



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

JUL 27 1977

Mr. David B. South
Auburn University
Department of Forestry
Forest Nursery Weed Control Cooperative
Auburn, Alabama 36830

Dear Mr. South:

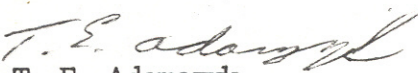
This is in reply to your letter of July 14, 1977, concerning the use of herbicides on non-crop land.

Although the broad definition of crop land would include ornamentals, timber products and other items of economic interest, the general definition used by this Agency only includes food and feedstuffs. For such food or feed crops, of course, a tolerance or an exemption from a tolerance must be established before any pesticide can be used on such commodities.

The situation described in your letter concerns nursery beds containing forest tree seedlings. For the purpose of pesticide application, forest trees would be considered non-crop land and in making a decision as to whether or not a herbicide could be applied safely to such an area, the chief concern would be phytotoxicity to the seedlings. Consideration of the volatility and leaching characteristics of the herbicide chosen as well as the method of application would be critical in making such a decision. Use of a "non-crop" type herbicide, however, would not prohibit you from applying that product to forest tree nursery plots if the other concerns mentioned above are satisfied.

I hope I have answered your question. If not, please contact me at any time.

Sincerely,


T. E. Adamczyk
Chief
Fungicide-Herbicide Branch
Registration Division (WH-567)