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Comment from Anonymous

Posted by the **Animal and Plant Health Inspection Service** on Oct 6, 2021

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Whether the use of ground rigging or aerial application the use of chemicals in response to disease and insect runs has to be applied very carefully. Several certifications and training are required for the use of fungicides, herbicides, and pesticides. Federal Aviation Administration (FAA) requirements such as a second class medical, appropriate endorsements and rating to fly the specific aircraft, proof of flight review, and a commercial pilot certificate. Based upon the fourth question of the NPRM the items listed above will not cause too many burdens on operators. The items requested should be readily accessible and organized for pilots who are exercising commercial privileges. Beyond that, if they are not organized this rule will force them to maintain currency in logbooks, flight reviews, and medicals which will further encourage compliance with federal agencies. To be the most efficient and cause the least burden an electronic submission or scanning will be the easiest for operators as opposed to mailing on or having random inspections. In addition to FAA requirements, respective states also require training and recurring tests to be conducted typically every three years. My experience is from an operation based out of Illinois so I will use Illinois as an example. APHIS specifically also requests an operator's pesticide applicator license. For Illinois alone, there are four types of licenses for an applicator to acquire from the Illinois Department of Agriculture. For aerial applicators, the license to request would be Commercial Applicator or Operator License. A Commercial Applicator License is "required for individuals who purchase, use or supervise the use of pesticides classified for General or Restricted Use for hire"(State of Illinois). Both of which are three licenses with associated fees. Within a specific license, there are several possible types of pesticides a certain applicator may use. For example, at the operation I am employed by, the majority of the spraying conducted is field crop pest control which is standard for Central Illinois application. However, places in the South do mosquito control with restricted-use pesticides which would be another type of pesticide license. The type of pesticide list totals seventeen. This is where the submission of the required information can become very tedious for applicators. Will it require the overarching license or will proof of each type held by the operator be required? As specified in the proposed rule APHIS is to suppress plant pests and noxious weeds that are new or not widely distributed. APHIS introducing the Plant Protection and Quarantine Program (PPQ) seems to be a helpful idea. However, it was not specified if the PPQ will be assisting state departments or if they will work independently with growers where new threats to crops arise. To finally reference back to the first question is the collection of all the information listed necessarily. While it may lead to better compliance in the industry and help APHIS implement the PPQ I do not think the collection of

the information is necessary from all operators. It comes a bit redundant to keep records from the FAA, the Department of Agriculture, the Environmental Protection Agency in regards to some of the restricted use pesticides. All the records are kept at the state or federal levels so why can the information not be transferred from the state governments and the FAA to APHIS. This option would take all burden off applicators and allow APHIS to have more information for research and which operators are spraying in spots where new diseases are spreading. Or instead of all operators request the information of operators where certain problems are arising with what disease or pests are killing plants and what chemical prescriptions are being used to retard the spread of the pests. In the operation I work at alone there are hundreds of combinations of chemicals used some being fungicide plus an adjuvant with an insecticide. Asking that information where new problems arise may help suppress the spread to different geographical locations.

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