Endangered Species and Pesticides: What's a PULA and Is a BLT More Than a Sandwich?

Dr. Brett Bultemeier
UF/IFAS Pesticide Information Office

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Conflict

FIFRA registers pesticides



ESA protects species

EPA involved in both



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The Agencies

Consulted if risks were found



Biological Evaluation



Biological Opinion

How did it get here?

Initial registration did NOT consider ESA

WAAAAY behind – 2030 only 5% would be done

Mega Law Suit

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ESA Workplan

Registration Review - ID

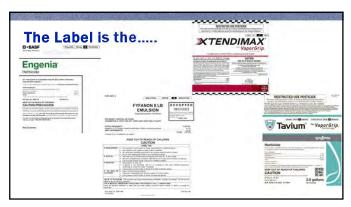
Drift and Erosion Control

BLT 2

Vulnerable species and pesticide grouping



https://blogs.ifas.ufl.edu/pesticideinformation/2024/10/04/epa-endangered-species-act-workplan/







Herb	icide	Strate	gy

Diverse group of actives

2,4-D Dicamba Diuron

Streamline decisions

MCPA Metolachlor Metribuzin Oxyfluorfen Paraquat

Gets away from product-byproduct decisions

Pendimethalin Propanil

Thiobencarb Trufluralin



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Purpose



Reduce soil erosion



Reduce off-site drift

Speed up decisions



https://blogs.ifas.ufl.edu/pesticideinformation/2024/08/26/what-is-a-herbicide-strategy/

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Picklist

Points assigned depending on location – soil type, etc.

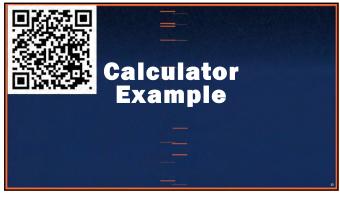
Points must be achieved through mitigation measures

Any Picklist can add up to total

- Vegetative Filter Strips Grassed Waterways
- Field Border Cover Crop Contour Buffer Strips
- Contour Farming
 Contour Strip Cropping
 Terrace Farming
- Strip Cropping No/Reduced Tillage
- Vegetative Barriers Vegetative Ditch Ba Riparian Buffers
- Mulching Alley Cropping

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https://www.epa.gov/pesticides/mitigation-menu



https://www.epa.gov/pesticides/mitigation-menu

Herbicide Strategy

Finalized

Use mitigation menu to get points

Offsets still pending

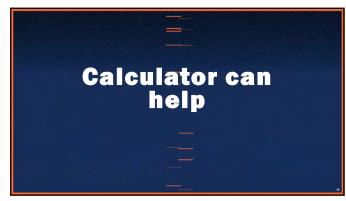


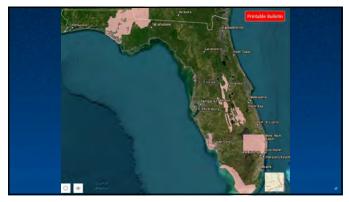
https://www.regulations.gov/docket/EPA-HQ-OPP-2023-0365

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PULA

Pesticide Use Limitation Area

Defined area in space AND time

Consult day of to 6 months before treatment

DIRECTIONS FOR USE

RESTRICTED USE PESTICIDE

To be used by certified applicators only; NOT to be used by non-certified persons working under the supervision of a certified applicator, except that non-certified persons may transport containers.

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Endangered Species Protection Requirements

Endangered Species Protection Requirements

Prior to making an application of this product on disamba-tolerant cotton or disamba-tolerant soybeans, an applicator must visit Intby/www.epa_gov/esppr to determine if there are any additional restrictions on Tavium Plus VaporGnp Tachnology use within the area to be sprayed.

It is a Federal offense to use any pesticide in a manner that results in an unauthorized "take" (e.g., kill or otherwise harm) of an endangered species and certain threatened species, under the Endangered Species Act, Section 9. When using his product, You must follow the measures contained in the Endangered Species Buildin for the area in which you are applying this product. You must obtain a Builletin no earlier than six months before using this product. To obtain Buildins, consult Intp://www.epa_gov/esppr_call-1444-44-73.31 or email ESPPdepa_gov. You must use the Builderin valid for the month in which you will apply the product.

Sale, use, and distribution of this product in Nassau and Suffolk Counties in the State of New York is prohibited. Use Tavium Plus VaporGrip Technology only in accordance with specifications on this label, or in separately EPA-approved labeling instructions for this product.

