

Questions and Comments on Possible Rule changes to ISDA

Categories

1. Applicator Core Competency (CO)
Law and Safety

Includes general knowledge of pesticides including proper use and disposal, product characteristics, first aid, labeling and laws. This category is required for all Idaho categories.

Question: Will current applicators be grandfathered in with their current LS, or will everyone need to take this exam? What about current SW category applicators or Applicators who have PC or other categories that didn't need LS before?

2. Public Health Pest (PH)

For the management and control of pests having medical and public health importance by employees of abatement districts and others controlling mosquitoes and other public health pests public health related governmental entities for.

Question: It appears this would mean that Urban Professional Applicators will not need the PH category to treat for Mosquitos with this now. General Pest would be the correct category now, correct? Maybe this should be clarified.

3. Aerial Pest Control (AA)

For application of pesticides to all application sites by operating or flying fixed-wing or rotary aircraft.

Question: You will still need the appropriate applicator categories like AH or AI to go along with this, correct? This is not clear and should be clarified.

4. Ornamental Herbicide (OH)

For persons conducting outside urban or residential herbicide applications to turfs, flowers, shrubs, trees, and associated landscapes, excluding soil applied, total vegetation control pesticides.

Comment: This should be re-worded since some TVC products like Diuron can be applied in shrub beds at lower rates. Maybe "products being applied for total vegetation control."

5. Ornamental Insecticide/ Fungicide (OI)

For persons doing conducting outside urban or residential insecticide and or fungicide applications to turfs, flowers, shrubs, trees and associated landscapes, including exterior applications to residential, urban or commercial buildings, excluding structural destroying pests

Question: OI will not be allowed for spider barriers now, correct?

6. Rodent Control (RC)

For rodent districts and others, for the control of field rodents. ~~Certification in the General Pest Control category shall exempt the applicant from the need to certify in this category.~~ application of outdoor use non-fumigation rodenticides to control field rodents.

Question: If GP will not allow RC applications now, will these current applicators with GP be grandfathered in or now need to take another exam? Field rodent control is not clear. Orchards, gardens, pastures, right of ways?

7. Commercial Apprentice (CA)

For conducting General Use Pesticide (GUP) foliar applications only in situations applicable to the OI, OH, AI, AH, GP, and RW categories. Persons with this category can only perform pesticide applications under limited supervision, and cannot make any soil-active Total Vegetation Control (TVC) pesticide applications or injectable applications to soil or plants. Applicators with this category cannot supervise other pesticide applicators. This is a non-renewable license category.

Question: The words "foliar application" is used frequently, but pre-emergence shrub bed grass and weed control is not always applied over foliage. Does this mean that only foliar applications will be allowed with the CA license? What about GP applications like outdoor ant control or spider barriers, or indoor pest control work?

Basic comments

8. **Licensing Periods and Recertification.** ~~Any professional applicator with less than thirteen (13) months in the licensing period is not required to obtain recertification credits during the initial licensing period.~~ The recertification period for professional applicators shall be concurrent with their two (2) year licensing period ending on December 31, every other year. The apprentice category (CA) will not be able to recertify. This license category will expire on the 31st of December in the year that it was issued. Recertification requirements may be accomplished by complying with either Subsection 100.07.a. or 100.07.b..

Question: So, if you get your license with 6 months left in the 2nd year of your two year licensing period, due to your last name, you would still need to get the 15 recertification points, correct? Doesn't seem right.

9. A person ~~shall~~ passes the Department's recertification and Law and Safety Applicator Core Competency (CO) recertification examination plus examinations for all categories in which a person intends to license. (3-20-20)T()

Question: Similar to an earlier question. Are current licensed applicators with LS grandfathered in or does everyone need to take the CO now? In that case will there be a grace period of no enforcement? That could be over 4,000 professional applicators.