

US EPA ARCHIVE DOCUMENT

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5 UNITED STATES
6 ENVIRONMENTAL PROTECTION AGENCY

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9 PESTICIDE PROGRAM DIALOGUE

10 COMMITTEE MEETING
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13 May 14-15, 2015
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18 Conference Center - Lobby Level

19 2777 Crystal Drive

20 One Potomac Yard South

21 Arlington, VA 22202
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P R O C E E D I N G S

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MR. HOUSENGER: Welcome. It's been close to a year, I think, since we met in person, so welcome back. We've had a few webinars to keep people updated, but there's nothing like meeting in person.

I don't know if you knew or not, but we threw a new wrinkle in to getting into the building today. We've had construction going on for what seems like forever. We're betting that the casino down at the waterfront gets completed before this little road out here.

So, we're a little behind, so let me turn it over to Jim Jones who is going to give some opening remarks.

MR. JONES: Thanks, Jack. I won't be long. I'm Jim Jones for those of you who don't know me. I'm the assistant administrator for chemical safety and pollution prevention at EPA. That's the pesticide program that's one of the three offices within chemical safety and pollution prevention. The toxics program is another one, and then we have a small office that does coordination, who you often hear from, the Office of Science Coordination and Policy. They help manage the endocrine disruptor screening program.

It's great to see so many familiar faces. A

1 couple of you I saw yesterday in a little Hill visit
2 that I had. For those of you who I don't know, I look
3 forward to going around the room and getting to know you
4 a little bit better.

5 This is a committee -- actually, Ray McAllister
6 from Crop Life mentioned that he thought this might be the 20th
7 anniversary of the PPDC. I cannot confirm that, but that sounds
8 about right. One of Jack's predecessors, and one of my
9 predecessors, in the director's job I think was somewhat
10 was a forward-thinking individual, Dan Barolo.

11 When he became the office director, he
12 recognized that one of the struggles he had in that job
13 was getting a sense of the breath of stakeholder input on
14 the sort of decisions in front of him on a day-to-day
15 basis, but on some of the bigger issues that the office
16 confronted.

17 I think he, in his previous life as a state
18 director in the water program in New York State, had
19 experience using what we at the federal level call a
20 federal advisory committee, a FAC, pulling together a
21 group of stakeholders in a very structured way to get
22 feedback, again, not on the decision of the day but on
23 some of the challenging issues confronting an
24 organization.

25 So, 20 years ago, probably 21 when he started

1 pulling this together, what we now commonly refer to as
2 the PPDC, the Pesticide Program Dialogue Committee -- I
3 think Jack and I and Bill have been involved at some
4 level the entire 20 years. I can't say we've been to
5 every meeting, but darn near close in some form or
6 another.

7 I believe firmly that it serves this
8 institution very well, and I think it's a model for how
9 government can get a breadth of feedback across
10 stakeholders within its space on the issues that the
11 office struggles with.

12 Pesticide regulation, I foolishly thought when
13 I had Jack's job that after we met the FQPA deadline in
14 2006, that the challenges would sort of fade away,
15 because we were kind of done. How foolish was I. The
16 challenge of pesticide regulation I don't think ever will
17 fade away. I think inherently it is going to
18 continuously be difficult in many respects.

19 The kinds of issues that we bring before this
20 group represent some of the big challenges of regulating
21 in such a complex area that matters so much to the health
22 and well being of all citizens in the United States. So,
23 as I often do opening these meetings, I really want to
24 most importantly convey the thanks that we have for all
25 of the work that you do, and it doesn't just include the

1 couple of days a year here, either annually or bi-
2 annually, helping us at these meetings, but the time that
3 you spend in between these meetings, not just giving us
4 your wisdom and the perspective from wherever it is that
5 you're coming from, but the experience that you have in
6 your regular jobs that allows you to then bring that back
7 to us.

8 I often say participatory government is a great
9 ideal, but it is not that cheap to deliver on. I mean
10 cheap for you. It takes a lot of time and energy to be
11 able to meaningfully input back into the government. We
12 recognize that, and we thank you for all the time and
13 energy that you have all individually given to give us
14 your perspective.

15 The other part, and this is just worth
16 reminding ourselves, Congress has given the
17 administrator, and then the administrator then delegates
18 it down to people like us, the decision authority in this
19 case as it relates to pesticide decision-making, whether
20 it be under FIFRA or FFDCA. That decision authority lies
21 with the EPA.

22 We firmly believe, and we believe it because
23 we've got a lot of experience having done it, that those
24 decisions are better informed when we understand the
25 perspectives, the diverse perspectives of the various

1 stakeholders who are impacted by those decisions. That's
2 what's represented in this room here.

3 But we also think it's important for everyone
4 to recognize that those decisions still lie with the EPA.
5 I say that because sometimes people can feel like the
6 decision didn't break my way. Some decisions we're going
7 to make would be impossible for them to break all of your
8 way because you all don't have the same perspective on
9 decisions that we make. That is not to mean by any
10 stretch that you have not been heard. What we try very
11 hard to do is make sure that we hear it.

12 When I say hear it, I mean in the real sense of
13 hear. We hear it and we understand where it is that
14 you're coming from. Again, every choice is not going to
15 land the way everyone in this room is going to want it.
16 That would be impossible to achieve. But we are
17 committed to making sure that we are working hard to make
18 sure that we've captured the range of perspectives.
19 That, in and of itself, is no small feat because this is
20 a big country with a lot of perspectives. We're trying
21 to capture the range of the perspectives and that we've
22 really heard them before we make our decision. So,
23 that's what this is about. That's what this meeting is
24 about. That's what the workgroups are about. That's
25 what the interactions in between the meetings are about.

1 I really feel strongly, having participated in
2 this group in one way or another from a junior staff
3 person to a manager to an office director and now to the
4 assistant administrator, that we have benefitted
5 dramatically over the course of that 20 years from this
6 institution, the PPDC.

7 I sort of would jokingly say that when I was
8 coming up the ranks, I didn't resent the PPDC, but it
9 sort of seemed like more work. I couldn't wait to be the
10 office director so I could disband it. And then I became
11 the office director and I'm, like, we are so not
12 disbanding this. It's almost that until you're in that
13 seat that you don't quite recognize just how useful it
14 is, how important it is to have a group like this to get
15 advice from.

16 So, thanks again for all of your service. Once
17 again, you're going to spend a day and a half, and I
18 think many of you spent the day yesterday, working on
19 some really tough issues, some tough issues that we are
20 grappling with. So, I will have a chance to spend a
21 little bit of time with you guys. I think I'm here until
22 about 10:30 or so. Then I will have to get back to other
23 duties as assigned by Jack and others.

24 So, I'll turn it back over to the Chair here.

25 MR. HOUSENGER: Thanks, Jim.

1 One of the things I wanted to mention before we
2 get into the meeting too far is that the next time we
3 meet, which I think is in October, some of the members
4 that are sitting next to you won't be here. They
5 exceeded the length of time they can serve on the PPDC,
6 and we're going to be choosing new members or they
7 decided to let their membership go. So, I want to thank
8 those people that have served so nobly and helped us out.
9 We'll see who joins us next time.

10 This is a very big group. As I look down,
11 there's not much room for public to watch what's going
12 on. We try to get every interest that we can and get
13 good representation, so that's what we're going to be
14 doing from now until October. I think the terms expire
15 in July.

16 I also want to acknowledge the workgroups that
17 have been going on and meeting. I think a lot of good
18 work gets done in those workgroups. They get into the
19 substance of what we're going to touch on a little bit
20 today. But I know that those workgroups are active. I
21 think what we also need to think about is which
22 workgroups we want to continue and which ones we need
23 advice from, and are there new ones to consider.

24 We have a range of topics today, some of the
25 ones we've talked about, seems like we've talked

1 continually about, endangered species, pollinators,
2 endocrine disruption. Then we're talking about IPM in
3 schools and topics like that. So, it's a broad range of
4 subjects. We have a bunch of updates to do.

5 Since the end of the year, Margie Fehrenbach
6 retired. Margie was our designated federal official
7 serving on the FACA group. We've replaced Margie with
8 Dea Zimmerman. I'd like to introduce her now and have
9 her say a few words about PPDC.

10 Dea.

11 MS. ZIMMERMAN: Thank you, Jack. So, thank you
12 very much. I really do miss Margie a lot, but I am
13 honored to have the opportunity to work with you, and I
14 look forward to meeting you.

15 Just a couple of housekeeping things real
16 quick. We have this wonderful new audio system that we're
17 going to try out today. You notice it's about one mic
18 for every two people. We do ask, though, that you keep
19 the microphones off, turned off. There's a toggle switch
20 that you'll see on the mic. We ask that you keep them
21 off unless you want to speak, because if we have too many
22 of the mics on at the same time, you will hear noise. I
23 know you don't want to do that. So, it's probably best
24 if you do want to speak to put your tent card up first,
25 and then we'll acknowledge you, and then you can toggle

1 the mic on, and then you can speak.

2 We also opened up our teleconference line, and
3 hopefully, with this new audio system, they can hear us
4 just fine. We have globally muted it, so for those of
5 you who are listening on the phone, please do not unmute
6 your phone. We'll handle the muting and unmuting from
7 our end here.

8 I just want to acknowledge the public comment
9 session at the end of each day. So, if you do want to
10 make a public comment, please sign up. There's a public
11 comment sign-up sheet on the registration desk.
12 Hopefully, you all registered. If you didn't, please
13 take an opportunity at the break to register with Doris
14 at the registration desk.

15 There's a folder on your desk. Today's Power
16 Point presentations are on the left. Tomorrow is on the
17 right. The Power Points are also on the website, the
18 PPDC website. You've got to get to the new website,
19 though. I know we've got some issues with the website
20 that we'll try to address.

21 Most importantly, bathrooms, if you haven't
22 been here before, are down the hall and on the left.

23 I think that's it. If there's anything I can
24 do to make your meeting better, please let me know.

25 Thanks, Jack.

1 MR. HOUSENGER: Thanks, Dea.

2 We're pretty good on time, even though we
3 started late. Let's go around and do introductions
4 quickly so we can get to the meat of the program. Susan,
5 you want to start out?

6 MS. STUDLIEN: I'm Susan Studlien, and I work
7 in the Boston office of EPA. That's called Region 1.
8 I'm sure, as you, I'm sure, know, EPA has 10 regions. My
9 regional office is charged this fiscal year and next to
10 be the sort of coordinating arm for headquarters with the
11 other regions. So, I try to keep them up to date on
12 important issues that come out of meetings like this.
13 Then they, in turn, work with the states in each region.
14 So, happy to be here.

15 MR. BUHLER: Good morning. I'm Wayne Buhler,
16 Professor at North Carolina State University, the North
17 Carolina State University. I also work as the pesticide
18 safety education specialist and provide training
19 certification and recertification for our restricted use
20 pesticide users. I'm representing the American
21 Association of Pesticide Safety Educators.

22 DR. CARLOS: Good morning. I'm Marylou Verder-
23 Carlos, Assistant Director for the California Department
24 of Pesticide Regulation, and I'm here representing the
25 states and AAPCO.

1 MR. VUKICH: Good morning. I'm Jake Vukich
2 from DuPont Crop Protection. I'm a manager of the U.S.
3 Registrations and Regulatory Affairs Group.

4 MS. RUIZ: Good morning. I'm Virginia Ruiz,
5 Director of Occupational and Environmental Health at
6 Farmworker Justice.

7 MR. COY: Good morning. I'm Steve Coy. I'm a
8 commercial beekeeper and represent the American Honey
9 Producers Association.

10 MS. PALMER: Good morning. I'm Cynthia Palmer.
11 I'm the Director of Pesticide Science and Regulation at
12 the American Bird Conservancy.

13 MS. CALLIES: Rachel Callies. I'm the Director
14 of Product Registration for S. C. Johnson & Son.

15 DR. LAME: I'm Marc Lame with Indiana
16 University School of Public and Environmental Affairs. I
17 represent the National Environmental Health Association.

18 MS. HARRIOTT: Good morning. I am Nichelle
19 Harriott. I am the Science and Regulatory Director at
20 Beyond Pesticides.

21 MR. WHITTINGTON: I'm Andy Whittington with the
22 Mississippi Farm Bureau Federation and the American Farm
23 Bureau Federation.

24 DR. WHALON: Mark Whalon, Michigan State
25 University. I represent the Upper Midwest Horticulture

1 Association.

2 MR. SCHERTZ: I'm Scott Schertz, Schertz Aerial
3 Service, Illinois, representing the National Agricultural
4 Aviation Association.

5 DR. KEIFER: I'm Matt Keifer from the National
6 Farm Medicine Center and the Marshfield Clinic.

7 DR. CLEVELAND: I'm Cheryl Cleveland. I work for
8 BASF in the Global Consumer Safety Unit. I reside in RTP
9 in North Carolina.

10 MR. TAMAYO: Dave Tamayo, Sacramento Stormwater
11 Program. Unfortunately, we don't have any stormwater
12 this year. I'm also with the California Stormwater
13 Quality Association.

14 DR. GILDEN: Good morning. Robyn Gilden with
15 the University of Maryland School of Nursing.

16 MR. BOTTS: Good morning. Dan Botts with
17 Florida Fruits and Vegetables Association and also the
18 Minor Crop Farmer Alliance. I'm representing
19 Mike Willett who is meeting with the Chinese delegation
20 to be sure that they can continue to ship cherries and
21 apples to China moving forward.

22 Just one note, Jack and Jim, as a charter
23 member of this organization back in 1994, we had a unique
24 distinction of having the first meeting set and they
25 promptly shut down government for six months. So, we had

1 to delay our first meeting for six months. So, a little
2 historical perspective there.

3 MS. SELVAGGIO: Hello. I'm Sharon Selvaggio
4 with Northwest Center for Alternatives to Pesticides.
5 I'm the Healthy Wildlife and Water Program Director.

6 MR. HANKS: I'm Douglas Hanks with the National
7 Potato Council. I'm on their Environmental Affairs
8 Committee.

9 MS. GOUGE: Good morning. I'm Dawn Gouge,
10 overly enthusiastic entomologist from the University of
11 Arizona. My focus is on public health.

12 MR. TAYLOR: Donnie Taylor, Vice President of
13 Agricultural Retailers Association, representing the
14 suppliers of farmers across the U.S.

15 MR. SANCHEZ: Valentin Sanchez, Oregon Law
16 Center. I represent the farmworker community.

17 MS. REA: Liz Rea, Sipcam Agro USA. I'm here
18 representing the Biopesticide Industry Alliance.

19 DR. FERENC: I'm Sue Ferenc with the Council of
20 Producers and Distributors of Agrotechnology,
21 representing manufacturers, formulators, and distributors
22 of agrotechnology products.

23 MR. DELANEY: Tom Delaney, Director of
24 Government Affairs for the National Association of
25 Landscape Professionals, new name.

1 DR. JACKAI: I'm Louis Jackai. I'm employed by
2 the other university, the other ag school in
3 North Carolina, A&T State University. We serve the
4 small growers.

5 MS. BISHOP: Good morning. I'm Pat Bishop with
6 People for the Ethical Treatment of Animals, also known
7 as PETA. I'm representing the animal welfare issues
8 associated with pesticide testing.

9 MR. MCALLISTER: I'm Ray McAllister with
10 CropLife America, Senior Director, Regulatory Policy. I
11 have been to every single PPDC meeting.

12 MS. LUDWIG: I'm Gabriele Ludwig, Associate
13 Director of Environmental Affairs with the Almond Board
14 of California. I haven't been at every one, but the
15 very, very first thing I ever did in D.C. was a PPDC
16 meeting.

17 DR. CALVERT: Hello. I'm Geoff Calvert. I'm a
18 physician with the Centers for Disease Control and
19 Prevention. I coordinate the Center's pesticide program,
20 which is involved with tracking pesticide poisoning
21 across the country.

22 MS. KUNICKIS: I'm Sheryl Kunickis. I'm the
23 Director in the USDA Office of Pest Management Policy.
24 We work closely with EPA on all pest management issues.

25 MR. JORDAN: Bill Jordan, Deputy Director for

1 programs here in the pesticide office.

2 MR. HOUSENGER: Do we have anybody on the phone
3 who is a member of PPDC calling in?

4 DR. KASHTOCK: This is Mike Kashtock from FDA.
5 I don't know if you got me.

6 MR. HOUSENGER: Okay, thanks, Mike.

7 Our first topic is one that everybody always
8 likes to hear about, our money, our resources. Marty
9 Monell is going to give us that update.

10 MS. MONELL: Thanks, Jack. You should all be
11 familiar with the format of these slides. This is a
12 presentation I try to give every six months, whether it
13 be via webinar or in person. So, the first slide is our
14 appropriated budget. You will see the totals, and this
15 is for the pesticide program. So, this does not include
16 other areas of the regulation of pesticides that are
17 affected in the regions and in the AA's office. So, this
18 is strictly -- oh, I guess it does have the regional. I
19 take it back.

20 So, the green bars, the light green bars are
21 the pesticide program, specific appropriations. The dark
22 green are what is sent to the regions. The orange is
23 what is provided to the AA's office for their
24 contribution to the licensing of pesticides and the
25 review of the old chemicals.

1 You'll see that the '16 president's budget is a
2 little bit higher than we have been appropriated in the
3 past, and that is because the president's budget normally
4 contains sufficient funds to provide for the minimum
5 appropriation requirement under PRIA. The congress has
6 not provided those funds in the past couple of years, but
7 we, nonetheless, because the president supports PRIA, we
8 have provided for adequate funding in our president's
9 budget.

10 The next slide depicts the minimum
11 appropriations requirement in just the lump sum. You'll
12 see for the 2016 president's budget that there is a bump
13 up. It's about \$2 million more than the president's
14 budget for 2015. That is because of the provision for
15 pollinator protection funding.

16 Ray, I believe you asked this question at the
17 webinar, how that might impact PRIA responsibilities. I
18 would say that a million and a half of that additional
19 funding is provided in the science and technology
20 account, which is specifically designed for our labs to
21 do analyses and research type work on pollinators. So,
22 to help us better understand the science of what's going
23 on with pollinators. So, that is an account that is not
24 used for regular PRIA work, so it will not have any
25 impact on our ability to do the PRIA work.

1 The other \$500,000 is designed to go to the
2 states. It's what they call STAG money, State and Tribal
3 Assistance Grants. This is awarded through the regions
4 to the states to help implement programs. In this case,
5 it's particularly identified to provide assistance to
6 states and tribes to come up with pollinator protection
7 plans. I'm not going to go into that because you're
8 going to hear a whole session on the state and tribal
9 protection plans for pollinators.

10 The next slide depicts FTE. This is full time
11 equivalents. This is government jargon for our ability
12 to have people do the work. As you all know, as a
13 licensing program, the pesticide program relies heavily
14 on government employees for the decisionmaking, for the
15 review of studies, for the development of risk
16 assessments, and for the ultimate regulatory decisions.
17 So, this will show you essentially a decline in FTE from
18 12 to 16 in the president's budget. We've lost quite a
19 few, about 60 FTEs.

20 The regional portion of that has been pretty
21 steadily declining but has proportionately been better
22 maintained. Then, as you'll see in the AA's office, the
23 assistance that's provided to licensing program by Jim's
24 staff has been pretty steady after an initial decline in
25 2012.

1 The next page is sort of a description of the
2 two pre-fee programs that we have in OPP. You can see
3 that the PRIA collections, the registration service fees,
4 have been pretty steady, around \$15, \$16 million for the
5 past few years. It appears that we're on track to
6 collect about that same amount this year.

7 We historically have projected that we would
8 collect around \$11 or \$12 million because we don't want
9 to be caught short. So, for planning purposes, we
10 generally have projected lower than the \$15 or \$16
11 million but have been able to collect more.

