



OFFICIAL PUBLICATION OF THE NATIONAL ALLIANCE OF INDEPENDENT CROP CONSULTANTS

**PRESIDENT'S COLUMN**




By  
*Gary Coukell*  
NAICC  
2014 President

## Time to Speak Up CALL TO ACTION

With the August 18 deadline approaching, NAICC members have a chance to be heard by US regulators. We need you to speak out against EPA's proposal to take away the exemption from certain parts of the WPS for EMPLOYEES!

We had a good response to the Worker Protection Standard (WPS) survey we sent to the membership several months ago. Your input was very helpful as we developed our comments to be submitted to EPA on August 18 regarding proposed changes to the Worker Protection Standard. NOW we need your help conveying this message to Washington. Watch your email for a template for making your comments.

Recently, NAICC Executive Vice President Allison Jones and other members of the Pesticide Policy Coalition including representatives from the American Farm Bureau, CropLife America, National Agricultural Aviation Association, National Association of State Departments of Agriculture, National Association of Wheat Growers, National Council of Agricultural Employees, National Potato Council and USA Rice Federation met

[www.naicc.org](http://www.naicc.org)

with EPA officials seeking clarification to some parts of the proposed rule. Among the questions presented was why EPA is seeking comments on whether or not the current Crop Advisor Exemption should be removed for employees of a certified or licensed crop consultant. The proposed rule states that some state regulatory agencies and their representative expressed concern that those working under the supervision of crop advisors may be unaware of the risks posed by pesticides.

EPA specifically wants us to comment on and convince them that our employees are not in any danger and that they are competent enough to know what precautions are needed in the field when pesticides are present. Answers to the following questions need to be stated in your comments in order for EPA to be satisfied that our employees are protected:

- What precautions do certified and licensed crop consultants take to protect and educate their employees with regard to pesticide exposure?
- What pesticide safety training do employees under your direct supervision receive? How often does this training occur? Do you require employees to have a pesticide applicators license?
- Do employees have access to and understand the product label?
- How often are employees exposed to plants that have been recently treated with pesticides?
- Are employees touching and handling the recently treated plants or making visual observations without handling?

NAICC's Governmental Affairs Committee and the NAICC Executive Board recently made changes to NAICC's policy statement on Crop Consultant Employees (a full copy of the final policy is attached to this newsletter).

1. During the REI and while in contact with plants, minimal Personal Protective Equipment (PPE) for crop consultants and employees should consist of: long pants, boots, long sleeve shirt, and gloves if there is contact with the portion of the crop that has been treated.
2. An annual viewing of the WPS safety video as the minimum requirement for employees under the direct supervision of a certified or licensed crop advisor is recommended. Documentation of such training should be kept on file by the crop consultant for a minimum of two years.
3. Have available emergency medical and decontamination supplies for employer and employees.

Whether you are a research consultant or a crop consultant, NAICC needs you to **ACT NOW**. We encourage you to send your personal comments to EPA and send a copy to the NAICC headquarters c/o AllisonJones@NAICC.org.

**EPA will make their final decisions based on the comments received from the public. The more we communicate with EPA, the better we can serve our growers and ourselves.**



# Happenings on the Hill

## Updates on Legislation Impacting NAICC Members

By Glenn Luedke, NAICC Legislative Assistant

### Reducing Regulatory Burdens Act of 2013 – H.R. 935

H.R. 935 passed the House of Representatives by a vote of 267-161. The bill now moves to the Senate for consideration this fall. The bill was taken to the House under a “regular order” rule for a one hour debate. The bill advanced under a “closed rule” and was not subject to amendment and required a simple majority vote to pass.

The bill would bar the EPA from requiring Clean Water Act (CWA) permits for the discharge of pesticides in waterways. The bill was originally introduced in March 2013 and unanimously passed by the House Ag Committee in 2014. The bill would reverse a 2009 ruling in the federal appeals court that required the EPA to use its authority under the CWA to regulate pesticides sprayed over water. Supporters of the bill argued that growers were already required to seek permits under FIFRA and EPA was out of control and disregarded the intent of the Congress.

