While discussions are on-going, NAICC and EPA have taken positive steps toward resolving the conflicts that have arisen regarding the Worker Protection Standard (WPS) and the Food Quality Protection Act (FQPA). On the table are revisions to the crop consultant exemption, a new exemption for research consultants, and a complete review of the entire WPS process.

**Crop Consultant Exemption**
NAICC Legislative Advisory Chair Robin Spitko, Ph.D., and NAICC Executive Vice President Allison Jones met with EPA officials Jim Aidala, Assistant Administrator for Toxic Substances; Antonio Bravo with the Office of Pesticide Policy; and Kevin Keaney and Don Eckerman with the Certification and Worker Protection Branch. Draft pest monitoring profiles (see related article “Real-Time IPM Data”) were presented as samples of the type of information NAICC could provide EPA as they make risk assessments for products going through the FQPA process.

In a recent interview, Bravo told the *Pesticide and Toxicology News, “...The profiles promise to greatly enhance our occupational risk assessments. If you can demonstrate that certain work practices don’t lead to serious workplace exposures, we would be interested in seeing the data.”*

Preliminary discussion for the next step centered on:
1. Sending representatives from the Health Affects Division (HED) and Biological Economic Analysis Division (BEAD) to accompany some consultants in the field during the 2000 season to gain insight into the daily activities of consulting professionals.
2. Holding a briefing with NAICC, HED, and BEAD to review and refine the profiles. Discussions would include the type of data EPA needs and to refine the definitions and assumptions. NAICC specifically asked EPA to reverse the language added to the bromoxynil label (“certified crop advisor exemption does not apply”). However, all they were told is that perhaps EPA would take another look at the specific wording on the new label so it would not imply an exemption from the exemption.

In the meantime, EPA has released the Reassessment Eligibility Document (RED) for profenofos that includes an advisory to crop consultant. The proposed language for the Advisory states:

Users should inform Certified Crop Advisors (as defined by the Worker Protection Standard (WPS)) that people engaged in scouting activities should wear coveralls, shoes and socks, and chemical resistant gloves made of any waterproof material when entering treated areas during the first 48 hours following application (72 hours in areas where the average rainfall is less than 25 inches per year).

**Researcher Exemption**
Spitko and Jones also had the opportunity to visit with Keaney and Eckerman on the request by the Consortium of Research Scientist to provide an exemption for research consultants.

Preliminary reports from EPA show that of the four main areas of concern, there is room in some areas for interpretation under the current WPS to allow for the uniqueness of the research setting.

For example, there is concern over the requirements for central posting. Under the WPS, there is no prescribed format for the central posting information, thus the research notebook containing updated information about applications, that is kept in an area accessible to employees would be sufficient.

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**CARAT Formed to Transition Agriculture – NAICC Represented**
Robin Spitko, Ph.D., will represent NAICC for the next 2 years on the Committee to Address Reassessment and Transition (CARAT), a subcommittee under the auspices of EPA’s National Advisory Council for Environmental Policy and Technology (NACEPT). CARAT was formed as a successor to the Tolerance Reassessment and Advisory Committee (TRAC), created in 1998 to serve as a forum for stakeholder input to EPA and USDA as part of the implementation of the Food Quality Protection Act. CARAT is a smaller committee and representation was strongly sought after by the many groups affected by registration changes resulting from FQPA. It is a continuing testimony to the respect given to NAICC and the independent crop consultants’ viewpoint that we were once again

CONTINUED ON PG.4
Just Do It!

BY DENNIS BERGLUND, NAICC PRESIDENT

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on't you just love this time of the year? Yes, I know it's often TOO BUSY.... Yes, I also know that working around the weather is NEVER EASY. But, when you're doing what you enjoy, you know what needs to get done and you JUST DO IT! When you're finally done with your schedule, you're really done! During other seasons of the year, when I get close to completing my "To Do" list, I just add more things to it. It never gets finished! Yet, during the summer, I sometimes almost get that "caught-up" feeling!

This summer, try to make sure that you take some time to relax and enjoy time with your family. And remember, kids in the back seat can cause accidents; accidents in the back seat can cause kids.

Combining the Internet and Our Expertise

Two new NAICC projects could be a source of revenue and information for NAICC members. Both projects combine technology and our "mud on the boots" professionalism to provide a new type of value to growers and clients.

