

Pesticide Labeling Interpretation

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The role of regulating pesticides in California is a joint responsibility of the Director of the Department of Pesticide Regulation (DPR) and county agricultural commissioners (CACs). Food and Agricultural Code (FAC) section 2281 provides that DPR is responsible for overall statewide enforcement and for issuing instructions and making recommendations to the CACs.

The CACs are responsible for local administration of the pesticide use enforcement program. Several other FAC sections (11501.5, 12977, 12982, 14004.5, and 15201) state that CACs conduct pesticide work under the direction and supervision of the Director. The *Pesticide Use Enforcement Program Standards Compendium* (Referred to as the Compendium) is the vehicle used by DPR to deliver DPR's guidance to the CAC's in the form of instructions and recommendations.

The Compendium is a series of eight manuals that contain pesticide use enforcement directives, interpretations, recommendations, and expectations. The Compendium represents the Pesticide Use Enforcement Program's "standard operating procedures." Contents of the Compendium supersede any position or direction on these subjects contained in previous letters to CACs or earlier manuals.

Guidelines for interpreting pesticide product labeling is found in Volume 8 of DPR's compendium. The link is (<http://www.cdpr.ca.gov/docs/enforce/compend.htm>). Volume 8 – Guidelines for Interpreting Laws, Regulations and Labeling includes DPR interpretations of various sections of law and regulations, and guidance on interpreting pesticide labeling, including interpretations of some general and specific labeling statements. It is cross-indexed by subject and section of the law or regulation addressed. Volume 8 is divided into 8 chapters. The guidelines for interpreting pesticide product labeling are found in Chapters 1 through 4 that address General Interpretation Guidelines, Pesticide Product Labeling Interpretations, Specific Labeling Statement Interpretations and DPR Specific Use Site Interpretations respectively. Chapters five through eight address guidance relating to Supplemental labeling, Worker Safety, Pesticide Product Registration, and Research Authorizations respectively.

This presentation will cover the first four chapters in Volume 8. From each chapter, I have selected specific guidelines established by U.S. EPA and DPR that are essential in interpreting pesticide product label and labeling as follows:

- Starting with “General interpretation guidelines” it is very important for you to understand definitions and examples given for: Agricultural use and Non-agricultural use; and production and non-production uses.
- As it relates to interpreting “Pesticide product labeling”, there are established guidance For understanding the definitions of: Label and labeling, Mandatory vs. Advisory, Conflict with labeling exemptions (2ee), and Site listing – Inclusive vs. Exclusive.
- Specific labeling Statement interpretations include: “Avoid breathing spray mists or dusts”, Bee protection statements, Feed restrictions statements, Harvest date, physically present (Certified Applicator), Plant back restrictions and Professional applicator statements.
- DPR Specific Use Site Interpretations include: Cropland/field crops, Non-crop land areas, Fallow land, and Bee protection statements.

Available tools and resources that is available for interpreting pesticide labeling:

- Food and Agricultural Code
- California Code of Regulations.
- Pesticide Use Enforcement Program Standards Compendium
- Internet Resources via Registration Branch Home Page
<http://www.cdpr.ca.gov/docs/label/;abelque.htm>
 - Pesticide Registration Branch (Query DPR Databases)
 - Product/label
 - Section 24 labeling
 - Section 18 Exemptions
 - National Pesticide Information Retrieval System (NPIRS)
Maintained by Purdue University
 - U. S. EPA’s Pesticide Information Retrieval System (PR Notices)
 - U. S. EPA’s State Label Issue Tracking System (SLITS)
- U.S. EPA label Review Manual 3rd Edition
<http://www.epa.gov/oppfead1/labeling/lrm/>
- Title 40 Code of Federal Regulations
http://www.access.gpo.gov/nara/cfr/waisidx_02/40cfrv20_02.html.
- American Society of Agricultural and Biological Engineers (ASABE) Standards.