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Applying Regulatory Requirements to Labeling with Activity-Based Reentry Intervals May 29, 2001

An example of recently approved product labeling with multiple Reentry Intervals (REIs) is Guthion 2L Emulsifiable Insecticide (U.S. EPA Registration No. 25-102-AA). This labeling bears the following REI statement for tree crops (except citrus):

- Hand Thinning and Harvesting 14 days
- Propping, Mowing, Irrigating, Scouting, Other Activities 48 hours

Applying the policy to the Guthion 2L labeling results in the following:

- A 14-day REI for all tree crops (except citrus where 6772 specifies a 30 day REI)
- REI reduced to 7 days for dormant orchards
- Posting is required for the 14-day REI

The provisions of sections 6770 and 6771 apply for the entire 14-day labeling REI.

Another example is Carzol SP Miticide/Insecticide (U.S. EPA Registration No. 264-635-AA). This labeling bears the following REI statements:

Do not enter or allow worker entry into treated areas during the REI of:

- 16 days for hand labor activities (harvesting, thinning, topping, pruning, except weeding and propping) in citrus, pome and stone fruit trees
- 10 days for hand labor activities (weeding and propping) in citrus, pome, and stone fruit trees
- 10 days for non-labor activities (irrigation and crop advisor activities)
- 4 days when treating stone and pome fruit trees that are bare of foliage
- 48 hours for alfalfa (grown for seed).

Applying the policy to the Carzol SP labeling results in the following:

- A 16-day REI for citrus, pome, and stone fruit
- REI reduced to 8 days for “bare” (without foliage) orchards [6774(c), Restricted-Entry Interval Adjustments]
- Posting is required for the 16/8-day REIs
- The provisions of 6770 and 6771 apply for the entire 16-day labeling REI
- The provisions of 6770(f) apply for the last 4 days of the 8-day REI for bare orchards

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