

Safety Note #164

SUMMARY OF ANR POLICY FOR EXPERIMENTAL PESTICIDES USE

Scope

- This Safety Note provides a summary of the ANR Policy entitled Pesticides and Related Chemicals: Use and Experimentation.
- The subject policy applies to all Agriculture and Natural Resources (ANR) employees, who use or handle pesticides for experimental purposes, including experimentation with pesticides or related substances (or mixtures of substances) in any field test or field demonstration.
- All experimental pesticide research is subject to the policy, whether on any campus, field station, Research and Extension Center (REC), and any other land or treated site (including livestock) when used in field tests, trials, or demonstration operations that are activities of ANR.
- Failure to follow this policy will result in loss of the exemption provided under California regulations and may result in issuance of violations.
- This policy does not include the use of a registered pesticide with the intent to provide pest control according to the pesticide label and where the pesticide is not being used as an integral part of the research.



*Field Bindweed Photograph
Courtesy of ANR Integrated Pest
Management*

Responsibilities and Precautions

- Supervisors/researchers shall provide employees with training about experimental pesticide hazards and safety as well as applicable laws, regulations, and pesticide label requirements.
- Trial sites with experimental pesticides shall be posted in accordance with any applicable pesticide labels or regulations, including any special re-entry instructions and intervals.
- In the absence of an experimental pesticide label: (1) treated areas shall not be entered for four hours after application and (2) persons shall not enter non-agricultural and urban areas treated with liquid formulations for two hours after application and until the area has dried. Entry shall be made while wearing shoes, socks, long-sleeved shirt, and long pants. For dry applications, the treated area should not be entered until the dust has settled.
- In the absence of PPE requirements on a registered pesticide label, minimum personal protective equipment shall be protective measures required for Category I pesticides (label signal word "DANGER/POISON").
- Supervisors/researchers shall consider potential environmental consequences of any proposed experimental use of pesticides and all research applications shall be made in a way that minimizes adverse environmental impacts.
- For each experimental pesticide application, the supervisor/researcher shall keep comprehensive records of the site location, commodity, pesticide applied, application rate/method, date commodity was destroyed, etc. Supervisors/researchers shall ensure that monthly pesticide use reports are submitted to the county Agricultural Commissioner.
- The supervisor/researcher shall ensure that a commodity treated with an experimental pesticide is posted and destroyed.
- Commodities treated with any experimental pesticide that has no residue tolerance or tolerance exemption shall not be used as a human or animal food or feed.
- Pesticides shall not be placed or kept in any container commonly used for food, drink, household products, or feed.
- At least 24 hours prior to commencing an experimental pesticide trial on property not controlled by the University, the supervisor/researcher shall submit a completed "Pesticide Application and Notification Requirements for Trials Conducted Off University Property" form to the Agricultural Commissioner and grower. See Appendix I at: <http://ucanr.org/anrhandbook281>
- Experimental pesticide trials conducted at RECs shall be approved by the Research Advisory Committee and reported to the REC Director in writing 48 hours prior to application. Crop destruction shall be documented in writing to the REC Director.
- Microbial pesticide use generally requires the supervisor/researcher to provide: (1) EPA notification or a federal experimental use permit for any program involving the deliberate release into the environment of living, genetically engineered microbial pesticides and (2) notifying the California Department of Pesticide Regulation (DPR) Registration Branch of the proposed field testing of genetically engineered microbial pesticides.
- In the event a commodity treated with an experimental pesticide is harvested and potentially made available for human or animal consumption where no pesticide tolerance exists, or where the residue is likely to be in excess of the tolerance, or other significant violations of this policy, the supervisor shall immediately notify the Agricultural Commissioner, grower, DPR, and ANR. CE Specialists and AES faculty shall notify the Department Chair, who will then notify their Dean. CE Advisors shall notify the County Director. Principal Investigators at RECs shall notify the REC Director. County Directors or REC Directors will then notify the ANR Controller.

The complete "Policy on Pesticides and Related Chemicals: Use and Experimentation" is presented in Section 281 of the ANR Administrative Handbook and available online at: <http://ucanr.org/anrhandbook281>