12 The maintenance fees, these are fees provided
13 under FIFRA. They support the registration review
14 program and can only be used for the registration review
15 program. We're authorized to collect \$22 million in '12.
16 And then, under PRIA 3, that ceiling was raised to \$27.8
17 million, \$800,000 being dedicated to enhancements to our
18 IT system. That's still a work in progress.

19 We have developed a tracking system whereby e-
20 mails are sent out to registrant companies as to the
21 status of their applications, but we have yet to fully
22 implement a new modern 21st century technology system in
23 the pesticide program. But we are aggressively pursuing
24 it.

25 The next slide depicts -- it's just another

1 view of our collection of PRIA fees, same for the
2 maintenance fees on the next page.

3 Lastly, I wanted to talk a little bit about the
4 FTE. Although the FTE have seen a decrease in the past
5 few years, we have been able to do some hiring. We
6 recently found a provision in the Office of Personnel
7 Management that enables any federal agency to hire what
8 they call term hires for a year, and then they can be
9 renewed for up to four years.

10 This particular authority is extremely
11 effective for work under PRIA and work on the
12 registration review program, because absent the statutory
13 authority under PRIA or FIFRA, we would not -- and the
14 mandates for completing the work -- we would not need the
15 additional personnel. So, we currently have on board
16 about 40 term hires.

17 We have 53 additional term hires in process to
18 bring on board. This will enable us to get the PRIA
19 decisions done in a timely fashion to meet our statutory
20 commitments there, and will also enable us to complete
21 the registration review work, or at least give us a best
22 effort towards completing the registration review work,
23 which, as you know, the first round is due to be
24 completed in 2022 under the provisions of PRIA.

25 This past year, the agency also, as part of a

1 government-wide effort to sort of reduce the number of
2 personnel for which payroll is increasingly become an
3 issue, we've offered what they call early outs or
4 buyouts. Early outs are for those that are not quite
5 retirement eligible, but it's an opportunity for them to
6 retire without incurring any setbacks to their pension.
7 The incentive program is essentially a buyout where
8 you're eligible and you can receive -- in our case, it
9 was a \$25,000 figure to retire.

10 We had 20 people take advantage of that in the
11 Office of Pesticide Programs. I believe most of them
12 were retirement-eligible. We tend to have people stay
13 for a long time once they start working in this program.
14 As a result of that, we obviously lost a lot of knowledge
15 and experience in the program, so we have been
16 aggressively pursuing the backfilling of those senior
17 positions and then aggressively pursuing permanent
18 backfills for the 20 that retired, for the aftermath of
19 the 20 that retired.

20 So, we are not only hiring sort of junior level
21 staff to actually grind through the work, but we're also
22 backfilling vacancies caused by the more experienced
23 staff that have retired. This is all, as you might
24 imagine, a very complicated process, but we have our
25 entire senior executive team working on it and coming up

1 with proposals to Jack, Bill, and I. We're trying to
2 move as expeditiously as the agency can allow.

3 PRIA itself, I'm pleased to say, that we have
4 increased our on-time completion rate. Last year, due to
5 the shutdown, the almost three weeks shutdown, and a few
6 days of furloughs, we had a setback in our ability to
7 complete the PRIA actions on time. We were down
8 somewhere around 86, 87 percent. We're now, as of mid-
9 year, halfway through the fiscal year, we're at 97.7. We
10 expect to be back up to 99 percent on-time completion.

11 Renegotiations, on the other hand, this is when
12 you have a PRIA date that's due, an action that's due on
13 a specific date but, for whatever reason, it cannot be
14 completed on that date, both parties, both the EPA person
15 responsible and the company representative agree to an
16 extension of the date. That's called the renegotiation.
17 We were up into the 20 percentile ranks for that, that
18 amount. We're now down to 15.3 percent.

19 A lot of that is because in PRIA 3, we provided
20 some technical assistance advice to the PRIA coalition
21 along the lines that if we had the ability to do a more
22 thorough screening of applications before we actually
23 committed to doing the work, we could eliminate the
24 number of renegotiations and identify problems in a more
25 timely fashion and deal with them.

1 We call it the 45/90 day screen. It's a 45-day
2 period for short term actions; it's a 90-day screen for
3 the longer term, new AIs, new uses, and so forth. So,
4 we screened over 1,000 actions under this particular
5 provision. We've sent out what we call 10-day deficiency
6 letters. That means we've identified deficiencies. It's
7 often where there's a claim that something is
8 substantially similar to another registered action. In
9 fact, it's not.

10 So, anyway, we send out these 10-day deficiency
11 letters, enabling the company to come back in and correct
12 the problem. So, we sent out 10-day deficiency letters
13 to about 10 percent of that 1,000 that have been
14 screened. So, I think not a whole lot are subject to
15 these deficiency letters. We've only rejected one. I
16 know there was a great concern throughout industry that
17 we would be slap happy and just reject applications
18 willy-nilly. In fact, we've only had to reject one.
19 Sixty-seven of the actions have been withdrawn, however.
20 I guess companies don't like the label of having been
21 rejected. They prefer to withdraw it themselves, which
22 is fine, because in most of those cases, the work has
23 been done, the application fixed, and then it's
24 resubmitted. We can properly address it without wasting
25 anybody's time.

1 I guess, in sum, this is quick, in sum, the
2 PRIA 4 apparently is being advanced for reauthorization.
3 I suspect the coalition doesn't want to have a
4 reauthorization discussion with congress during an
5 election year, so we have been recently asked to provide
6 technical assistance to the coalition for PRIA 4. I
7 suspect we'll be embarking upon those discussions within
8 the next month or so.

9 Any questions?

10 MR. HOUSENGER: Sue.

11 SUE: We've just been hearing that you've been
12 having trouble kind of with some of the renegotiated due
13 dates. I know that you guys are doing the best you can
14 to try and get all these things done on time. Has there
15 been renegotiated due dates, not because of a problem
16 with the application but because you guys don't quite
17 have the staffing yet to be able to get done on time?
18 What's the trend in your renegotiated due dates now?

19 MS. MONELL: See, I can tell you that the one
20 category that seems to be experiencing the most
21 difficulties are the inerts. The inerts are, as you
22 know, under PRIA 3, it's the first time we've had
23 specific categories for inerts reviews. We had no
24 experience, really, in judging the amount of time
25 necessary, including the amount of time required for the

1 FR notice process. So, we've had to -- I've noticed
2 because I sign all of the renegotiations, for the most
3 part -- that that area is probably about a 60 percent
4 renegotiation rate.

5 So, I can tell you that, the others, I don't
6 have that sense at all. Quite frankly, in the
7 Registration Division, we're down about four percentage
8 points from the rate of last year. In the Biopesticides
9 Division, it's down about seven percent from last year.
10 Antimicrobials is about the same as last year, about 14,
11 15 percent. So, other than those trends, I'm not seeing
12 it. I'm not aware, Sue. If you have a particular example,
13 I'd be happy to follow up.

14 MR. HOUSENGER: Ray.

15 RAY: A couple questions. Do the PRIA
16 completion dates include renegotiated dates as completed
17 on time?

18 MS. MONELL: Yes.

19 RAY: And those rates, can we determine those
20 on a category-by-category basis? Is that information
21 available for us?

22 MS. MONELL: You mean the renegotiations by
23 action code or do you mean --

24 RAY: Well, if I've got category R-127, can I
25 get a renegotiation rate for that category?

1 MS. MONELL: Yes, you can. I believe, though,
2 that information was provided at the last coalition
3 meeting, the quarterly coalition meeting.

4 RAY: Okay. In some federal budget
5 negotiations one or two years ago, some PRIA funds were
6 sequestered. What's the status of those?

7 MS. MONELL: There's about \$800,000, assuming
8 it's not earning interest, that is still sequestered
9 because we don't have the statutory authority to release
10 those funds back to the program. So, they're still being
11 held in a sequestered account until such time as congress
12 acts. If you recall, there was a provision in the 2014-
13 15 president's budget that would have provided for the
14 return of those funds. It was not acted upon in our
15 appropriations.

16 RAY: You spend PRIA funds on several different
17 projects/categories. Whose hide were those sequestered
18 funds taken out of?

19 MS. MONELL: It's taken off the top. We never
20 saw the money.

21 RAY: I mean, you have less to spend, so where
22 did you not spend it?

23 MS. MONELL: Where did we not spend it?

24 RAY: Yes. Was it spread across all
25 categories?

1 MS. MONELL: Oh, I see where you're going.
2 Yes, it would have been a reduction in the amount of
3 money spent on payroll, as well as the amount of money
4 spent on contracts.

5 RAY: What about the specialty programs?

6 MS. MONELL: Set asides are set in the statute,
7 so we did not take the money from them.

8 RAY: Okay.

9 MR. HOUSENGER: Wayne.

10 WAYNE: Marty, thank you for this efficient
11 report. It's good to have this format to look at from
12 year to year.

13 I just have a question regarding slide 5, the
14 authorized pesticide fees and the comments for the PRIA 3
15 mandated programs. Can you explain how monies for worker
16 protection and partnership grants are distributed? I'm
17 familiar, of course, with PSEP, but what about
18 the others?

19 MS. MONELL: The partnership grant set-aside
20 was utilized for the past two years to support NPIC,
21 National Pesticide Incident Information -- yes, thank
22 you. We believe that that is an invaluable resource for
23 the public and something which is certainly a
24 partnership. It's a cooperative agreement that we fund.
25 Working with them, we have been able to leverage a lot of

1 service with a very small investment.

2 WAYNE: Worker protection?

3 MS. MONELL: The worker protection, we've done
4 things like -- it supports -- I don't have the exact
5 list, but I can get it for you. As a matter of fact,
6 I'll see that the exact expenditures are posted on the
7 PPDC website, where all these materials will be found.
8 It's all activities to support either the certification
9 and training of applicators for restricted use
10 pesticides, the training program that we used to fund
11 through USDA but they no longer are in that business.
12 So, part of the funding goes there. Part of the funding
13 goes to various outreach activities for the workers.

14 MR. HOUSENGER: (Inaudible) for training
15 farmworkers under the new rule.

16 MS. MONELL: Right. I was going to get to
17 that. This year, in FY 15, in anticipation of the new
18 worker protection rule and the modifications to the
19 certification and training rule, we have set aside not --
20 we are going to be utilizing not only the PRIA set
21 asides, but we're also dedicating some resources, some
22 discretionary resources, from our EPM accounts towards
23 outreach activities and training and so forth, so that we
24 will be ready.

25 As Jim just mentioned, there's an RFA out for

1 the pesticide safety education program. Stay tuned, keep
2 your eye open, because there will be lots of
3 announcements of funding availabilities. We're also
4 dedicating about a million dollars to help fund IPM in
5 schools again, this time with EPM money, not with STAG
6 money, so that we can broaden the funding
7 available to various organizations and entities to
8 increase our efforts in the school IPM area.

9 MR. HOUSENGER: Robin.

10 ROBIN: Thank you. Just an administrative
11 comment and then a real question. Is there any way that
12 we cannot print out the full slides? EPA wastes trees.

13 The early outs and buyouts, the 20 people, from
14 where are you recruiting or advertising? Is it within
15 the agency, outside the agency, both? Where are you
16 trying to get those people from?

17 MS. MONELL: Well, a good number of the
18 backfills for those that retired will be promotional
19 opportunities for those within our organization or within
20 the AAship or within the larger EPA. It sort
21 of depends on what has been identified as a priority need
22 for the backfill.

23 Then, there will be another probably dozen that
24 will be announced through USA Jobs, broadly announced.
25 Also, when we do announcements like that, we also make

1 sure that we get the word out to minorities serving
2 institutions, both the HBCUs and the HSIs, anyway,
3 minorities serving institutions, so that we get as broad
4 and diverse a candidate pool as possible.

5 MR. HOUSENGER: Gabrielle.

6 MS. LUDWIG: This is a little bit more on the
7 details, but given some of the losses and given some of
8 the loss just in general to FTEs, where and how has
9 budgeting been going on for international efforts?

10 This president has made a priority for
11 enhancing trade and exports from the United States. To
12 be honest with you, our sense is that we've lost
13 capacity, not just because of certain individuals but
14 just in general.

15 There has not been a priority given to these
16 international issues from working with OECP on
17 biopesticides. How do we set up those standards so
18 there's more uniformity from the get go rather than
19 getting to where we are on the conventional arena to
20 really working on MRL issues as part of TTIP (phonetic)
21 and all those kinds of stuff?

22 So, I'm just trying to get a sense of, if
23 you're looking at the budget, and I know there's been
24 cuts, and it may not be a question for Marty, it might be
25 a question for Jack or Jim, how are you prioritizing or

1 where does that whole effort come from on really making
2 sure that the United States and EPA is represented in
3 these international arenas in terms of how you do
4 pesticide risk assessments, MRL setting, all that kind of
5 stuff?

6 What is the definition of a biopesticide? When
7 is something exempt from a tolerance? I mean, there's a
8 whole bunch of things along those lines that require
9 effort. If we don't pay attention, they make it really,
10 really hard to use new products.

11 MR. HOUSENGER: I think we actually do a lot on
12 the international front. We participate in the OECD. We
13 have just hired a new person to be the OECD test
14 guideline coordinator. Recently, we met with the
15 Peruvians to talk about a situation on quinoa,
16 to allow them to import quinoa into our country, and also
17 set tolerances to help our domestic growers grow quinoa
18 effectively.

19 You know, I think it is a balance about how
20 much of your resources go to international and what you
21 get out of that. I think that's one of the things we're
22 looking at now, is how often do we play in the OECD
23 meetings. But I think next week we have representatives
24 going for those meetings as well.

25 So, I actually think we give quite a few FTEs

1 to OECD international activities. I think we're doing a
2 good job. We harmonize with Canada on our MRLs.
3 Australia, we conduct global reviews. So, I guess I see
4 it differently.

5 Scott.

6 SCOTT: A question for Marty. You referred to
7 one rejection and 67 withdrawn registrations. What time
8 frame is that current to? What are you actually
9 referring to?

10 MS. MONELL: From October 1st. In other words,
11 the beginning of this fiscal year to the end of March,
12 which was the end of the second quarter of this fiscal
13 year.

14 SCOTT: Okay, thank you.

15 MR. HOUSENGER: Sue, I assume you don't have
16 another question?

17 Let's go on to our next topic, which is one
18 that we spend quite a bit of time working on, ESA. For
19 those of you who are familiar, you know that the NAS gave
20 us recommendations on how to implement ESA with the
21 services. We've been working successfully. We're
22 gearing up this summer to issue our first biological
23 evaluations on three pilot chemicals.

24 We're looking closely at when we grant a new
25 active ingredient, about whether that shift is a good one

1 in terms of the alternatives that are available and what
2 it would go to. We've been conducting ESA assessments
3 for herbicide tolerant crops, such as 2,4-D and upcoming
4 Dicamba (phonetic) decision. And we've been dealing with
5 a lot of litigation.

6 So, Anita and Craig are going to give us an
7 update on everything else.

8 MS. PEASE: Good morning, everybody. I'm Anita
9 Pease. I'm the associate director of the Environmental
10 Fate and Effects Division. And Craig Aubrey, who is the
11 chief of the Environmental Review Division and the Fish
12 and Wildlife Services Ecological Services Program. We
13 are going to tag-team this presentation.

14 So, for today, we're going to give you a little
15 background on ESA. We're going to tell you what we've
16 been doing since the National Academy of Science issued
17 their report in 2013. Craig will be talking about that,
18 giving you a status of our ongoing activities. I'll
19 discuss our most recent stakeholder meeting that we had
20 in mid-April and some of the work that we've done to date
21 before that meeting. Then, we'll finish with some
22 challenges and perspectives.

23 I'll turn it over to Craig.

24 MR. AUBREY: Good morning. Thanks for having
25 us. So, like Anita said, I'm going to go ahead and give

1 a little bit of a background on how we got to where we
2 are today.

3 Basically, in April of 2013, the National
4 Academy of Sciences released a report on how to basically
5 improve the way we are assessing risks that threaten
6 endangered species from pesticides. This report had been
7 produced at the request of the U.S. Fish and Wildlife
8 Service, National Marine Fishery Service, EPA, and USDA.

9 What we were trying to do was basically
10 overcome years of difficulty trying to figure out the
11 best way to approach this. We had a lot of questions
12 regarding what was the best science to use, what was the
13 best techniques, that kind of thing. So, the whole idea
14 was to turn to the National Academy of Sciences to try
15 and get over some of these obstacles that we had had.

16 So, what they recommended in the report was a
17 three-step approach that would integrate ecological risk
18 assessments with the endangered species section 7
19 process, basically. So, the three-step approach is
20 illustrated up here on this screen. This is actually
21 straight out of the NAS report.

22 So, what we have is step one, which the first
23 step is basically determining whether or not the
24 registration or re-registration of this pesticide and its
25 use may effect a federally listed species or designated

1 critical habitat, which is actually a pretty low bar.

2 It's just kind of the first initial screening step of the
3 process.

4 Once we get through that step, the second step
5 is step two, likely to adversely affect. So, is the use
6 of this pesticide likely to adversely affect an
7 individual listed species or designated critical habitat?
8 If we had determined no affect for a species, you're
9 basically done with that species.

10 Step 2 is likely to adversely affect. If EPA
11 determines that it's not likely to adversely affect that
12 particular species or designated critical habitat, and
13 the service concurs, either one of the services concur,
14 then we're done for that particular species.

15 However, if we don't concur or if EPA
16 determines that it's likely to adversely affect that
17 particular species or designated critical habitat, then
18 we would enter into formal consultation on that
19 particular species or critical habitat. That's where the
20 services would do a more in-depth analysis and at the end
21 have to make a determination as to whether or not the use
22 of that pesticide would either jeopardize that particular
23 species or, in the case of critical habitat, adversely
24 modify or destroy its critical habitat.

25 If the answer is no to jeopardy or adverse

1 modification, then that's essentially it. We produce
2 that within our biological opinion, which is given to
3 EPA, and then they can move forward with the registration
4 or re-registration. However, if we do find that there's
5 jeopardy or adverse modification, that's when we'd be
6 looking at developing a reasonable or prudent
7 alternative, which is what additional measures might be
8 necessary to avoid jeopardy or adverse modification.

9 So, throughout this process, we're employing
10 the current ecological risk assessment framework.
11 Another kind of important thing to kind of point out is
12 ultimately, steps one and two, is it may affect or is it
13 not likely adversely affect determination, that's EPA
14 that is making those determinations.

15 Step three is for the Fish and Wildlife
16 Service, National Marine Fishery Service. That's where
17 we're producing our biological opinion, basically.

18 One thing I do want to point out here, though
19 -- so, we just kind of focused on who has ultimate
20 ownership or responsibility for a particular step -- is
21 that throughout this process, all four agencies are at
22 the table. Staff, I would say, if they don't talk daily,
23 they're talking throughout the week, as we're trying to
24 work through integrating these separate processes.

25 So, when I keep turning my head or people are

1 getting noise then not noise, I just got to notice that
2 I'm kind of sometimes talking into the microphone and
3 sometime not. Is that starting to be a problem for
4 people? I just wanted to make sure.

5 So, like I said on the previous slide, the goal
6 we have right now is to have a unified approach with
7 agreement in processes across all these phases. So, from
8 staff all the way up through management, there's really a
9 concerted effort to work through, using the
10 recommendations out of that NAS report and the interim
11 approaches that we've developed, to come to a consensus
12 on how to move forward so that there would be no
13 surprises and, hopefully, we're getting the best possible
14 product that we can.

