PPDC) Work Group Report

2/23/2024

AAPCO has continued to support state lead agencies on the Pesticide Program Dialogue Committee. Gretchen Paluch served as the AAPCO representative from February 2023 to December 2023. Brian Verhougstraete currently serves as the AAPCO representative in 2024.

The workgroup has met two times since February 2023 including one virtual meeting May 31-June 1st and a hybrid meeting in November 15-16th. Full meeting agendas, notes and presentations are available on EPA's website - <https://www.epa.gov/pesticide-advisory-committees-and-regulatory-partners/pesticide-program-dialogue-committee-ppdc>.

May 31-June 1st Meeting Highlights:

- The PPDC Label Reform workgroup was accepting members to participate. There was much interest in this new workgroup and overall, the committee was supportive of the need and effort outlined by the presenters.

- There was an ESA session largely delivered by Jan Matuszko. There was an overview of the upcoming strategy efforts and how EPA is organizing their review teams, as well as attention to mapping at sub-county level.

- Emerging Technologies workgroup provided recommendations on their charge questions and EPA indicated their initial responses. The Agency expressed interest, but it was clear that more data is needed to support changes going forward. This included any consideration of revised risk modeling, as well as targeted applications (including spot and spray tech) in ESA or FIFRA IEMs. There were multiple asks for 'adoption' rates of these new technologies.

- There was a session on EJ, which covered a broad range of efforts that EPA is initiating. There were multiple comments throughout the session about how much effort the Agency was putting into direct involvement with farm workers. For example, the topic of farm worker focus groups came up as well as funding support under PRIA 5, which includes pesticide incident surveillance (increasing participation in NIOSH SENSOR) and incident reporting.

- Several comments were made about EPA's pesticide registration process and the need to streamline/improve. This was folded into discussion along with label reform and EPA taking on more of a digital mindset, as well as the need for development in digital infrastructure. Useability and access of new digital technologies was emphasized in multiple committee member comments.

- On multiple occasions committee members asked questions about how pollution prevention funds were spent (resistance management, IPM, etc.)

November 15-16th Meeting Highlights:

-EPA provided several timeline updates and 'outlooks' on topics such as chlorpyrifos, AEZ WPS rule, atrazine, ESA strategy, etc. Refer to full session slides here - <https://www.epa.gov/pesticide-advisory-committees-and-regulatory-partners/pesticide-program-dialogue-committee-14>

-The PPDC Label Reform workgroup has developed a draft listing of digital label data elements for a label template. EPA recently released a white paper on the approach. Several comments were made about the need to involve end users as part of the project. Unclear if/how this will be addressed. EPA is directing groups to submit comments to the docket.

-There was an ESA session with presentations by Jake Li, Jan Matuszko and Nathan Donley (Center for Biological Diversity). EPA provided some initial feedback on adjustments for vulnerable species and herbicide strategy. There was a call for collaboration on this effort.

-EPIC had an impressive amount of progress and will likely expand the workgroup efforts for 6 additional months.

-Resistance Management workgroup had several elements, largely focused on incentives and ways to increase footprint of resistance management efforts.

-Updates on C&T plans, AEZ WPS rule, and bilingual labeling implementation. Of interest to the AAPCO WPS workgroup might be the new workgroups EPA has formed as part of their 'next steps':

Next Steps

- Interdivisional Spanish Labeling Workgroup
- Formed subgroups to address the various provisions of PRIA 5
 - Accessibility Subgroup
 - Communications Subgroup
 - Tracking Subgroup
 - Spanish Translation Guide Subgroup

-Continued discussion on how to further involve farmworkers as part of ag worker protection programs. The PPDC committee voted to form a farmworker workgroup.

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The current AAPCO representative remains engaged to participate in future PPDC meetings.

Additionally, Liza Fleeson Trossbach and Gretchen Paluch have participated in the PPDC Label Reform Workgroup. AAPCO membership interested in provided comments to EPA about digital pesticide labels may do so in response to the white paper out for public comment. ***Pesticides; White Paper Describing Benefits of Structured and Digital Content Labels for Pesticide Products; Notice of Availability and Request for Comment - EPA-HQ-OPP-2023-0562***. Submit your comments on or before March 14, 2024

Please reach out to the current or past AAPCO PPDC representative if you have questions or interest in this report (Gretchen Paluch Gretchen.paluch@iowaagriculture.gov, and Brian Verhougstraete verhougstraeteb@michigan.gov).



TPSA Liaison Report
Rob Hofstetter, MD Dept. of Ag
02/15/2024

The Pesticide Stewardship Alliance (TPSA), founded in 2000, is a non-profit organization of federal, state and local governmental agencies, educational and research institutions, public organizations, private corporations and individuals that are actively involved in different aspects of pesticide stewardship. The goals of TPSA are to increase the effectiveness, efficiency and longevity of various pesticide stewardship efforts. Please visit the [TPSA web site](#) for more information.

2024 Annual Conference

The 2024 TPSA Conference was held February 6-8, 2024, in St. Louis, Missouri at the Live! By Loews. New this year were a choice of two tours. Attendees could pre-register for a tour of the Veolia Incinerator. The Veolia Sauget Team hosted attendees and provided tours of their Unit 2,3 and 4 incinerators. Attendees could also choose to tour Bayer's Chesterfield facility, including the introduction/gallery, advanced breeding/chipper, greenhouses, growth chamber and crop protection areas. The tours were well received by the attendees and will be something TPSA looks to provide at future conferences.

The conference's keynote address was given by Samuel Polly, with the University of Missouri. Sam discussed the state of the industry, a behind the scenes perspective on stumbling blocks to our industry. The conference focused on a host of topics including but not limited to, recycling and disposal issues, the rise of spray drones, biologicals Rodenticides and EPA's Endangered Species Program and Bulletins Live! Two. Ed Messina, Director, Office of Pesticide Programs, USEPA, provided our closing address on day one, which included OPP updates. Ed also participated in several of the Endangered Species Program discussions. Multiple tracks were available covering a wide variety of topics. The conference was attended by over 120 participants representing pesticide registrants, state lead agencies, pesticide safety educators, container and equipment manufacturers, waste management and disposal companies, industry associations and more. The 2024 conference presentations will be available to attendees and TPSA members on the TPSA website.

As always, one of the highlights of the conference is the annual stewardship awards. This year's winners were:

Member Contribution: Michelle Wiesbrook, University of Illinois
President's Award: Kimberly Gilbert, Corteva Agriscience
Program Innovation: Jack Ranney, Waste Options Southwest, LLC
Clinton Shocklee, Tri-Rinse, Inc.
Nicole Jansen, Corteva Agriscience
Best Program: Jon Johnson, Penn State University
Leader in Product Stewardship (The Pizzy Award): Steven Brunt, BASF

2025 Annual Conference

Please join us for our 25th anniversary conference next year at the Hyatt House in Charleston, South Carolina. The conference is scheduled for February 4-6, 2025. If you have attended a TPSA conference in the past, you know the value of this conference and the wonderful networking opportunities. We hope to see you in February.

For more information about TPSA please visit: <http://tpsalliance.org>. You will find information about past and current activities including the State Pesticide Disposal Database Map, pesticide application information, mini bulk and IBC container management, the TPSA Adviser Newsletter and more.