First, NAICC has submitted a grant proposal to USDA to develop methods to collect real-time data to document actual product use and IPM methods. Consultants would be asked to participate in the data collection and, of course, would be compensated for any work done. This data could also help EPA and USDA make better decisions, which will benefit all of agriculture.

NAICC is also reviewing a model for an "On-line Consulting Forum" that will enable qualified crop and research consultants to answer grower and industry questions. Could on-line consulting add value without arriving at a field-specific solution, which usually requires a field visit? Would there be value in helping a grower better understand a problem and narrow a solution down to several options? Finally, would it have enough value for a client to pay for it?

If you have any questions or comments concerning this, please feel free to give me a call and we'll have a little chat-chat.

The NAICC Annual Meeting Paradox

One thing that I've learned about Annual Meetings over the years is this:

NAICC Annual Meetings are worth far more than the effort that you put into them, yet the more that you put into them, the more they are worth.

Invest in your future by making plans to attend the NAICC Annual meeting, in Orlando, on January 17-21, 2001.

More On Biological Control

After writing about Gramma Nellie's peonies in the last newsletter, I have reminisced about helping around the yard and garden as a young boy. At least one time each year my mother enlisted me as a "biological control agent" to remove large caterpillars from her vines. I think that they were Tobacco Hornworms, but I'm really not sure. I was probably 10 years old and the caterpillars were much larger than my fingers. Just one caterpillar was a handful, and I was half-scared of them. I remember picking the twitching lime-green caterpillars from the vines, one at a time, and dropping them into a bucket. I vividly remember staring into my bucket that was half-full of these large squirming caterpillars. I even more vividly remember the nightmares that I had about "The Attack of the Killer Lime-Green Caterpillars".

I'm okay now, though. After 30+ long years and 4 nervous breakdowns, I am very happy that I can actually pick up a small cutworm and put it in my insectivial! (I won't go into why I need to wear gloves to do it, though. My psychiatrist has advised me against going into that!)

Annette's Class Reunion

Even though I had earlier said that I would attend, as Annette's Class Reunion got closer, I thought of many other things that I should be doing and tried several excuses. I tried to talk Annette into going alone and letting me stay home and take care of the kids. I said that I wouldn't know anybody there. I tried convincing her that she would have more fun without worrying about the kids and me. When those excuses weren't working, I whined that I really had a lot of work to do that weekend.... But, her silent treatment worked far better than the feeble excuses that I offered, so I was pretty much forced into going to the reunion. It was actually fun! I finally got to meet many of her classmates whose names I had heard many times before. They were all great people and we had a lot of fun! Now that it's all over, I know that I really should have went willingly, and I really am glad that I got to meet her schoolmates.... But, next time I'll have better excuses.

FEAE Awards First Jensen Memorial Scholarship

The Foundation for Environmental Agriculture Education presented its first scholarship to Clint A. Dotterer of Fairbury, IL. The $1,000 scholarship is in memory of Richard L. Jensen, Ph.D.

Dotterer is entering his senior year at the University of Illinois, Urbana-Champaign where he is pursuing a degree in Crop Science. He currently has a 4.0 grade point average.

Also while attending the University, Dotterer is employed as a research assistant with the UIUC Soybean Pathology Lab. He also works for NAICC member Don Brucker, Jr., with Boehle Consulting Services, Melvin, IL, during the summers, as well as working on the family farm. According to Dotterer, "I see a need for people who are able to gather, interpret, integrate, and apply all the data and knowledge that will be available through the new technologies of agriculture. As a crop consultant, I could help farmers produce the best crops possible and yet
Congress, Organizations Call for Withdrawal of TMDL Rule

A recent request was made for Total Maximum Daily Load (TMDL) rules to be withdrawn due to egregious mistakes discovered in data used to formulate provisions related to silviculture.

In August of 1999, the Environmental Protection Agency (EPA) proposed two changes to the regulations governing the implementation of the Clean Water Act which, if finalized, would fundamentally alter the agency's role in the management of nonpoint sources of pollution. The EPA proposal has met with widespread opposition to both the substance of these rules and the acceleration process employed to bring them to finality. The request was brought forth by a bipartisan group of House Members led by Agriculture Subcommittee on Department Operations, Nutrition and Forestry Chairman Bob Goodlatte (R-VA) and Ranking Member Eva Clayton (D-NC). It was based on a recently released report that surveyed all 1,040 waterbodies identified by the EPA as impaired by silviculture. The report indicated that, based on information provided by 18 states, silviculture possible affected only 84 of the waterbodies.