Late last month, Senate Majority Leader Stabinow and 12 U.S. Senators sent a letter to EPA regarding the CWA jurisdictional rule and interpretation jointly proposed by EPA and the U.S. Army Corps of Engineers. The group of Senators want to make sure that the proposed jurisdictional and interpretative rule do not have unintended effects on agriculture and conservation practices currently used by many of the nation’s farmers and ranchers. Stabenow stated there is concern across the country that the intent of the interpretative rule will not be met.

Major concerns include:

1. Agency documents and congressional testimony state that the purpose of the interpretative rule is to provide certainty to farmers/ranchers by stating that specific conservation practices are exempt from CWA permitting.

2. Privacy is a great concern. Farmers/ranchers/forest owners are worried the interpretative rule could expose them to citizen suits if they are not in compliance with NRCS standards.

3. The interpretative rule has also raised questions over requirements not on the list. Many growers are concerned conservation practices not included on the list of 56 practices automatically require a CWA permit.

4. Growers are concerned that requiring NRCS compliance in order to qualify for a CWA permit exemption could be damaging to existing conservation work not carried out with the NRCS.

5. Growers have concerns regarding the “waters of the U.S.” rule. Concern centers around intermittent streams and low-lying areas on fields. Concern is that flow and runoff from the fields may be categorized as tributaries and thus fall under the proposed rule.

6. Clarification is requested regarding farm drainage and ditches. EPA and the U.S. Army Corps of Engineers state in the proposed rule that upland ditches are exempt from permitting. In a guidance document on the EPA website, it states that the “agency” intends to include ditches collecting runoff or drainage from crop fields as upland ditches. The rule itself mentions only “ditches that are excavated wholly in uplands, drain only uplands and have less than perennial flow”. Many growers are concerned because their farms contain fields in flood plains. Because the ditches are in low-lying fields, there is concern these ditches are now jurisdictional.

Farm organizations have expressed concern after EPA’s attempt to clarify proposed changes and perceptions of the proposed CWA. EPA Acting Assistant Administrator, Nancy Stoner, made comments in a recent blog, “Setting the Record Straight on Waters of the US”. (EPA sponsored a webinar on July 16 with 1100+ participants and it centered on the same theme) The EPA administrator’s “town hall” type meetings and the comments and presentation by Ms. Stoner did not appease members of the agricultural community and agricultural group representatives stated the presentations contained numerous inaccurate and

misleading statements/comments. A major concern expressed by ag groups and growers centers around a list of 56 conservation practices listed in an “interpretative rule” released with the overall CWA rules that would essentially narrow the 56 practices exempt from the law by requiring growers to follow NRCS specifications of those practices.

The National Association of State Departments of Agriculture (NASDA) sent comments to EPA and the Army Corps of Engineers, outlining their concerns regarding the “Interpretive Rule for Agricultural Conservation Practices”. The Rule, published in the Waters of the U.S. listed rules, attempted to clarify the relationship between conservation activities and the CWA “normal farming” from permitting requirements (Section 404). The concern was the Interpretive Rule would limit the CWA “normal farming” exemptions and possibly make growers not want to implement conservation activities on their land. The group further stated that the Rule was developed without input from regulators in the states. In addition, there is confusion regarding which operations would be covered as an ongoing operation, how the use of pesticide applications in conservation practices would be impacted and the process of determining which practices would be added or deleted from the list of exemptions.

A recent poll by the American Sustainable Business Council found that 80% of small business owners say they would support provisions of the EPA Waters of the U.S. rule. Two-thirds of the small businesses polled stated government regulation is necessary and that water pollution could have a negative effect on their businesses.

