

Special Local Need Labeling for Pesticides in Hawaii

Charles Nagamine¹ and Lance Kobashigawa²

¹CTAHR Pesticide Risk Reduction Education Program, ²Pesticides Branch, Hawaii Department of Agriculture

What is a Special Local Need labeling?

A special local need labeling (SLN labeling) is the printed instructions for using a pesticide to treat a minor crop (such as taro), object (such as plant containers), or site (such as "off-shore islands"). It gives directions for treating the crop, object, or site that is not covered by the label on the pesticide's container. It also limits the treatments to a state, territory, or some other specific part of the USA.

An SLN labeling is not attached to the pesticide's container. It is printed on one or more sheets of common office paper.

You could think of an SLN labeling as an extension of the label on the pesticide's container. The label on the container tells what crops, animals, objects, or sites the pesticide may *legally* be used to treat. It is illegal to use that pesticide to treat something else. For example, it would be illegal to treat taro with a pesticide named Pyretrol Spray if its label does not list taro. But if one of Hawaii's SLN labelings were registered to allow taro treatment with Pyretrol Spray, then it would be legal, provided that the applicator follow the rules for SLN labelings.

Rules for SLN labeling

An example of an SLN labeling is shown on page 2.

1. The pesticide applicator must have a copy of the SLN labeling at the time of application. The applicator need not carry a copy, but he or she should be able to show it if a pesticide inspector asks to see it. Each SLN labeling reminds the applicator of this requirement by showing a statement like this: *This label must be in the possession of the user at the time of application*. This rule applies to any pesticide named by an SLN labeling, whether it is a *restricted use* pesticide or not.

- 2. The SLN labeling must not have been cancelled, withdrawn, or otherwise made inactive. (Details appear below in the section, *Hawaii's SLN labeling*.)
- 3. The SLN labeling must have been issued for Hawaii. This means that a Hawaii sugarcane grower could not use an SLN labeling issued for Puerto Rico or Florida sugarcane. SLN labelings issued for Hawaii would show the phrase: For distribution and use only within Hawaii.
- 4. The SLN labeling must be up-to-date. The treatment described by the SLN labeling must take place before the expiration date printed on the SLN labeling. (Details appear below in the section, *Expired SLN labeling*.)
- 5. The product name and the EPA Registration Number shown on the SLN labeling must match the product name and the EPA Registration Number shown on the pesticide container. An example is shown on page 3.
- 6. The pesticide applicator must also comply with all relevant instructions on the label on the pesticide container.

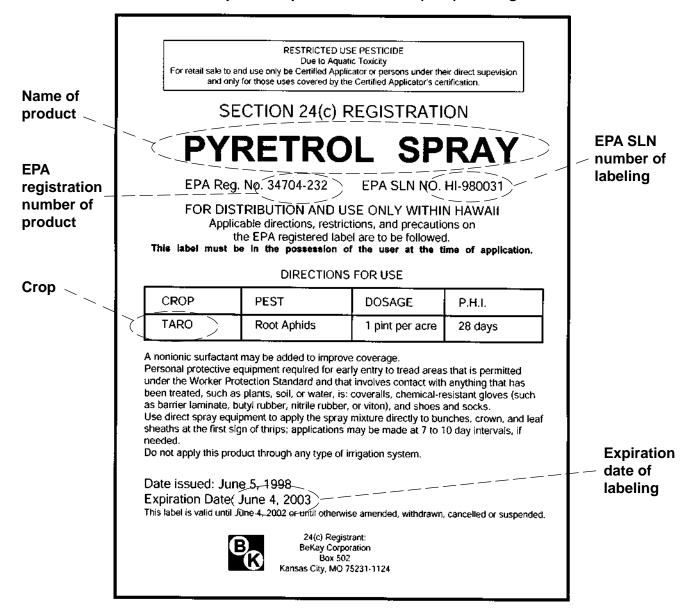
Hawaii's SLN labeling

Currently, about 50 SLN labelings are active in Hawaii. Each allows an applicator to use a specific pesticide to treat a crop, object, or site not listed on the pesticide's label. As a group, Hawaii's SLN labelings cover various fruit, nut, beverage, grain, and vegetable crops, mosquito control, fruit fly control, rodent control, plant nursery sanitation, and drip irrigation system flushing.

To learn if any of Hawaii's SLN labeling might meet your pest management needs, consult these information sources:

 Your pesticide dealer. Ask, "Is there any special local need labeling for any pesticide to control [name your pest] on [name your crop, object, or site] in Hawaii?"

