



***SURVEY SAYS...***

**STATES/TRIBES/TERRITORIES ON  
AMENDED CERTIFICATION OF  
PESTICIDE APPLICATORS RULE**

**September 18, 2017**

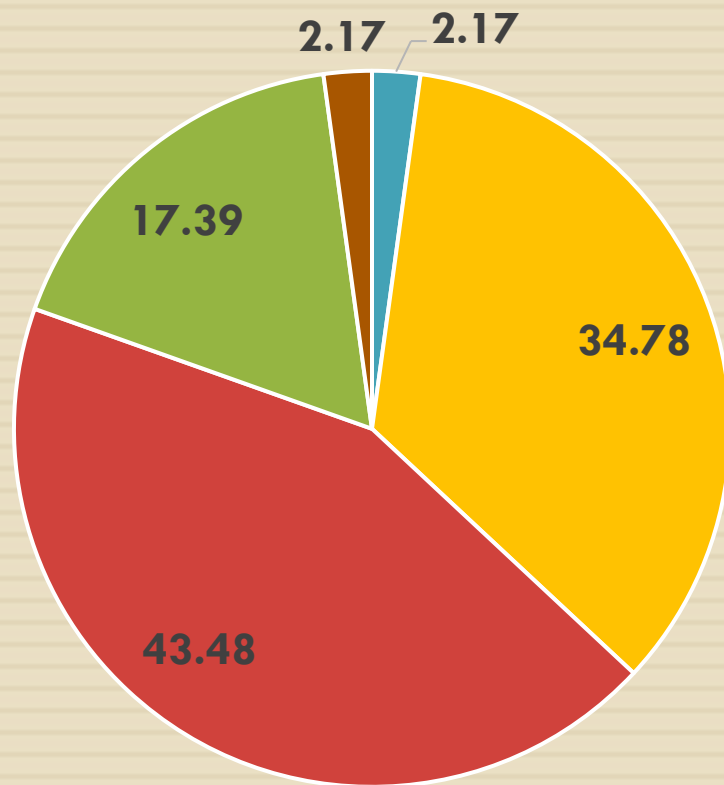
**State FIFRA Issues Research & Evaluation Committee  
Joint Working Committee Meeting**

# The Survey

**E**  
**N P M A**  
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**P**  
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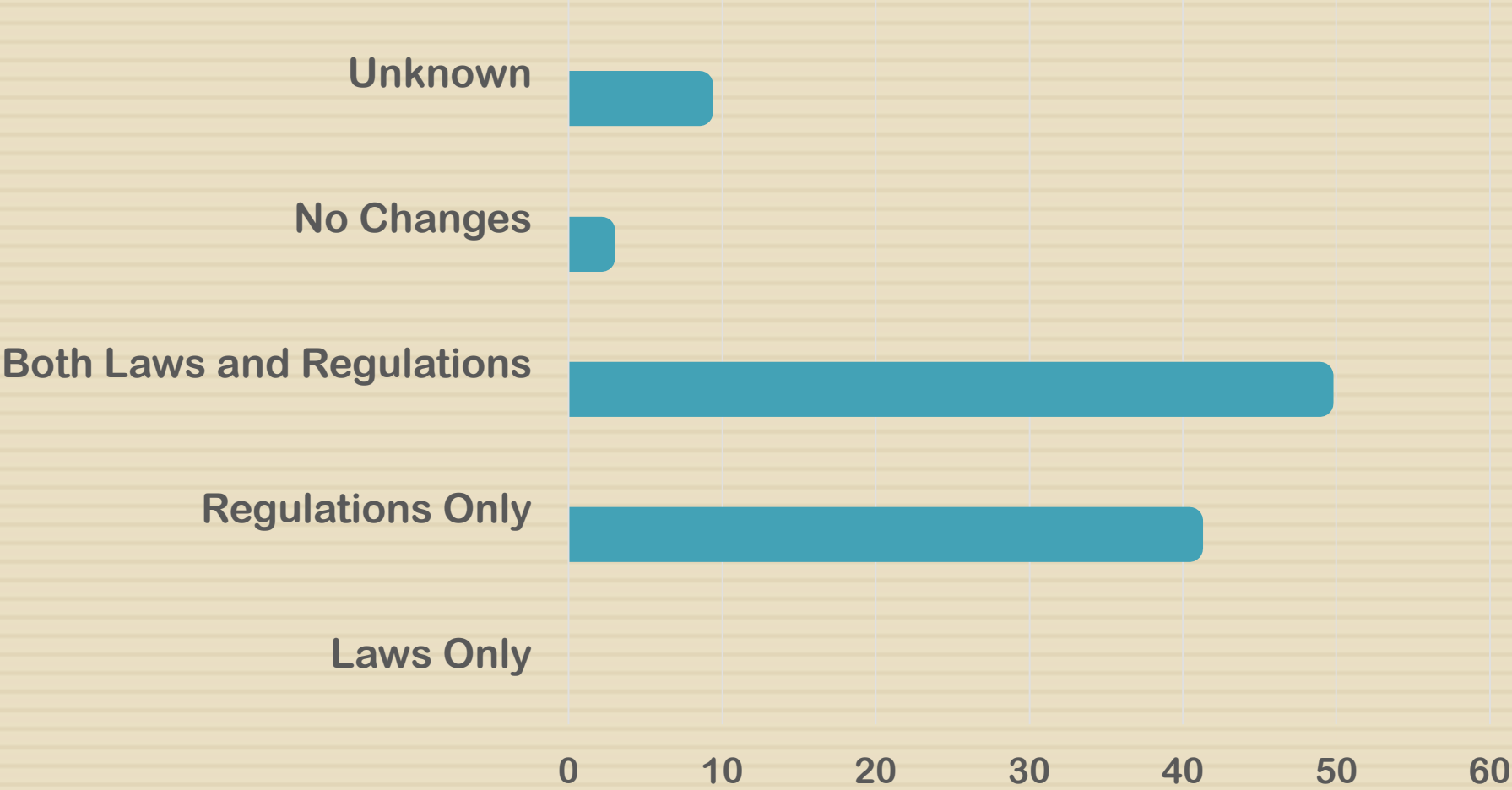
- Certification & Training
  - Current program
  - Implications to current programs with amendments to the federal certification rule
- 39 Questions
- 47 responses!!!
  - Inform future activities