### FDA

The “Safe and Accurate Food Labeling Act of 2014” was introduced in April. The opinion was that by requiring the FDA to approve genetically engineered products it “might” improve the public’s confidence in the technology. Eventually, the proposed bill, HR 4432, did not include the mandate that would preempt state GE labeling efforts. The sponsor of the bill decided the

*Continued on next page.*

## Happenings on the Hill

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FDA process outlined in the legislation should reassure the public regarding health and safety issues. The FDA has the authority to approve or make objections to the data submitted by companies and to request more information. Once the FDA has stated that a product is considered safe, companies cannot be required to label foods as containing GMOs.

### FARM BILL

The USDA has notified growers of their obligation to be in full compliance with conservation regulations in order to be able to buy crop insurance. Previously, this obligation was required for participation in a number of agricultural support programs. It is now mandated for the fruit and vegetable industry as outlined in the 2014 Farm Bill. Growers must complete AD-1026 at their local FSA office and show they have put in action the required farm and natural resource practices. It is understood that permanent crops are largely exempted from the requirement. The paperwork must still be completed and filed in order to remain eligible

for a federal subsidy under various crop insurance programs. Crops that are tilled annually, may be required to have a certified conservation plan in place along with other restrictions. This depends on whether or not the land is defined by USDA as highly erodible or in a wetland area. USDA is planning information sessions for industry input and to further explain the new requirements.

### GMOs

A recent report stated the USDA is backing down from a GMO disclosure rule that would have provided regulators in the states with critical information about the GMO organisms that growers use when spraying crops. In early 2013 the USDA APHIS offered a proposal to share information with state regulators regarding GMO organisms that are released within their state. USDA withdrew the proposal and stated it was done to protect confidential business information from disclosure. In a later update, it was stated that growers that want to use or import GMOs must register with the USDA and submit an application

for the required permits. In this process, USDA gains access to the information about grower use of GMOs.

The Committee addressed the lack of a “connection” between ag biotech/research and consumers and issued a statement stating the focus needs to shift to the sharing of biotech benefits that are rooted in science and that consumers need to learn the true facts and not only hear from unreliable groups. The mis-understanding of GMOs is a prime example. The Committee heard from study groups that political leadership has held back on taking positions and won't express themselves for fear of non-support from voters.

### GROWER FUNDED TECHNOLOGY

The Georgia Peanut Commission board of directors unanimously approved a motion opposing the sharing of grower-funded technology with other countries that compete in direct competition with domestically produced peanuts. The Georgia Peanut Commission has been funding research projects at the University of Georgia since 1961.

*NAICC welcomes Netafim as a new Sustaining Member! A global leader in the development of innovative drip irrigation products, Netafim was founded in 1965 by farmers and agronomists. Be sure to stop by and welcome them at their booth at the AG PRO EXPO trade show in Reno in 2015.*

## Lack of Quality Water for Food Production

*By Will Ostedt, Vice President,  
The Pollack PR Marketing Group/Netafim*

It has been nearly five decades since Netafim first introduced drip irrigation to the world as a solution to one of the world's most urgent problems -- lack of quality water for food production. Today, it is the same pioneering spirit that makes Netafim a global leader in drip irrigation solutions for the agricultural industry.

With a sole focus on drip irrigation technologies, Netafim offers the industry's most comprehensive drip irrigation systems, each designed to deliver increased yields while using less water.

Consisting of flexible polyethylene tubing with drippers permanently welded to the tubing's inside wall, drip irrigation slowly emits specified amounts of water and nutrients, at low pressure, directly to the plant's root zone.

More than an irrigation method, drip irrigation is a management tool that allows growers to manage crop production, resulting in earlier, more profitable harvests, as well as enhanced consistency and quality in yields from year to year. Energy, water and fertilizer costs are minimized to further improve profitability.

With minimal loss of water to runoff and evaporation – as well as uniform application to plants, drip irrigation is being utilized by increasing numbers of growers for a wide variety of crop applications.