Goodlatte commented that the implications of the report extend well beyond forestry, calling into question the credibility of all scientific data EPA is using to justify its proposed rules. Clayton said that many State officials believe that enforcement of the TMDL rules would result in states spending their time and resources on litigation, rather than on resolving real water quality problems in the field using proven, non-regulatory programs.

Due to overwhelming public opposition to these proposed rules, and because the data used by EPA has been proven inadequate and unscientific, the Agency removed provisions relating to silviculture from its proposed TMDL rules. Since then, Members have asked the EPA to withdraw its rules entirely to allow for a full scientific review of the proposed regulations.

Various pieces of legislation are in process regarding the TMDL issue. A House bill sponsored by Jay Dickey (R-AR) is worded to exempt agriculture from TMDL completely.

H.R. 4502 (a bill sponsored by Congressman Stenholm and Combest), similar to the existing Senate bill, will slow down the process while including agriculture and let the National Academy of Sciences take 18 months to further research the issue for the most sound implementation of TMDL. The Senate bill would also provide states with $500 million and an additional $250 million for state water programs. These monies are needed for states to research and gather data from nonpoint pollution sources and devise and implement strategies concerning Best Management Practices (BMPs) in agriculture and forestry.

The American Crop Protection Association, the Farm Credit Bank of Texas and other organizations are coordinating a nationwide grassroots effort to gain co-sponsors to S. 2417 and H.R. 4502. The American Farm Bureau Federation is challenging the regulation in court on the grounds that Congress has given the states, not EPA, the authority to regulate nonpoint source pollution. According to Stan Ray with the Farm Credit Bank, "This rule would greatly restrict land use and establish onerous requirements on landowners without providing significant environmental benefits."

NAICC member, Mark Jensen, has followed this issue extensively for the NAICC legislative efforts believes that, "NAICC should favor a position where significant money is allocated for research and implementation of Best Management Practices (BMPs), nutrient management, pesticide usage, and residue issues." He went on to add that the states should have the majority of authority on TMDL implementation since they are better able to coordinate efforts with their respective lead state agencies and universities.

New Crop Insurance Coverage
Farmers and ranchers will now have access to vastly improved federal insurance on crops planted as early as the coming fall season. This is a result of the recent signing into law of "The Agricultural Risk Protection Act" (H.R. 2559).

With the Act, premium assistance for producers will be improved at all levels of coverage. Crop and cattle producers will be offered new coverage for revenue losses and insurance that more realistically reflects their productive capability and production costs, according to House Agriculture Committee Chairman Larry Combest (R-TX).

This improved coverage will allow producers who have experienced multiple years of disaster to re-establish their actual production history to levels that will allow meaningful coverage when losses force down yields.

New provisions also strengthen the integrity of the crop insurance program with directed coordination between USDA agencies to reconcile producer information for investigating claims of waste, fraud or abuse. In addition to identifying vulnerabilities of the insurance program, the law mandates greater civil penalties and disqualification of producers, agents, loss adjusters and others who defraud the crop insurance program.

With the Act, experts will be able to develop new policies to ensure producers have available to them a wider choice of coverage. The Federal Crop Insurance Corporation will have the authority to enter into contracts for research and development for underserved states and commodities, including specialty crops. Pilot programs may be expanded nationally, including coverage for livestock.

Visit the House Agriculture Committee Web site, www.agriculture.house.gov, for more details on the crop insurance program.
CARAT Formed to Transition Agriculture – NAICC Represented (cont. from pg. 1)

"given a seat at the table." Other groups represented on the CARAT include National Poison Control Centers, American Crop Protection Association, the Weed Science Society, National Cotton Council, Center for Disease Control, Florida Fruit and Vegetable Council, Del Monte Foods, Children and Farmworker Advocates and others.

The first CARAT meeting was held in Arlington, Virginia, June 22 and 23, 2000. The first day consisted of orientation for the committee members, including overview of current policies and funding at EPA and USDA regarding tolerance re-assessment and FQPA implementation. The second day was the first official CARAT meeting. There was standing room only indicating the high level of interest being shown in the committee by Washington observers. It appears that the focus of CARAT will differ considerably from TRAC. TRAC was convened to provide feedback as the science policies for implementing FQPA were developed. CARAT will work intensely on agricultural transition. It was the opinion of many CARAT members that transition was proceeding too quickly with numerous registrations being canceled before science policies had been finalized and with no time for mechanisms for transition to even be developed.

