

Approval to Make Pesticide Recommendations

OVERVIEW

Prior to making any written or spoken pesticide recommendations to any user group, personnel must meet specific criteria mandated by the designated authority. The University's designated authority for review and approval of pesticide recommendations is the Pesticide Coordinator. The Director of the Washington State Pest Management Resource Service is the University's Pesticide Coordinator.

Unlicensed Employee or Volunteer

An employee or volunteer who does not have a public operator or public consultant pesticide license, and makes spoken recommendations, must exclusively reference approved WSU written materials regarding pesticides registered with the Washington State Department of Agriculture (WSDA) for home and garden use.

Licensed Employee

An employee who has a public operator or public consultant pesticide license with the appropriate endorsements, and who is considered to be an expert in some field of pest management, may make spoken recommendations without having prior approval providing that his or her recommendations are in accordance with label directions or allowable label deviations.

Review and Approval of Recommendations

All written recommendations must undergo formal review and receive approval from the Pesticide Coordinator. Written recommendations may be included in, but are not limited to, bulletins, manuals, crop protection guides, newsletters, posters, brochures, fact sheets, computer software, and web-based materials, including blogs and social media postings.

If required by unit policies, authors obtain approval from the applicable signature authority before sending publications to the Pesticide Coordinator for review.

The Pesticide Coordinator reviews the recommendations in the manuscript, proposed webpage, or proposed social media posting and ensures that the recommendation is consistent with the currently registered label for the pesticide.

After Approval

Once a recommendation is approved, personnel may publish the recommendation in publications, news releases, or other forms of communication without further approval.

No Approval Required

Discussion of pesticides at professional society meetings of scientific peers does not require approval. Publication of scientific studies involving pesticides in scientific journals does not require approval.

Approval to Make Pesticide Recommendations**APPROVAL PROCESS****New and Revised Written Publications**Extension and CAHNRS
Personnel

Authors in the College of Agricultural, Human, and Natural Resource Sciences (CAHNRS) and WSU Extension must send manuscripts or other proposed publications and signed approval forms to the Extension Marketing, News, and Educational Communications coordinator.

See the Extension Marketing, News, and Educational Communications Publishing Process website for publishing instructions and approval forms, at:

<http://cahnrsnews.wsu.edu/getting-published/the-publishing-process/>

The Extension communications coordinator routes the manuscript to the Pesticide Coordinator for review. The Pesticide Coordinator:

- Matches each recommendation with a currently registered label,
- Approves the recommendations as written, or
- Contacts the author with suggested changes.

For Extension and CAHNRS personnel, the Pesticide Coordinator returns manuscripts and signed approval forms to the Extension Marketing, News, and Educational Communications coordinator for final publication.

Other Departments

Authors in colleges and departments other than Extension and CAHNRS **must** send manuscripts to the Pesticide Coordinator for review through any required signature authority in their units. If none exists, the authors send manuscripts directly to the Pesticide Coordinator.

Upon approval, the Pesticide Coordinator returns each manuscript and a document of approval to the authors.

Newsletters or Other Time-Sensitive Publications (All Colleges/Departments)

Authors of newsletters or other time-sensitive publications in all colleges and departments are to send the material directly to the Pesticide Coordinator for review. Upon approval, the Pesticide Coordinator returns the material and a document of approval to the authors.

Approval to Make Pesticide Recommendations

New and Revised Webpages, Sections, and Social Media (All Colleges/Departments)

Authors in all colleges and departments must submit a request for review directly to the Pesticide Coordinator for electronic communications that advise on pesticides, including:

- New webpages,
- New sections to existing webpages,
- Revisions to webpages,
- Blogs, and
- Social media postings.

The Pesticide Coordinator:

- Matches each recommendation with a currently registered label,
- Approves the recommendations as written, or
- Contacts the author with suggested changes, and
- Returns a signed approval form directly to the author.

The authors may publish the new or revised pages, sections, blogs, or social media postings online after receiving approval from the Pesticide Coordinator.

"Home Remedies"

It is a violation of state law for anyone to recommend or give advice regarding a pesticide that is inconsistent with the label of the product. Because home remedies have no labels, it is not against the law to recommend them. However, WSU policy **does not allow** recommendations unless personnel have adequate supporting scientific data.

Prior to making any home remedy recommendations, personnel must submit supporting data and draft written recommendations to the Pesticide Coordinator for approval.

Exception

Personnel may recommend stale beer traps used for control of garden slugs without review as the beer is considered an attractant for the device and therefore does not fall under the Washington Pesticide Control Act.

Allowable Off-Label Use

Employees are forbidden to knowingly provide information that is inconsistent with label directions unless it is a legal label deviation (allowable off-label use). See 45.67.4.

Approval to Make Pesticide Recommendations

Allowable Off-Label Use (cont.)

State and federal law allow label deviation (also referred to as "allowable off-label use") for the following uses **only** :

- Control for a pest that is not listed on the label. NOTE: The type of pest must be congruent, i.e., an insect pest not listed on an insecticide label or a weed pest not listed on an herbicide label.
- Use of other application methods not mentioned on the label, unless specifically prohibited. NOTE: Chemigation must be specifically mentioned on the label to be allowed.
- Less chemical per application than the amount listed on the label.
- More diluent (usually water) than listed on the label.
- Fewer number of applications than listed on the label.

All of these exceptions are provided under federal and Washington State law. (See 7 *USC* 136(ee) and *WAC* 16-228-1225.)

If a WSU employee recommends an allowable off-label use of a pesticide, both the employee and the University have represented that the product will work under the stated circumstances. As such, the employee should have supporting scientific data generated by the employee or his or her peers that in his or her professional opinion is sufficient to stand up to examination by a court of law.

MASTER GARDNER PROGRAM

Personnel writing Master Gardner (MG) resource material are reminded to reference home-and-garden-only products. WSU Extension's HortSense and PestSense web sites contain fact sheets that are designed to support MG pest management recommendations.

View the HortSense website at:

<http://pep.wsu.edu/hortsense/>

View the PestSense website at:

<http://pep.wsu.edu/pestsense/>

WSU MG program leads who also have public consultant licenses may recommend general use commercial pesticides to members of the general public if circumstances warrant. In such cases, care must be taken so that resource materials describing commercial products do not become mixed with MG resource materials.

Approval to Make Pesticide Recommendations

MASTER GARDNER PROGRAM (cont.)

MG coordinators must ensure that all MGs working under their supervision have a signed Pest Management Agreement form on file. To obtain copies of the form, see the WSU Extension Master Gardner Program's Required Volunteer Forms website at:

<http://mastergardener.wsu.edu/forms.html>

MGs are limited to making recommendations for home-and-garden pest management, and limited to products previously approved through the WSU pesticide approval process. Volunteers are not allowed to directly provide pesticide information to the public on behalf of the University unless they are certified MGs.

ADVISORY GUIDELINES

Several advisory guidelines supplement the policy information. The advisory guidelines are available on the WSU Employee Resources section of the Washington State Pest Management Resources website:

<http://extension.wsu.edu/wsprs/Pages/Employees.aspx>

The advisory guidelines include, but are not limited to:

- Contacts (for questions and assistance)
- Frequently Asked Questions (FAQs) about Pesticide Recommendations
- Case Study: Off-Label Recommendations