

## **White Paper - Integration of WPS Handler Training Requirements into C&T**

The pesticide applicator certification and training program is undergoing an assessment through the cooperative efforts of the Certification and Training Assessment Group (CTAG) to determine what changes should be considered to assure a standard and thorough training for all people who handle pesticides as part of their employment. One recommendation is to move the pesticide handler training requirements of the Worker Protection Standard (WPS) to the Certification and Training program in order to provide better security over access to pesticides and reduce human health and environmental hazards associated with pesticide handling.

### **Background:**

The Worker Protection Standard requires training of a varied labor pool ranging from agricultural field workers to non-certified pesticide handlers, crop consultants, and aerial applicators. Non-certified pesticide handlers, crop consultants, and aerial applicators face similar pesticide-related hazards and have similar health concerns as certified commercial or private applicators and these hazards and health concerns differ significantly from those of agricultural field workers.

Integrating the current WPS *handler* training requirements with a revised applicator certification and training program would put into one place all of the national pesticide certification and training regulations and allow the remaining WPS program to be more tightly focused on agricultural workers who do not handle pesticides. This would simplify compliance with the WPS for both growers and inspectors. It would also provide a more robust infrastructure for handler training, facilitate pesticide security, and would establish a system to assure competency and identification of all commercial and agricultural pesticide handlers.

Issues of concern that must be addressed if this change takes place include:

1. Will this change affect current state C&T programs due to the increase in numbers of people who need training?
2. Who will ultimately be responsible for conducting training in the states?
3. Will verifying training impose a burden on some states?
4. Are there ways to shift appropriate amounts of WPS funding to the C&T program to help support this change?
5. Are there ways states can charge for training to help cover costs?

### **Recommendation:**

EPA should revise 40 CFR Part 170 to move the training requirements for handlers, aerial applicators, crop consultants, and researchers into 40 CFR Part 171.

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