

Recording and reporting experimental uses of pesticide products

New York State Pesticide Product Registration Procedures (August, 1996) require that:

*For experimental programs conducted on property **other than** that owned or managed by registrants or recognized research institutions, the person proposing to conduct the program must notify the NYSDEC with the details of the proposed program as soon as they are available, but not less than 30 days in advance of the program.*

These regulations put a difficult burden on Cornell applicators of experimental use pesticides*, who often make application decisions based on changing field conditions and pest populations and who therefore can not easily determine in advance where and when they will apply particular pesticides. Several Cornell researchers have conferred with DEC and all parties have agreed that Cornell researchers will satisfy all DEC experimental use notification requirements if they complete and submit two forms. These forms must be completed only when experimental product applications occur **off** Cornell property. The forms are described in more detail below.

Small Scale Testing of Experimental Use Pesticides/Off Cornell Property

Any researcher who may apply or intends to apply experimental use pesticides off Cornell property during a growing season must complete the form, "Record of Projected Use: Small Scale Testing of Experimental Pesticides Applied Off Cornell Property (Spring)." After the growing season, the researcher must complete the form, "Record of Use: Small Scale Testing of Experimental Pesticides Applied Off Cornell Property (Fall)."

The Spring form should include any products which the researcher may use during the growing season. The Fall form will be a more accurate record of the products actually used.

Both of these forms should be sent to Eric Harrington, CALS OEH, 416 Kennedy Hall. Eric will compile the forms and forward them to DEC.

Small Scale Testing of Experimental Use Pesticides/On Cornell Property

Cornell pesticide applicators are no longer required to complete the form "Use of a Registered Pesticide in Research Mode **On** Cornell Property." This form was required whenever an applicator went "off-label" with a registered product in terms of dose, pest or crop on Cornell property. DEC has notified us that small-scale experimental use of pesticides on Cornell property can continue without the "research mode" form as long as applicators meet the regulatory record keeping and reporting requirements.

The Pesticide Sales & Use Reporting Law requires annual reporting. For all products with an EPA registration number, you are required to report, on the Commercial Applicator and Technician Pesticide Use Annual Report (the 9-column form):

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- 1) the EPA registration number
- 2) the product name
- 3) the quantity used (quantity + units)
- 4) the date of application
- 5) the place of application (street address, municipality, county, and zip code)

In addition to this information, you must keep in your records, for each application:

- 1) the dosage rate
- 2) the method of application
- 3) the target organism(s)
- 4) the specific location of the application at the given address (e.g., plot #3, baseboards in the kitchen, crab apples adjacent to pool, etc.)

Your records must be maintained on an annual basis and retained for at least three years.

*Experimental use pesticides include 1) those requiring either a Federal or State EUP **or**
2) those used on a small scale for off-label or new-label research.

The spring form and fall form may be downloaded from the following web site
(<http://oeh.cals.cornell.edu/pestmain.html>). Please contact Eric Harrington
(eh22@cornell.edu, 255-0485) if you have any questions regarding the forms.