

## A Review of the “How to Comply with the 2015 Revised Worker Protection Standard for Agricultural Pesticides” Manual

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### How to Comply with the 2015 Revised Worker Protection Standard for Agricultural Pesticides: What Owners and Employers Need to Know

**Producers:** EPA and PERC

**Short description:** This is a manual with a series of WPS topics for agricultural owners and commercial pesticide handler employers (CPHE). Each topic has an easy-to-follow bullet-pointed list. There are additional quick reference guides and checklists included as well.

**Date:** 2017

**Format:** Electronic manual

**Length:** 146 pages, 3 MB

**Target audience:** Agricultural establishment owners, commercial pesticide handler employers, self-employed crop advisors, and self-employed pesticide handlers

Many of the questions that come to pesticide safety education programs (PSEPs) are in regard to the federal Worker Protection Standard (WPS). This is not surprising as the law is rather voluminous with various exceptions and caveats. For this reason, the Pesticide Educational Resources Collaborative (PERC) has developed a manual that condenses the law into a more digestible format. This manual defines and clarifies roles, details responsibilities, and explicitly states the exceptions to any individual component of the law. Thus, if one were to utilize this manual and fulfill each of the requirements, they would theoretically be in full compliance with the law.

The manual has many positive traits that make it an excellent resource. It is written at a reading level that allows the stakeholder to understand the material. Since few to none of our stakeholders are lawyers, it is vital that materials be made available that break down the legalese into more basic terms. The organization of the manual is also simplified to allow for a quick understanding of what is required. This was done by creating a preamble providing examples of those who may need this information and why. This preamble also contains a chart that identifies the chapters in the manual relevant to each type of WPS employer. This simple visual aid allows stakeholders to quickly identify which chapters are most relevant to them. This is followed by the introduction, which then goes on to describe the WPS and the roles of people the WPS is meant to protect. The first chapter then clearly states to whom the WPS applies. Stakeholders will be able to determine if they employ workers, handlers, or both. From this point, stakeholders can use the table of contents to determine which of the seven chapters are applicable to them. This allows stakeholders to read only those pages that are relevant to their situation.

Within each of these chapters, much of the information is provided in bullet-pointed lists. This allows stakeholders to quickly glance over the material to ensure they are following

each of the requirements for each component of the law. Additionally, the manual is organized so stakeholders can skip to one of the several very convenient quick reference guides or checklists. These are extremely useful as a part of the manual and as stand-alone handouts to get those with WPS responsibilities into compliance.

Although this manual is very useful in its current form, there are a few drawbacks. A stakeholder completely unfamiliar with the WPS may be dismayed when handed a 146-page manual. If a stakeholder has multiple roles in agriculture, it is possible the entire WPS could apply to them, which may seem overwhelming. However, most stakeholders are not going to have dual roles (agricultural employer and CPHE) and can be instructed to use only the chapters needed. Therefore, this drawback is not severe. Another drawback is that the document is a simple PDF with quick links that allow one to advance through to certain areas. In the post-pandemic era, many advances have been made to create more interactive materials for a wide array of learning styles. These include narrated PowerPoints™ and video lectures, available online, and podcasts such as "Working in the Weeds" out of the Center for Aquatic and Invasive Plants at the University of Florida. Stakeholders may be disappointed at the somewhat outdated format, now that they have gotten used to a variety of audiovisual materials. Finally, some may say the age of the document is a drawback, but until the WPS is updated, this manual will serve the stakeholders perfectly well.

To address some of these mild drawbacks, PSEPs may want to create more interactive directive resources to help stakeholders sift through even the condensed version of the law. A small amount of instruction on stakeholders' roles and responsibilities and directions to appropriate portions of the manual is all that is needed. Once that initial challenge is overcome, this resource is the top of the line as far as WPS goes. It encompasses all necessary components to follow the laws, includes the details of exemptions, and is relatively easy to use and understand. It surpasses many other resources that are limited to single portions of the WPS. Additionally, the various checklists are immensely valuable for stakeholders. This condensed version of the materials allows owners to quickly assess their level of compliance and determine where attention is needed. The appendix of definitions is a convenient resource for beginners and longstanding employers alike. This is overall an extremely practical and functional resource.