“In joining the NAICC, we aim to extend our commitment beyond our innovative drip irrigation solutions and work hand-in-hand with our partners to raise awareness of the role that drip irrigation plays. We want to make America's corn farmers more profitable and together with them elevate our reach when fighting against scarcity of water, land and food,” said Ze'ev Barylka, Marketing Director for Netafim USA.

As environmental, economic and demographic factors have brought water use to the forefront, Netafim is in a position to leverage their leadership position to drive mass adoption of drip irrigation technology as the path forward.

“While farmers make decisions based on many variables, such as weather predictability, soil quality, seed selection and others, Netafim will take away any farmers' concerns regarding efficiency in the utilization of the available water and fertilizer, securing maximum yields and crop uniformity” added Barylka.

# 2015 NAICC Annual Meeting And Ag Pro Expo Offers Something For Everyone

January 21-24 are the dates for the 2015 NAICC Annual Meeting at the Peppermill Resort Spa and Casino in Reno, NV, “where luxury and affordability converge”. Our 2012 meeting was such a huge success at the Peppermill, we’re coming back for more educational and networking opportunities at great rates!

The rates for the sleeping rooms are the same as 2012: \$89 or \$119 per night depending on which tower you select. The Peppermill Tower (\$89) houses the casino and the majority of the 10 award-winning restaurants and 16 bars and lounges. Or you can stay in the Tuscany Tower (\$119) where the meeting space, spa and several restaurants are located, plus the Terrace Lounge where your NAICC name badge gets you a 20% discount on designated beverages!

You can make your hotel reservations now at [https://resweb.passkey.com/Resweb.do?mode=welcome\\_ei\\_new&eventID=11421422&utm\\_source=7268&utm\\_medium=email&utm\\_campaign=32718646](https://resweb.passkey.com/Resweb.do?mode=welcome_ei_new&eventID=11421422&utm_source=7268&utm_medium=email&utm_campaign=32718646). Or go to the NAICC website and click on the reservations link under Meetings tab; 2015 Annual Meeting.

According to reports from the Peppermill, a new state of the art air filtration system, as well as multiple air purifiers placed throughout the resort have been added since 2012. The new system increases the speed at which the internal air is circulated. The hotel even offers personal purifiers for your sleeping room if needed for a small charge.

Registration for the AG PRO EXPO will open for exhibitors by September 1 and individual registration will be available online by October 1.

The NAICC Annual Meeting Coordination Committee has been developing the program for the 2015 meeting since last January. Working hard to ensure there is something of interest for everyone no matter in which area of consulting you specialize in are **Matt Eich**, Crop Consultant program, **Kathy Richards**, Research Consultant program and **Mark Tumey** the QA sessions.

The Plenary Session on Thursday will feature the NAICC Leadership Program Class of 2014 reports as well as the keynote address given by John Phillips, host of *US Farm Report*, America’s longest-running farm TV show, and writer of humor & commentary. Phillips appears monthly in *Farm Journal & Top*



*Producer* magazines as a Contributing Editor. You don’t want to miss this special keynote address. The keynote address is jointly sponsored by NAICC and the Foundation for Environmental Agriculture Education.

Topics slated for the researcher sessions include GLP and OECD Regulatory updates, food safety, and sample processing covering pollen sampling and analysis. Researchers will have a concurrent session with QA professionals and discuss ways to work effectively together. Back by popular demand, researchers will have from 12:00 noon – 3:30 pm Thursday for networking sessions with sponsors or they may attend the Emerging Technology session from 2:00-3:30 pm.

Consultants will hear from experts in areas of soil fertility, cover crops, and the use of UAVs in consulting businesses. Other business topics will be covered and will include a presentation on social media. The popular roundtable discussion will be held Thursday morning.

A joint session on pollinators is planned for crop and research consultants.

