



FLORIDA DEPARTMENT OF AGRICULTURE AND CONSUMER SERVICES
COMMISSIONER ADAM H. PUTNAM

Delivered via electronic mail

March 7, 2013

Steven Bradbury
Director, Office of Pesticide Programs
U.S. EPA
2777 South Crystal Drive
Arlington, VA 22202

Dear Dr. Bradbury:

Attached is an issue paper requesting that EPA consider a number of recommendations made by SFIREG as part of the agency's response to the issue of persistent herbicide residues that have caused phytotoxicity as a result of the use of compost and mulch "tainted" with these residues. This topic was discussed at a number of SFIREG committee meetings and with Agency staff.

SFIREG recommendations include, where appropriate:

- 1) More restrictive use language and uses allowed for products containing active ingredients known to cause persistent residues in compost,
- 2) Review of label statements requiring or requesting management by non-applicators of the treated area,
- 3) Examination of the present process for evaluating environmental fate for possible persistent herbicides as part of registration reviews, and,
- 4) Development of guidance necessary for the successful implementation of bioassays used in the composting industry and interpretation of their results.

We recognize that this is a complex issue and that the Agency has a number of efforts underway to address the problem. We present this paper as a way to support the Agency in these efforts and offer to assist in any way we can.

This issue paper will be posted to the SFIREG website in the near future. Please let me know if you have any questions. I look forward to the Agency's response to these recommendations.

Dr. Bradbury
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Once again, I thank you for your continued support of SFIREG. The SFIREG members and I appreciate the effort you and your colleagues are making to improve pesticide regulation.

Sincerely,

ADAM H. PUTNAM
COMMISSIONER OF AGRICULTURE



Steven E. Dwinell, SFIREG Chair