Spitko pointed out that all the burdens for transition so far have been placed on growers who are the least able to afford these additional costs. Spitko cited specific examples of how "softer" pesticides and alternative programs, when they exist, are costing from 20 to 50 dollars per acre more that more traditional pest control programs. An extreme example cited was that of Alar in apple production. After the cancellation of Alar, which cost $50.00/acre, growers spent 10 years waiting for a new product to help hold apples on the trees so that they can be harvested without a large percentage falling on the ground. A new product is finally available but it's price is over $300.00 per acre. It was clear from the ensuing discussion that no economic analysis of transition costs has been planned or developed. Spitko emphasized that U.S. agriculture cannot be expected to bear this burden without financial assistance. NAICC will continue to serve as the "reality check" for transition policies as USDA and EPA struggle to meet FQPA requirements.

Real-Time IPM Data for Science-Based Approach to Safe, Sustainable Food and Fiber

A proposal for gathering real-time IPM data - a cooperative effort between NAICC and North Carolina State University — was recently submitted in an effort to assure science-based methods are used to ensure a safe, sustainable food and fiber supply.

With this project, which would require approximately $640,000 over a three-year period, the NAICC would collect and electronically report real-time field and crop observations. The observations would be made from major cropping states and regions of major and minor crops regarding pesticide use, needs, and IPM strategies.

Project objectives include promotion of continued, safe food production, expansion of biologically based IPM strategies for improved worker safety, environmental benignity and a profitable farm society. To meet these objectives, the following goals have been set:

1) To collect and report real-time pesticide use data over the major food and fiber crops and selected regions, with an awareness of the Food Quality Protection Act (FQPA) targeting pesticide issues and children's dietary needs.
2) To develop IPM measurement profiles for selected crops and objectives.
3) To develop an array of continuing education vehicles and modules to provide transition information for the critical pest management challenges.
4) To respond to specific survey requests from government and industry with desired information and analysis. The majority of the project's funding would be targeted at Certified Professional Crop Consultants (CPCC) to gather data. This project would have a Stakeholder Advisory Panel consisting of members from USDA's Office of Pest Management Policy, EPAs Office of Pesticide Programs, regional IPM centers, the environmental community and the NAICC Coordinating Committee.

The USDA review committee that will award funds will meet in October, and if funding is granted for this project, the process could start as early as January 2001.

Those who participated in the initial meeting for this proposal with Ron Stinner, Director of the Center for IPM at NC State, included: Dennis Berglund, Al Averitt, Larry Sax, Phil Cochran, Charlie Mellinger, Roger Carter (who assisted but was not present at the meeting), and Allison Jones.

Help Gather Balanced Risk Assessment Information

Real-world information is increasingly crucial as risk assessments for pesticides are evaluated by the EPA. We can have a voice in this process, and one way is for NAICC cotton consultants to fill out the Web-based survey designed to gather information on several aspects of cotton scout activity.

This short survey, designed to gather information regarding potential exposure of workers to pesticides, covers several aspects of cotton scout activity. The survey came as a result of a need by USDA for real-world data on a specific cotton protection product. "It's a real testimony to the value and work of NAICC -- the likes of which may be unsurpassed by anything in our 20 plus year history," said Harold Lambert.

By now, all NAICC cotton consultants should have received an e-mail asking you to complete the survey on-line. If you have not already done so, please log on to www.naicc.org/surveys/survey1.html and complete the survey. If you cannot access this site, we will be happy to send you a copy by fax.
New to NAICC, Tim Miller is as entrepreneurial as they come. Seven years ago he started a contract agricultural research company known as Research West LLC in Moses Lake, Washington, the heart of the Columbia Basin. The company conducts both performance and GLP residue and environmental fate studies.

Tim holds a Bachelor of Science degree in plant protection and a Masters degree in plant science from the University of Idaho. Before starting his company, he worked for the University of Minnesota as an assistant scientist, Conex Land O'Lakes as a research agronomist, Qualls Agricultural Laboratories as assistant director of research/agronomist and Collins Agricultural Consultants, Inc. as a research manager/agronomist.

