

EPA Finalizes New Pesticide Certification and Training Requirements for Restricted Use Pesticide Applicators.

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People should be aware of the Environmental Protection Agency (EPA) pesticide certification and training rule finalized on December 12th, 2016 and published in the Federal Register on January 4, 2017. This applies to those that apply restricted use pesticides (RUP) across the nation. Restricted use pesticides are those deemed by EPA as having the potential to cause unreasonable adverse effects to the environment and injury to applicators or bystanders without added restrictions. Only licensed applicators can use or purchase RUP's. According to the EPA, stronger standards will reduce risks to applicators, communities and the environment from pesticide exposure. It is estimated by EPA that this could prevent up to almost 1,000 acute illnesses per year from unnecessary pesticide exposure.

The increased competency requirements will impact approximately one million certified applicators across the nation; with approximately 5,600 private and 2,700 commercial/government applicators in Montana. Changes include a minimum age of 18 for all restricted use applicators with an exemption for private applicator immediate family members for a minimum age of 16, mandatory categories for certain applications, increased competency standards, and annual training for individuals working under the supervision of licensed restricted use pesticide applicators. States can expect variable impacts depending on their pre-existing state minimum requirements. The following tables display Montana's current pesticide certification and training requirements regarding pesticide applicators compared to the new minimum requirements by EPA:

Table 1. Comparison chart of current Montana pesticide certification and training requirements and the new minimum EPA requirements.

PRIVATE (FARM) APPLICATORS	
Current Rule in Montana	New EPA Final Rule
No Category Specific Training. Endorsements for sodium fluoroacetate dispensed through livestock protection collars and sodium cyanide dispensed through mechanical ejection devices.	Category specific training for non-soil fumigations, soil fumigations, aerial applications, sodium fluoroacetate dispensed through livestock protection collars and sodium cyanide dispensed through mechanical ejection devices.
5 year certification cycle	No change. 5 year certification cycle.
Minimum of 16 years old for any RUP applicator.	Minimum age of 18 for any RUP applicator; exception for non-licensed applicators working under farm applicator (see non-certified applicator section)
Competency standards over 7 core subject areas	Competency standards expanded to 10 core subject areas
COMMERCIAL / GOVERNMENT APPLICATORS	
Current Rule in Montana	New EPA Final Rule
Non-certified applicator training doesn't need to be recorded.	Non-certified applicator annual training must be recorded.
Minimum 16 years old	Minimum 18 years old

NON-CERTIFIED APPLICATORS (APPLYING PESTICIDES UNDER THE SUPERVISION OF A LICENSED APPLICATOR)

Current Rule in Montana	New EPA Final Rule
Individuals working under applicator (noncertified applicator) must be competent to use RUP's	Annual safety training similar to that of worker protection standard training of handlers (i.e. WPS handler training or state approved training)
Minimum age of 16	Minimum age of 18; age is 16 for family members working under the supervision of a private applicator

**This represents only some of the changes finalized by EPA. More details are available by accessing the [‘EPA comparison chart’](#) or see all details at the [EPA website](#).*

The Montana Department of Agriculture and affiliate tribes in Montana have until early 2020 to develop and submit an EPA revised certification plan that complies with the new requirements. EPA will have two years to review and approve the plan after it is submitted. Part of the plan approval will include an implementation timeframe so that applicators are not required to comply with all new requirements immediately upon EPA's approval of the certification plan.

FOR FURTHER INFORMATION: Revisions and supporting materials can be viewed at www.regulations.gov, under docket ID # EPA-HQ-OPP-2011-0183. For all details regarding the proposed action see the [EPA website](#). A detailed comparison chart is available at [EPA Detailed Comparison Chart](#). For questions regarding this article contact Cecil Tharp, Pesticide Education Specialist (406-994-5067; ctharp@montana.edu) or contact Linda Johns, Pesticide Program Manager (406-444-5400; ljohns@mt.gov) regarding implications in Montana.