Example of a Special Local Need (SLN) labeling



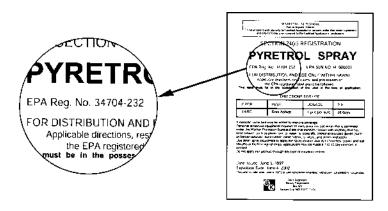
• The Hawaii Department of Agriculture's Pesticides Branch. This office is responsible for issuing SLN labeling. It maintains a file of the registrations for active and expired SLN labeling. On the Internet, view the HDOA's list of current Hawaii special local needs registered pesticides at http://www.hawaiiag.org/hdoa/pi_pest_list.htm. *Caution:* If you plan to use a pesticide according to an SLN labeling described in the HDOA list, you *must* have a copy of the appropriate SLN labeling in your possession at the time of

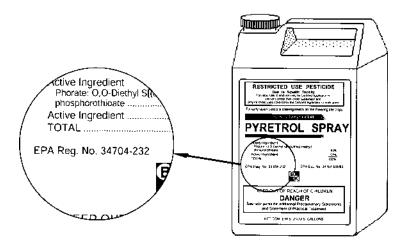
use. For more information about SLN labeling, including the criteria for registering a SLN labeling and maintaining them, you may call the Hawaii Department of Agriculture's Pesticides Branch (registration section) in Honolulu at (808) 973-9412, (808) 973-9414, or (808) 973-9415.

How to obtain a Hawaii SLN labeling

A copy of an SLN labeling is usually available from the pesticide's manufacturer or the local dealer who sells the

The product name and the EPA Registration Number shown on the SLN labeling must match the product name and the EPA Registration Number shown on the pesticide container.





pesticide. Also, certain SLN labelings are available from "third-party registrants," which are the associations or government agencies who assume responsibility for registration of the labeling instead of the pesticide manufacturers.

Recognizing SLN labelings

Pesticide manufacturers use different titles to identify their leaflets as SLN labelings. Some examples are: "Registration for Special Local Need," "Special Local Need Labeling," "24(c) Special Local Need Labeling," "Section 24(c) Registration," and "Supplemental Labeling for Special Local Need." Other less specific titles are: "Supplemental Labeling," "Agricultural Bulletin," "New Registration Bulletin," and "Product Bulletin."

If the labeling title does not definitely indicate that it is a SLN labeling, look for the *EPA SLN Number* such as "HI-980031." It's usually printed near the top or the bottom of the labeling. An example is shown on page 2.

What's on the SLN labeling

An SLN labeling bears instructions and restrictions for using the pesticide to treat the additional crop, object, or site. They include the following:

1. The pesticide product that may be used. On each SLN labeling, usually near the top of the front page, there is a pesticide product name (also called the *brand name*) and *EPA Registration Number* (often abbreviated *EPA Reg. No.*). These refer to the product name

and EPA registration number printed on the label of the matching pesticide's container. Only a pesticide with the matching brand name and EPA registration number may be used to treat the crop, object, or site described by the SLN labeling. Beware of differences among brand names like this: "Pyretrol Spray, "Pyretrol Premium Spray, "Pyretrol 1.2E Insecticide Spray." These are names of three different products. To tell them apart, compare their EPA registration numbers. With few exceptions, each brand name has a unique EPA registration number.

- 2. The special local crop, object, or site that the pesticide may be used to treat.
- 3. The restrictions that apply when treating the crop, object, or site. Some examples are:

 Do not apply until plants are at least 4 months old.

 Do not apply through irrigation systems.

 Do not apply within 30 days of harvest.
- 4. The dosage or dilution to use. Some examples are: Apply 1–2 pounds per acre per crop cycle.

 Prepare a mixture of 20–24 ounces per 100 gallons.
- 5. Timing of the pesticide treatment. Some examples are: Apply when corn plants are in the 3–9 leaf stage. Do not apply to fruit trees after they have borne fruit.
- 6. Special equipment, if any is required. An example is: *Apply with a properly calibrated sprayer equipped with shielded nozzles*.
- 7. Other do's and don'ts to prevent harm to people (including the applicator), domestic animals, or valuable wildlife; or damage to the crop, object, or site; or to sensitive areas of the environment. Some examples are:

Do not apply within 1,000 feet of schools, residential areas, and public or private buildings.

Do not allow animals to graze treated areas. Do not apply within 1,000 feet of known nesting sites of the Hawaiian hoary bat. All of these instructions and restrictions were checked and registered with the Hawaii Department of Agriculture and with the U.S. Environmental Protection Agency. An SLN labeling is a document that the Hawaii Department of Agriculture can enforce.

If you plan to buy a pesticide to treat a crop, object, or site described by a SLN labeling, review a copy of it first to learn the details. Also review a copy of the label on the pesticide's container so you can learn what you must do or avoid doing to handle the pesticide both legally and safely. Then you can decide if you are willing and able to comply with both sets of directions.

Expired SLN labelings

You must have a copy of an up-to-date SLN labeling in your possession when you use the pesticide to treat the crop, object, or site described by the SLN labeling. An SLN labeling usually expires 5 years after the Hawaii Department of Agriculture issues it. An expiration date appears on each SLN labeling. If the expiration date has passed, the SLN labeling is not valid. But, a renewed version or a suitable substitute might be available. Check with the person who gave you the original SLN labeling. If you find a renewed version, review it to learn if any of the directions or restrictions have changed.

Buying pesticides for special local crops or sites

Before you buy a pesticide to treat a crop or site described by an SLN labeling, consider the expiration date of the labeling and the size of the container. Could you use all of the pesticide for your crop, object, or site before the labeling expires? If you cannot and the manufacturer or third party registrant does not renew the labeling, then you may use the pesticide only for the crops, objects, or sites described by the label on the pesticide's container.