15 One of the things that we've kind of made a
16 concerted effort and we back up is the idea that each of
17 the agencies be open to changing how it views risk
18 assessment methodologies. So, truly, if you sit and
19 listen to staff, they're really open, trying to work with
20 each other to figure out the best solutions.

21 And then, kind of recognizing that although the
22 NAS report is really a great product for us to work from,
23 that A, not all of the answers are in that report and B,
24 that we can't necessarily implement all of the
25 recommendations right away. To some extent, we have to

1 get through these first couple of biological opinions as
2 we're working some of these recommendations out, how do
3 they actually apply in the real world, the idea that
4 we're recognizing that we're learning as we go,
5 conducting an iterative approach, basically, and with the
6 goal, hopefully, as we learn to improve the processes and
7 to have the most streamlined approach that we can.

8 The idea, when we're working through steps one
9 and two, we're doing so with the idea of informing step
10 three, if it's necessary, for a particular species and
11 that we're really thinking these things through so that
12 as we get through these first couple of chemicals,
13 they're really going to help inform our thinking as we go
14 forward in the future.

15 So, a kind of basic time line, in 2013 the NAS
16 report was released. Since then, we've had three
17 interagency workshops. The last one was actually the
18 first one that I had attended. It was the better part of
19 a week. It was a really good opportunity for all of the
20 staff and all the agencies to get together and talk
21 through some of these really difficult issues that we've
22 been trying to get through.

23 We have had four stakeholder workshops, the
24 last of which was last month. The first couple actually
25 focused on the idea of getting feedback on the interim

1 approaches that we had developed and for us to provide
2 updates. And then, this last one in April really focused
3 more so on us providing updates on where we were going.

4 One of the things that we have done since the
5 2013 report is we had a variety of settlement agreements.
6 Each of the agencies had a variety of settlement
7 agreements on a variety of chemicals and species and that
8 kind of thing. There was a concerted effort by all of
9 the agencies to kind of go back and consolidate, I guess
10 would be one word for it, what we are supposed to be
11 doing so that we could unify resources and priorities.

12 The last thing that I would mention is that in
13 addition to having stakeholder workshops, staff from each
14 of the agencies have been providing presentations at a
15 variety of scientific conferences, other stakeholder
16 group presentations, you kind of name it. So, we are
17 trying to keep people as informed as possible and solicit
18 feedback as much as we can so that we're providing the
19 best products we can.

20 So, right now we are working through our first
21 three chemicals. These are our first national level
22 pesticide consultations, so we're looking at re-
23 registration for these three chemicals nationwide, so
24 having to look at every listed species and designate a
25 critical habitat throughout the U.S. It's a pretty big

1 list. I would say it was pretty much an all hands on
2 deck approach with each of the agencies from staff up.
3 It's a truly collaborative effort. I definitely feel and
4 believe that. It's being conducted consistent with the
5 interim approaches that were based on that NAS report.

6 The first three chemicals are listed here,
7 chlorpyrifos, diazinon, and malathion. We are shooting
8 to have our draft biological evaluations for these first
9 three pilot chemicals this fall. We are scheduled to
10 have our final biological opinions for these first three
11 pilot chemicals in December of 2017, which seems like a
12 long way off, but it doesn't feel like a long way off at
13 all for us.

14 MS. PEASE: Thanks, Craig.

15 I'll just also mention that as these documents
16 go out, as we release drafts, there will be multiple
17 public comment periods. So, as the draft BE goes out,
18 you'll have an opportunity to comment. As the draft
19 biological opinion goes out, there will also be a public
20 comment period. So, although, like Craig said, it's a
21 long way to 2017, there is multiple opportunities for
22 stakeholder engagement along the way.

23 So, I'm going to update you a little bit on our
24 last stakeholder meeting, and this meeting provides a
25 good opportunity for me to tell you what's been going on

1 in terms of the ongoing work. This was probably our most
2 interactive meeting of the four that we've had so far.
3 There was a lot of dialogue between the technical folks
4 that are working on these draft BEs from all three
5 agencies. There was a lot of good dialogue at that
6 meeting.

7 So, basically, what we did was we provided an
8 update of the problem formulation. If you recall back to
9 the slide Craig presented with the three steps, along the
10 side of that was our risk assessment methodology
11 framework, which includes four steps, problem
12 formulation, exposure, effects analysis, and then a risk
13 characterization. So, the problem formulation is really
14 the first step in that process, in drafting out that BE.
15 It occurs in all three steps of our consultation process.

16 We also had a presentation on the geospatial
17 data that will be used throughout the three steps. I'll
18 talk a little bit more about that. We also presented
19 work that's ongoing right now in developing a weight of
20 evidence approach, which is really the key framework
21 we'll be using to make that likely to adversely affect or
22 not likely to adversely affect as part of step two of the
23 process.

24 Then, there were also presentations, some
25 specific examples relative to some listed species, the

1 Kirkland's warbler, which is a listed bird, as well as a
2 short-nosed sturgeon. I'm not going to go into those
3 today, but the slides from the stakeholder workshop are
4 available on our website. I encourage you all to look at
5 them because there's a lot of really good information,
6 especially in those last two presentations, in terms of
7 the tools we'll be using and how that information will be
8 presented in the draft BEs.

9 So, relative to the problem formulation, the
10 teams are pretty far along in this section of the draft
11 BE. They have good drafts. They've already circulated
12 the documents for comments amongst the technical staff,
13 so we're in pretty good shape with this.

14 This section includes four different
15 subsections. We'll be describing the scope of the
16 federal actions for these three chemicals that Craig
17 mentioned. We'll be providing information on the
18 pesticide, the active ingredient. We'll provide
19 conceptual models, which I'll discuss a little bit.
20 Then, we'll also lay out the analysis plan for steps one
21 and two in the problem formulation.

22 So, in terms of the federal action, the federal
23 action is really based on the product label for all the
24 pesticide products that are contained in the pesticide
25 that we're assessing. This includes all the formulated

1 products, everything that's registered along with that
2 active ingredient.

3 Right now, you can understand that clear labels
4 are extremely important in us determining what the
5 federal action is. If we don't have clear labels, then
6 we have to make assumptions, and they're usually
7 conservative assumptions about maximum rates, number of
8 applications, and such.

9 So, we have been actively engaging the
10 registrants for these three chemicals to try and get some
11 clarity on labels when they're unclear, especially for
12 use patterns that can be anywhere in the country. So,
13 this would include things like wide area uses or
14 mosquitocide use patterns.

15 In terms of the pesticide active ingredient
16 information, this will describe the fate properties of
17 the chemical. All three of these chemicals are
18 acetylcholinesterase inhibitors so they all
19 share a common mode of action. They have all common
20 degradates, so that would be described there.

21 In terms of the conceptual model, I think most
22 of you have seen this, but it's basically a figure that
23 depicts the stressor, the exposure pathways, the
24 receptors, and the attributes that are changing based on
25 the stressors.

1 In terms of the analysis plan, we will describe
2 how we're making that may affect/no affect determination
3 in step one. Basically, that's a co-occurrence of the
4 area where pesticides can be used. That's the footprint.
5 Plus, in the offsite transport distance, based on spray
6 drift or runoff, which we call the action area, and where
7 species ranges overlap within that action area.

8 Then, step two is a not likely to adversely
9 affect or likely to adversely affect (inaudible). As I
10 mentioned, this is largely based on our weight of
11 evidence approach.

12 So, in terms of the geospatial data, I first
13 want to mention that we have had a lot of engagement with
14 a couple of industry task forces in developing these
15 approaches. We've engaged with generic endangered
16 species task force, GESTF, and the federal endangered
17 species task force, FESTF. GESTF has been very
18 instrumental in helping us work out our methodology for
19 defining the footprint of pesticide uses; whereas, FESTF
20 has been instrumental in helping us develop range maps
21 for species. This information, again, is critical for
22 step one. Obviously, step one is the overlap of these
23 two layers, so it's very critical for step one. But it
24 will be used in all three steps of the consultation
25 process.

1 In terms of the pesticide use site information,
2 for agricultural use patterns, we have agreement to use
3 existing USDA spatial layers. So, this would include the
4 crop land data layer, or CDL, as well as the National
5 Agricultural Statistic Service, or NASS, census data on a
6 county level to ensure that we're not underpredicting the
7 footprint based on the CDL layers.

8 We have a methodology we've worked out for
9 binning 111 thematic classes of CDL layers into 11 bins
10 for different agricultural use patterns. For
11 nonagricultural uses, this is a little bit more tricky.
12 We're trying to make use of the existing data sets, and
13 we have agreement on what we'll be using for forestry and
14 nursery use patterns.

15 Again, some of the more challenging use
16 patterns to describe are some of the mosquitocides that
17 can be used anywhere. So, in situations where the label
18 doesn't restrict use in any part of the country or we
19 don't have a spatial layer, we will be assuming that that
20 pesticide can be used anywhere.

21 Again, use site is really defined by areas
22 where the pesticide could be used, not necessarily where
23 it is being used. That's an important distinction to
24 make. We hope to bring that information into the
25 assessments later on, but right now we're basing it on

1 what's on the label.

2 In terms of the range maps, FSTF was
3 instrumental in helping us gather some of this
4 information. We do have all the range maps from Marine
5 Fisheries in house, and this is approximately 100
6 species. Right now, we're working on gathering that
7 information from the Fish and Wildlife Services field
8 offices for their species, which are really most of the
9 endangered species that are out there. We are doing that
10 in a phased approach right now, so we're getting that
11 information right now.

12 In terms of the risk hypothesis and weight of
13 evidence approach, the teams are really developing this
14 right now, so it's not fully cooked. But I will tell you
15 that they've made a lot of progress in working out a
16 methodology for step two. They have developed risk
17 hypotheses. These are basically directly linked to our
18 protection goals for step two. So, the slide provides an
19 example of a risk hypothesis.

20 So, the question we're asking for all these
21 chemicals is, is it likely that the fitness of an
22 individual -- and I want you to pay attention to this
23 fitness of an individual because that's the ESA bar for
24 step two. So, again, as Craig mentioned, a very low bar
25 that we're talking about, one individual being impacted.

1 So, is that fitness of that individual listed
2 species or what we include as part of an analysis of
3 designated critical habitat, is that being adversely
4 affected by the pesticide according to the product label?
5 That's the question we're asking.

6 As part of the weight of evidence, we have
7 developed various lines of evidence and will be assigning
8 them weights of high, medium, and low. They are based on
9 confidence in the exposure and the effects data that are
10 based on existing criteria.

11 So, the data that we're going to be using is
12 the exposure data, which will be based on our existing
13 models, our existing tools, targeted monitoring data, as
14 well as environmental fate data. We'll be looking at
15 the relevance and robustness of that information.

16 In terms of the effects data, we'll be looking
17 at registrant submitted studies, as well as information
18 in the open literature. The criteria we will be using to
19 evaluate the effects data is biological relevance,
20 species surrogacy, and robustness. Then, we'll be
21 comparing all of that information, so we'll be comparing
22 the exposure concentration to all the effects data that
23 we have and determining where the overlap is.

24 If you look at the slide from the presentation,
25 what you'll see is we're presenting that data in what we

1 call a data array. So, we'll provide all of the toxicity
2 information along an exposure concentration gradient so
3 you can see how all the information is being used to
4 inform that weight of evidence. Like I said, the teams
5 are working on this right now. We expect that it's going
6 to evolve over time and that we may include additional
7 lines of evidence, and we'll learn lessons from the draft
8 BEs.

9 So, in terms of challenges and perspectives,
10 just to give you a sense of the modeling effort for
11 diazinon, malathion, and chlorpyrifos, the number of
12 modeling runs per chemical ranges from 2,000 to 8,000
13 runs. Assuming that we're going to be looking at
14 different types of bins, so we'll be looking at water
15 modeling beyond our farm pond model, we'll be looking at
16 static flowing water bodies, as well as estuarine and
17 marine water bodies.

18 We're looking at species within different HUC 2
19 (phonetic) regions, so 18 different regions around the
20 country. So, when you do that math and multiply that
21 out, it's a lot of modeling efforts to come up with
22 exposure concentrations for these species.

23 In terms of the terrestrial modeling, we have
24 to really account for three different sets of units when
25 we're looking at the data, the toxicological data that we

1 get for terrestrial species. So, a lot of information is
2 coming in, and the teams are evaluating that now as we
3 speak.

4 Also, we're looking to integrate our existing
5 tools. So, right now we have separate models. T-REX for
6 birds and mammals, T-HERPs for reptiles, TerrPlant for
7 plants, and then AgDrift to estimate offsite transport
8 distance due to spray drift. We're looking at
9 integrating all those tools into one specific model right
10 now.

11 The other challenge is just the sheer number of
12 determination calls we need to make for each chemical.
13 So, if you assume that there's 850 listed species out
14 there, including all the proposed and candidate species,
15 we need to make calls for each of those species for each
16 chemical. In addition to making the call for whether or
17 not the critical habitat is adversely modified, you do
18 the math for that, you're looking at about over 2,600
19 determinations per chemical. Then you further subdivide
20 things into different use patterns. So, you're looking
21 at really an enormous amount of work that the teams are
22 doing right now.

23 So, these are really complex, very challenging
24 assessments. Obviously, everyone recognizes that we've
25 had some historical differences with the services and how

1 we carry out our science relative to pesticide risk
2 assessment. I want to dispel the notion that there's a
3 culture, an EPA culture and a services culture.

4 Really, what we're trying to do is each agency
5 is just trying to carry out its mandate under the
6 statutes that it operates under. So, the pesticide
7 program operates under FIFRA and the services operate
8 under ESA. We also at EPA have obligations under the
9 Endangered Species Act to ensure that the federal actions
10 that we authorize, which are the labels, that they don't
11 jeopardize the continued existence of listed species.

12 So, we're all operating under our current
13 statutes and mandates. I think the teams have really
14 done a remarkable job at trying to see through the lens
15 of the other agencies, which we were not able to do so
16 well in the past.

17 So, the NAS report helped us do that,
18 obviously. This report really did provide a road map in
19 how we should evolve the risk assessment tools. I think
20 we recognize that. As Craig mentioned, there's some
21 things that we can do now, other things that will take
22 longer to implement. So, we're trying to use the phased
23 approach based on these interim methods.

24 There are a lot of gray areas in the NAS report
25 that require interpretation and judgment. So, the teams

1 are really trying to do the best that they can to come up
2 with methods and methodologies that follow the
3 recommendations of the National Academy of Sciences and
4 also meet each agency's statutory mandates. So, it
5 really is a very tall challenge, but again, the teams
6 have been doing a remarkable job at this.

7 Finally, I'll just leave you with the notion
8 that this is a ton of work. We have, like Craig said,
9 all hands on deck for all three agencies in developing
10 these methodologies and trying to get these draft BEs out
11 in the fall for public comment. It's not like we're
12 going to be finished after that. It's not one and done.

13 These methods and approaches are going to
14 evolve over time. We expect that from public comments
15 that we'll be getting on draft BEs, we'll modify our
16 approaches and we'll learn as we go. So, the conclusions
17 may change from what you see in the draft to what we do
18 moving forward.

19 So, I'll leave you with that, and I'll take any
20 questions.

21 MR. HOUSENGER: Dave.

22 DAVE: Thank you very much. One thing that
23 strikes me about the things that you're working on right
24 now, the three chemicals you're working on right now,
25 they are very data rich. That's an advantage for trying

1 to work out the kinks. But I think that at the end of
2 that and once you start working with things where you
3 have a lot less data on the toxicology of the chemicals,
4 you're going to end up with sort of a lack of the right
5 tools.

6 I just wanted to point out that currently there
7 is a tool that OPP and Office of Water have been working
8 on, which is the common effects methodology, is stalled.
9 I would encourage the agency to work through getting the
10 resources to get that tool in place so that that's
11 available once you work through your pilot program. I
12 don't see how you can really work through some of those
13 problems with all the different chemicals you're going to
14 have to work through that don't have adequate data so you
15 can have real certainty with --

16 You mentioned species surrogacy. So, if you
17 have that tool that's already set up and approved, and
18 Office of Water and Office of Pesticide Programs agree to
19 that, then you'll have that available when you need it to
20 work through the rest of the process that you have to go
21 through.

22 You do have my condolences on all those
23 different endpoints that you have to work through. But I
24 think it's really important that you have this sort of
25 global tool so that you can sort of narrow down all the

1 different endpoints, because I think if you have
2 something that's in place, you'll have better ability to
3 work through this at the end. I think that will help
4 simplify the number of endpoints that you're trying to
5 work with.

6 The other point I'd like to make is that you
7 mentioned use sites. Of course, I'm concerned about
8 urban discharges. I want to make sure that you fully
9 take into consideration and put the models in place to be
10 able to understand how the urban application sites are
11 likely to impact receiving waters. Currently, we don't
12 believe, as stormwater agencies, that the office
13 universally analyzes those correctly. They're certainly
14 not being conservative enough to keep us out of trouble
15 with the Office of Water and the state agency that
16 regulates us directly.

17 So, I would encourage the agency also to put in
18 place at least better scenarios and make sure that you
19 use the correct parameters in the models that are
20 supposed to evaluate urban discharges. I think otherwise
21 you'll end up with species that are at risk because those
22 types of discharges haven't been adequately considered.

23 Thank you.

24 MR. HOUSENGER: I'm going to take all the cards
25 that are up, but no one else put their card up.

1 Robin.

2 ROBIN: Thank you for your report. Just to
3 follow up with Dave, I would ask your consideration of
4 lawn care and particularly athletic field chemicals in
5 your model, residential lawn care.

6 And then, what were the three pilot pesticides
7 discussed in the April 2015 stakeholder workshops?

8 MS. PEASE: That was chlorpyrifos, malathion,
9 and diazinon.

10 ROBIN: Okay. So, they were the same?

11 MS. PEASE: Yes.

12 MR. HOUSENGER: Sharon.

13 SHARON: Hi. My question is, can you describe
14 to what extent any mitigations that are common to the no
15 affect step one, essentially, and step two process, will
16 you be considering any mitigations at that step that are
17 not currently on the label? If so, will those
18 mitigations to essentially reach a no affect or reach a
19 not likely to adversely affect, will those be
20 incorporated into the labels?

21 MS. PEASE: I think we're always willing to
22 have that dialogue with registrants. In fact, we've
23 documented that in a stakeholder agreement paper, I think
24 that went out in May of 2011 or so. But basically, we're
25 calling them focus meetings. The registrant can come in

1 at any point in time. If you would like to negotiate, if
2 you'd like to voluntarily cancel a use that may trigger a
3 risk concern for a listed species because it's not
4 marketable, we're certainly willing to have those
5 discussions at any point in the process.

6 What we've been doing, just in terms of how we
7 would change the label, which I think was the second part
8 of your question, is we've been asking for a commitment
9 letter from registrants to change labels by X date, and
10 then we would have that agreement with the services, and
11 we would adjust our modeling and our risk assessment
12 accordingly.

13 MR. HOUSENGER: Cheryl.

14 CHERYL: Thanks. You mentioned a couple of
15 times how mosquitocides sometimes are kind of problematic
16 in all of this. There's a clash between the risk benefit
17 laws and whatever, conservative law. How is that being
18 worked out? Then I have one other comment, too.

19 MS. PEASE: I mean, it's a fair point. I
20 understand that mosquitocides are necessary for public
21 health control. Yet, there are use patterns that may be
22 potentially risky to listed species. The teams right now
23 are working out the scientific methods, and we're doing
24 that based on the label. So, we have had multiple
25 discussions with the American Mosquito Control

1 Association. We're trying to get better usage and use
2 information from them. I know they want flexibility in
3 their labels.

4 So, we are working with them to try and get
5 better information to inform our risk assessments. But
6 at the end of the day, that public health concern, I
7 think, is more of a policy call; whereas, we're working
8 on the science.

