



January 22<sup>nd</sup>, 2016

To: Federal Register Docket EPA-OPP-HQ-2011-0183

From: Washington Growers League, 406 West Chestnut Avenue, Yakima, WA 98902  
Michael Gempler, Executive Director

Re: Comments of the Washington Growers League on Proposed Rule: Certification of Pesticide Applicators (RIN 2070-AJ20), Docket number EPA-OPP-HQ-2011-0183

The Washington Growers League represents over 300 farms employing over 80,000 employees. All of our members employ spray applicators, and we conservatively estimate that our members employ over 1,000 applicators. While we are aware that these rules have not been changed since 1974, we feel that the proposed regulations will do more harm than good. While we support the concept of more training and more specific training for applicators, the proposed regulations will result in more applicators skipping training altogether and just choosing to recertify by taking the test each cycle.

#### Recertification cycle:

The proposed reduction of the certification cycle from 5 years to 3 years will not allow for sufficient time for trainees to complete the courses required for proposed method specific or equipment specific categories. Either the proposed reduction of the certification cycle, or the added categories should be abandoned, preferably both.

#### Training versus testing:

It is apparent that the EPA is interested in having applicators receive more training. The proposed compressed recertification cycle and additional category training create an incentive for applicators to take tests rather than complete the additional training. The result will be applicators that won't refresh their knowledge over time through training. The Washington Growers League believes that the applicators, industry and public will benefit more from a system that encourages attendance at training sessions. Hence we oppose the proposed reduction in the recertification cycle as well as the proposed addition of training categories.

#### Increased Cost:

The Washington state agriculture industry pays for the recertification program through fees. Added training and a compressed recertification period will require our State Department of Agriculture to hire additional staff and increase fees and license costs in order to fund the program under the EPA proposal.

#### Availability of Training Courses:

With over 15,000 private applicators and 25,000 applicators of all types in Washington state, the Washington State Department of Agriculture and the WSU Extension Service would need to significantly increase the number and availability of training courses. With the additional proposal of requiring that 50% of the recertification credits be obtained in the last 18 months of the recertification cycle, even more training course capacity would have to be added to our current system. This would require more instructors, more classes and more venues, all of which cost money. Washington has a good training system now. Making it more expensive is unnecessary to achieve the goal of adequately trained applicators.

#### Required Identification Screening at Recertification Training:

Washington State currently requires self-verification at recertification classes. There is no evidence of fraud in the current system, and the additional cost required to put an ID screening procedure into place would be yet another unnecessary cost increase for applicators and their employers.

#### Conclusion:

The Washington Growers League opposes the proposed regulations based on the comments above. We do not see benefits from the proposals that justify the cost. Furthermore, we feel that the proposal significantly threatens the ability of our current government agencies and educational institutions to administer the certification program in the future, even with substantial fee increases to applicators to fund an expanded system.