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QBL Is Now a Tabloid Queen

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I apologize to my subjects that I have been out of contact since “Down the Garden Path with HRH QBL” appeared in *Agrichemical and Environmental News (AENews)* Issue No. 184, August 2001. You see, things have been a little bit busy. I believe that the U.S. Environmental Protection Agency (EPA) is on the brink of finally making the move that has been overdue since “If I Were the Queen of Labels” appeared in the May 2000 *AENews* (Issue No. 169). Yes, loyal followers, I am sure that EPA will soon be extending me that offer for the position of Queen Bee of Pesticide Labels (that’s QBL to you). The whole issue of a QBL post at EPA has been pushed to the forefront by recent events. A small drum roll please...

President Bush has become involved.

When the leader of the free world recently learned what I have asserted since Day One, that there are absolutely NO RULES where pesticide labels are concerned, he simply was horrified. Not only has Mr. Bush taken a personal interest in rules for pesticide labels, so has the nation as a whole. Witness the recent cover of a reputable national publication shown on the following page. Although I quake to sink so low as to pass along a rumor, Royal Sources in Washington are atwitter with the news that President Bush is now exerting hefty pressure on EPA to get on with it and appoint *moi* as the Queen Bee of Labels.



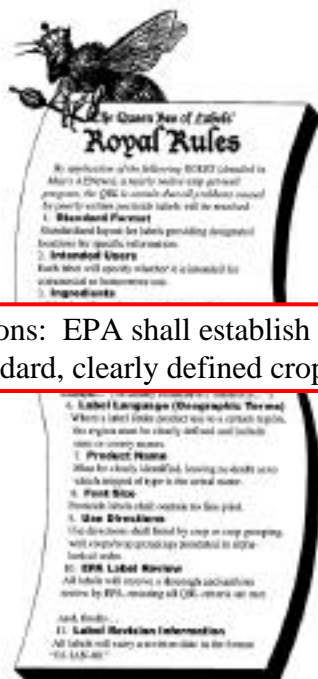
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As to my recent silence, well I have been busy crossing my "i's" and dotting my "t's." (Or vicey versey as my Aunt Connie always says.) Yes, I am prepared to step into the breach and render assistance to EPA. But least anyone think I would be so rude, I will not stick my nose into other people's business uninvited. (EPA take note: A small tastefully engraved invitation, accented with gold leaf, perhaps on heavy, watermarked linen stock will do nicely.)

However, now that I have completed my preparations for assuming my proper place in the world of pesticide labeling as the QBL, I do have a few items that I feel would benefit from my immediate attention. First I would like, once again, to discuss the burning need for EPA to establish crop definitions. Remember the Royal Rules (see *AENews* Issue No. 173, September 2000)? If not, I shall supply a small reminder. Let's begin with the one about Crop Definitions.

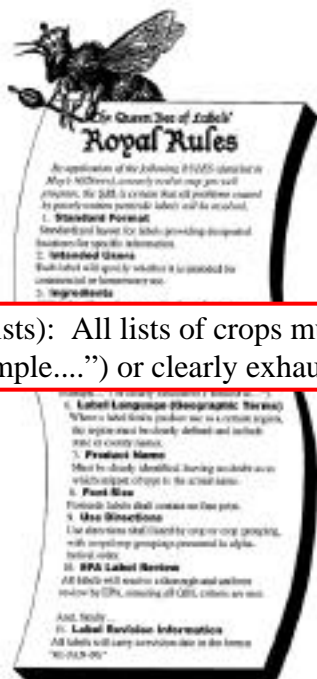


Crop Definitions: EPA shall establish and registrants shall use standard, clearly defined crop terminology.

I recently came across a supplemental label for Micro Flo's Kumulus DF. On the front page, the supplemental carries the following words: "Dormant, delayed dormant, or postharvest applications for apples and pears." Now we at Washington State University's Pesticide Information Center know that the term "postharvest" (a.k.a. "post harvest" and "post-harvest") refers to applications made to fruit and vegetables after they have been harvested. These are typically fungicides used to prevent storage rots or plant growth regulators used for sprout inhibition on potatoes or onions. The link on the Micro Flo label to "dormant, delayed dormant" was a clue that this product was intended for application to the trees as opposed to application to harvested fruit. Were we not so razor sharp in our thinking, we might have seen this label language and coded this label for post-harvest apple and pear use. Now if EPA had already established those standard definitions that have had me royally ranting for the past year and a half, this potential bit of confusion would not exist. A simple, clear definition of the term "postharvest" would have caused Micro Flo to choose different wording for the front of their supplemental label.