9 MR. AUBREY: I think it's worth noting that
10 working it out will not happen until you're in risk
11 management and the schedule that we've seen here this
12 morning leaves risk management happening sometime after
13 December 2017 when you've got biological opinion. So,
14 that is when it would be worked out and people can then
15 state whether or not we've landed it correctly or not. I
16 think we're a ways away from working it out.

17 CHERYL: Tools for benefit analysis are also
18 helpful as well. So, you spend all your time on risk
19 tools, maybe there's a need to look at tools for benefit
20 analysis.

21 The other thing is you mentioned that you need
22 to be assessing things that could be used, not are used,
23 today, which makes sense until you take out of that any
24 kind of realistic monitoring data that allows you to
25 validate the exposure estimates. But at what point are

1 you getting too far from is used to could be used and you
2 negate that ability to use existing data?

3 MS. PEASE: Well, I can answer, and then maybe
4 Craig can add his thoughts.

5 I understand the concerns. Right now, like I
6 said, we're trying to base our methodology on what is on
7 the pesticide label, which doesn't necessarily describe
8 how things are actually used in the real world. So, we
9 are trying to bring that information in later in the
10 process.

11 Do you want to add?

12 MR. AUBREY: No, I think you're doing a pretty
13 good job. I don't really have anything to add to what
14 she's been saying.

15 MR. HOUSENGER: Mark.

16 MARK: I really appreciate the review and going
17 through this process. I've wondered for a long time
18 since, what, a couple years ago when it seemed to go
19 underground. So, I appreciate that. I really like the
20 way that you're moving ahead and the kind of balance of
21 risk that you've set forward. It seems reasonable at
22 this point.

23 One of the challenges that I think that has
24 been brought forward already is this whole benefit
25 analysis/risk management analysis. I didn't see enough

1 of that to feel very comfortable one way or another. It
2 would be great to see some more depth to that. I know
3 that there's layer after layer after layer.

4 I worked around the Kirkland warbler issue, for
5 example, and the public process is probably the most
6 dangerous for the agencies. I'm wondering how are you
7 going to handle that in terms of information and
8 reporting, et cetera, as you move through the process?

9 MS. PEASE: I mean, we recognize that we'll be
10 getting a lot of mail when these go out for public
11 comment. There will be a lot of information to digest.
12 So, I think that the teams will take whatever information
13 we can. I know Don Brady threw out a challenge to
14 CropLife America at the recent spring conference about
15 coming to us with a revised process that they thought
16 might be better. I know we've heard a lot of criticism
17 of our current methods.

18 Again, it's easy to criticize but not so easy
19 to do. So, I think we're always open to hearing from
20 stakeholders and how to improve things. We recognize
21 it's a lot of work, and it's going to take time to adjust
22 the methodologies accordingly. But I think we're open to
23 having that dialogue.

24 MR. AUBREY: I think we're still trying to
25 consider some of the amount of public participation from

1 the Fish and Wildlife Service or National Marine
2 Fisheries Service perspective. Related to section 7,
3 consultation, we rarely have this degree of public
4 participation. So, we're still kind of trying to think
5 through some of these to make sure that we're providing a
6 solid process, basically, a transparent process.

7 MR. HOUSENGER: Ray.

8 RAY: I want to make sure I understood the may
9 affect process correctly. You say that it's based on
10 where a product is registered and where the species
11 occur, not where it's used, just where it's registered?

12 MS. PEASE: That's correct. It's based on
13 labeled use patterns.

14 RAY: What about toxicity?

15 MS. PEASE: Toxicity, there are thresholds that
16 come into play to determine the off-site transport
17 distance. So, the footprint is based on the geospatial
18 air. The species range maps are based on geospatial
19 data. Then the additional distance that's added to the
20 footprint is based on toxicity information.

21 RAY: Toxicity to the surrogate species?

22 MS. PEASE: It's based on the lowest toxicity
23 threshold, and these were agreements that we made with
24 the services as part of our interim methods. Again, you
25 know, recognizing that these things may change over time,

1 that was the agreement we made. If you look at the NAS
2 report, I think NAS was pretty clear about what they
3 intended for step one. I mean, it's this co-occurrence.
4 It's clearly articulated in the report.

5 RAY: Okay. Others have expressed my concerns.

6 MR. HOUSENGER: Cynthia.

7 CYNTHIA: I appreciate all the hard work on
8 ESA. I learned a lot at the stakeholder workshop in
9 April. I especially appreciated the Kirkland's warbler
10 analysis.

11 On page 5, you speak of an iterative approach
12 based on real world experience. I would just like to
13 emphasize the importance of gathering that data of the
14 real world experience to see if mitigation is actually
15 working.

16 I hope that the ESA effort is going hand in
17 hand with an upgrade of FIFRA's 6A2 reporting thresholds.
18 Just to refresh everyone's memory, for herding mammals,
19 registrants do not have to report unless at least 50
20 mammals are killed. For birds, it's 200 of a flocking
21 species, 50 song birds, or 5 raptors. For fish, we're
22 talking 1,000 of a schooling species. For bees, well,
23 for bees there's no reporting requirements under 6A2.
24 So, I would hope that these efforts that ESA and the
25 FIFRA 6A2 upgrade will go hand in hand. Thank you.

1 MR. HOUSENGER: Dawn.

2 DAWN: Thank you for your report. I have one
3 comment and one question. The comment is, I just
4 wondered if the FDA might be at the table where it comes
5 to malathion and stormwater issues, because there are
6 prescription drugs that are used for head lice and
7 scabies that are pretty much everywhere. I mean, your geospatial
8 map, I could draw that for you.

9 My question is, are you intending to triage
10 your species that are being tested? If so, what criteria
11 will be used?

12 MS. PEASE: So, let me just address your first
13 concern about FDA being included and your issues with
14 pharmaceuticals. We understand that. There will be a
15 description of baseline status in these determinations,
16 which includes all kind of the other stressors that
17 listed species face that I assume would be part of that
18 description. So, that's good to hear.

19 Your second question was how to triage species
20 data? I just want to make sure I understand.

21 DAWN: Are you triaging your species according
22 to any level of importance that you're running these
23 tests, or is everything just being tackled all at once?

24 MS. PEASE: Well, I mean, we rely on the
25 registrants' submitted data, which uses surrogate species

1 for different taxonomic groups. Then, we really
2 expanded our dive into the open literature. So, we have
3 really more data needs assessments that we've included in
4 any of our other assessments.

5 We're really moving beyond selecting the lowest
6 endpoint for a particular taxonomic group to looking at
7 all of the data-building species sensitivity
8 distributions when necessary. So, really casting a much
9 wider net in terms of toxicity information. So, I think
10 we're trying to cover more than we have in the past.

11 MR. HOUSENGER: Let's take a 10-minute break.
12 Try to get back in 10 minutes so we can make up some of
13 the time here.

14 (Whereupon, a brief recess was
15 taken.)

16 MR. HOUSENGER: Our next presentation is going
17 to be on Bulletins Live number two. Melissa Grable and
18 Jen Connolly from our Environmental Effects and FATE, the
19 eco part of our program, is going to give this.

20 MS. GRABLE: Thanks, Jack. I'm Melissa Grable,
21 and this is Jen Connolly. As Jack said, we're from the
22 Environmental Fate and Effects Division. So, welcome to
23 the training and demonstration of Bulletins Live Two, or
24 BLT, for PPDC.

25 First, I'll provide some background on the

1 endangered species protection program, or ESPP. I'll
2 briefly touch on our old system, Bulletins Live, and
3 we'll provide a demonstration of our follow-on system,
4 Bulletins Live Two. I'll finish by providing a flowchart
5 for the process that we use when making bulletins.

6 So, EPA's Endangered Species Protection
7 Program, or ESPP, helps promote the recovery of listed
8 species. When I say listed species, I'm referring to
9 species that are listed as threatened or endangered. So,
10 it's designed to determine whether pesticide use in a
11 certain geographic area may affect any listed species.
12 If it's determined that pesticide use limitations are
13 necessary to ensure that legal use of a pesticide will
14 not harm listed species or their critical habitat, EPA
15 can either change the terms of the pesticide registration
16 or establish geographically specific pesticide use
17 limitations.

18 So, when these geographically specific use
19 limitations are necessary, they will be reflected in
20 endangered species protection bulletins, or bulletins.
21 The goal of the Endangered Species Protection Program is
22 to carry out our responsibilities under FIFRA in
23 compliance with the Endangered Species Act without
24 placing unnecessary burden on agriculture and other
25 pesticide users.

1 So, the final implementation of the Endangered
2 Species Protection Program, or ESPP, was designed so that
3 a generic statement on the label would reference
4 Bulletins Live which would show the use limitations. So,
5 the generic label language reads as follows on the slide,
6 that it's a federal offense to use any pesticide in a
7 manner that results in the death of an endangered
8 species. Using this product may pose a hazard to
9 endangered or threatened species.

10 When using this product, you must follow the
11 measures contained in the Endangered Species Protection
12 Bulletin for the area -- and this used to say county, but
13 we're changing it because the bulletins are no longer
14 county based -- for the area in which you're applying the
15 product.

16 To obtain the bulletin no more than six months
17 in advance before using the product, you need to consult
18 this web site or call the phone number provided. You
19 must use the bulletin valid for the month in which you
20 intend to apply the product. By including this generic
21 statement that refers to bulletins on the product label,
22 that makes the pesticide use limitation areas, or PULAs,
23 and the associated principle bulletin part of the label
24 and therefore enforceable.

25 Pesticide users who fail to follow the label

1 provisions applicable to their pesticide application,
2 whether that failure results in harm to listed species or
3 not, will be subject to enforcement under the misuse
4 provision of FIFRA.

5 So, the previous slide mentioned a web site.
6 So, what happens when you go to that web site? This is
7 what you see. So, the users will be directed to the
8 Bulletins Live Two web site, via pesticide labeling,
9 which will direct them to the web site that you see here.
10 There's a few quick start steps in the comments in this
11 box over here. It also provides a more in-depth tutorial
12 that you can click on down at the bottom. This takes a
13 user through the steps that are necessary for them to
14 obtain their bulletin.

15 So, we've talked a lot about bulletins. What
16 do the bulletins actually provide? They provide the
17 date, and that's the month and the year, for which the
18 bulletin is valid. It has a map showing the geographic
19 area associated with the protection measure. It has the
20 active ingredient and/or product, depending on what you
21 select. It has the use, the application method, the
22 formulation, and it also has the code and corresponding
23 description of the protection measures.

24 So, I mentioned that we had Bulletins Live
25 previously. Upgrades were made to Bulletins Live Two,

1 and Bulletins Live Two was launched in mid-December of
2 2014. So, if you are familiar with our old system,
3 Bulletins Live, there are a few differences between the
4 old system and the new system.

5 The old system had static county-level maps
6 with limited resolution, which meant that you couldn't
7 zoom in and out, and it was sometimes difficult to
8 determine whether your intended pesticide application
9 area was within a pesticide use limitation area. We've
10 included township section range data and tried whenever
11 possible to provide a zoomed-in inset map.

12 Our new system, Bulletins Live Two, has an
13 interactive map, much like Google maps, into which the
14 user can zoom. Bulletins Live Two is geo-coded so that
15 the user has the ability to enter in an address to search
16 their intended pesticide application area to determine if
17 there's any pesticide use limitation areas within the
18 intended pesticide application area.

19 However, because of this change, as I mentioned
20 before, from the old county-level bulletins to our new
21 interactive system, as I mentioned, we're working to
22 revise the standard label language to remove the
23 references to county bulletins.

24 Our new system also allows the user to select
25 base maps. We'll see that when we get to the

1 demonstration. That will help the user determine whether
2 the specific pesticide use limitations apply in areas
3 where the pesticide is intended for use.

4 Our old system allowed the user to search only
5 based on the pesticide active ingredient; whereas, the
6 new system allows the user to search based on the active
7 ingredient, the product, and that's either by product
8 name or registration number. And the new system also
9 allows a search by location, so state, county, and
10 specific address. We'll see that.

11 The old system included the species of concern.
12 However, our new system omits this information. This is
13 in an effort to protect the species location information,
14 which has been a concern that we've heard from the
15 services. So, the new system also provides a mechanism
16 to receive public comments on the draft pesticide use
17 limitation areas, which was not available in the old
18 system. So, in the future, also we're looking at ways to
19 provide services for use with other GIS base systems.

20 So, what's the schedule for developing
21 bulletins? The schedule for posting pesticide use
22 limitation areas, or PULAs, will depend on the timing of
23 the decisions that are made relative to registration
24 review, consultations, and other litigation. Our focus
25 will be on registration review, but it may include other

1 registration actions as well.

2 So, as the pesticide use limitation areas, or
3 PULAs, are developed, we will communicate and disseminate
4 the draft pesticide use limitation areas to impacted
5 stakeholders, and we'll solicit public comment before
6 finalizing them. Once final, we intend, whenever
7 possible, to allow a time period of approximately six
8 months before they become enforceable, and that's to
9 allow for the planning of pesticide applications.

10 What happens if you go to Bulletins Live and
11 there's no pesticide use limitation area within your
12 intended application area? If there's no pesticide use
13 limitation area for the user selected intended pesticide
14 application area, the user will see the following
15 statement that instructs them to follow the pesticide
16 product label and check back if they're planning to apply
17 the pesticide in a month other than the one for which the
18 bulletin is valid.

19 So, the statement on the label reads as
20 follows, currently no pesticide use limitations exist
21 within the printed map view for the month and year you've
22 selected beyond the label instructions. Follow the use
23 instructions on the label. Ensure that your pesticide
24 application area is within the printed map view. If it
25 is not, follow the directions on the instructions tab to

1 ensure that your pesticide application area is captured
2 within that map view. Check back if you plan to apply
3 your pesticide in an area outside the map view or in a
4 month and year other than the one for which the bulletin
5 is valid.

6 What is in Bulletins Two Live right now? We
7 currently have pesticide use limitation areas in 10
8 states. We have pesticide use limitation areas in two
9 states, Wisconsin and Michigan, for the use of
10 methoxyfenozide. We have pesticide use limitation areas
11 in seven states, and that's relative to the use of Rozol
12 and Kaput-D Prairie Dog Bait, and that's for the control
13 of black-tailed prairie dogs. Some of those bulletins
14 restrict use all together. Some limit the timing of
15 application in some of those pesticide use limitation
16 areas that occur on Indian land. We also have
17 pesticide use limitation areas in one state, and that's
18 relative to the use of thiobencarb on rice.

19 So, we're about to switch to the demo unless
20 there are any questions prior to going into the demo.

21 UNIDENTIFIED MALE: You mentioned that the
22 system does not reveal what species are in the area of
23 concern. How do we comment on those pesticide use
24 limitation areas if we don't know what the species are?
25 I might have information about a particular species,

1 whether or not it occurs there, but if I don't know which
2 one -- if it's not identified, do I comment?

3 MS. GRABLE: We're looking at the enforcement
4 side, but we'll have to look at that also.

5 Okay, we're going to jump into the
6 demonstration. So, Bulletins Live Two works best in
7 Google Chrome, Mozilla Firefox, Internet Explorer, any
8 version later than version 9, and it also works in
9 Safari. So, you need to make sure that you're using one
10 of those web browsers, and that information is provided
11 in the tutorial.

12 What we're seeing on the screen now is what the
13 public will see when they go to Bulletins Live Two. What
14 I'm first going to do is orient you to what you're seeing
15 here. The first thing that you see is the zoom tool, the
16 plus and minus. Jen is going to point to it up there.
17 So, you can use the plus button to zoom in and the minus
18 button to zoom out.

19 There's also the arrows at the top. There's
20 the previous view tool. The left arrow brings you to a
21 previous view, and the right arrow brings you to a later
22 view. Then, if you get too far zoomed in or out or
23 something goes wrong, you can always press the little
24 world button, and that will take you to the map extent.

25 There's also a base map tool. There's the

1 orange box sort of in the middle there labeled base maps.
2 That allows you to change the base maps. Here you have
3 roads. There's also imagery. There's also a little
4 magnifying glass that Jen is pointing to right now.
5 That's the location search tool.

6 You can enter the search criteria here that
7 will get you to your intended pesticide application area.
8 Options include, but are not limited to, an address,
9 city, county, landmark, or zip code. It's best to be as
10 specific as you can. It's best to include the state.
11 So, if you put Paris, Texas, you want to make sure you
12 put Texas in so you don't end up in Paris, France.

13 There's also the opacity slider. This allows
14 you if you've got that imagery below and you want to see
15 whether or not you're within the pesticide use limitation
16 area, you can make it darker or lighter so you can see
17 the base maps underneath. We also have visible map
18 layers that you can turn on and off. Right now, that's
19 just the pesticide use limitation area.

20 Right now you'll see that the orange tab, the
21 instructions tab, is highlighted on the right hand side
22 of the screen. That allows you to search for the
23 pesticide use limitation areas or the pink polygons that
24 you see on the left side of the screen.

25 So, you can select the month in which you

1 intend to apply the pesticide. It defaults to the
2 current month. You can also see and print out bulletins
3 six months in advance. That's for planning purposes.
4 This is a rolling six months, so as we add a new month
5 onto the end of the list, one drops off the top.

6 You can also refine your search based on the
7 pesticide active ingredient, pesticide product, or
8 pesticide registration number. Jen is going to show us
9 the active ingredient, the product name, and we'll do a
10 test right now of the product registration number. This
11 is the product registration number for Rozol.

12 This allows you to refine the number of
13 pesticide use limitation areas. Right now, we're seeing
14 all of them, but as Jen does this, it might take a little
15 while. You have to select the product that you want,
16 which does not seem to be working right now. There it
17 is. Then, when you hit search, you will only get the
18 pesticide use limitation areas relative to Rozol. You
19 see the one for thiobencarb that's in California is no
20 longer showing up.

21 You can also zoom to the geography where you
22 intend to apply the pesticide. You can double click to
23 zoom in or you can press the shift key to anchor and draw
24 a box, as Jen is demonstrating right now. As we looked
25 at the search bar earlier with the magnifying glass, you

1 can see that. As Jen shows, if you hover over it, you'll
2 get some further instructions.

3 As we saw previously, you can also change the
4 base map. There's topography and a variety of other
5 imagery options, roads and streets. We talked about the
6 opacity slider. You're also able to click on the
7 pesticide use limitation area, which Jen is going to show
8 us. When you do that, you'll see it outlines in yellow.
9 That indicates that it's been selected.

10 So, once you've selected the pesticide use
11 limitation area, the results tab will be selected in
12 orange, as you can see it happening up on the screen.
13 You're able to see the effective date and the pesticide
14 use limitation summary table. So, the summary table
15 includes the AIM products. Actually, because we searched
16 on the product, this is just showing it for the product.
17 It also shows the use, the application method, the
18 formulation, and the code.

19 Then, the code and limitation table below shows
20 the code and the associated limitation. So, here you can
21 see it's for the product Rozol. It's for use on black-
22 tailed prairie dogs. It's a bait. And it shows that the
23 code is R-6. This tells you what that specific
24 limitation is.

25 You're also able to click on a principle

1 bulletin. It will give you a bulletin in a PDF format
2 which you can save and print, which we recommend you do.
3 If there's ever an enforcement question, you can show
4 that you have that information. Do you want to show them
5 what a principle bulletin looks like? Great.

6 Here at the top it has in orange the valid for
7 and the date, the month and the year. It shows the
8 printed map view that we were just looking at. It shows
9 that it's been selected, so it's outlined in yellow. If
10 you scroll down, it has further instructions. It shows
11 you the product use, the application method, formulation,
12 and the code.