QAs will participate in a mock audit during the week and also hold a debriefing on the audit during their educational sessions. Other topics include industry standards versus GLP regulations and How To’s 101. The well attended “game show” is also back!

There will be a lab QA session held on Thursday afternoon at 2:00 pm.

According to 2015 Annual Meeting Coordination Chair Debra Keenan, “The 2015 NAICC Annual Meeting will be a group of meetings that will allow us to gain experience and gain knowledge. Coming to the conference and participating will allow you to learn and grow.”

## NAICC’s Annual Meeting Dates

January 21-24, 2015

Peppermill Resort Hotel and Spa, Reno, NV

Reserve your room now!

<https://aws.passkey.com/event/11421422/owner/7268/home>

January 27-30, 2016

Lake Buena Vista Palace, Orlando, FL

January 18-22, 2017

St. Louis, MO or Kansas City, MO

# Reno Tahoe USA Reaches “Tipping Point” With More Than 50 “Top 10” Awards

Travelers looking for a fun, safe, affordable, sunny, beautiful, hip and varied vacation destination should check out Northern Nevada’s Reno Tahoe area, according to more than 50 varied publications and websites, from A (AOL Real Estate) to Z (Zagat.com). The four season, high desert resort destination that encompasses Reno, Sparks and North Lake Tahoe has been recognized for excellence in a wide variety of national publications and online rankings.

“It’s pretty incredible to be ranked #9 on the list of ‘100 Best Places to Live’ (Livability.com), #5 on ‘Top Spots for Winter Vacations’ (The Weather Channel) and as one of the ‘20 Most Crime-Free Cities in America’ (AOL Real Estate) as well as the #1 ranking for ‘Underestimated Cities for Food’ (The Daily Meal),” according to Christopher Baum, President and CEO of Reno Tahoe USA.

Reno-Tahoe International Airport is the gateway to nearby Lake Tahoe’s world class skiing for the vast majority of visitors. It will be difficult to find a better winter getaway, according to authorities such as:

- *National Geographic Magazine*, which recently highlighted Reno as one of its “Top 10 Emerging Ski Towns.”

- *Mother Nature Network* celebrated the world’s tallest artificial rock climbing wall at BaseCamp, in the heart of downtown Reno, as one of “8 of the World’s Best Climbing Walls.”
- Chapel Tavern in Reno’s hip MidTown District was recently named one of the “10 Best Places to Drink Rum” in the country by Zagat.com.
- A mainstay in downtown Reno for more than 50 years, the Awful Awful was listed as one of the “51 Great Burger Joints Across the U.S.” by *USA Today*.

And after a fun-filled day of learning, networking and eating, it’s reassuring to know that - for the sixth year in a row - Reno has been recognized by *Casino Player Magazine* for being home to the “Loosest Slots in America.”

Reno is located at the base of the eastern slope of the Sierra Nevada, 13 miles east of the Nevada-California state line on Interstate 80. At an elevation of 4,500 feet, Reno averages more than 300 days of sun each year with wide variations in temperatures during a 24-hour period.

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## Best Practices

By Kathryn Hackett-Fields

Continuing Education for the QA professional should always include peer information sharing. We can learn from questions raised by others and weighing the answers against our particular situation. The Society of Quality Assurance (SQA) offers its members access to “listservs” for questions and answers from many sources.

Recently, the topic of QA records – those that are generated by the activity of a given QA Unit – and their archival procedures provided worthwhile feedback. When reviewing the replies, please bear in mind that fulfilling GLP requirements may be accomplished in a variety of ways. Rather than trying to obtain the one right answer, we gain more by examining how our peers meet the goals, then crafting methods and procedures that will work best in our own circumstance. You will usually find common ground reflected in the responses that can be traced back to the “predicate rule,” i.e., the historical dictates of EPA and FDA.

