



Pesticide Spray Drift

The Issue

The U.S. Environmental Protection Agency's (EPA) proposals for the new "general label statement on spray drift" creates a new standard (harm, or no harm) that is not defined within the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) and is subject to interpretation that is potentially inconsistent with the current standard for registered pesticides of "no unreasonable adverse effects."

Without a clear definition of "harm," EPA's proposed changes do little to reduce ambiguity in labeling, and they create a potential for violation of the label for users who diligently follow all use directions based on subjective interpretation by state enforcement officials.

The current EPA risk assessment conservatively estimates the potential for off-target movement of an applied product as spray drift. In many cases, the data used by EPA in assessment does not account for the use of the additional protections of advanced drift-reduction technologies such as:

- Low-drift spray tips;
- Large droplet/low pressure application equipment;
- Drift-reduction product formulations and adjuvants;
- Use of shrouds, fans, electrostatic sprays and physical barriers.

CropLife America's (CLA) Outlook

1. CLA supports the "no unreasonable adverse effect" standard contained in FIFRA which governs pesticide registration and use.
2. CLA suggests that any pesticide product labeling regarding spray drift should provide applicators with scientifically-based, consistent, validated and appropriate directions for managing drift.
3. CLA would oppose any regulatory definition of "harm" from off-site drift that is inconsistent with the FIFRA standard of "no unreasonable adverse effects." The definition of harm should not be left open to interpretation which could include mere detection, without including any scientifically valid benchmarks for adverse effects.

Talking Points

- Appropriate measures should be taken by all applicators to reduce the potential for spray drift. This includes following the label directions, as legally required, and using best management practices for spray drift minimization as applicable.
- EPA acknowledges that, regardless of the management practices put in place, small levels of pesticide drift may be unavoidable. In their risk evaluation, EPA assumes that some drift will occur. Restrictions on product use are put in place accordingly as a condition of registration.
- Registered products, when used according to the product's label, have been determined by EPA to pose minimal potential for 'unreasonable adverse effects' to humans and the environment.
- Science-based and consistent drift management guidance is needed to eliminate confusion with FIFRA compliance among applicators.
- EPA should use the best available science in the estimation of spray-drift potential.
- EPA should encourage the use of new drift-reducing technology by considering its impact on drift, and making restrictions less onerous on applicators using the best management practices and technology that minimizes drift potential.