13 Now we'll go ahead and take a look at what
14 happens if there are no pesticide use limitations within
15 an area. We're going to use the address of the building.
16 You can see Jen has put in the whole address for the
17 building here. What you will see when it comes, there
18 will be a popup that says there's no limitations within
19 the map view. Then it will also give you a little --

20 I'm not sure why it's not working right now,
21 but what you would see is there's a popup, as I said, and
22 it says there are no limitations within the map view.
23 Then you're also able to print a bulletin from there as
24 well. The language that we had on the previous slide is
25 the language -- oh, here's the no limitations popup box.

1 It says no limitations within the map view, and then
2 you're able to get a printable bulletin from here as
3 well. That has the language that we saw already.

4 So, now we're going to go into the back end of
5 the system, so not what the user normally sees. I had
6 mentioned that we had a way in the new system to get
7 comments on draft pesticide use limitation areas, so
8 we're going to demonstrate that as well.

9 What you didn't see Jen do, because we have it
10 sort of set like a cooking show, but she logs in as a
11 guest. So, what we would do is when we have draft
12 pesticide use limitation areas, we'll have a guest login
13 that's just guests. Then we have a password, and that's
14 specific to the pesticide use limitation areas that are
15 drafts that we want comments on.

16 So, in this case, we have some draft bulletins
17 that are ready in the system to be reviewed. So, what
18 you would do is you would enter that information, the
19 login information. It would take you to this. Again,
20 you would only see those pesticide use limitation areas.
21 You're not seeing any of the other things that we saw on
22 the front side.

23 It shows you the active ingredients in the
24 pesticides. Actually, it just shows the products here.
25 It shows the product registration number, the crop use,

1 application method and formulation, and the code, and
2 then down below it shows you what the code limitation is.
3 Then it has a place for you to provide comments, your
4 name, your organization, your comment.

5 You can submit those comments to us. Then we
6 can see the comments once they come in. We're actually
7 able to export them into an Excel format so we can keep
8 track of the comments that have come in. So, this is a
9 new functionality. The previous version of Bulletins
10 Live Two we sent out PDF of the draft county level
11 bulletins to stakeholders and asked for comments to be
12 sent back for tracking. So, this is a huge improvement
13 that captures the comments.

14 Note also that we will have the same
15 enforcement capabilities that we had in the back end as
16 we did for Bulletins Live. There's a date filter that
17 will allow you to go back and see what pesticide use
18 limitation areas were effective on a given date to see if
19 that matches what the user has.

20 So, Bulletins Live Two is a huge step forward
21 in terms of being able to search by product, both by name
22 and with registration number, as well as active
23 ingredient. Also, the spacial resolution has
24 significantly improved from Bulletins Live.

25 As I mentioned, we're going to go back to

1 the slides and talk through the process that we use when
2 making bulletins. So, this side outlines the process for
3 developing bulletins and where we'll require some input
4 from the risk management divisions, both within EPA and
5 also from the registrants and external stakeholders.

6 First we'll overlay the species range shape
7 file with the pesticide use location shape file. It's
8 the overlap of these two shape files that results in the
9 pesticide use limitation areas, or the PULAs, that we
10 were talking about.

11 We will then determine what use limitation is
12 necessary to protect the species within that pesticide
13 use limitation area. Once we've developed that pesticide
14 use limitation area, we'll share a PDF of the map and the
15 pesticide use limitation area, as well as the use
16 limitation, with the registrant, and ask them to submit a
17 revised label with a reference to bulletins.

18 We then enter the metadata, including the
19 active ingredient in the product and the EPA registration
20 number into Bulletins Live Two. This step will
21 coordinate internally with the risk management divisions,
22 as well as with the registrant, to ensure that the
23 product names, the product registration numbers,
24 formulations, and application methods are correct. We'll
25 then send the draft bulletin to the registrants and

1 stakeholders for a 30-day review. That will be using
2 Bulletins Live Two, that process that we just
3 demonstrated.

4 We'll then ensure that the registrant has
5 submitted and the Registration Division has approved and
6 stamped the label with the reference to bulletins. We'll
7 then finalize the bulletin allowing that six-month time
8 period before the bulletin becomes enforceable. That's
9 for planning purposes.

10 So, that's it. I'll take any questions.

11 MR. HOUSENGER: Valentin.

12 VALENTIN: Just one comment here. When you go
13 to the home page, it seems a bit crowded at this moment.
14 I'm just thinking about the applicators that have low
15 schooling. I think it would be easier if you have a
16 popup screen that kind of shows the bulletin month, shows
17 the EPA pesticide registration number, so people can just
18 enter that information immediately and then get the
19 results. The way it is set up at this moment, I think
20 it's a bit overcrowded. Just one suggestion.

21 MR. HOUSENGER: Dawn, or Sharon, sorry.

22 SHARON: Hello. Currently, there are nine
23 active ingredients for which there are mandatory no spray
24 buffers in Oregon, Washington, and California along
25 salmon-bearing waters. I'm just wondering if you can

1 explain why EPA is maintaining two separate systems to
2 inform people about these, and why those were not
3 integrated into the Bulletins Live. By the way, I like
4 the ability to zoom in and get cite specific information.
5 That's great.

6 MS. GRABLE: That's great to hear. There are
7 two different systems. You're talking about the salmon
8 mapper, which is a different system. Those are court
9 ordered restrictions; whereas, these are enforceable as
10 part of the label. They're a little bit different, and
11 that's why they're in two different systems.

12 MR. HOUSENGER: Dave.

13 DAVE: First, I'd like to say it looks like a
14 really useful tool. I understand there's probably going
15 to be some glitches here and there, but I think it's
16 pretty impressive and looks pretty useful.

17 Just a minor thing, I think, when you showed
18 how the opacity slider worked, when you put it all the
19 way over to completely transparent, it just disappeared.
20 It seems like it would be very helpful to the user to not
21 let it completely disappear, because -- and I don't know
22 exactly how it works, but if they have that slider all
23 the way over and they look at it, they'll say, oh, yes, I
24 don't see anything.

25 Also, I was wondering, and maybe I missed it,

1 can you save those views as PDFs or you just have to
2 print them out?

3 MS. GRABLE: You can save them.

4 DAVE: Oh, okay. So, that's really good.
5 That's another reason not to allow that slider to go
6 over, because if you're going to present it to some
7 regulator and say, hey, look, there's nothing here. That
8 could be misleading. Thank you.

9
10 MR. HOUSENGER: Mark.

11 MARK: I, too, think it's a real progress in
12 the right direction. I particularly appreciate the
13 mapping process. There's a couple things that came to me
14 in the process that I'd just like to touch on. That is,
15 when you think about proximity, drift, and other
16 transport mechanisms, and you're going to subscribe or
17 develop a map system, how do you come to that, the edge
18 of that map? How do you decide where and when in that
19 kind of process?

20 MS. GRABLE: So, you're saying, how would we
21 decide that for the maps that we're showing now?

22 MARK: That's right. What I'm trying to get at
23 is, is there a buffer zone, is there a range indicator,
24 is there going to be a system of determining that?

25 MS. GRABLE: So, I'd say for right now, none of

1 these have that. That's something we could look at in
2 the future for sure.

3 MARK: Okay. Another follow up is on the
4 comments. Who is going to read those comments? What are
5 you going to do with them? You're going to read them?
6 You don't have enough time.

7 MS. GRABLE: We'll take a look at them. As I
8 said, these are draft bulletins that will be in there.
9 We'll look at the comments and see if there's something
10 we can do to address those comments.

11 MARK: Coming back to the maps, then, will you
12 be thinking about or publishing or arriving at
13 scientifically some sort of mechanism of establishing
14 what kind of range around a known area to control?

15 MS. GRABLE: As I mentioned before, the
16 pesticide use limitation area is where the species is
17 overlaid with pesticide use. So, that is really what
18 generates that area. But we can look, if we wanted, to
19 include a buffer in that. I think that would be part of
20 our discussion with Fish and Wildlife Service.

21 MARK: As I remember, this is a couple years
22 ago when we had a big meeting, that was a big issue that
23 Fish and Wildlife Service wanted. I'm wondering, maybe
24 you guys ought to come together and have an agreement or
25 something, depending on what the species is and its

1 mobility, something along those lines.

2 MS. GRABLE: We can look at that.

3 MR. HOUSENGER: Virginia.

4 VIRGINIA: I'm wondering if, in the event that
5 there is a bulletin that would cover Puerto Rico, are
6 bulletins going to be in Spanish? Are there plans to
7 make it bilingual?

8 MS. GRABLE: That's something we can look at.

9 MR. HOUSENGER: Nichelle.

10 NICHELLE: I really like this whole mock view
11 of this whole process. Currently, there are tons of
12 information already on labels. So, how permanent
13 will this statement that you guys have, how permanent
14 will that be on the label? Is there or could there be
15 some type of symbolic pictorial attention-grabbing symbol
16 that can be placed on the label so that applicators can
17 know that this is something they need to pay attention
18 to?

19 MS. GRABLE: Right now it's on the label in
20 endangered species language section of the label. It's
21 on there right now for the ones I mentioned, Rozol and
22 Kaput. I think we could look at that, but what we've
23 tried to do is to keep the labels as streamlined as
24 possible, even knowing that there is a lot of information
25 on the label. That's why we've got that link that takes

1 you here to see the spacial information.

2 MR. HOUSENGER: Ray.

3 RAY: These technologies are very impressive,
4 and I think it's a big step in the right direction.
5 Could there be a way for a label to have a link or
6 multiple links to this web site, which fills in some of
7 the information that's already known for the pesticide
8 and the particular use, perhaps with a QR code?

9 MS. GRABLE: We've actually talked about that.
10 I think that's something that would probably be in the
11 future. But that is something that we talked about.

12 MR. HOUSENGER: And Wayne.

13 WAYNE: Just a quick, more or less,
14 interpretive or esoteric question. What is considered
15 labeling from the standpoint of training our pesticide
16 applicators? The website is by reference from the label,
17 but would a printable document be considered labeling as
18 such?

19 MS. GRABLE: It is, yes, because the reference
20 to bulletins on the label, that also makes the document
21 a printable bulletin, also part of the label.

22 WAYNE: Thank you.

23 MR. HOUSENGER: Cheryl.

24 CHERYL: Just a little bit of follow up to
25 Ray's question. It just struck me. CBMS is a very

1 popular place to grab labels. Are you talking with them
2 about how to coordinate back to links to this site?

3 MS. GRABLE: We haven't yet, but that's
4 something we could do.

5 MR. HOUSENGER: Okay, thanks very much. You'd
6 think with that technology, our technology in the program
7 would be a little better, but that's not how it works.

8 The next presentation is the public health
9 workgroup meeting that was held yesterday. Susan Lewis,
10 the director of the Registration Division, and Susan
11 Jennings, our public health coordinator, will give this
12 briefing.

13 MS. LEWIS: Good morning. I'm Susan Lewis.
14 Susan Jennings, who is our senior public health liaison
15 for the pesticide program, is going to walk us through
16 sort of the discussions we had yesterday at the sub-
17 workgroup of the PPDC. I wanted to thank everyone who
18 participated, because the input that we hear is extremely
19 valuable. There were multiple different sort of
20 viewpoints on things. So, I found it extremely helpful.

21 So, with that, Susan.

22 MS. JENNINGS: Thank you. We'll try to keep
23 everybody on time here. I don't think we're going to use
24 the full time, if people are worried about that. Just
25 kind of sit tight.

1 I want to go through a little bit about the
2 history of this group and what this group is, because
3 it's a little bit different than some of the other
4 groups. I know that there are some new members on the
5 PPDC since we last did this with the group. So, we're
6 just going to very briefly touch upon some of that.

7 Basically, it's been around for about five
8 years. It was created to address issues of pesticides
9 that control pests. The reason for this and the reason
10 for the special workgroup is that a lot of the people
11 that sit on the PPDC when we've brought things in the
12 past are not really familiar with some of the details of
13 mosquito control or bed bug control, or depending on what
14 organization is being represented.

15 It was hard because we had to do a lot of
16 educating and then a lot of getting back input. This
17 allows us to kind of pull it into a group of people that
18 really do know and work with this or other people who are
19 at least interested in it, and then bring it back to the
20 full PPDC to work out.

21 So, unlike a lot of the other workgroups, this
22 is kind of a standing workgroup that goes on. It's not a
23 real formal rigid this is our goal and now we're done
24 type of workshop, or workgroup. As I said, this is
25 ongoing.

1 The issues that we address were all over the
2 map. We do regulatory issues, policy, programmatic,
3 environmental, technical, economic, science policy
4 issues. We discuss, we take input, we bring it back to
5 the place within the organization that will address this
6 or has the ability to address it, and then we move
7 forward from there.

8 There are three really critical roles for the
9 workgroup. One is it's an opportunity for us, as I said
10 before, to get the FACA input on an area that's of
11 limited interest to a lot of organizations. It is a
12 portal for stakeholders to bring issues to us of concern,
13 because just like when we talk to the whole pesticide
14 user community, we're talking to a broad spectrum of
15 people who are interested in different pest and use
16 sites.

17 Sometimes when people come in to EPA, they
18 don't know quite where to go with their information.
19 They have a problem. They have an issue. They may not
20 know exactly where to come in. So, this allows us to
21 actually have a public forum where we do take in input
22 and suggestions.

23 Then, lastly, it's just a forum to discuss
24 items of common interest about public health and their
25 control. So, we get the user community, the public

1 health community, the registrants all in the same place.
2 Then we can have a real rounded discussion about the
3 issues and kind of get down to the root of the problem
4 and move on from there.

5 So, those are the three things that we do. In
6 each workgroup, we kind of try to segregate the workgroup
7 so that we have opportunities for each. We also have a
8 lot of different stakeholders, different areas, broad
9 input in collaboration with the public.

10 That was the background part. Now I want to
11 talk a little bit about what we covered at yesterday's
12 meeting. There were probably five sections. Some were
13 bigger than others. We talked about the update to
14 innovations impact project, which is being hosted by the
15 Gates Foundation, the Bill and Melinda Gates Foundation.
16 Ray McAllister came and did a real good presentation to
17 the group. That was mostly just a report out on this is
18 what's going on and people might be interested.

19 EPA is developing a communications piece, and
20 I'll talk in a little bit more detail later, to help
21 pesticide applicators explain risk to the residential
22 sites and other areas where people might not know exactly
23 what's being applied and what the risks might be.

24 We talked about updates to the website. Then
25 we had two sections. One was an EPA update, which was

1 kind of just a quick thing we went through, a few issues.
2 The other was member updates where people could bring
3 things and just bring in what they're working on.

4 The innovation impact is basically very broad.
5 There's a group -- I did use acronyms without defining
6 them. I thought that might be easier for everybody. We
7 have WHO, the Global Fund, the Presence of Malaria
8 Initiative, NIH, EPA, CropLife, Industry, and the
9 Innovative Vector Control Consortium.

10 Really, the bottom line purpose of this is to
11 try to make a place where public health pesticides can be
12 registered for over -- a lot of it is concentrated on
13 overseas use, but it's a multi-pronged approach to focus
14 on industry and registrants to try to figure out what
15 needs to be done on a global level to reduce the impact,
16 the disincentives for people to bring these things to
17 market.

18 It also is trying to work with the people who
19 purchase the products so that it might not necessarily be
20 just cost-based procurement, but they might also look at
21 things such as resistance or such as using a varying
22 toolbox of what's available, and the broader decision-
23 making apparatus for the purchasing and the procurement
24 when they are trying to control disease in endemic areas.

25 The other aspect of this is they're looking to

1 EPA to try to support and to try to give examples of it
2 and to try to work with them as the regulatory authority.
3 There are a lot of places that will apply a product if it
4 is registered in the United States, for example. So this
5 gives a forum for them to try that.

6 We're trying to work with WHO and get the
7 entire market working together to hopefully reduce the
8 disease impact all over the world. We all know that when
9 disease occurs overseas, it can come here as well. We're
10 not this little island anymore. With global travel
11 expanding, it makes it more serious. That was the one
12 thing that was kind of an update piece.

13 Then we had a piece where we looked for input
14 from people on -- we're working on this communications
15 piece that is primarily for professional applicators who
16 are going out and treating places. They can be resorts,
17 hotels, people's homes, schools, anywhere where they're
18 applying a pesticide. Someone comes up to them and says,
19 what are you applying and what are the risks to me. Or,
20 they go out online and they look online and they find all
21 kinds of scary information about the active ingredient
22 that is being applied, when, in reality, by the time it
23 comes out in a ULV or in a diluted form, the risks might
24 be extremely low.

25 But when they look at that label and they look

1 at the label prior to dilution, or in the pure form of
2 the product, it might say do not inhale, wear a
3 respirator, all these things. It's a difficult risk
4 communication process for the person interacting with the
5 public. It isn't always as effective as it could be.

6 So, what we've agreed to do is to create a fact
7 sheet or a companion piece for people so that when people
8 are looking for information on a particular pesticide,
9 this will be a document that will say you need to be
10 careful what you look at, because that might not be an
11 accurate portrayal of, let's just call it, post-
12 application risk.

13 So, your post application risk could be
14 significantly exponentially lower than some of the things
15 that are written on that label, and here's why, and talk
16 a little bit about that to try to provide a bridge for
17 the labeling and for the risk that people are actually
18 experiencing, because sometimes it really is varied and
19 very different.

20 We had developed a draft piece that we wanted
21 to present to people. It really was a great discussion.
22 It was a very good discussion yesterday about this. We
23 took away a lot of good information. We don't interact
24 that way with these people. The best people to give this
25 are the people who are doing the interaction and the

1 people who work more with the public.

2 The other thing to point out is this is not
3 going to be product specific. This is one communication
4 piece for all the products. There have been suggestions
5 here that the workgroup made yesterday which was to
6 highlight the difference in messages between ULV and
7 diluted products, because it is slightly different.
8 Additionally, someone brought in that we should talk more
9 about the MSDS sheets and how -- I guess they're SDS
10 sheets now -- how that might play into the perception of
11 risk.

12 An additional consideration and -- hard on the
13 hazard statements because those are the things that
14 really can get people going when it says do not inhale
15 and yet you're just spraying it everywhere.

16 Another thing that was pointed out is that
17 everyone appreciated that this would be an EPA authored
18 document so that the applicator is not sitting there
19 saying, oh, yes, actually, it's not going to harm you at
20 all. The person is looking at something that says it
21 will. They can actually take a look at this document and
22 it will be an EPA authorization.

23 We talked a bit about the web updates. I think
24 some of you are aware we've done a lot of work on the bed
25 bug page. We've done some work on some of the different

1 sites. We talked more about where we might want to go
2 with the public health page in particular. How do people
3 use it? Where do people use it? Try to get some
4 information.

5 We're looking at our tick page as well because
6 of the increase in tick activity, where we want to go
7 with that. CDC has a very extensive tick page, so we
8 have no intention of trying to reinvent the wheel, but we
9 might want to vamp up the pesticide portion of it a
10 little bit more than we have at the current time.

11 So, we talked. That was just a general
12 conversation. We showed what we were thinking of. They
13 gave us some information back. Then we had a section of
14 the group that was called, just quick updates. EPA, we
15 provided updates on where we're going with the efficacy
16 guidelines, which is kind of a standing issue. We talked
17 a little bit about the repellent graphic mark, how that's
18 going. We talked about bed bug updates, the fact that we
19 have issued -- the federal bed bug workgroup, not EPA,
20 the federal bed bug workgroup issued the federal strategy
21 on bed bugs fairly recently, finally. So, that was out.

