



FOR YOUR INFORMATION

Summary Of PR Notice 93-7: "Labeling Revisions Requested By The Worker Protection Standard"

The Environmental Protection Agency (EPA) has issued a pesticide registration notice on the labeling revisions required by the Worker Protection Standard. This notice is directed to persons responsible for the registration of pesticide products and for their labeling. A pesticide registration notice, referred to as a PR Notice, is an announcement of policy and directions that pertain to pesticide registration actions.

On August 21, 1992, EPA issued final regulations increasing the protection of employees on farms, forests, nurseries, and greenhouses from occupational exposures to agricultural pesticides. These regulations outline new responsibilities for employers of both agricultural workers and pesticide handlers and new requirements for the labeling of most agricultural pesticides.

As part of the Worker Protection Standard (WPS) requirements, pesticide registrants must modify their labels to add appropriate statements referencing the new regulations and specifying other requirements such as the WPS-established restricted entry intervals and use of personal protective equipment. PR Notice 93-7 describes these requirements and gives pesticide registrants the criteria they need to determine if their products fall within the scope of the notice. The PR Notice refers registrants to a Guidance Package which gives detailed instructions for making the necessary label revisions.

PR Notice 93-7 and the WPS labeling requirements apply to end-use products, registered under section 3 or 24(c) of the Federal Insecticide, Fungicide, Rodenticide Act, which are used in the production of agricultural plants on farms or in forests, nurseries, or greenhouses. The Agency reviewed its records to identify all registrations accepted for any crop, forestry, nursery, or ornamental use, and therefore potentially affected by the WPS labeling requirements. Approximately 650 registrants who hold one or more registrations within the scope of WPS requirements were sent the PR Notice and Guidance Package. The remaining registrants (approximately 1650), identified as holding no such registrations, were provided with the PR Notice only.

Detailed instructions of the Guidance Package will ensure accurate uniform labeling of all agricultural pesticides that are covered by the WPS. For example, the addition of an "Agricultural Use" section on the labels will greatly enhance user understanding and compliance with label directions.

Resource ID#: 3194

Summary of PR Notice 93-7: Labeling Revisions
Requested By The Worker Protection Standard

The Agency has established a toll-free WPS Label Information Line for registrants (1-800-777-2185) to help them understand and implement the required labeling changes.

KEY DATES

The provisions of the WPS will become enforceable as soon as specific worker protection requirements and statements referring to the WPS appear on pesticide labeling. Dates for registrant compliance are:


- o **After 4/21/94**, no registrant may sell or distribute a product that falls within the scope of the WPS unless its labeling is consistent with PR Notice 93-7.
- o **After 10/23/95**, no one may sell or distribute a pesticide product that falls within the scope of the WPS unless its labeling is consistent with PR Notice 93-7.

When a product with revised labeling is used, the users must follow the specific product labeling requirements for personal protective equipment (PPE), application restrictions, restricted entry intervals and, if present, the requirement for both treated area posters and oral warnings.

Users are required to meet more generic WPS requirements beginning April 15, 1994. These include requirements for employee training, provision of decontamination sites (water, towels, soap, and a change of coveralls for pesticide handlers), cleaning and maintenance of PPE, emergency assistance, and displaying a pesticide safety poster and pesticide-specific information.

SUBSTITUTE this page for pages 45-46 in MAIN LABELING GUIDANCE

Your decision about what to do with any references to reentry on your current labeling depends on how the statements are worded:

- If reentry-related statements specifically mention "workers" or are not directed to any specific group (such as "Do not enter . . ."), remove the statements completely.
- If reentry-related statements explicitly extend the entry limitation or reentry interval to persons other than workers (such as "Do not allow any person to enter until . . ." or "Keep everyone out until . . ."), call 1-800-777-2185 for further instructions. 

If your product has both WPS and non-WPS uses and any of the statements you removed from your current labeling apply to both types of uses, see "Non-Agricultural Use Requirements Box" below for instructions for retaining these protections for non-WPS users of your product.

Create a Non-Agricultural Use Requirements box.

If your current product labeling contains entry restrictions, notification requirements, or other of the above-listed instructions that apply to uses NOT within the scope of the WPS, create a second box called "Non-Agricultural Use Requirements." Put this new box anywhere in the Directions for Use section of your product labeling after the Agricultural Use Requirements box.

Place the required statements in the Non-Agricultural Use Requirements box.

- The non-agricultural use requirements box must contain the following statements:

"Non-Agricultural Use Requirements

The requirements in this box apply to uses of this product that are NOT within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR Part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries, or greenhouses."

SUBSTITUTE this page for pages 45-46 in MAIN LABELING GUIDANCE

- In addition, place into the Non-Agricultural Use Requirements box all the entry restrictions, notification requirements, or other statements and instructions (except personal protective equipment requirements) that apply to the non-WPS uses.

Examples:

- "Keep children and pets out of the treated area until sprays have dried."
- "Keep unprotected persons out of treated areas until sprays have dried."

3.

Add the Personal Protective Equipment Statements.

The PPE statements you have circled in sections B and C on the **PRODUCT WORKSHEET** (unless you have subsequently crossed them out) are the PPE statements that must be included on your product label or labeling. Place them under the heading **"Precautionary Statements: Hazards to Humans (and Domestic Animals)"** as shown in section A on the **PRODUCT WORKSHEET**. **IMPORTANT:** If section C on the Worksheet is crossed out **AND** if you have not already changed the wording in item 2 of section A on the Worksheet, cross out the phrase **"(other than mixers and loaders)"** in item 2 of section A.

Remove current PPE statements if the product's uses are all within the scope of the WPS.

If the product's uses are all within the scope of the WPS, do the following:

- Remove from the product labeling all current statements that specify PPE requirements for mixers, loaders, applicators, or other types of pesticide handlers, **EXCEPT:**
 - Retain statements prohibiting specific handling tasks, such as prohibiting human flaggers.
 - Retain statements warning users about possible harmful effects or about avoiding getting the pesticide on or in their bodies.
 - Retain statements that contain a product-specific warning, such as "Never wear protective gear with the odor of VIP DePesto I/M. Clean and aerate all protective gear until all odor is gone."