# How difficult ...to implement the revised federal Pesticide Applicator Certification Rule?



Very Difficult   Difficult   Somewhat Difficult   Not Difficult   Unsure

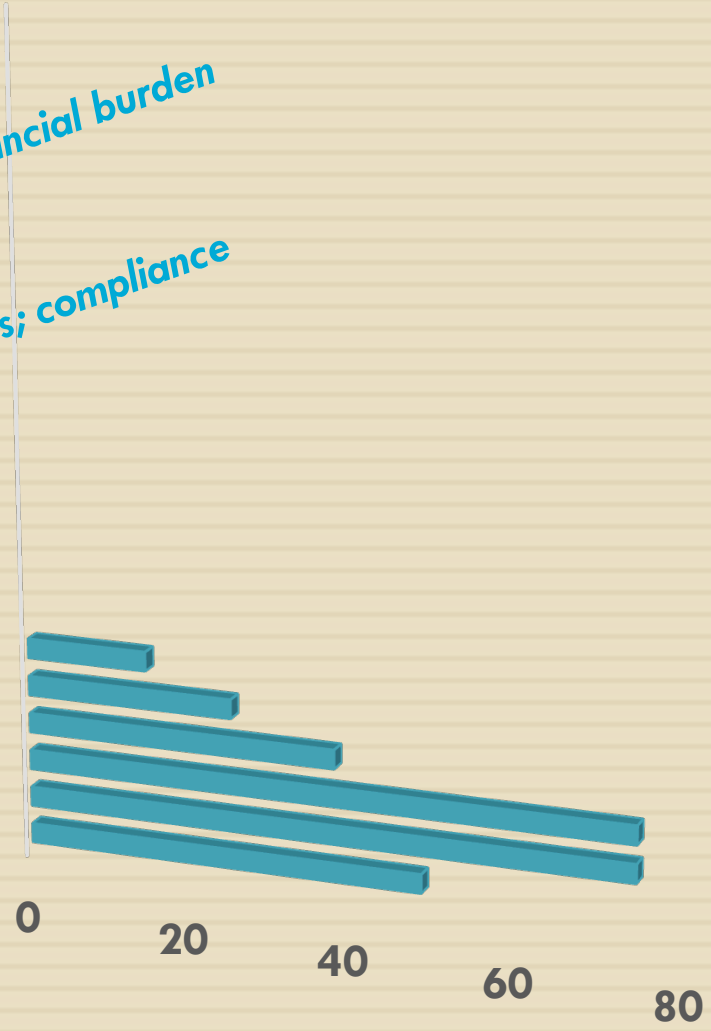
# *Changes that will be required to your current laws and regulations to implement the revised federal rule.*