22 We have a bed bug clearinghouse section,
23 communications clearinghouse section on our web. We want
24 to continue. That is supposed to be a living, and is a
25 living, area of our site where when people develop really

1 good communications pieces we can put it on there, and
2 they can share it nationwide or wherever anyone else
3 might want to see it. They can look at it. They can
4 borrow from it. It will just help the communities and
5 the people trying to combat bed bugs to use it a little
6 bit more efficiently and effectively, their own
7 communications resources.

8 So, we have that section as well. That is
9 something that we like to bring up because sometimes
10 people develop something and say, oh, isn't this
11 beautiful, we did a great job, but they won't necessarily
12 think about that arm of it. So, we find it good to
13 remind people of that on a fairly regular basis.

14 In the workgroup, there was a companion piece
15 of the meeting where we had a workgroup update. MPMA,
16 Jim Fredericks from MPMA said that they were revamping
17 their best management practices for bed bugs, and that
18 the survey results would be available shortly. So,
19 that's the kind of thing that people are sharing in those
20 sections.

21 One of the things we also had yesterday was --
22 this was part of the update section -- was a CDC update
23 on tick-borne diseases. There's a lot of movement on
24 tick and tick-borne diseases. They're increasing.
25 Things that 15 years ago weren't even a concern are now.

1 So, Dr. Ben Beard (phonetic) from CDC presented this
2 section, and he did a really nice job of just talking to
3 the different areas. He talked a little bit about the
4 federal coordination on the tick and the tick issues.

5 So, for the next step, this is a list of the
6 ongoing items that we (inaudible) on a fairly regular
7 basis. We try not to make any workgroup meeting focus on
8 a particular aspect of it so that we keep everybody
9 involved. Not everybody is interested in mosquito
10 control. Nobody likes mosquitoes, but we're not all
11 interested in control. Some people aren't interested in
12 indoor control. So, we try to keep it mixed and
13 balanced.

14 IPM in housing and urban communities, really
15 public health and IPM go hand in hand. You don't really
16 do public health control without using an IPM practice.
17 Efficacy performance standards, bed bugs, IPM, tick-borne
18 diseases, rodents, cockroach, allergies, asthma, these
19 are all issues that the workgroup has identified as
20 potential areas of interest.

21 Again, it's a really good workgroup for us. It
22 provides us with a lot of good input, and it gives us a
23 way to communicate with people who are interested. We
24 really would welcome if there is anyone else on this
25 group, on the PPDC members at the moment, that would like

1 -- you do not need to be a member of the PPDC to
2 participate. Robyn Gilden is on it. We do need to have
3 one member, so she does a nice job of being our member.
4 Thank you. But we really would welcome anybody else that
5 might be interested. If you want to just shoot me an e-
6 mail or give me a call, I can give you more information
7 on it. Thank you very much.

8 If anybody has anything they'd like to say,
9 we're three minutes past lunch, which isn't bad.

10 MR. HOUSENGER: Thanks, Susan.

11 Matt.

12 MATT: The work that you're doing is very
13 important. I find an incongruousness about the term
14 public health workgroup and what you presented today.
15 What you presented today I would term more something like
16 vector control agents and its impact on human health.
17 That's more or less what I see you doing. To call it a
18 public health workgroup seems to me to not include things
19 like human health surveillance of pesticide impact or
20 work related exposures to pesticides, which are all under
21 the purview of public health.

22 I'm leaving the PPDC so won't be here to
23 comment anymore. It's nice to hear that I could
24 potentially participate despite not being a member of the
25 PPDC in the future. I'd encourage you to open your

1 agenda more broadly so that you do live up to the term
2 public health, because, of course, that includes so many
3 other dimensions that are discussed routinely in many
4 other workgroups in this organization, in the PPDC.

5 So, right now I see your agenda as being
6 somewhat restricted. If you're to maintain the title
7 public health, I think your obligations extend far beyond
8 the human health impacts of vector control chemicals.

9 MS. JENNINGS: I don't disagree with you.
10 However, I would say that everything we do at the Office
11 of Pesticide Programs has an impact on public health.
12 That is not everything, but that is one of our very, very
13 main core tenants of what we do. That pesticide impact
14 and how pesticides are effective and everything, that is
15 all part of the risk management, and the risk assessment
16 process, and registration, and registration review
17 processes.

18 This area is an area that actually started out
19 of FQPA, because what was happening, it goes hand in hand
20 with the minor use. When registrants were coming in and
21 when chemicals were coming in for re-registration, people
22 were saying, oh, don't need that, don't need that, and
23 they were cutting all the public health uses and -- there
24 is a definition for public health pesticide in FIFRA.
25 That's kind of what this public health program keys off

1 of.

2 A public health pesticide is something that is
3 used to control pests that vector or transmit diseases.
4 But the caveat in FIFRA -- we try not to use that term
5 because the caveat in FIFRA is to be a public health
6 pesticide, it needs to be used by people who are using
7 tax dollars, federal tax dollars or local tax dollars to
8 do it. So, it has to be kind of a public program.

9 So, we have broadened that to be really any
10 user group, because mosquito control can be done on a
11 local basis, can be done privately and can be done
12 publically. So, I agree with you that that is a common
13 interpretation of it, but that is how we use it in EPA.

14 MATT: That presents even a greater challenge to
15 me. You've redefined public health, the purpose of this
16 workgroup, in terms of the way we discuss public health
17 outside of EPA. It becomes even more difficult for me to
18 understand from outside, and anyone else from outside, to
19 look at the term public health workgroup and know that
20 that's principally about public health pesticides, as
21 defined by FIFRA.

22 I don't know what to do about that terminology.
23 I'm just mentioning to you that it feels funny to me to
24 call this group a public health workgroup with its very
25 limited scope.

1 MS. JENNINGS: Okay. Well, we'll consider that
2 take into consideration. Thank you very much.

3 MR. HOUSENGER: Mark.

4 MARK: Thank you. I think that there's good
5 progress being made. Again, I do have to agree that it's
6 very narrow in scope, but this is about pesticides. So,
7 if I was to criticize things being pesticide centric,
8 that would be a problem. So, I do understand that. At
9 the same time, integrated pest management is not
10 particularly pesticide centric. So, I have one question
11 and a comment.

12 The question is, after seven years of the CDC
13 doing IPM workshops for vector pest management, where is
14 EPA on collaborating with them on doing that for public
15 health departments, environmental health specialists
16 throughout the country? That's the question.

17 Then, the comment that I have is, as far as
18 things to look at with regard to global warming and
19 because of that the increased use of pesticides for
20 public health, we need to look at resistance. That's
21 something that I think we should be proactive in looking
22 at. It's going to happen.

23 Then, finally, and perhaps that group can look
24 at it now that it's been in effect for about three years,
25 the rules both at the state level and with the feds on

1 NPDES with regard to the use of pesticides on and around
2 the waters of the United States. So, that's my question
3 and comment.

4 MS. JENNINGS: Okay, thanks. I'll go to the
5 first one first, which was your question about CDC and
6 the IPM work that they're doing. We've always supported
7 that workgroup, and we've always provided technical
8 expertise whenever they've requested it and whenever it
9 was needed. However, there have been times when finances
10 have just not allowed us to actually contribute towards
11 the production of those programs. But we do think
12 they're very valuable and very worthwhile.

13 My understanding right now is that CDC is
14 moving that program into a recorded webinar-type format.
15 We have offered and will be giving them support for that
16 type of effort on that.

17 Your third question was NPDES, but the second
18 question was about the resistance management.
19 Resistance, that is something that we do keep very, very
20 -- we participate in that as much as we possibly can.
21 But registrants do bring in the pesticide tools to us to
22 register. We don't create them ourselves.

23 So, when we talk about resistance management --
24 and that is actually one of the main purposes of this
25 Gates Foundation eye-to-eye initiative, is to try to

1 bring in alternatives. So, we're never going to conquer
2 resistance. It is always a problem. IPM is always the
3 best way to try to work with that. But that's kind of
4 where we are.

5 I'm going to let Susan Lewis answer your
6 question about NPDES.

7 MS. LEWIS: Regarding the water permitting
8 process, we worked extremely closely with Office of Water
9 in developing the first five-year round of permit. We
10 had many of the public health mosquito control and states
11 involved. They helped develop some of the best
12 management practices. We were worried about resistance
13 management. We have extensive stakeholder input. We
14 continue to work with Office of Water. So, that is
15 something that we have coordinated closely on.

16 MR. HOUSENGER: Dave.

17 DAVE: Until recently, I was on the board of
18 Sacramento's mosquito and vector control district. One
19 of the problems that arose that our staff discovered
20 through some research was structural pest control
21 products being pretty much present in the water all the
22 time. I'm speaking specifically about pyrethroids. We
23 developed evidence that that was causing resistance in
24 the mosquito populations. It made it so that the
25 pyrethrins that we were relying on were no longer useful

1 or significantly less useful for mosquito control.

2 I would suggest that your workgroup look into
3 that particular issue of the interaction between widely
4 used insecticides with other related chemicals where you
5 might have cross resistance. I think it's a significant
6 issue that could occur over and over again in
7 significantly reducing the efficacy of really important
8 uses. I think that that should be part of the
9 registration process in considering the potential for
10 those products to induce resistance to public health
11 insecticides.

12 The other thing that I wanted to point out is
13 that similarly with the widespread use of the
14 pyrethroids, it also made it so that because of the
15 persistence of both the pyrethroids and the adjuvants in
16 the water bodies, that that made it so that the
17 applications that were made by the mosquito and vector
18 control district were problematic in waters where just by
19 themselves they may not have been or probably would not
20 have been problematic. So, I think that's another issue
21 to look at. I'd hate to see further limitations on
22 public health insecticides due to what I consider less
23 necessary uses.

24 I can offer to at least suggest to the Sac Yolo
25 that they participate in these discussions in

1 your workgroup. Thank you.

2 MR. HOUSENGER: Robyn.

3 ROBYN: Thank you. To Matt, I was under the
4 same misconception as well when I first joined the group,
5 that it was going to be focused on public health. But
6 you're more than welcome to join us and broaden our
7 scope.

8 I'd also like to just say that during our
9 discussion of the companion piece of further explaining
10 the labels, the comment had also come up about adding a
11 contact person, somebody that they could actually reach
12 out and touch and have a conversation with. Anybody who
13 has ever done risk communication knows that if you're
14 leaving it up to written words, there's going to be some
15 misinterpretation.

16 MR. HOUSENGER: Tom.

17 TOM: Generic just to the public health
18 products or to any product?

19 MS. JENNINGS: I imagine if we do it right, it
20 would be any product. I mean, it's mostly designed for
21 what is used in and around places, but there's no reason
22 it couldn't be applied to all.

23 DR. JACKAI: You have your hands full.
24 That's a really wide scope that that workgroup is
25 tackling. But at the end of the day, you're really

1 dealing with the issues that we're all concerned about,
2 human health. Pesticide is a major concern in that
3 regard.

4 You started off your comments by making
5 reference to pesticides in the international arena. I
6 think it kind of lost track of how that kind of
7 interfaces with what you spoke most of the time about
8 doing. Specifically, the fact sheets that you're talking
9 about, are those going to be focused on just the U.S. or
10 are they also going to have to do with international
11 pesticide use?

12 You almost have to be really careful about that
13 because once you start to tell the users that the
14 pesticides are not exactly as dangerous as the label say,
15 that's going to be taking on a different (inaudible) by
16 some folks, particularly in the international scene. So,
17 we need to be very careful. There's a very easy tendency
18 for folks to misuse pesticides. If you give them a
19 little window, they'll expand it.

20 MS. JENNINGS: We're very, very much aware of
21 that. That's one of the reasons -- it's just for the
22 U.S. It's not for international. It will be posted on
23 the web, so people will have access. It's in the very,
24 very beginning stages now. We want to just start right
25 from the beginning making sure we've got -- we're not

1 going to put anything out there if we don't think it's
2 going to work right. You can join our workgroup, too.

3 MR. HOUSENGER: Dawn.

4 DAWN: Thank you. It's an awesomely important
5 team you have. I should probably volunteer to join the
6 ranks as well.

7 Susan and Susan, thank you for your report. I
8 would like to ask that the group put some effort into
9 encouraging strategies for resistance management,
10 specifically for bed bug products. We're seeing some --
11 I'm sure across the country, but certainly in the west --
12 some really significant issues emerging.

13 Secondly, I was a little concerned, and
14 maybe I got this wrong, but your documents to allay risks
15 or allay fears associated with the use of ULV and diluted
16 products. I seem to spend a lot of my time -- and I do
17 answer those questions, too, where people are just
18 panicking because there's been a vector-related mosquito
19 treatment and fogging in their neighborhood.

20 But I deal with many, many, many more instances
21 where people are literally abusing/overusing, poisoning
22 themselves and their children. I'm just really concerned
23 that a document that is designed to allay fears
24 associated with these products will just exacerbate this
25 problem.

1 MS. JENNINGS: I understand from what I've said
2 how that would be the interpretation. But it's really
3 designed to accurately communicate the risk, because
4 reading the label is not an accurate portrayal of the
5 risk to the bystander. So, that's really what it is, is
6 to try to make sure that things are portrayed -- right
7 now they have nothing. So, what we're trying to do is
8 provide something.

9 We are completely on board with everything that
10 you two have both said about that. That is not the
11 intention. We want to make sure that that's not the
12 effect when we're done. Thank you, though. And we would
13 love to have you.

14 MR. HOUSENGER: Doug.

15 DOUG: As you have talked about resistance and
16 what she just said, there has to be benefit risk ratios
17 in there. That's what you need to display also. Thank
18 you.

19 MATT: Just a quick comment. It
20 just struck me, and it's probably struck others before
21 this, but based on Dave's comment of the resistance
22 patterns that are seen as a result of agricultural use or
23 structural use of pesticides, the pesticides we use in
24 public health is an analogous situation to the
25 antibiotics used to control animal growth or enhance

1 animal growth and the loss and resistance we see in the
2 infectious arenas. I just wanted to mention it because
3 it struck me so hard when I heard what Dave was saying.

4 MS. JENNINGS: It's almost exactly the same.
5 It's really kind of uncanny.

6 MR. HOUSENGER: Resistance has been a big issue
7 for us lately, mostly on the weed side. But I think it's
8 something that we need to consider for insecticides and
9 fungicides as well. We are doing something to put
10 numbers on the labels so you know you can rotate with
11 certain chemistries and stave off resistance.

12 So, Susan lied. She went over. So, lunch has
13 been cut. Let's come back at 1:10 because it's hard to
14 get to lunch with this configuration out here.

15 (Whereupon, a luncheon recess
16 was taken.)
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AFTERNOON SESSION

MR. HOUSENGER: Our next session is about bees. There's a lot about bees in the news. This one is about state/tribal pollinator protection plans. Marietta is going to lead us through this discussion.

MS. ECHEVERRIA: Thank you. My name is Marietta Echeverria. I'm a branch chief in the Registration Division. Together with Mike Goodis of the Pesticide Re-evaluation Division, we've been leading OPP's efforts to engage with states and tribes on the development of pollinator protection plans. So, I'll go through a set of slides just to bring people up to speed on some of the activities that we've been doing. But then we want to have some open discussion.

Just by way of background, we know over the last 10 years, there's been several federal reports and scientific reports documenting pollinator declines and discussing the possible causes of pollinator declines. We're down to about 2.7 million managed beehives in the U.S. right now, and that's compared to about 6 million beehives that we had in the 1940s.

Back in 2013, the EPA and USDA released a comprehensive scientific synthesis of what we know about causes of pollinator declines. The consensus is that there is not one single factor that is leading to

1 pollinator declines; there's actually a complex
2 interaction of several stressors, including pests,
3 pathogens, disease, pesticide exposure, as well as poor
4 nutrition because of the loss of bee forage habitats, as
5 well as bee management practices and a lack of genetic
6 diversity.

7 So, back in June of last year, a lot of you
8 guys will recall, President Obama issued an executive
9 memorandum to the Executive Branch of the government
10 calling for a coordinated strategy for addressing
11 pollinator decline and honeybee health. So,
12 specifically, that memorandum called for commitments from
13 each federal agency with respect to specific activities
14 for pollinators and honeybee health.

15 It also called for a pollinator research action
16 plan, a public education plan. And throughout the
17 memorandum discussions on opportunities for
18 public/private partnerships because there's a recognition
19 that the federal government is not going to be able to
20 solve this issue on its own.

21 Specifically for EPA, some of the things that
22 EPA was tasked with, specifically assessing the effects
23 of pesticides on pollinator health. So, that's an
24 activity that we are currently rolling into our
25 registration and our re-evaluation programs by adopting

1 the new risk assessment framework for pollinators, and
2 then, specifically, to engage states and tribes in the
3 development of pollinator protection plans, which is what
4 I'm going to talk about today.

5 So, managed pollinator protection plans, this
6 idea was really a state-led idea. Several states over
7 the last couple of years have been working through this
8 issue at the local level. So, prior to the issuance of
9 the presidential memorandum, certain states had been
10 convening local stakeholders, including growers,
11 applicators, and beekeepers in coming to some agreement
12 on how better to communicate and collaborate prior to
13 pesticide applications.

14 What emerged for us at OPP was what we saw as
15 an effective model. When we say a model, we're not
16 saying that one of these plans is a one size fits all
17 example that should be replicated, but it was really the
18 model of the local stakeholder engagement in that
19 collaboration that emerged that we found to be
20 particularly a potential approach to help mitigate acute
21 risk to pesticides.

22 So, we believe that these plans serve as an
23 effective communication and collaboration between the
24 stakeholders at the local level. By establishing these
25 plans, we can best balance the needs of growers and

1 producers and the needs of beekeepers.

2 Over the last nine months or so, we've been
3 strongly engaging our co-regulators, our state and travel
4 partners. Back in August, the Office of Pesticide
5 Programs sent a letter to the AAPCO president, the SFIREG
6 chair, and the TPPC chair expressing our interest to
7 partner on this issue. Specifically, in that letter, we
8 asked for partnership in identifying the key elements
9 that make a successful pollinator protection plan, and
10 then also to partner with encouraging the adoption and
11 implementation of these plans.

12 Also, over the last nine months or so, there's
13 been several meetings through SFIREG on this issue. In
14 response to this collaboration, SFIREG has actually
15 drafted guidance that states or tribes could use if
16 they're interested in developing a pollinator protection
17 plan.

18 We've had similar discussions with the TPPC,
19 the Tribal Pesticide Program Council, and there a lot of
20 the discussion has focused on engaging tribes,
21 identifying specific issues that tribes may face, and,
22 where appropriate, seeing if tribes can collaborate with
23 their state partners to become part of that stakeholder
24 process, if it's appropriate. Of course, we have to
25 respect tribal sovereignty throughout that conversation.

1 Then, the big topic of conversation right now
2 has to do around measuring the effectiveness of these
3 plans. We recognize if EPA is going to rely on these
4 plans as part of our strategy to reduce exposure to bees,
5 we're going to have to have some measures in place so
6 that we can show that they're actually meeting their
7 goals. So, there's been a couple of meetings focused on
8 this conversation, and it really is still an emerging
9 topic that requires additional conversations.

10 In terms of the SFIREG draft guidance -- and I
11 want to point out that EPA inputted to that guidance, so
12 we were able to provide comments on that -- the states
13 have identified seven critical elements that we believe
14 are the foundation of what needs to go into a pollinator
15 protection plan.

16 The first critical element is that a
17 stakeholder participation process has to occur. So, it
18 really is about getting the appropriate stakeholders at
19 the local level together to convene stakeholder meetings,
20 to have the discussions, so that agreements on the
21 additional elements can occur. That is probably the
22 number one important element that really needs to be
23 there in order for this to work.

