




FLORIDA DEPARTMENT OF AGRICULTURE AND CONSUMER SERVICES
COMMISSIONER ADAM H. PUTNAM

September 24, 2012

MEMORANDUM 886

To: All Holders of Limited Certification for Commercial Landscape Maintenance Personnel, Businesses Involved with Residential Lawn Maintenance and Urban Landscape Activities and Suppliers of Pesticides and Application Equipment

From: Michael J. Page, Chief 
Bureau of Entomology and Pest Control

Subject: Use of Tree Injection Devices Such as Arborjet

The Bureau has recently received a number of inquiries concerning which license or certification is needed for the commercial use of pesticide injection devices such as Arborjet in urban landscape settings. The purpose of this memorandum is to clarify the Department's position on this issue.

Individuals who possess Limited Certification for Commercial Landscape Maintenance Personnel (LCLM) are not authorized to use a tree injection device due to the application equipment limitations specified in section 482.156(1) Florida Statutes. This section states in part, "The application equipment that may be used by a person certified pursuant to this section is limited to portable, handheld 3-gallon compressed air sprayers or backpack sprayers having no more than a 5-gallon capacity and does not include power equipment."

Additionally, the same section referenced above limits a person holding the LCLM Certification to the use of pesticides having the signal word "caution" but not having the signal word "warning" or "danger".

Certain pesticides registered for use and application with tree injection devices have the signal word "warning" on the pesticide label. Therefore, use of a tree injection device with a pesticide having a signal word other than "caution" would place a LCLM certificate holder in violation of the law in two areas.

Use of tree injection devices for commercial pest control purposes requires that a company be licensed by the Department as a pest control business in the category of Lawn & Ornamental pest

control. There are no exceptions to this requirement regardless of the type of pesticide or signal word present on the product label.

The Bureau has also received a number of calls questioning whether the treatment of palm trees will affect the consumption of coconuts. Applicators must be aware of a product's label requirements when treating fruit bearing trees, including palm trees, for White Fly infestation. A review of product labels commonly used to treat palms or other fruit bearing trees indicates that several labels have statements which forbid the use of the product on trees where fruits and/or nuts are consumed. With some labels, the product may only be used on ornamental trees.

It is therefore important for applicators to carefully read and comply with product label requirements.

The Bureau requests that vendors and suppliers of pesticides and tree injection devices assist in disseminating accurate and factual information to the landscape industry concerning this issue.

Individuals and or businesses found in violation subject themselves to the penalties set forth in Chapter 482 Florida Statutes and Chapter 5E-14 Florida Administrative Code.

Please do not hesitate to contact Bureau Headquarters at 850.617.7997 should you have any questions or need further clarification of this memorandum.

MJP/sdr