Most of the Agency expectations of QA Units are found in the Personnel (Subpart B) section of the GLPs. The QAU’s core SOPs are generally developed to meet these requirements with other procedures generated to address specific needs of our business or our employer’s corporation. It is clear that we will document our critical phase inspections, the audits we perform on raw data and draft/final reports, and the facility inspections we perform. Some records will be study-specific, while others will be general in scope. The common ground for all of them is the requirement for separation of these records from study file records. This is our first guidance point, as was reflected in all of the listserv responses. When our records are to be archived, they may be keyed

to a specific study, but must still be placed in a separate “section” dedicated to the QAU.

A small or sole-proprietor QAU may have its own locked file cabinet or a clearly-marked set of shelves in the archive area. Some have a completely separate archive (or cabinet) for use by the QAU but it appeared from the responses that most of us share a large common archive space, especially when loss prevention measures exist only in that area. An independent QAU might use an archive service to achieve the highest level of protection of records from fire, flood or disaster.

A second guidance point was the Archivist position and maintaining the necessary separation of QA activity from the entire quality system. How can QA properly inspect the archival procedures if QA is involved in the process? Despite early guidance by FDA that offered exceptions for archival, this viewpoint has largely (but not totally) changed over time. The listserv responders observed separation measures even when QA was involved in the mechanics of transfer and storage. For example, a designated member of the QAU was never involved with the process, allowing that individual to impartially inspect all archival procedures. Others train the Archivist to recognize and separately store QA records when presented with the study file. Whichever option your QAU chooses, be sure that SOPs on archival of QA records are in compliance with GLP requirements and follow Preamble logic. This will insure that your procedures are easily defensible during Agency inspections.

# NAICC Trip to Washington, DC

By John Hecht

I was asked to write an article about the trip I made to Washington, DC this past March with members of NAICC. This was the first time that myself and my wife, Deb, had ever been in DC. It was quite an experience for both of us.

From a personal standpoint, just seeing all of the statues and memorials to our nation and government's history was breathtaking. It was like taking a walk through all of the history books that I have studied for so long. The Washington Monument; made for the father of our nation; a true leader that cared more for the people of this country than he did for himself.

The Lincoln Memorial; made for the man that pulled our nation through it's only Civil War. I could go on and on, but the thing that struck me most as we

walked around and through DC was that this nation is greater than any one leader. And even though we're struggling now with leaders and issues, all one has to do is look around Washington, DC and then realize that we will persevere through this, as we always have.

Deb and I did get to look a little bit in the Smithsonian Air and Space Museum. I was in awe. Here I stood, touching Apollo 11, which so many of us watched back in 1969, when it orbited the moon. I got to see the Spirit of St. Louis, which Charles Lindbergh flew across the Atlantic. Something no one else had ever done before. We also saw the Wright brothers' plane, the topic of many of my grade school science projects.

This was also my first chance to visit my Representatives and Senators. As we

sat and talked about issues and talking points that concern NAICC members and consultants, I realized that this is something that needs to continue. We need to make our voices heard. The numbers of people involved in agriculture are getting to be fewer and fewer, yet our issues seem to be getting bigger and bigger. Food production is basic in any nation, and those of us involved in this part of the economy have to take the time to try and educate those who aren't. By trying to work with other groups involved in agriculture also, maybe we can become a big enough voice that people will listen and help.

Deb and I enjoyed all of the time we spent with NAICC members, touring DC, and learning how to properly eat crawfish.

We can't wait till next year.

## New Webcasts Save Time, Money, and Pesticide during Soybean Aphid Season

Soybean aphids can cause significant damage and lower yield potential on their namesake crop. It's no surprise, then, that soybean farmers will spray for peace of mind and 'insurance' when even a few of these bugs are sighted.

But growers and their consultants can save on time, money, and pesticides by following economic thresholds and using key biological controls.

This is the idea behind some key applied research conducted through a North Central Soybean and Research Program (NCSRP) grant led by Kelley Tilmon, Associate Professor and Soybean Extension Entomologist at South Dakota State University.

