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Meeting Notes from PPDC Pollinator Protection Workgroup Meeting September 20, 2012

Attendees: Laurie Davies-Adams, Bret Adee, Cindy Baker Smith, Rich Bireley, Wayne Buhler, Steven Coy, David Epstein, David Hackenburg, Connie Hart, Allen James, Erik Johansen, Iain Kelly, Nicole Harriott, Vince Kramer, Tim McPherson, Chris Mullen, Joel Nelson, Cynthia Palmer, Don Parker, Jeff Pettis, Brian Rowe, John Scott, Mark Seetin, Rick Smith, Marylou Verder-Carlos, Mike Willett, Joseph Wisk, Allen James, Rick Keigwin, Donald Brady, Tom Moriarty, Mary Clock-Rust.

- o Indicates EPA feedback on the Subgroup's preliminary recommendations (9/5/12)
- → Indicates discussions from 9/20/12 meeting.

EPA Feedback on Enforcement Subgroup Priorities:

- o EPA recommends moving forward with all of the Enforcement Subgroup priorities. They are practical and doable and yield immediate improvements.
- → The WG gave feedback on the FIFRA Enforcement Manual in April 2012, but it is not clear whether the recommendations of the group would be included in the revised manual.

EPA Feedback on Labeling Subgroup Priorities:

- o There are some issues with 'level playing field' and resources.
- o EPA recommends the subgroup look closely at the comments from stakeholders on the draft PR Notice from 2000 and note the issues and problems that surfaced. Have things changed since then? Where is there agreement? What were the differences of opinion and what were the bases of the disagreements?
- o Develop a plan for a website that would list the residual toxicity¹ (RT) time for bee-toxic chemicals (similar to the website for aquatic life benchmarks and human health benchmarks).
- → The Labeling group has had meetings and is making progress on its recommendations.
- → Some on the call asked about residual toxicity data. Data on the honeybee toxicity of residues on foliage (OPPTS 850.3030) are required only when the formulation contains one or more active ingredients having an acute LD50 of <11 micrograms per bee as determined in the honey bee acute contact study and the use pattern(s) indicate(s) that honey bees may be exposed to the pesticide.
- → While there is not complete agreement across this group, areas of disagreement should be captured in the report to the PPDC
- → There was a discussion of the California regulations which include protections for citrus which could be shared with the group and may be a good topic to discuss in a future call.

¹ Residual toxicity (RT) time is that period of time after completing a pesticide application until there is minimal toxic effect to bees. The RT time is specified on product labeling and is based upon Residual Toxicity25 (RT25) studies. RT25 studies determine 25 percent bee mortality based on the test bee population exposed to the formulated pesticide product applied to foliage. (from CDPR Division 6. Pesticides and Pest Control Operations; Chapter 3. Pest Control Operations; Subchapter 2. Work Requirements; Article 3. Protection of Bees)

EPA Feedback on BMP Subgroup Priorities:

- There is overlap with the Labeling subgroup on the recommendation to have residual toxicity information available and with the Training Subgroup to have standardized training of applicators.
- o EPA is checking into the OPP's certification and training programs
- O Utilize a website for disseminating ideas, giving information on a national and regional basis, with local ideas available for users.
- o Connect the BMP group with the seed coating BMPs
- → The BMP group has had meetings and is making progress on its recommendations
- → Wayne Buhler's website (<u>www.pesticidestewardship.org</u>) an serve as an example of a portal website for information on pesticide use and pollinator protection.

EPA Feedback on Communication, Training and Education Subgroup Priorities:

o All of these priorities are fine by EPA.

Next Steps

- → Subgroup chairs should have meetings with members to continue work on recommendations for their subgroup.
- → Subgroups should begin to prepare reports for the full PPDC meeting (29-30 November).
- → The next meeting of the workgroup will take place on October 22, 2012 from 2-4 PM, EDT. The call in number will be 1-866-299-3188, Code: 703-305-5035.