Tim was influenced to join NAICC after hearing from associates about the "tremendous opportunity to network and discuss current techniques and issues involved with agriculture today." After attending his first conference, he is sold on the value of NAICC membership and is looking forward to participating on committees.

Tim believes that "industry reconfiguration/consolidation is just a sign of our times and reflects the seriousness of our agricultural situation." He adds that change in any endeavor is inevitable and believes that we must all work together to improve agriculture's profitability and to assure that US citizens continue to have a cheap, abundant and safe food supply. "The reasons for agriculture's decline are associated with our efficiency and performance." This productivity has "freed over 98 percent of our population to concentrate on other activities" besides agriculture. "Agriculture has a long history of innovation and refinement of practices to increase our efficiency. We routinely implement many management tools to reduce our overhead costs or to raise our level of production to make a profit. Unlike any other business venture, we do not control the price of our products; thus the option to raise prices to recover ever-increasing production or regulatory costs is unavailable to us."

Tim believes that our elected officials are able "to understand the role that agriculture has played in our country's rise to greatness" and are starting to become concerned about the plight of agriculture. He adds that they need to "stop hindering farmers and ranchers with continued regulation and trade interference."

Tim added, "I do believe the agricultural economy will improve in the long term. Unfortunately, the small family farms may not be around to see it. Agricultural production must continue to ensure our continued existence on this planet. I have spent the last 10 years of my life talking to any group that would allow me to discuss issues important to our farmers. I have talked to legislators, both state and federal, physicians, grower groups and consumer/environmental groups. I will continue to do so. I hope our citizens will come to realize the importance of agriculture in their lives. I pray they do."

Webster's New Dictionary defines a committee as "a body of persons appointed to manage any matter." That seems to be cut and dried, doesn't it? Yet in most cases, committee work is carried out by two or three committee members.

The "Chair" of a committee is the individual appointed to preside over matters under consideration by the committee. Many times, the Chair and perhaps one or two other committee members carry the entire burden of making the committee work prosper.

If you are asked to sit on a committee, you should not take this responsibility lightly. First, consider what will be required of you, and if you will be available to carry out your assigned tasks. If you have any doubt that you will not be able to live up to the committee's expectations, you should rightfully decline the offer.

On the other hand, if you believe you have the ability to help the committee through your expertise and insight, then by all means accept the offered position - or offer your services before being asked.

I use the above as a preface to asking all NAICC committee chairs, with the help of their committee members' input, to submit an update on your committee's activities. Please send your comments concerning your committee's accomplishments, goals and ideas to Allison Jones at JonesNAICC@aol.com or to Denise Wright at rdfarm@acadiam.net. These updates will be included in a future issue of NAICC News.

Council for Biotechnology Information Program Successfully Launched

A multi-year, industry-led program to share information about agricultural biotechnology with people in the U.S. and Canada has been rolled out by the Council for Biotechnology Information. The Council is a coalition of seven leading companies with an interest in biotechnology, plus the industry trade association, the Biotechnology Industry Organization (BIO).

The program, launched in early April, includes a Web site, toll-free consumer hotline, information materials and television and print advertising. Although it is too early to gauge the program's impact, reaction to date has been very positive, according to Council members.

The founding members of the Council are Aventis CropScience, BASF, Dow Chemical, DuPont, Monsanto, Novartis, Zeneca Ag Products and BIO. The Council also includes a number of associate members, such as trade and commodity organization, as well as scientific experts who serve as Distinguished Advisors. Plans for the program include making safety data for commercial products available through the Web site; sponsoring a separate, university-managed Web site which would serve as an ongoing repository for safety and environmental data from the companies and other sources; and development of white papers on a variety of food safety and environmental issues.

The program is intended to help people in the U.S. and Canada find answers to questions they may have and to provide them with accurate information from a variety of industry, academic, scientific, government and third-party sources.

"Food biotechnology has enormous potential for developing more nutritious foods and addressing health and hunger..."
Council for Biotechnology... (cont.)

problems in our fast-growing worlds,” said Dr. Louis Sullivan, president of Morehouse School of Medicine and former U.S. Secretary of Health and Human Services. “It is important to encourage responsible development of these technologies and inform the public of them.” Dr. Sullivan serves as a Distinguished Advisor to the Council.

The Web site, www.whybiotech.com, features facts and information about biotechnology, including data from a variety of sources, a discussion of benefits, links to other academic, government and scientific organization sites and third-party opinions and referrals.

