

US EPA ARCHIVE DOCUMENT

Follow-up to PPDC PP WG Meeting January 25, 2012

Topics Discussed by the Labeling Subgroup

- The subgroup members want to know more about EPA's process for determining what goes on the label and how changes to the label are considered in light of PP.

Suggestion: In one of the upcoming meetings of the Labeling Subgroup, OPP can arrange for a brief discussion/overview on labeling processes and procedures (i.e., how changes are suggested, vetted, processed, etc.)

- The subgroup wanted EPA to describe the state of bee labeling as it exists currently for pesticides. An table with sample label language was created to help inform the discussion.

Suggestion: OPP staff can provide material from previous (2000 draft PRN) OPP effort to revise label language for pollinators as background material on this topic.

- The subgroup wanted to be sure EPA was adding bee-protective language and labeling for those chemicals that could affect native/wild pollinators as well as honeybees.
- Members of the subgroup discussed the enforceability of label language. That is, what portion was advisory (warning and not enforceable), and what was directing (enforceable)
- The subgroup discussed the "Directions for Use Section" of labels. They discussed how or whether EPA will handle crop-specific label recommendations.
- Label improvement ideas included restructuring label to accommodate better warning and mitigation sections of the label so that warnings are separate from enforceable directives, using symbols or red boxes, adding risk mitigation language to the Directions For Use (DFU) section in a box under the application rate and other use information on a crop by crop basis.
- The subgroup discussed how pesticide residues can be persistent in some climates but degrade quickly in others. A suggestion was made for a chart that could be consulted based on temperature and humidity for extended residual toxicity (ERT, which indicates that pesticide residues remain toxic longer than 8 hours) values.
- The subgroup wanted EPA to explain and define the following terms that appear on labels:
 - Extended residual:
 - Residual:
 - Visiting,

Actively visiting
Potentially toxic
Toxic to larvae
Treatment site

Suggestion: OPP has not yet defined these terms with the exception of ‘treatment site’, which is briefly described in FIFRA 156.10 (i)(2) which lists the elements required in the DFU section of a label, “The site of application, as for example, the crops, animals, area or objects to be treated.”

Topics Discussed by the BMP Subgroup

- The subgroup asked that EPA request research on the use of **repellents and attractants** in conjunction with chemical treatments-some disagree as to the value of this effort.

Suggestion: Research into repellant and/or attractants may be something best addressed through the USDA-led CCD Steering Committee.

- Some members of the BMP Subgroup believed that a bee yard registry was a workable solution that provides contact information of the beekeeper and location of the bees and nothing else. Others thought it was less helpful. One member said that a bee registry is conduit for communication but it does not protect bees. Originally, bee yard registries were started as a way to control the spread of American Foulbrood (in Arkansas anyway).
- Sensitive Site Registry: Requires more discussion. The subgroup discussed it as a communication tool.

Suggestion: Encourage the subgroup to continue to pursue.

- Untreated Refuge Registry - Safe, clean forage for all pollinators as well as other organisms (CRP, Federal lands, State lands)

Suggestion: This issue is beyond the scope of just EPA, and may involve other Federal Agencies.

- Need for information and training on night applications
- Chemical behavior/Residual toxicity was discussed including the effect of environmental conditions on chemical (by class) behavior as it effects the potency or exposure profile of a pesticide, The subgroup discussed how best to communicate this type of information and suggested that a table be constructed that contains information on residue decline dependant on humidity and temperature and/or other environmental conditions.

Suggestion: The Subgroup is encouraged to discuss how to best produce this information and explore what is available already, and if this type of information is not suitable to be put on product labels, the Subgroup may discuss mechanisms to disseminate this type of information.

- National registry of pesticide applications

Suggestion: OPP notes that there are statutory barriers to moving forward with this concept, such as (FIFRA Section 11(d)).

Topics Discussed by the Communication, Education and Training Subgroup

- Discussed standardized training information across states
- The group explored outreach and cross-communication between stakeholders (e.g. beekeepers presenting at NCC meetings)

Suggestion: The group should continue to explore different outreach/communication mechanisms between stakeholders.

- The subgroup thought that NAPPC's efforts in communication and education have been really good (English + Spanish video, workbook, on-line pesticide toxicity guide, teacher training manual, webinars, brochures, planting guides, websites, education, etc.) but we need to expand it.
- Beekeepers would like to see inert ingredients listed on the label

Suggestion: Given the charge to this Workgroup, the suggestion to include inert ingredients on product labels may be outside the scope and charge of the workgroup.

- This subgroup is compiling a list of helpful websites on pollinator protection.

Topics Discussed by the Enforcement Subgroup

- The subgroup discussed the definition of "incident" and "investigation."
- The group discussed that enforcement cannot take place without investigation. An investigation can be difficult to conduct for multiple reasons. Sometimes "lack of funds" has been used as an excuse for not conducting an investigation.
- Determine whether there is a standard process for how and what to report

Suggestion: It may be helpful for the Enforcement Subgroup to engage the SLA's and ask them to elaborate on their respective enforcement processes.

- The Enforcement subgroup discussed the need for an audit trail for all reported incidents such that there is a tractable record of who receives a report, and when a report is received.

Suggestion: The Subgroup may need to elaborate on this point; the idea is unclear and needs to be defined better.

- The group would like to better understand information sharing between the States and EPA
- FIFRA Inspector Training Manual is currently under revision.
- This subgroup discussed the idea of mandatory reporting of pesticide use.

Suggestion: This issue may be outside the scope of the WG; and there is a statutory prohibition on this. (i.e., FIFRA Section 11(d)).

Next Steps:

- Subgroups meet and move forward on prioritizing and developing ideas
- Meeting with subgroup co-leaders and EPA
- Workgroup meeting/call in March
- Subgroups meet and prioritize tasks
- Workgroup meets May 2 prior to the full PPDC meeting
- Subgroup co-leaders present findings to full PPDC and ask for further direction.