

**CTAG Workgroup: Label-Mandated Trainings**  
Scoping Document – 6.25.2020

EPA's Registration Division and Re-evaluation Division in negotiations with product registrants have been using "label-mandated training" as a mechanism to mitigate human health and environmental concerns as part of the pesticide registration process. The training requirements vary somewhat with each product or product grouping. The similarity of label mandated training to initial applicator certification training and required applicator recertification training presents challenges to State Lead Agencies (SLAs) and Pesticide Safety Education Programs (PSEPs).

CTAG also recognizes that some states have added active ingredient (product) specific training as a requirement for state product registration. CTAG may need to address the challenges of adding training as a state registration requirement.

**CTAG Workgroup Goal:** evaluate the benefits and challenges for the mitigation practice of label-mandated training. The intent is to develop a white paper that provides EPA and product registrants with more information about this practice, so their product managers better understand the benefits and downstream difficulties before making this registration decision. These decisions need to ensure label mandated registration requirements have full consideration of the impacts to SLAs, PSEPs, and the applicator community.

CTAG will consider and present a discussion on the benefits and challenges of this label required training as a mitigation measure, including but not limited to:

- Whose training is it – EPA's, the registrants, SLA/PSEP, NPSEC, eXtension?
- Who is required to offer the training?
- When is it beneficial to have SLA/PSEP doing the training vs. registrants?
- What is the cost to SLA/PSEP to take on the responsibility of providing label mandated training?
- Who approves the content?
- How can concerns about the content be conveyed to EPA and the appropriate training provider?
- Why and how do EPA requirements for SLA/PSEPs to "verify" identity of those becoming certified or those attending recertification events differ from label mandated training that does not carry the same stipulation?

CTAG intends to develop some considerations for EPA, registrants, PSEPs, and SLAs before making mandated product-specific training a label requirement, such as:

- Strongly urge EPA to engage with PSEPs and SLAs about this mitigation measure before they adopt it
- Address the benefit of consistency across labels regarding mandated training, i.e., who and how this training is conducted: online, in-person, third-party trainers, etc.
- How can state PSEPs/SLAs provide comments on the training mechanism or content?  
During the registration decision, define who is responsible for conducting the training and who pays for the trainer's time.
- eXtension could charge for this training and send funds to PSEPs in states where the person resides (NPSEC model)