By calling the toll-free number, 800-980-8660, consumers can get a free copy of the Council's brochure, “Good Ideas Are Growing.”

The television and print advertising are designed to raise awareness about biotechnology and to direct people to sources for more information, starting with the Council’s Web site and toll-free number. The ads feature real people who have benefited from biotechnology in medical and agricultural applications, from a child with leukemia and a woman with diabetes to a cotton grower in the South, an African farmer and his family and farm families in the Midwest.

“The developing world could certainly use an increase in the food supply and the use of biotech crops in one way to make it happen,” said Professor Jennifer A. Thompson, head of the Department of Microbiology at the University of Cape Town in South Africa. “Biotech crops can help cut down on the losses due to pests and disease, and these crops can introduce drought tolerance so that marginal lands can be planted.” Like Dr. Sullivan, Professor Thompson serves as a Distinguished Advisor to the Council.

The Council anticipates that the integrated information program will be a three- to five-year effort. ■

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"Genetically Engineered Crops for Pest Management" Report Available

Survey results on the adoption of genetically engineered cotton, soybeans and corn by U.S. farmers is only one of many topics covered in USDA’s new report, “Genetically Engineered Crops for Pest Management in U.S. Agriculture: Farm-Level Effects.”

The report presents results of an ongoing econometric study using 1997 USDA survey data on the farm-level effects of adopting genetically engineered soybeans and cotton on pesticide use, yields and net returns.

Key findings include:

- Farmers believe that the use of genetically engineered crops will offer many benefits, including higher yields, lower pest management costs, greater flexibility with cropping practices.
- Farm-level performance of genetically engineered crops varies greatly by region because of pest infestation levels and other factors.
- Farm-level impacts of adoption of genetically engineered crops on pesticide use, crop yields and net returns vary with the crop and technology examined.
- Adoption of herbicide-tolerant cotton in 1997 is associated with significant increases in yields and net returns, but it was not associated with significant changes in herbicide use.

For an electronic copy of this report, visit the ERS Website at www.ers.usda.gov. Printed copies are available from the USDA order desk by calling (800) 999-6779 and requesting ERS-AER-786. ■

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Patriarchs of the organization, leaders in crop consulting. NAICC members Ray Young, Grady Coburn, the late Dick Jensen, Harold Lambert and Roger Carter were saluted in an extensive feature in April’s Farm Progress. The article, “Leading the Way,” reviewed the accomplishments and the NAICC leadership each of these men have provided for years.

Harold Lambert was also featured in the May issue of Farm Progress in an article called “Test Drive.” He and a client were highlighted for working together to solve the problem of rank growth in cotton by using an electrical charge mapping system to test varying soil textures.

“Consultants Can Help,” a column that recently ran in the Fayetteville Observer, featured NAICC member Al Averitt of Protech Advisory Services. The article emphasized how consultants can provide insight to farmers that can help make good crop management decisions that can improve crop performance and save money. ■

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ASSOCIATE:
worker protection program, which has been in full implementation for five years. EPA also is attempting to determine the effectiveness of its provisions and the national program's future direction. A second workshop is scheduled for January or February 2001.

Dan Bradshaw, CPCC-I represented NAICC on the opening panel with representatives from EPA, farmworker groups, grower trade groups, states, and Extension. Each panelist was asked to give their perspective of the WPS including their thoughts on what was working and what was not.

According to Bradshaw, numerous topics were presented and are in the early stages of discussion. However, two main points that were discussed at length were the lack of effective worker education and problems involved with children in the field during labor activities. It was suggested that training needs to be more specific and relevant to the particular crop and work situation. Exposure to children promises to be a hot topic as the review process continues.

EPA, NAICC Move Ahead...(cont. from pg. 1)

Field sign notification and restricted entry intervals (REIs) are other areas of concern that are being discussed at this time. With regard to complying with the REI restrictions, EPA has indicated that if researchers are certified under an approved program they would qualify to be exempt from this requirement in the same way crop consultants are exempt.

Researchers also believe that WPS requirements are in direct conflict with Good Laboratory Practices (GLP). A meeting is scheduled the week of July 10 with EPA officials to discuss these conflicts in detail.

A Look at the WPS

EPA held the first of several workshops on June 6, in Austin, Texas, to initiate the Agency's national assessment of the

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