The key findings and recommendations from this NCSRP project are now available through three easy-to-follow, open-access webcasts produced by the Plant Management Network (PMN), a nonprofit publisher of crop management information.

These webcasts are targeted at growers, consultants, and other practitioners in the upper Midwest, where soybean aphids are often an issue. They are available 24/7 and viewable on PC, Mac, and mobile devices. They include...

"Host Plant Resistance for Soybean Aphid" by Dr. Erin Hodges, Associate Professor and Extension Entomologist at Iowa State University. Through this webcast, users can learn about host plant resistance for soybean aphid, as well as the benefits of using host plant resistance to reduce aphid numbers and protect soybean yields.

"Soybean Aphid Management Using Neonicotinoid-Treated Seed" by Dr. Christian Krupke, Associate Professor and Extension Field Crops Entomologist at Purdue University. This webcast helps practitioners assess the relative value of seed treatments in soybean

aphid management. Krupke covers many aspects, including the duration of seed treatments' effectiveness, their effects on non-target beneficial pests, yield data, and comparisons to the standard IPM approaches of monitoring and treatment.

"Update on Soybean Aphid Biological Control" by Dr. Thelma Heidel-Baker, Postdoctoral Research Associate and Extension Coordinator at Iowa State University. This webcast covers the different biological control options for soybean aphid management. It also offers details on the beneficial insects that provide this control. Heidel-Baker also informs viewers about current and ongoing research projects to improve the use of biological control for this pest.

All three webcasts are permanently open access and can be found in the 'Grant Outreach Webcasts' section of 'Focus on Soybean', PMN's webcast resource, located at [www.plantmanagementnetwork.org/fos](http://www.plantmanagementnetwork.org/fos).

'Focus on Soybean' is a publication of the Plant Management Network. To get the most out of this and other Plant Management Network resources, please sign up for PMN's free electronic newsletter, PMN Update.

The Plant Management Network ([www.plantmanagementnetwork.org](http://www.plantmanagementnetwork.org)) is a nonprofit online publisher whose mission is to enhance the health, management, and production of agricultural and horticultural crops. It achieves this mission through applied, science-based resources, like Focus on Soybean.

To achieve this mission, PMN partners with the United Soybean Board and more than 80 other organizations, including universities, nonprofits, and agribusinesses.



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## **NAICC Position Statement**

### **Employees of Certified Agricultural Professionals**

Regarding the EPA Worker Protection Standard (WPS), The National Alliance of Independent Crop Consultants (NAICC) believes the exemption to certain portions of the WPS which was granted by EPA in 1995 to qualified crop consultants and their direct employees places responsibility on all exempted certified consultants. NAICC recommends that all certified and/or licensed crop consultants:

- Pursue additional continuing education on all matters relating to pesticide safety procedures
- Annually conduct pesticide safety training for all employees covered by the NAICC WPS exemption. Documentation should be kept on file for a minimum of two years.
- Consider that such training should include information regarding appropriate personal protective equipment's (PPE), appropriate clothing and the care and handling of same. During the REI and while in contact with plants, minimal Personal Protective Equipment (PPE) for crop consultants and employees should consist of: long pants, boots, long sleeve shirt, and gloves if there is contact with the portion of the crop that has been treated.
- Have available emergency medical and decontamination supplies for employer and employees.
- Closely evaluate what are appropriate ages of current and prospective employees who will be engaging in tasks covered by the WPS exemption, such that these employees are able to bring sufficient knowledge and awareness to their respective duties.
- Refrain from directing employees into tasks that differ substantially, temporally or spatially from that of the consultant so as to avoid any inadvertent reduction in safety-related practices or procedures.

The NAICC encourages all qualified consultants to adhere to these practices. Further, NAICC pledges to work with EPA to disseminate informational materials to consultant members through electronic media and printed materials.