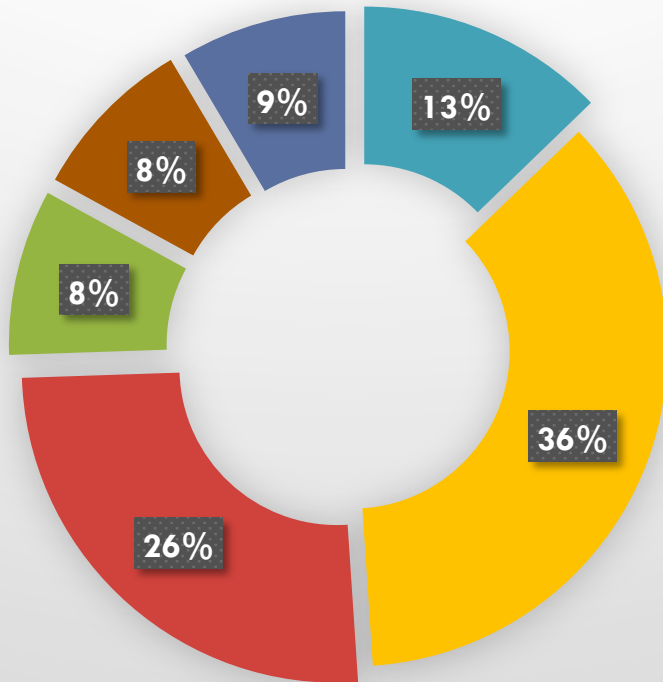
# Challenges ...to successfully implement the revised certification rule (check all that apply).

- ✓ "OTHER"
- ✓ Outreach & education to stakeholders
- ✓ Political-no new legislation that places additional financial burden on taxpayers
- ✓ Process to make regulatory changes
- ✓ Bridging communication between states and tribes; compliance

**Other**  
**Lack of Guidance**  
**Revision State Plan**  
**Staffing Resources**  
**Required Regulatory Changes**  
**Funding**



