

INSECTICIDES FOR USE IN THE NURSERY

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I find myself on the horns of a dilemma as I appear before you this morning. I wish I was two people instead of just one. On Monday, I had the pleasure of being up in the Routt National Forest in Colorado attending the annual meeting of the Rocky Mountain Conference of Entomologists. They used yesterday for field trips and recreation. Today, they are back in session. This is always an enjoyable and profitable meeting. In addition, this is a meeting to which we take wives and families. My wife was enjoying the brief vacation.

On the other hand, I find it enjoyable and profitable to meet with people such as you who can bring me up to date on the current insect problems in the nurseries. Much of my research in the past has resulted from discussions with people like you; and I hope our association continues with mutual advantages to both.

This is indeed a very difficult time to give a report such as your program chairman requested. At the present time, the regulations covering insect control are in a very unstable situation. In 1972, Congress passed and President Nixon signed, the amendment to the Federal Insecticides, Fungicide and Rodenticide Act. This is known as the Federal Environmental Pesticide Control Act. One of its provisions moved the labelling and regulation of pesticides from the United States Department of Agriculture to the more recently created Environmental Protection Agency. The former used people with an agricultural background. The latter uses legally trained personnel. They are most difficult to work with.

Originally, the amendment provided for progressive stages of implementation through the succeeding four years to be fully implemented by October, 1976. Actually, the progression has been anything but steady. The first thing they did was to cancel all existing pesticide labels and require the

manufacturers to provide new data substantiating the labels. It required data on efficacy and environmental hazard. They soon learned that putting emphasis on environmental hazards exposed the users to too much risk. So, they added that requirement to the criteria.

It is needless to say that the manufacturers have been slow in providing all the new substantiating data. Even worse, the EPA people are even slower in studying the data, holding hearings and approving labels. As you might understand, most of the emphasis has been put on approving labels for insecticides used on economic crops. Insecticides for controlling forest and nursery pests has taken a "back seat".

In addition to requiring relabelling, pesticides now must be categorized for "general" and "restricted" uses. This phase is even further behind. Very few insecticides have been put in their respective categories. Information about this is very difficult to find. EPA first put out a compendium consisting of three looseleaf volumes. More recently, they have put the information on microfiche. There is one set of microfiche in each state, usually in the hands of the team charged with the responsibility of training applicators.

Adding to the confusion, although the EPA has the responsibility of regulating the use pesticides, they have required each state to pass legislation setting up an organization to administer and regulate the use of pesticides within its boundaries. All states must comply, but some of them are taking longer than others to get organized.

To illustrate the points I have made, I would like to point out some examples. Many of you are applying dimethoate (Cygon) to control pine tip moth as an approved use for dimethoate. I know it is on the label of the containers in which you buy it. However, I have looked through the compendium and the microfiche, and I can't find pine tip moth control as an approved use for dimethoate. The law is clear on this point. It is illegal to apply an insecticide to control an insect which does not appear in the list of approved labels. We may be in violation of the law. Fortunately, there is an escape clause. An insecticide, currently available may be used until all existing supplies are exhausted. I don't know if it will be

approved, but our research has shown that azinphosmethyl (Authion) is the most effective insecticide to control pine tip moth.

Finally, the new amendment requires that anyone applying "restricted use" pesticides must be certified in the use of those "restricted use" pesticides they will use. There are two classifications of applicators: 1. private and 2. commercial. I am not sure in which category you belong. Private applicators, such as farmers, apply pesticides on land they own. All others are classified as commercial applicators. I suspect you will be classified as commercial applicators.

Now that I have said all this, I would like the opportunity of coming back again with a longer time at my disposal to discuss specific insects, including bark beetles, borers, defoliators and some of the more serious pests that are sucking insects.