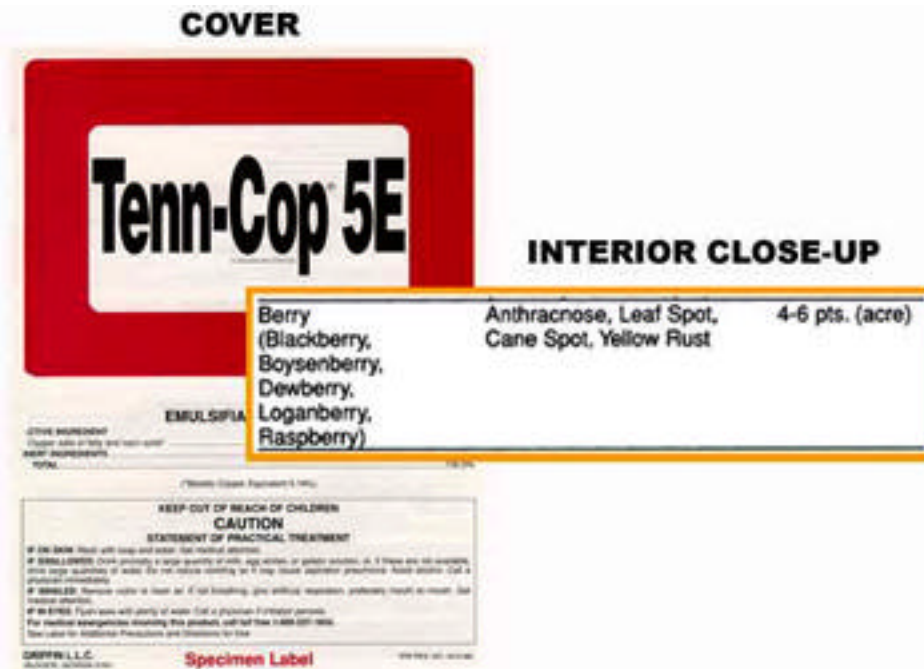
And while I'm on the subject of crop terminology, I would like to revisit a beef (with all due respect to buffalo, ostrich, and The Other White Meat) I mentioned in "If I Were the Queen of Labels." Back in May 2000, I espoused my belief that all lists of crops (or other usage sites) on pesticide labels should be worded so as to be either clearly illustrative or clearly exhaustive. In fact, I feel so strongly about this that I made it one of the Royal Rules.

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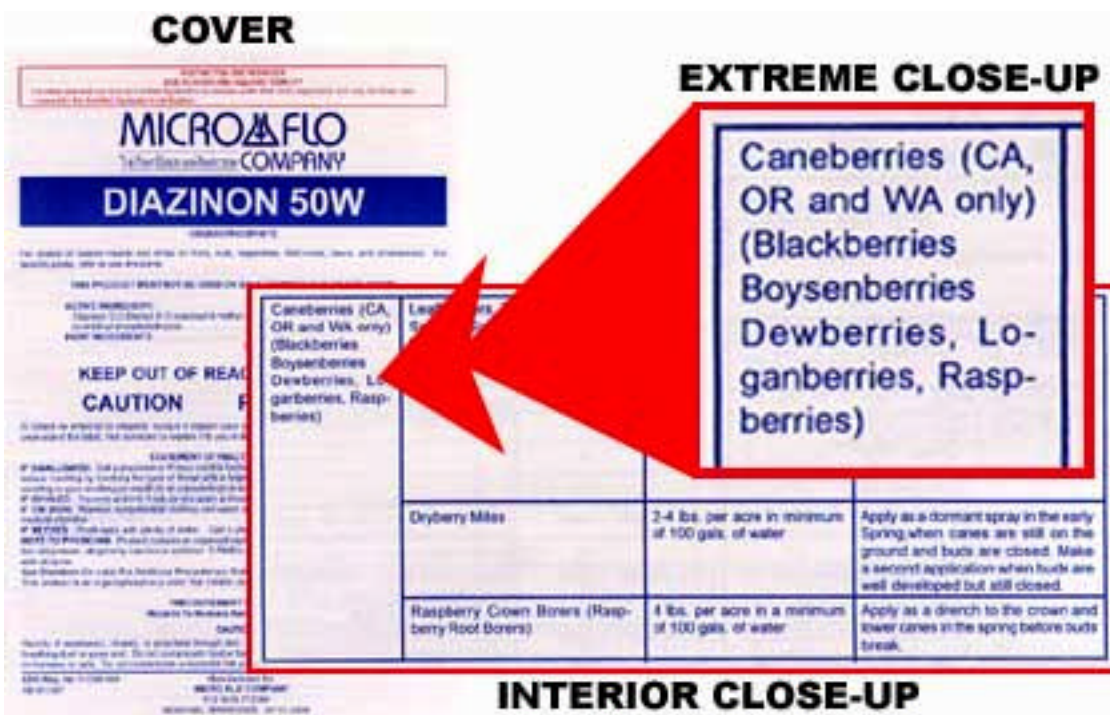


Label Language (lists): All lists of crops must be either clearly illustrative (“for example...”) or clearly exhaustive (“limited to...”).

At the time that I drafted the Royal Rules I did not provide a specific example. I would like now to correct that omission. I offer first the following great, glaring, and graphic example, Griffin's Tenn-Cop 5E.



