

From: [Thrun, Rose J - DATCP](#)
To: [Jeremy Shepherd](#)
Cc: [Dan Papineau](#); [Early, Annie](#)
Subject: RE: WI pesticide use and control SS 082-24
Date: Thursday, October 3, 2024 10:40:00 AM

Good morning, Jeremy,

Thank you very much for your questions regarding the Scope Statement for ATCP 29. We are not yet at a stage in the rulemaking process where we can fully address these questions. However, we will treat your questions as a comment on the scope statement that will be submitted to the Secretary and DATCP Board for consideration when seeking approval of the scope statement from the DATCP Board pursuant to Wis. Stat. 227.136(5). If the scope statement is approved and rule drafting begins, your comments will also be included in the analysis that accompanies the proposed rule in the summary of public feedback on the scope statement, pursuant to Wis. Stat. 227.14(2)(a)3m. Moreover, if the scope statement is approved and rule drafting begins there will also be future opportunities to comment on the proposed rule.

I appreciate your time in making these comments.

Rose

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From: Jeremy Shepherd <jeremey@sgrwi.com>
Sent: Monday, September 30, 2024 10:02 AM
To: Thrun, Rose J - DATCP <rose.thrun@wisconsin.gov>
Cc: Dan Papineau <DanielPapineau@trugreenmail.com>; Early, Annie <annie@sgrwi.com>
Subject: WI pesticide use and control SS 082-24

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Thank you for the hearing this morning, Rose! On behalf of TruGreen, we appreciate the Department's review of this rule and the opportunity to participate. We do have some general questions and figured we would send these via email to make it easier for a response from the Department.

We understand the proposed rule may:

— Update pesticide categories/category descriptions for commercial and private applicators

How will the categories change and what will the consequences be?

— Update minimum age requirements to get certified for commercial and private applicators

The minimum is 18 years of age under the federal standards so we anticipate that will be the minimum age under this rule?

— Update pesticide core standards descriptions for commercial and private applicators

What core standards is the Department looking at and will it require a change in the test? (which we do believe is already difficult)

— Update record keeping requirements for commercial applicators

What records will we have to keep under the rules that we did not have to keep prior?

I copied Dan Papineau, Director of Government Affairs for TruGreen, on this email for his input as well.

Thank you for your help in answering these questions and having this dialogue with members of the lawn care industry. We appreciate it.

Jeremey Shepherd, Lobbyist
Schreiber GR Group