

Appendix P

Comparison Chart, Section 24(c) and Section 18

Sections 24(c) and 18 of FIFRA authorize states to allow an additional use of a product, without the manufacturer first going through U.S. EPA if the following criteria are met.

Section 24(c)

1. Tolerance or exemption already established.
2. Justification and lack of alternatives must be documented.
3. Data - efficacy, phytotoxicity. Residue requirement was discontinued in 2004
4. Scientific evaluation.
5. Letter of authorization from manufacturer.
6. Post for comment.
7. Issued without expiration date, although can be inactivated.
8. May be third-party or first-party.
9. Must pay U.S. EPA maintenance fee.

Section 18

1. No tolerance yet established. U.S. EPA will establish a time-limited tolerance.
2. Emergency situation must be documented - not historical pest problem (economics and lack of alternatives must be verified).
3. Data - residue, efficacy, phytotoxicity.
4. Scientific evaluation.
5. Letter of authorization from manufacturer.
6. Post for comment although not technically required.

Write justification to U.S. EPA and wait for approval which includes the use, limitations on acreage and location, and the time-limited tolerance.

7. Expiration date (not to exceed one year).
8. Must be third-party.
9. No U.S. EPA maintenance fee.