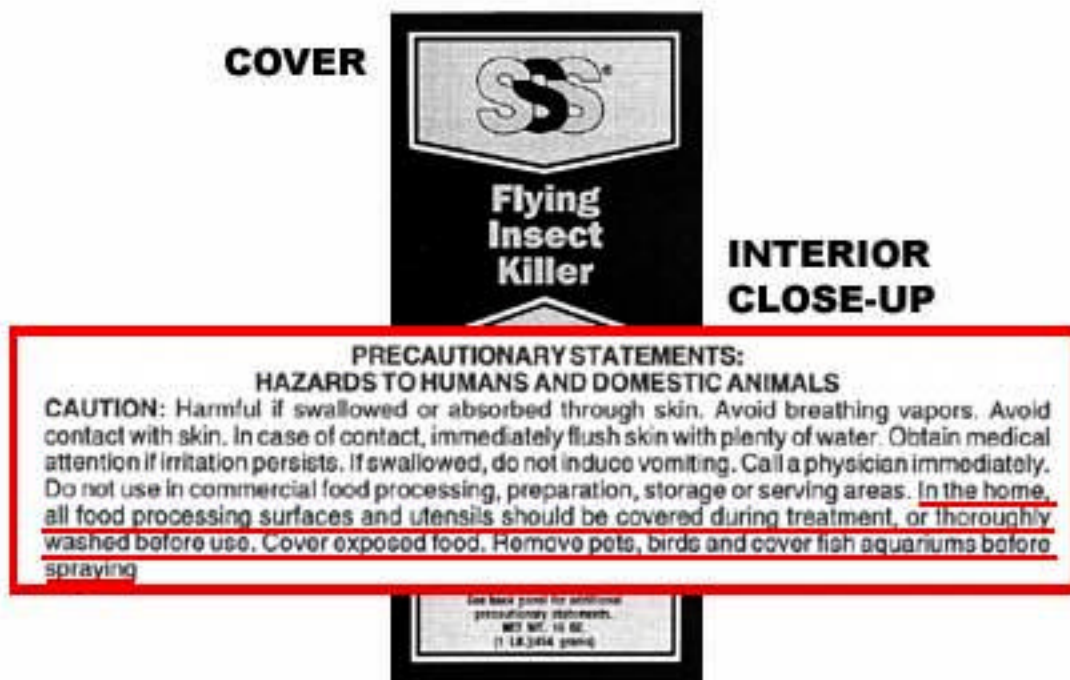
Let me direct your attention to the list following the term “berry” on the Interior Close-Up of the graphic, taken from the use directions portion of the label. I ask you, does this label allow for use on strawberries? Could this product legally be applied to youngberries and marionberries? Inquiring minds would like to know. A similar example is Micro Flo's Diazinon 50W. This label also concerns berries (really, all you conspiracy theorists, this is just a coincidence) but in this case the list is restricted to caneberries. As with the Tenn-Cop label, there are no qualifiers preceding the list of berries. Where does this leave our youngberries? Our marionberries? In a confused state, that is where.



What? Have we (that is the Royal “We”) just had an epiphany? This example points out the need for perhaps yet another Royal Rule. I believe we have found the missing 12th step of the Pesticide Label Get Well Program (PLGWP - plugwhup?), a.k.a. the Royal Rules: **Label Language: Registrants should work unceasingly to reduce confusion in all areas (for example, language and layout) of pesticide labels.**

It happens that with the upcoming coronation, HRH QBL has more than enough to concern herself with and shouldn't still be dealing with lists of usage sites on pesticide labels. Come along now registrants, please just follow the Royal Rules and, trust me, we will all be much happier.

I would like to close this missive with one more thought-provoking (for EPA) and soul-search-inducing (for registrants) example. This constitutes another entry for a ***Down the Garden Path*** Non-Anom award (see *AENews* Issue No. 171, "QBL II, No It's Not a Boat," July 2000, and Issue No. 175, "Call it Confusing, Call it Contradictory, Call it a Non-Anom Nominee," November 2000). The label under Royal Scrutiny is Triple S's Flying Insect Killer. This label was brought to light by PIC's own Charlee Parker, the tireless coordinator of the PICOL Label Database (<http://picol.cahe.wsu.edu>). The front of the Triple S Flying Insect Killer label states, in nonsense capital letters, that the product is "for use only in non food area of industrial and institutional buildings." However, note the final sentence of the precautionary statements inside:



Now what is the REAL message here? We, as a society, often wonder what message we are sending to our young people. Well I have a question for all of you. With label language like this, that has been reviewed and approved by EPA, what message are we sending to our pesticide applicators? Triple S is stating that you can't apply this product anywhere other than nonfood areas of institutional and industrial buildings, then says that if you do decide to make an application in the home, be sure to cover food processing surfaces and utensils and remove your pets. In short, Triple S is telling the users how to safely make an off-label application. Are we encouraging applicators to make off-label applications? I wonder if this is precedent setting. Do you suppose that, by approving this label, EPA is headed toward a policy requiring registrants to include information about making safe off-label applications on every label? Good Heavens! Just imagine how large the labels will have to be. (Quick, order more file cabinets.) EPA, save yourself! Please make me that offer quickly. Once I am appointed, anointed, and coronated, I, the QBL, will put an end to this nonsense.

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