DO NOT apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

FAILURE TO FOLLOW DIRECTIONS AND PRECAUTIONS ON THIS LABEL MAY RESULT IN CROP INJURY, POOR WEED CONTROL, AND/OR ILLEGAL RESIDUES.

AGRICULTURAL USE REQUIREMENTS

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and the Section Section

This product is highly toxic to bees exposed to direct treatment or residues on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds if bees are visiting the freshment area. In criturs, stone fruit, pome fault and tree nuts. So on adapt high product within 3 days prior to bloom, during bloom, or until paterial fail is complete. Protect pollinating insects by following label directions intended to minimize drift and to reduce risk to these organisms.

ollowing best management practices can help reduce risk to terrestrial polimators. Examples of best management practices oludie applying pesticides in the evening and st right where polimators are not foraging and checking to confirm hive caccions before spraying. For additional recursions on polimator best management practices, wait tips://www.eps.gov/polimator-protection-find-best-management-practices-protect-polimators.

Managed politisator protection plans are developed by states/finbes to promote communication between growers, landowners, taments, beskepens, pesticiou users, and other pest management professionals to reduce exposure of bees to pesticides, if available, vist state plans for additional information on how to protect politication.

How to Report Bae Kills. It is recommended that users contact both the state lead agency and the U.S. Environmental Protection Agency to report be skills due to pesticide application. Bee kills can be reported to EPA at besidil@epa.gov To contact your safe lead agency, serif to usurent ising of sixte pesticide requisitory agencies at the National Pesticide information Contact's velocitic http://npic.const.edu/leg/state_agencies.html.

Reporting Ecological incidents: To report ecological incidents, including mortality, injury, or harm to plants and animals, call 901/761-0050.

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Bulletins Live! Two -- View the Bulletins





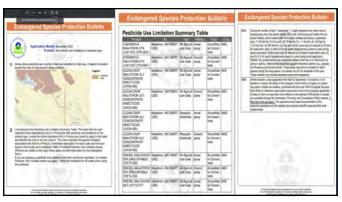
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TAVIUM PLUS VAPORGRIP TECHNOLOGY (100-1623) Alternate: TAVIUM PLUS VAPORGRIP TECHNOLOGY	Dicamba, diglycolamine salt	Dicamba- Tolerant Soybean	Ground spray	Liquid	D220
XTENDIMAX WITH VAPORGRIP TECHNOLOGY (264-1210) Alternate: M1768 Herbicide	Dicamba, digfycolamine salt	Dicamba- Tolerant Cotton	Ground spray	Liquid	D220
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See additional precautionary statements and directions for use inside booklet.

EPA Reg. No. 100-1623

EPA Est. 5905-IA-01

SCP 1623A-L1E 0223 4177994

Net



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KEEP OUT OF REACH OF CHILDREN

Please refer to booklet for additional precautionary statements and directions for use.

For MEDICAL and TRANSPORTATION Emergencies ONLY Call 24 Hours a Day 1-800-334-7577

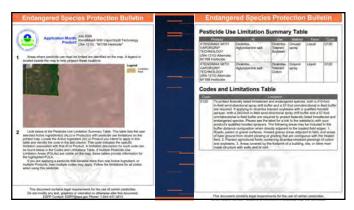
For PRODUCT USE Information Call 1-866-99BAYER (1-866-992-2937)

For Incidence of Non-performance or Off-Target Movement or for Questions Regarding Buffer Requirements or Sensitive Crop Registries Call 1-844-RRXTEND (1-844-779-8363)

EPA Reg. No. 264-1210













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- •Original restriction no mosquito from April – December
- •Since been changed, mosquito exempt
- •Feedback critical for this process

Process

- •Follow label
- •Mitigation points met Y/N?
- •Check buffer requirements
- •BLT Y/N
- •Check if you are in PULA Y/N

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How to comply?

- •Label
- •Up to 4 or 5 different websites that are label now
- •Lots more math and boxes to check

Additional Changes

Herbicide Strategy - final

Insecticide Strategy - draft

Rodenticide Strategy – should be final soon

Fungicide Strategy – 2025 or 2026 draft

Vulnerable Species – draft

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Shift

- •Entire classes of chemistries with set limitations
- •Entire areas may be off limits to treat
- •Much more adaptability, but lots of changes

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What do we do?

Familiarize yourself with BLT

Stay up to date with changes

Don't Panic







https://blogs.ifas.ufl.edu/pesticideinformation/

https://www.epa.gov/endangered-species/bulletins-live-two-view-bulletins

Questions?			
bwbult@ufl.edu			
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