

Worker Protection Standard - Farm and Nursery Facilities CALs Policy

The Worker Protection Standard (WPS) is an amendment to FIFRA (the Federal Insecticide, Fungicide, and Rodenticide Act), a federal law which regulates pesticide registration and use. WPS is designed to protect agricultural workers (people involved in the production of agricultural plants) from the risks of exposure to pesticides. The Cornell community includes persons not covered by WPS (e.g., students who are not employees of Cornell, trades staff). It is the desire of the College to protect all members of its community in the spirit of WPS. The following guidelines will serve to provide more information and protection to students, faculty, staff, and visitors.

CLASS USE

1. Instructors and students who visit agricultural production facilities, fields, forests, or nurseries as part of undergraduate course work should be informed of the law at a level appropriate to the degree of anticipated exposure. At a minimum, this should consist of instructions not to enter a posted field or other treated area and a reminder to wash hands after handling plants or plant materials. A “prompt” (poster with instructions on back) is available from the Director, CALS Occupational and Environmental Health to assist instructors in providing this information.
2. Students and instructors may enter treated areas which have been sprayed only after they have attended WPS training and the posted Restricted Entry Interval (REI) has expired. No plant materials may be removed from a treated area for classroom use during a REI.
3. Instructors and students having contact with plant material must wash their hands with soap and water immediately upon leaving the treated area or upon completion of work with treated plant materials.

CLASS USE - SUGGESTIONS

In order to minimize interference from regulatory requirements, particularly the need to provide personal protective equipment (PPE) to classes, instructors and farm management should follow these suggestions:

1. Carry out chemical pest control procedures at least three days prior to the scheduled class activity. Regardless of Toxicity Class of the pesticide used, the REI will be expired by the third morning after application.
2. Limit use of Toxicity Class I and II pesticides.
3. Consider alternative pest control strategies (cultural, biological, mechanical, etc.).

4. Faculty should notify farm managers of their class schedule no later than one week prior to the start of the semester. Faculty should also discuss their pest control requirements with farm management so that appropriate pest management strategies may be selected.

RESEARCH USE [faculty, staff, and students (including work study)]

1. All research faculty, staff, and students who work in agricultural production facilities or nurseries, who are not certified pesticide applicators, must have valid WPS worker or handler training cards.
2. Only a certified pesticide applicator or WPS trained handler may be in a treated area during pesticide application.
3. For early entry to treated areas (during the REI) with contact : Only certified pesticide applicators, trained handlers, and trained early entry workers may enter a treated area during the REI when contact with pesticide residues is expected. Everyone must always wait a minimum of four (4) hours after the pesticide application before entry. PPE must be worn according to label requirements.
4. For early entry to treated areas (during the REI) with no contact: Early entry is allowed without PPE if contact with pesticide-treated surfaces will not occur. But the following must be provided:
 - WPS pesticide safety training (or certified pesticide applicator)
 - Information at a central location
 - Notification
 - Restrictions during application and during the REI
 - Emergency assistance(This policy does not include visitors)
5. Supply and maintenance of any PPE required for research work is the responsibility of the Principal Investigator.
6. There are no exceptions to the requirement to supply specific pesticide application information to the farm manager for central posting prior to the application.
7. Only certified pesticide applicators may access pesticide storage buildings.
8. Applications of experimental pesticides must be posted. Unless the manufacturer has supplied explicit requirements for PPE, including an LD₅₀ for the material, it must be treated as a Toxicity Class I pesticide with a 48-hour REI.
9. Persons carrying out scouting activities must meet the WPS requirements for Crop Advisors.

RESEARCH USE - SUGGESTIONS

In order to minimize interference from regulatory requirements, faculty and farm management should follow these suggestions:

1. Apply pesticides in the early evening.
2. Use Toxicity Class III and IV pesticides whenever possible. PPE for early entry will then be minimal - long pants and long-sleeved shirt with gloves or less if the label permits. Toxicity Class I materials have an additional requirement to warn all farm personnel orally.
3. Avoid the need for early entry in the research design.

VISITOR USE

Visitors may not enter treated areas until any applicable REIs have expired. Visitors must be given clear instructions not to handle plants.

Visiting scientists may have anywhere from very little to a great deal of contact with treated materials. The primary host of the visiting scientist is responsible for judging the potential exposure and providing the appropriate information relating to any pesticide applications.