24 So, once the stakeholders convene, the second
25 critical element is a method for identifying where

1 managed bees are located within an area. So, the whole
2 purpose is to increase collaboration and communication
3 between the growers, applicators, and beekeepers. So,
4 there's got to be a method to know, an approach to know
5 where the bees are actually located.

6 Once you know where beehives are located within
7 an area, there has to be an established framework for
8 communication, whether that's a registry system or you
9 exchange business cards. The method is not important,
10 but just the fact that there is a communication mechanism
11 identified within the plans that all parties agree to.

12 They also need to include actual measures,
13 whether they're best management practices or they could
14 also be regulatory measures, to minimize acute risk to
15 bees. So, utilizing information that we have on BMPs to
16 make sure that applications are occurring when bees are
17 less likely to be foraging, or other options in BMPs.

18 Once a plan is established, there needs to be a
19 clear defined plan for public outreach. It serves no
20 purpose if a plan is developed and it sits on a shelf
21 somewhere and folks are not actually adopting it. So,
22 it's critical that there is a role-out plan and there is
23 adoption by the stakeholders in the area.

24 Then, it's also important to view these as
25 living documents. There needs to be a process to

1 identify issues, modify plans periodically over time.
2 Then, finally, it goes back to the state of the
3 conversation now. There needs to be a mechanism to
4 measure that the plan is actually effective over time.
5 That's really crucial, like I said, to us because we're
6 considering relying on these as part of our overall
7 strategy for reducing acute risk to bees.

8 So, moving into our proposal, we've been
9 working on an acute risk mitigation proposal over the
10 last several months. In that proposal, we are
11 considering various scenarios based on the likelihood
12 that bees are actually going to be exposed.

13 So, in one scenario, we're calling it the
14 contracted services scenario. So, you are purposefully
15 bringing in managed bees on your site for the purpose of
16 pollination services. So, in that scenario, there's
17 large numbers of hives that are actually being brought
18 onto the property. The certainty of exposure is very
19 high. Because of that, what we're considering in our
20 proposal is label restrictions to address that scenario.
21 So, you actually eliminate co-occurrence of the
22 pollinators and the pesticide application.

23 There's another scenario, though. You may not
24 actually have bees on site for the purpose of pollination
25 services, but perhaps they're within the foraging

1 vicinity. So, you have another crop that's flowering.
2 You don't have bees on site, but perhaps they're on an
3 adjacent property, or somewhere within the area. That is
4 really the scenario that these pollinator protection
5 plans get at. That's where you have an opportunity to
6 actually identify where bees are located and to have that
7 communication prior to pesticide application. As I
8 mentioned, the SFIREG guidance helps to further elucidate
9 what the elements are in those plans.

10 So, we're really pleased with the response that
11 we've gotten from our state partners. There's been a lot
12 of activities on their part. In response to the letter
13 that we wrote back in August, AAPCO convened a pollinator
14 committee to look at the state of plans that were
15 currently out there and then to also identify any
16 barriers or challenges, and to survey states. They
17 finalized a report that's available on their web site.

18 What they identified was five states had
19 already developed and implemented plans. Of course,
20 those were the models that occurred prior to the SFIREG
21 guidance. So, they didn't include things like measures
22 like we're talking about now. But that was the state
23 then.

24 Also, since we've started this effort, an
25 additional 30 states, approximately 30 states, have plans

1 in some stage of development. So, they have either
2 established workgroups or committees to look at this
3 issue. They're starting to identify stakeholders and
4 starting to convene these stakeholder meetings. So, we
5 think this is a big success in terms of the amount of
6 adoption and energy that's around this issue.

7 Again, as I mentioned earlier, the current
8 conversation is really around measuring the effectiveness
9 of plans. There are some themes that are starting to
10 emerge in terms of measures. One has to do with
11 communication. So, if the cornerstone of these plans is
12 to enhance communication between the parties, can we
13 measure that in some way. Are there surveys that we can
14 use or other mechanisms to measure enhanced
15 communication?

16 Additionally, another theme would be behavior.
17 Are there changes in actual pesticide applications that
18 are being made in response to these plans? Are decisions
19 to use less toxic products being made in response to
20 these plans? Are applications being made at different
21 times of day when bees are less likely to be foraging?
22 Are there ways for us to measure those changes in
23 behavior?

24 Another theme has to do with actual exposure
25 and risk. Again, we're looking at this from OPP's

1 perspective as a way to mitigate acute risk. So, are
2 there actual measures of exposure, so residue data as an
3 example? Then, this also centers around bee kill
4 information. Obviously, there's a lot of concern with
5 bee kill information due to underreporting and some of
6 the other challenges around there. So, it is a theme
7 that is being considered.

8 Finally, overall pollinator health indicators
9 or measures, so honey production, numbers of colonies,
10 reductions in overwintering losses, overall pollinator
11 health as a measure.

12 So, those are the themes that are being
13 discussed. SFIREG is actually working on a companion
14 piece to their guidance document that would discuss in
15 more detail options on measures. We look forward to
16 having a discussion at the June SFIREG meeting on that
17 topic.

18 So, in terms of our next steps, we are going to
19 take comments on this proposal. It will go out for a
20 comment period. We expect a robust comment period, as we
21 always get. We're strongly encouraging our state and
22 tribal partners, like I said, to start this process this
23 year. Many of them are doing so. EPA will monitor the
24 success of these plans. We're going to monitor the
25 implementation.

1 We're going to continue on this discussion with
2 measures to see if this is a successful overall strategy.
3 If we see that it's working, we'll continue down this
4 path. If we have evidence that it's not working, we may
5 need to consider additional measures.

6 I also want to be specific that this strategy
7 has to do with acute risk in particular. We're getting
8 data now on other routes of exposure. We're going to
9 continue to evaluate those in the registration and the
10 re-evaluation program. If additional mitigation measures
11 are warranted, we will implement them as part of our
12 regular process.

13 So, with that, I think we can open it up for
14 some questions and discussion.

15 MR. HOUSENGER: Dawn.

16 DAWN: Hi. Thank you for your report. I have
17 one comment and a question. My comment is with regard to
18 measuring connectivity and collaboration. There are
19 formalized tools available on the web that you can do
20 that. Being involved in a lot of the grant programs and
21 on the NESR side of things as opposed to EPA, they are
22 going to start requiring some of those maps to be
23 included in some of our grant proposals. Having got my
24 head around this now, they are pictorial representations
25 of how people connect. I would encourage you to

1 investigate those because it might be ideal for what
2 you're after here.

3 My question is, will the pollinator protection
4 plans include anything other than managed honeybees? I
5 mean, bats, native pollinators, birds, anything else?
6 Thank you.

7 MS. ECHEVERRIA: So, thank you for that
8 comment. I'd like to follow up with you to get more
9 information on exactly where that's located.

10 In terms of the scope of the pollinator
11 protection plan, the initial scope was to focus on
12 managed bees, particularly because it's a communication
13 component that we're really looking at here. However,
14 states have flexibility, in including other pollinators,
15 including other issues of pollinator health, like
16 foraging habitat, et cetera. So, there is flexibility in
17 what a state can choose to do. But the focus has
18 primarily been managed honeybees.

19 MR. HOUSENGER: Nichelle.

20 NICHELLE: Thanks for your presentation. First
21 I want to follow up on Dawn's point about needing more
22 focus on wild bees and the impact of bees, pesticides on
23 wild bees. That may be a little difficult because they
24 are wild. We don't really have much data on them. But
25 we really do need to make more of an effort to include

1 them in pollinator plans.

2 My actual comment is so this focuses a lot on
3 acute risk mitigation. There's no mention of long-term
4 chronic risks to bees, especially since a lot of the
5 pesticides that are highly toxic to bees are systemic.
6 As you guys know, because of the systemic nature, they
7 are very persistent in plant tissues and in soil and
8 water. So, I really do urge the agency to start
9 incorporating the systemic nature of these pesticides
10 into their mitigation plans for these state protection
11 plans.

12 Then, finally, do you have some sort of sense
13 or have you identified best management practices of the critical
14 elements to these plans? Can you give us an idea of what
15 that would look like? Like, what are some examples of
16 some of the best management practices that EPA would like
17 to see in some of these state plans?

18 MS. ECHEVERRIA: So, thank you for that. With
19 respect to the systemic issues and the longer term
20 chronic effects, we are implementing our risk assessment
21 guidance, which considers all routes of exposure. It
22 considers other effects other than acute effects. So, we
23 are evaluating that. Those data are coming in now as
24 part of the re-evaluation program. So, that is part of
25 our routine process. We will be considering that prior

1 to making decisions and re-evaluation in the registration
2 programs.

3 Additionally, in terms of best management
4 practices, I will say this is not my area of expertise.
5 There are resources out there. Extension has resources.
6 The universities have resources. Timing of applications,
7 the method of applications, there is a lot of information
8 and resources out there for states to rely on.

9 MR. HOUSENGER: Mark.

10 MARK: Thank you. I would like to echo the
11 concern with regard to non-managed pollinators. I have
12 absolute sympathy with the beekeepers and their
13 livelihood. As well, we do need to look at the non-
14 managed ones. The newest evidence seems to indicate that
15 those, particularly the apian pollinators, the wild ones, are much
16 more susceptible to pesticides than the managed ones are.
17 So, I, of course, want to put my name on that concern.

18 A couple of things. With regard to best
19 management practices, integrated pest management is a
20 best management practice. I'm not going to sit here and
21 advocate IPM as the best management practice for this.
22 I'm not.

23 What I am suggesting, as a person who spent his
24 career trying to get communities to adopt the best
25 management practice innovation of IPM, is that the EPA in

1 this perhaps provide more leadership with regard the
2 standards in the implementation of those best management
3 practices as innovations. I recognize one size does not
4 fit all. Yet, if it's too nebulous, if you don't have it
5 defined as an innovation, it doesn't get adopted very
6 well. That is just my suggestion as a person who has
7 been doing this for awhile.

8 Then, finally, I might recommend with regard to
9 measurement and the fact that it is state by state in a
10 lot of ways, that sometimes agencies in these states have
11 different degrees of concern or empathy, the measuring of
12 enforcement actions in terms of the numbers of
13 enforcement actions and the strength of those enforcement
14 actions where regulation is allowed regarding exposure.
15 That might be one of the metrics or several of the
16 metrics that you look at. Thank you.

17 MR. HOUSENGER: Cynthia.

18 CYNTHIA: Hi. One comment and one question.
19 First to echo what Dawn and Nichelle and Mark just
20 mentioned, it would be good to focus more beyond foliar
21 and acute and managed bee populations. It might make
22 sense to start a new workgroup or a sub workgroup that
23 looks specifically at seed treatments, looking at
24 subacute exposures impacts on birds, bats, butterflies,
25 other invertebrates, waterway contamination, some of the

1 efficacy and benefits questions, the treated seed
2 exemption, the use data or lack thereof, the consistency
3 or inconsistency with IPM. So, that would be a really
4 good path to follow.

5 My question, I'm just curious, having worked on
6 rat poisons and other pesticide families, why there is
7 this emphasis on state-based approaches for the
8 neonics and the pollinator protection? Thank you.

9 MS. ECHEVERRIA: So, with respect to the
10 reliance on a local approach, the information that we get
11 back from the local stakeholders is that the situations
12 are so varied across the states in the crop producing
13 areas that a one size fits all regulation may not be the
14 most effective approach. There could be some value in
15 customizing that approach based on local regulations,
16 conditions, and expertise in the different practices.

17 So, that's the feedback that we've gotten. So,
18 our first instinct is to see whether or not a local
19 approach can work prior to implementing a national
20 regulation which may not be feasible in all places.

21 MR. HOUSENGER: Steven.

22 STEVEN: Thank you. First of all, let me say
23 that while the beekeepers are grateful that so much
24 attention in this area has been focused on us, we are not
25 trying to exclude the native pollinators. We feel that

1 in protecting managed bees, we will inadvertently protect
2 some of the other pollinators out there.

3 I'm going to jump way back to slide number
4 three. You have about six different pictures on here
5 depicting possible problems. You mentioned a lack of
6 genetic diversity. I'd like to know where the proof is
7 of a lack of genetic diversity in the bee colony, because
8 if we can eliminate one of those potential stressors,
9 then we can focus on what the real problems are.

10 GABRIELE: Certainly, from the almond
11 board's perspective where we funded research, what we're
12 seeing is the queen breeders pride themselves in their
13 stock. They pride themselves in whatever it is. What
14 we're looking at -- certainly, the almond board has
15 currently been finding research where we're bringing in
16 semen from honeybees from elsewhere in the world to
17 diversify the genetic stock available. Our dream, I'm
18 not saying it's a reality, but our dream is to find
19 genetics that will help with either some disease
20 resistance or help with varroa mites. I mean, we
21 have like the cleaning -- I'm not using the right term
22 now --

23 STEVEN: Varroa sensitive hygiene.

24 MS. ECHEVERRIA: Yes, the hygienic behavior,
25 but USDA has other genetics that help with Varroa. So,

1 can we do that? Again, from the plant world, we're used
2 to looking for genetic routes to help us deal with pest
3 management, so basically looking at that same thing. So,
4 that's what that's referring to, is can we find within
5 the gene pool that exists for honeybees around the world
6 additional genetics that will help with some of the
7 issues that honeybees face. That's what that's referring
8 to, just to answer that question.

9 STEVEN: I don't have a problem with that.
10 That's a good thing. But USDA's own scientists have
11 research to show that the amount of genetic diversity
12 in the American honeybee population is greater than
13 Italian bees in Italy, where they originated from. So,
14 there's a distinction between lack of genetic diversity
15 and finding improvable traits to bring into. We can
16 discuss that later.

17 I have a couple other things. The SFIREG draft
18 guidance, critical elements of MP3's slide, it says
19 method to know if managed bees are near the treatment
20 area. Who is to know? Who needs to know? In the
21 development of the state plans, who does the state say
22 needs to know where the bees are? The producers know
23 where the bees are because they are the ones that give
24 permission to locate the bees on the property. And the
25 beekeepers know where the bees are.

1 MS. ECHEVERRIA: So, in terms of who needs to
2 know where the bees are located, it is the growers, the
3 applicators and the beekeepers. The landowner may know
4 if there are colonies on his site, but also within a
5 forage area. So, within a one or two mile forage range,
6 you may not know exactly all the bees that are located on
7 someone's adjacent property. The idea is to get folks
8 within that vicinity who are placing hives in places and
9 who are making pesticide applications to have the
10 information so the communication coordination can occur
11 prior to a pesticide application that is acutely toxic
12 and could have an impact on the neighboring bees.

13 STEVE: Okay. So, this is going towards the
14 state registration program so everyone in the state
15 knows, which is --

16 MS. ECHEVERRIA: That's an option. There are
17 lower tech options if that's not an amenable approach for
18 the local stakeholders. The idea is that there is a
19 method to communicate between -- to know where the bees
20 are prior to a pesticide application. That could be a
21 state registration process.

22 But if there is another method of agreement on
23 contacting growers within the area by phone, that's also
24 acceptable. It doesn't have to be a one size fits all
25 technological approach. So, there's variability in the

1 way that a local/state authority who is convening the
2 meetings could approach that.

3 STEVEN: Okay. The next slide mentions EPA
4 considering label restrictions to protect bees under
5 contracted services. So, in your description, I was
6 thinking mainly of almonds because that is the single
7 largest pollination contract. But those bees need to be
8 protected outside when they leave the almonds so that
9 they'll be healthy enough to come back to the almonds. I
10 don't understand why there's a distinction between a
11 contracted crop label and a noncontracted crop label.

12 MS. ECHEVERRIA: The distinction between the
13 two scenarios is knowing that the bees are there and that
14 they are going to be exposed, because you know that
15 they're there. There's a large number of them. There's
16 a large number of hives that are intentionally brought
17 in. If an acute pesticide is sprayed, you know there's
18 going to be an impact on those bees.

19 In the other scenario, there may or may not be
20 managed bees within the area. You need a method to know
21 whether they are there and then to make appropriate
22 accommodations if they are within the area and there is a
23 likelihood that they're going to be sprayed.

24 So, we looked at a differential in the
25 likelihood that exposure is going to occur in the two

1 scenarios, and that was part of our rationale for taking
2 the two different approaches.

3 STEVEN: So, in the State of North Dakota where
4 there's 600,000 colonies in the state, they're just as
5 likely to occur anywhere in the state where there's a
6 blooming crop as they are in an almond orchard. So, why
7 differentiate?

8 So, it sounds to me like there's going to be a
9 completely separate set of rules for pollinated crops and
10 non-pollinated crops because you're not sure that the
11 bees are there. So, if the bees are there, then you
12 would have the same set of rules.

13 MS. ECHEVERRIA: I think that the other
14 consideration is the benefit that the grower gets from
15 having the bees on site for the purposes of pollination
16 services. In the second scenario where the bees may be
17 viewed as guests or they're not for the purposes of
18 pollination services, the grower is not receiving a
19 perceived benefit. So, that was another one of our
20 considerations in balancing the risks and the benefits as
21 we're required to under the statute.

22 STEVEN: I would like to see some more research
23 measuring the actual benefit to that. What research is
24 there is outdated. So, I think that they are receiving,
25 in many cases, a much more benefit than they do perceive.

1 Thank you.

2 MR. HOUSENGER: Keep in mind, too, that this is
3 a proposal that we're going to be drawing comments on.
4 So, we may be modifying it based on those comments.

5 Scott.

6 SCOTT: Thank you. A couple comments. First
7 off, it is a real need to know. I mean, as running a
8 custom application business (inaudible) crop rate with
9 beekeepers and do all these things. But we really do
10 need to know. So, I do appreciate those comments in the
11 last few minutes.

12 Another part of this, though, is it is very
13 valid. At times, there are very large benefits for
14 protecting crops, even during pollination time. So, we
15 do need these tools to be available.

16 I guess the other thing, though, that I really
17 question is you've talked a fair amount about the state
18 management plans and sort of the SFIREG interest, et
19 cetera. But we've seen little on the linkage with the
20 label. Will there be a direct reference to this on the
21 label or not? That's probably the pointed question.

22 MS. ECHEVERRIA: So, as Jack said, it is a
23 proposal. We do expect robust comments. In the
24 proposal, we are not going to be linking the state plans
25 to the label, as our proposal.

1 SCOTT: Am I mistaken or is this quite a flip in
2 the last, roughly, year?

3 MS. ECHEVERRIA: Our thinking continues to
4 evolve on this issue.

5 MR. HOUSENGER: The answer to that question is
6 yes. Our opinions on these positions change probably
7 weekly, which is why we're going out and soliciting
8 comments. It's a fluid plan right now.

9 SCOTT: Well, it will weaken the state plans if
10 there isn't a linkage to the label. This morning we saw
11 the Bulletin Live scenario where there is a linkage to
12 off label position things. My recommendation and direct
13 request would be that you keep that linkage.

14 MR. HOUSENGER: Okay.

15 Dan.

16 DAN: Thank you, Maria, for your presentation.
17 I guess the discussion and dialogue suggests the
18 complexity and the diversity of opinions around this
19 whole process and how the mechanisms need to work. I'd
20 support Scott's comment.

21 At some point, there's going to need to be some
22 kind of reference associated with state management plans
23 and their intention from a mitigation standpoint for
24 protecting the pollinators as well as protecting the
25 flexibility to allow pesticides to be used. The only

1 place that can come from is direct reference on a label.

2 So, I'm fully supportive of that.

3 Having intimately been involved with the
4 development of the initial Florida State management plan
5 that was specific to citrus, it has now been expanded to
6 look at blueberries and cucurbits where it is
7 a direct contracted pollination service, a lot of the
8 same issues apply across both cropping scenarios.

