

Regulation 637
Frequently Asked Questions

The Michigan Department of Agriculture is providing the following answer to frequently asked questions. This document will be amended periodically during the implementation period and will eventually be combined with the original Regulation 637 Q & A document which is currently under revision.

- Q: How soon must a business comply with the revised vehicle identification information?
- A: The recommendations for vehicle identification to be legible and visible and in a type size of three inches or larger takes immediate effect. These recommendations came from industry representatives on the rulemaking committee who implied that compliance should not be a problem. If a licensed business has a problem complying immediately, they should submit a request in writing to MDA, identifying the reason for non-compliance and a short timeframe to correct deficiencies. Requests should be submitted to Brian Rowe, MDA-PPPM, P.O. box 30017, Lansing, MI 48909.
- Q: In Rule 9, Personal Protective Equipment, the allowance for wearing short sleeve shirts (if not prohibited by the label) also requires soap and water or “other protection is in place that provides comparable or great protection” to be immediately available. What “other protection” will be acceptable?
- A: MDA will allow the use of waterless soap products like GOJO, LAVA, or any other hand cleaner type products that have the effect of removing residues from skin as meeting the conditions of “comparable or greater protection”. These products were acceptable in the past and continue to be acceptable. Hand sanitizer type products designed to kill germs or bacteria but do not have the same cleansing effect to remove residue are not considered to provide comparable protection and therefore do not meet the requirements.
- Q: “When does the new lawn marker requirement go into effect?”
- A: While the regulation provides for immediate implementation, MDA is allowing applicators to use up remaining inventory of signs that comply with the previous requirements until June 30, 2008. On July 1, 2008, firms must begin using markers that comply with the revised rules. This will allow marker manufacturers time to produce a sufficient supply and move their product into the market.
- Q: “Will the amendments to the regulation affect the 2008 Notification Registry or the Organic Farm Registry?”

- A: No. Updates to these two registries were nearly complete and must be printed and published by mandated deadlines, so there is insufficient time to implement minor modifications to adjacent or additional property descriptions and comply with mandatory publication deadlines. MDA will implement changes and inform affected individuals at the time 2009 renewal notices are distributed.