

Instructions for submitting comments to the NC Pesticide Board:

Please submit a letter to the NC Pesticide Board expressing your support for clear and enforceable pesticide record-keeping rules that really work to protect farm workers. Please submit your letter no later than the December 15th deadline for public comments. You can refer to the talking points below, and submit your letter by mail or email to:

james.burnette@ncagr.gov
NC Pesticide Board
c/o Mr. Jim Burnette
1090 Mail Service Center
Raleigh, NC 27699-1090

Re: Proposed Pesticide Record-keeping Rules 2 NCAC 9L .1002, .1402 and .1807

Talking Points:

1. These proposed rules are a positive step forward for farmworker health and safety, but the current proposal needs some changes in order to be clear and effective.
2. The proposal will require pesticide applicators to record the specific time of day when pesticides are applied. They should also be required to track the specific time when workers are allowed back into the fields, in order to understand whether the required re-entry interval has been followed.
3. The new rule should apply consistently to all pesticides, whether restricted-use or general-use pesticides, whether or not workers are present. Currently, the proposal only covers general use pesticides if they are applied when workers are present, or if they are applied from the air. The rule should be consistent and easy to follow and enforce.
4. Without these simple changes, a tragedy like the Ag-Mart case could happen again. The state must be able to enforce the worker re-entry intervals in order to hold bad actors accountable when workers are harmed.