# Greatest challenge to...implementation?

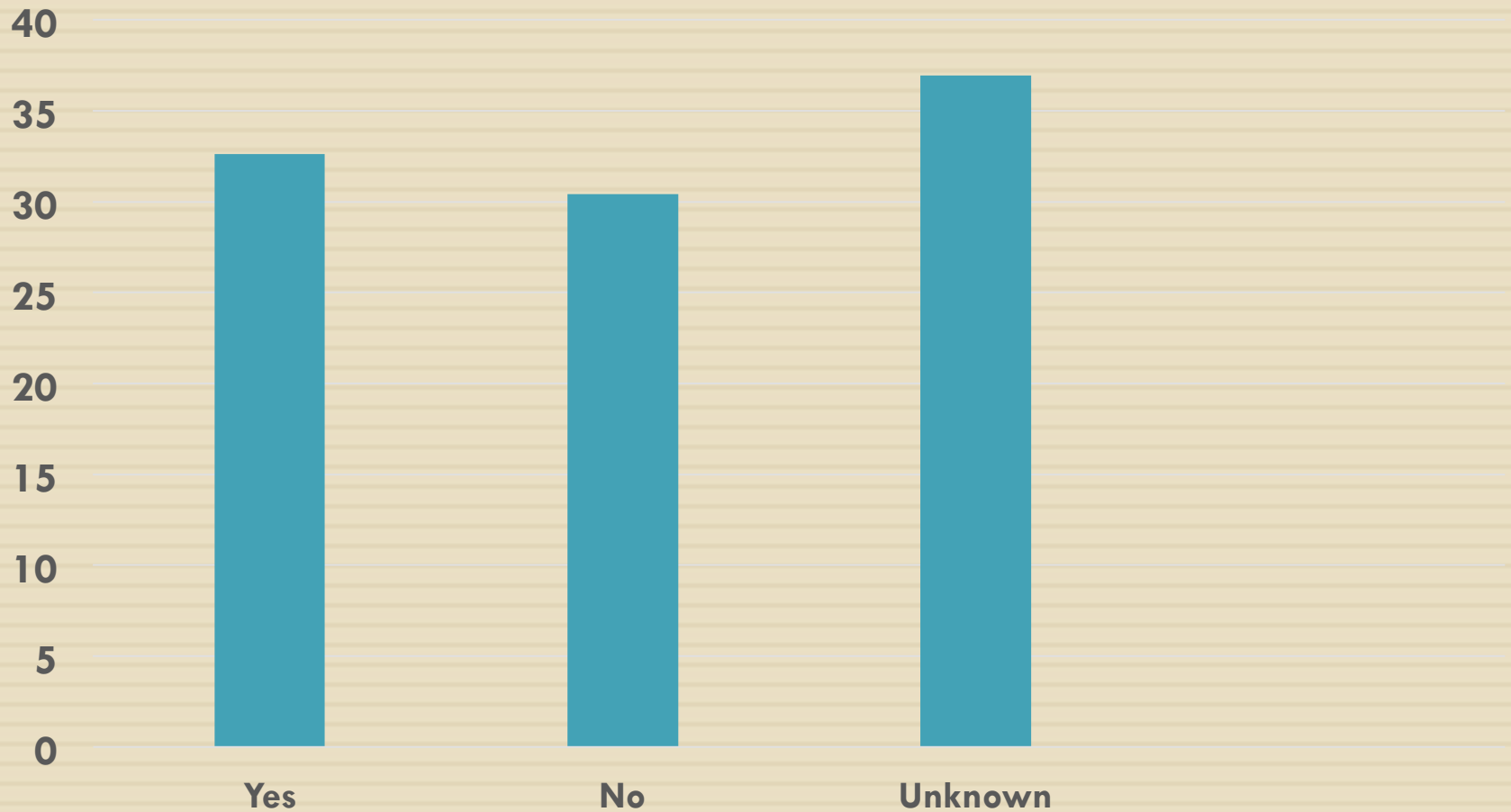


- Funding
- Required Regulatory Changes
- Staffing Resources
- Revision
- Lack of Guidance
- Other

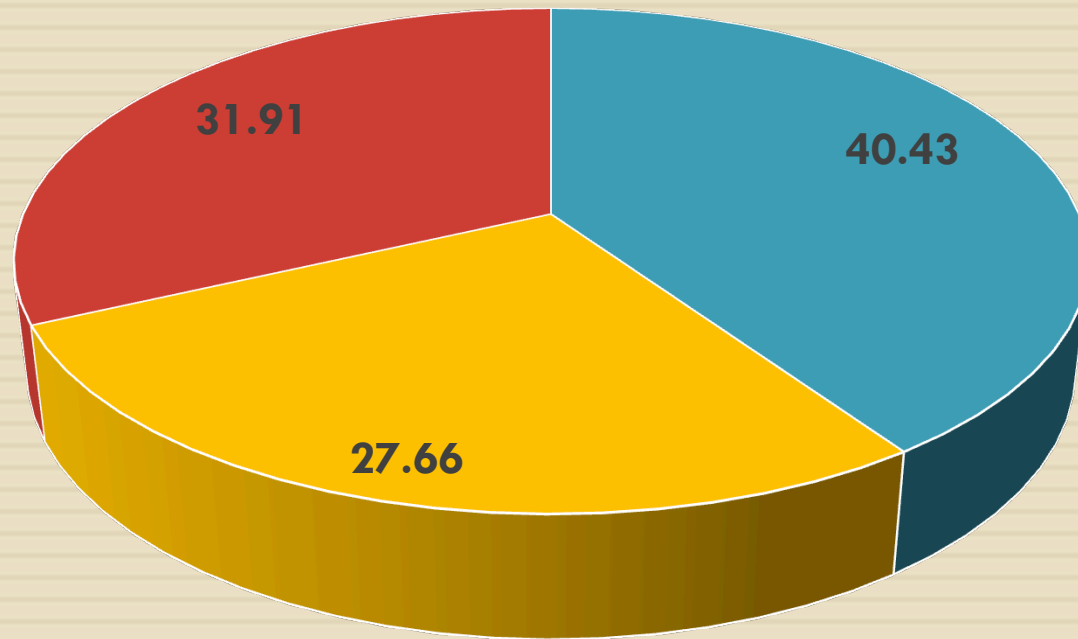
- Other
  - Process to make regulatory changes
  - Implementation by tribal programs
  - All of the above...

***Do you believe.....***

***seek funding to implement the changes?***



# *When determining the costs...would you find a cost template or tool valuable?*



■ Yes ■ No ■ Unknown



# *Do you anticipate difficulty implementing the minimum age requirement?*

- Yes = 10.64%
- No = 70.21%
- Maybe = 19.15%
- *Select Comments*
  - ▣ *Limit employment...financial impact to employers and age group 18 and under*
  - ▣ *Age verification will present additional challenge*
  - ▣ *Anticipate resistance from industry (allow under 18)*
  - ▣ *Moratorium on rulemaking...difficult to get regulations passed...tried once before...failed*

# *Did the final rule address your biggest concerns with the proposed rule?*

- Yes = 74.47%
- No = 25.53%
- Select Comments
  - ▣ *Training of noncertified applicators...huge hurdle*
  - ▣ *Civil and criminal penalties....*
  - ▣ *Resources to review manuals and exams...*
  - ▣ *Open book exams reflect real-world conditions*
  - ▣ *Although more acceptable...dictates to states far too many requirements that are not significant issues*
  - ▣ *We can not regulate out intentional misuse or stupidity*

# Conclusion

- Final rule did address many of the biggest concerns of states/tribes/territories
- Impacts to current regulatory programs will vary
- Guidance from EPA is needed to assist in implementation of revised rule
- Concerns regarding the regulatory changes
- Concerns regarding time for revision of State Certification Plans
- Concern regarding financial and human resources to implement

# *Survey Is Available*



**[www.dapco.org](http://www.dapco.org)**

**[www.aspcro.org](http://www.aspcro.org)**