

Session 9: Pesticide Program Dialogue Committee Meeting - November 2, 2017 Revised Pesticide Applicator Certification Regulation Implementation

Objective: Discuss the Challenges of Implementing the Final Rule Minimum Age Requirement

Number of States with Minimum Age Requirements

Type of Applicator	No Minimum Age	Minimum Age of 18	Minimum Age of 16	Other Relevant Information
Commercial applicator	3	31	16	None
Private applicator	16	16	17	1 State has a minimum age of 17
Noncertified applicator under the supervision of a Commercial Applicator	40	6	0	4 States prohibit use of RUPs by noncertified applicators under the supervision of a commercial applicator
Noncertified applicator under the supervision of a Private Applicator	40	4	3	3 States prohibit use of RUPs by noncertified applicators under the supervision of a private applicator

EPA seeks to ensure that the challenges the minimum age requirements pose for affected stakeholders are accurately assessed and to identify unintended consequences of the minimum age requirements.

EPA would like to understand and reconcile the information about the number of States that already have minimum age requirements for some pesticide applicators and the relatively low number of States that anticipate difficulty in implementing the minimum age requirements with the strong opposition expressed by some stakeholders since January 4, 2017.

EPA is interested in getting information from the discussion on the following questions.

1. It appears that there may be fewer problems implementing the minimum age requirements for commercial applicators than for private applicators or for noncertified applicators. Is this an accurate assessment?
2. What are the expected challenges associated with a minimum age requirement for pesticide applicators?
3. Are the challenges different for commercial applicators, private applicators and noncertified applicators working under the supervision of a private applicator?
4. Are the challenges different for agricultural pesticide applicators than for nonagricultural pesticide applicators?
5. Are the challenges specific to certain commodities, industries, or regions?
6. What are the economic consequences to persons facing these challenges?