9 It's hard for me to understand why there would
10 be a distinction between the two different systems if the
11 whole intent of the programs being developed is to
12 mitigate in the most effective and efficient way the risk
13 to bees. I would argue that the acute exposure is
14 probably the least important piece of the puzzle. It's
15 going to be the chronic/subchronic exposure and some of
16 the other issues.

17 In Jim's testimony yesterday at the hearing, he
18 alluded to the fact that you all had developed guidance
19 for determining some of the measurements associated with
20 how to determine what needed to be done for that. I'm
21 familiar with the guidance that came out earlier this
22 year based on the European model, but has there been
23 anything officially developed that allows or suggests
24 what the appropriate measurements would be in a managed
25 bee situation to determine what the impacts are so that

1 we could actually get some real metrics around the impact
2 of the state management plans as they go forward?

3 MS. ECHEVERRIA: I'm not sure I understand the
4 question, Dan.

5 DAN: One of the things we struggled with in
6 Florida -- I mean, it's pretty straightforward when you
7 have an overspray incident or you actually cause an acute
8 bee kill where there's numbers that you can measure. The
9 bigger impact that we're trying to mitigate in Florida
10 where we have to have use of pesticides that have been
11 alluded to as being extremely detrimental to bees, we
12 don't see that impact.

13 We don't disagree that we don't have a
14 measurement process to determine what the subproduct
15 impacts are because we've looked for guidance everywhere
16 to try to come up with how do you measure overall hive
17 survivability. It's beyond just a single measurement of
18 overwintering losses or summer losses. It's the overall
19 health of that hive is what you're trying to measure.

20 We've looked to try to put together a protocol
21 to look at landscape level impacts of pesticide use and
22 agro ecosystems in Florida in managed bee populations,
23 because that's a community you can measure. I don't know
24 how you would measure wild bee populations in Florida to
25 try to come up with the same thing where you're using the

1 managed bees population.

2 I'm struggling to come up with a mechanism to
3 be able to provide the type of measurement at the end of
4 the day that's going to determine success. If you talk
5 to a certain subgroup of beekeepers in Florida right now,
6 at the latest meeting on cucurbits, they said they've
7 had less problems than they've ever had after the totally
8 voluntary program was put into place in Florida a year
9 ago.

10 It's all based on dialogue and having a
11 conversation and an ability for people who need to know.
12 It's the applicator, it's the landowner, it's the
13 beekeeper who needs to know who is around him as well.
14 It's a two-way street. It's not just a one-way street in
15 this process. It's been fairly successful. It's totally
16 voluntary and working better in certain regions in
17 Florida than it is in others because it is voluntary.

18 You're going to need at some point to come up
19 with a mechanism that can show that these programs work to
20 achieve the end goal. I'm concerned that we don't have a
21 measurement yet that allows us to establish that other
22 than a warm fuzzy feeling among the two communities that
23 are directly impacted at this point, which is the growers
24 and the beekeepers.

25 I can tell you right now there's not a lot of

1 warm fuzzy feelings on both sides of that equation about
2 how this process is supposed to work. It's going to take
3 a lot of dialogue, a lot of effort to get it to the point
4 where there's support for the program going forward. It
5 needs an indication from the agency that you think is
6 going to be successful in stronger terms than what we've
7 seen today.

8 The other question I've got is directly to the
9 comment that was made on the PRIA funds allocations.
10 Evidently, there's a half a million dollars from the PRIA
11 funds that's going to be earmarked towards supporting
12 development of the state management plans. How is that
13 money going to be spent, and where is it going to be
14 directed? Since Florida has already gone through a whole
15 tremendous process, is any of it going to be available
16 for us to go back and look at some of the other crops?

17 MS. MONELL: The money I was talking to is
18 in the FY 16 president's budget, so it would be
19 appropriated funds. It would not be out of the PRIA
20 account fees. It would not (inaudible) fees. It is a
21 STAG allocation, state/tribal allocation. Assuming that
22 that budget item is passed and authorized by congress,
23 then there would have to be an allocation process set up
24 for that \$500,000.

25 DAN: But there's been no planning on how it

1 would be utilized if it was approved yet, other than the
2 fact you want to use it to support plans?

3 MS. MONELL: Not at this point, no.

4 MR. HOUSENGER: Wayne.

5 WAYNE: Thank you for your presentation. It
6 was very good. In North Carolina, we're in the process
7 of developing an MP3. I'm just curious, it appears that
8 the crux of this is all about communication and BMPs. Is
9 there enforceable or mandated language in any of the
10 MP3s?

11 MS. ECHEVERRIA: So, in the SFIREG guidance, we
12 talk about states having flexibility to adopt a
13 regulatory approach or a voluntary approach. So, a lot
14 of the plans that we've been discussing here have taken
15 on a voluntary approach. Those BMPs are voluntary.

16 However, there are examples of states who have
17 adopted regulation to deal with the issue, who have
18 issued restrictions of making applications at bloom, for
19 example. So, I know Iowa has a state law, and there's
20 some regulation in California. So, there is the option
21 for states to take either approach.

22 WAYNE: And would all of those be put online,
23 by any chance, or is there a one-stop shop for these
24 MP3s?

25 MS. ECHEVERRIA: I think that's a great idea.

1 We don't have that yet developed. I think that's
2 something that we should take back and consider because I
3 think that would be a great resource for other folks
4 going forward.

5 MR. HOUSENGER: Gabrielle.

6 GABRIELLE: Just briefly a couple things. I
7 think I'm also trying to understand the difference
8 between pollinating using and pollinating nonusing crops.
9 Like in the case of almonds, after bloom, those growers
10 behave like every other grower that's not a pollinated
11 crop. So, I get what you're saying. Basically, you're
12 saying that from that communications perspective, the
13 growers know it's there. The question is really more how
14 does a grower who is not an almond grower know that
15 there's hives nearby in the almond orchards and figures
16 out what to do about it.

17 So, I think we need to figure out how to talk
18 about that in a better way. It's not as black and white
19 as it sounds. As I say, an almond grower after bloom,
20 I'm not sure how much they're thinking about bees
21 somewhere else. I'm just being up front with you.

22 I understand the concerns about additional
23 pollinators, but I would also say let's try and figure
24 this out for the managed honeybees and see what we can do
25 and learn from this process, as we also figure out what

1 are the risks or not risks to the rest of the pollinating
2 world. So, I think this is something I view as a
3 learning experience, a way of figuring out what our
4 options are.

5 I understand the question about why state by
6 state, but I can just give the example that what we can
7 do as BMPs on almonds is not the same thing as what you
8 can do in other crops, even in California. So, you're
9 just looking at that. There's a reason why -- or, like,
10 what a cotton grower can do in California, a cotton
11 grower in Louisiana might not be able to do because of
12 different environmental conditions.

13 So, that's the reason why it's being on a
14 state-by-state basis, which I realize can drive people
15 crazy at the same time. I mean, that's just the reality
16 of it, but given where we are right now, I think this is
17 actually a pretty good approach to -- really what we're
18 talking about here is gaining awareness. Focus on
19 communications for the almond industry, even the almond
20 industry has had to sit down and look really hard at
21 what's going on in their own industry.

22 Communication was one of the biggest problems,
23 lack of communication, because you can have a grower, the
24 pest control advisor, the actual applicator, a beekeeper,
25 a bee broker -- the grower is not even dealing with the

1 beekeeper; they're dealing with the bee broker. So, how
2 do you get communication going on within that chain?
3 That emphasis on communications, even where it's very
4 intentional, bees are going to be there and pesticides
5 are going to be there. That's been something we've had
6 to work on, or are actually working on right now.

7 So, I just want to reemphasize that that
8 Element- it seems fuzzy. It doesn't seem regulatory, but
9 it's making a difference. I mean, that's something that
10 we hear often from beekeepers in other states where
11 there's been that focus on communication.

12 I also don't understand how this is supposed to
13 work if there's not some linkage with label, or
14 mitigation, or whatever you want to call it. So, that
15 needs to be clear to us because I think that makes a big
16 difference about how meaningful this effort will be.
17 Just a couple thoughts.

18 MR. HOUSENGER: Thanks.

19 Doug.

20 DOUG: Talking about communications, the things
21 that need to be done as you look at the seven mechanisms
22 to measure effectiveness of the plan, there's a lot of
23 studies going on right now that data metrics need to be
24 included not only in pesticides but also mites, habitat,
25 health of bees. Those all need to be measured and

1 communicated with the pesticide that we're focused on
2 right now, too. So, thank you.

3 MR. HOUSENGER: Steve.

4 STEVE: I agree with Gabrielle that lack of
5 communication has been the biggest hurdle so far, but
6 some of the state plans that currently exist are based on
7 communication. They have absolutely no pollinator
8 protection in them. It's all about communication.

9 Some other state plans are based on the
10 mitigation measure is to move the bees. That enforces it
11 all on the beekeeper to protect his bees. The applicator
12 makes his application as he sees fit. If the bees are
13 moved, that's great. If they're not, he doesn't care.
14 If you move the managed bees, you can't move the native
15 bees. So, if a state plan core in the protection of the
16 managed pollinators is to move them, then you have
17 absolutely no protection for natives.

18 MR. HOUSENGER: Donny.

19 DONNY: Thank you. I'll be very brief. This
20 kind of goes back to the question I asked earlier about
21 best management practices. If you go to
22 honeybeehealthcoalition.org, you'll find some valuable
23 information there as far as bee health is concerned and
24 even what you can do in your own backyard to promote
25 healthy bees. So, I recommend you take a look at that.

1 That will help answer some of the questions you have
2 around best management practices.

3 MR. HOUSENGER: Andy.

4 ANDY: Thank you. I appreciate Marietta going
5 through this, but it sounds like it's created quite a bit
6 of confusion that EPA is looking at this as bee
7 regulatory mechanism. I've always viewed this as in
8 addition to EPA, nothing in these state plans will
9 alleviate EPA's duties under FIFRA to regulate
10 pesticides.

11 These are voluntary mitigation measures that we
12 can engage in now. We developed these before. We
13 actually brought them to EPA and said this is what we're
14 doing. So, these are in addition to anything that I
15 would expect EPA to do from a regulatory standpoint.

16 I don't think that there's anything in them --
17 whether it's communication, or agreeing to a set of
18 cooperative standards, voluntarily supporting the
19 increase of habitat on state and federal lands, or any of
20 those things that we can do, I view them as complementary
21 to, in addition to anything that EPA is planning on doing
22 under their duties under FIFRA.

23 So, I don't see them as being an alternative to
24 regulation. I view them as being in addition to and
25 complementary of anything that EPA would be doing. Thank

1 you.

2 MR. HOUSENGER: Yes, I would agree with that.

3 Mark.

4 MARK: Having listened to a number of folks
5 here, I get back to a few things. I think what folks
6 ought to look at is just what Andy said, there's all
7 kinds of things that can delay this. Timing is a bit of
8 concern here. So, we've got to think about how much time
9 we have to study things or put things back on a label or
10 whatever else. While I personally agree with the idea of
11 linking it to labeling, I don't think that that should,
12 in any way, stop the process and the implementation of
13 what currently is going on. So, I will provide comments
14 at the time. That was one comment.

15 The other thing is just getting back to the
16 idea that I know with school integrated pest management,
17 once the agency took the leadership to help develop some
18 standards in common to where yes, one size does not fit
19 all and things are different across the country, there
20 are standards in common, then that took out some of the
21 wiggle room to go just for communications and things like
22 that.

23 With the agency leadership, that made a big
24 difference for school integrated pest management. I
25 think it would make a big difference in the

1 implementation of best management practices for
2 pollinator protection.

3 MR. HOUSENGER: Louis.

4 LOUIS: I think for the most part, Don, Mark,
5 Steve can sense ahead. Let's just think about the
6 communication piece for awhile. I sit here thinking
7 okay, a lot of what we say got great application for
8 commercial agriculture. Now, if you were a small land
9 owner and you have a piece of land where you intend to
10 grow your crop, and you're told that your next door
11 neighbor has bees, what do you do? Are you going to
12 abandon your piece of land and make no money that season?
13 I know bees are important. They need to be protected.
14 I'm for that.

15 But one of the pieces that I think is missing
16 here is sure, you tell somebody that one mile down the
17 road there is somebody with bees. But we need to also
18 tell them what's the buffer zone that prevents us from
19 using pesticides if it's any shorter than prescribed.
20 Again, it would have to do with the flight range of the
21 bees and the drift potential of the chemicals.

22 It's not as easy as it sounds. I understand
23 that. So, I'll be looking for that proposal because I
24 think you'll get a lot of response from the public. There
25 are issues that are quite complex to deal with, even

1 though we all recognize the importance of protection to
2 pollinators.

3 MR. HOUSENGER: Nichelle.

4 NICHELLE: So, we discussed these state
5 pollinator protection plans which are voluntary and they
6 have voluntary elements, such as best management
7 practices, notification, communication. But what does
8 that mean for compliance and enforcement? Could EPA shed
9 some light on that?

10 MS. ECHEVERRIA: So, all use instructions on
11 the label are enforceable. Our advice is always follow
12 the label. That is an enforceable piece here. If a
13 state adopts a regulatory approach to a plan, they adopt
14 a state level regulation, that would also be enforceable.
15 A plan that is based on voluntary measures is not an
16 enforceable plan.

17 NICHELLE: So, in other words, these best
18 management practices don't really have much teeth at the
19 end of the day?

20 MS. ECHEVERRIA: So, our perspective is that
21 voluntary approaches can be effective, as can regulatory
22 approaches. That's why our discussion on the measures is
23 so important. Voluntary approaches that are widely
24 adopted and change behavior and actually make an impact
25 can be very effective at achieving our goal.

1 On the flip side, a regulation that is not
2 followed, that is not enforced, that there's no
3 compliance with is not very effective at achieving our
4 goal. We're really looking at incorporating measures
5 into these plans to make sure that they're achieving the
6 goal of reducing risk to bees. So, that's why this
7 conversation around the measures is so important, because
8 we do want to see evidence that we are achieving our
9 goals.

10 MR. HOUSENGER: I assume that Louis, you're
11 done? Nichelle, you're done? We're done with this
12 session then. Thanks, everybody, for the comments.
13 Those are useful.

14 The next session speaks to incident reporting
15 and what the agency is doing to improve the ability to
16 report, collect better data, and use these incidents in
17 our regulatory decisions. Rich Dumas and Melissa Panger
18 are going to lead up this session.

19 MS. PANGER: All right, we'll go ahead and get
20 started. Rich and I appreciate the opportunity to speak
21 with the PPDC today about the OPP's incident workgroup.
22 So, what we're going to be talking to you guys about
23 today is we're going to be talking a little bit, an
24 overview, of the importance of incident data. We'll talk
25 a little bit about the current sources of incident data.

1 Give an overview of OPP's incident workgroup. Talk a
2 little bit about our current and future projects.

3 Then, most importantly, while we're here, we'd
4 like to start talking about stakeholder input into some
5 of our proposed projects. We're hoping there's enough
6 interest in this that we can perhaps set up a PPDC
7 workgroup. Rich will talk a little bit more about that,
8 on incidents.

9 So, just a little bit on the importance of
10 incidents. Obviously, they're very important to us. We
11 want to make sure that everybody is aware of the
12 importance of not just the enforcement type of incidents,
13 but also the incidents that have to do with perhaps a
14 registered use of a pesticide. It gives us really,
15 really important information about what can happen out in
16 the real world when a pesticide is used. So, they're
17 very valuable. It can be valuable for that reason, for
18 characterizing risks. They can help identify problem
19 areas.

20 So, if we're getting a lot of incidents related
21 to a particular use site or area, then that can maybe give
22 us an opportunity to go back and look a little bit closer
23 at what's going on there. It can inform risk management
24 decisions and obviously support some rulemaking. When
25 we're talking about incidents, we're talking about all

1 incidents. So, we're talking about human, eco, plant,
2 honeybee, and pets. So, we're talking about all incidents
3 here.

4 Just talk a little high level about some of the
5 current sources of incident data. Although there's a lot
6 of different sources out there, we kind of think of them
7 in two main chunks. The two main chunks are really the
8 required data incident reporting, which is required of
9 registrants under FIFRA 6(a)(2), where there are some
10 requirements for reporting.

11 But then, there's also voluntary reporting.
12 Both types of information are very important to OPP. The
13 types of voluntary reports are the sources that we get
14 from our poison control centers for the human ones, NPIC,
15 other countries such as Canada.

16 We share regularly incident data with PMRA.
17 Obviously, state and local governments provide very
18 important details information on some incidents. Other
19 federal agencies, other EPA offices such as OECA and the
20 regions, can also inform us on incident data. Then
21 obviously the public, including beekeepers.

22 So, just to provide a little overview of the
23 workgroup. Rich Dumas and I are the co-chairs of the
24 group. We started back in January 2014. It was really
25 designed to be an umbrella group for all kind of

1 incident-related activities. Prior to that, there were
2 kind of incident things going on in different divisions
3 and different groups. We wanted to kind of make it more
4 efficient and hopefully more productive in terms of
5 making an umbrella group for incidents.

6 It truly is an OPP-wide workgroup. It has
7 representation and membership from all of the OPP
8 divisions. Our first kind of marching orders for the
9 workgroup was to develop some priority projects, what
10 were the priority projects that we thought would be the
11 most benefit to OPP?

12 To help frame that, we came up first with a
13 vision. So, the OPP workgroup's vision, as stated here,
14 is really to create a sustainable framework for incidents
15 that improves reporting, both on the registrant and the
16 voluntary side. It enhances the efficient use of
17 incident data, supports quality, science-based decision
18 making, and encourages data sharing among EPA, other
19 agencies, and other stakeholders. So, that's kind of our
20 vision. That's what we're moving towards.

21 That helped frame kind of where we were
22 thinking there might be some areas of improvement.
23 That's what's on this slide. The slide is really showing
24 the different gears because we're trying to illustrate
25 that a lot of these things are interdependent. They're

1 not independent. Kind of these different projects are
2 related to each other.

3 We do see that there is some room for
4 improvement on the voluntary side of reporting, under
5 6(a)(2) reporting. We think there's some improvement
6 that we can make in terms of the use of data and risk
7 assessment and risk management. A lot of that has to do
8 with creating consistency across assessments and
9 decisions across the divisions.

10 We think there could be a lot of efficiencies
11 gained by moving towards electronic reporting.
12 Obviously, some of these are very long-term kind of
13 visions. Part of that, going to electronic reporting and
14 improving data quality, is really kind of gaining a solid
15 understanding of what type of information we think is
16 important for incidents.

17 So, we've been developing these incident data
18 standards and data elements, which Rich will talk about
19 in just a minute. We think this will help improve data
20 management. Then, we'd ultimately like to improve
21 sharing the information with partners, and the public,
22 and stakeholders.

23 With that in mind, our specific goals are
24 basically to improve reporting. One way we think we can
25 do that is to make it easier for registrants and the

1 public to report incident data to EPA. We'd like to
2 eliminate or at least ease kind of the time-consuming
3 data entry efforts that are currently necessary to
4 process incident data, which are mainly done by hand now.

5 We'd like to reduce the time spent on incident
6 FOIA requests and better able to share the data with the
7 public. Obviously, getting the data via FOIA is not the
8 most efficient way to share data. So, we'd like to get
9 better at that.

10 We'd like to improve the quality of the data
11 that we actually get in. One way to do this is these
12 data standards that Rich will be talking about, to get
13 more detailed information on each specific incident and
14 the type of information that we think is valuable for
15 making it higher quality.

16 We'd like to improve the consistency in the use
17 of the data across risk assessments and risk management
18 decisions. And then, in terms of just efficiency, a lot
19 of these are interrelated so they seem a little bit
20 redundant, but improve internal OPP incident data
21 management. Ensure consistent use again of incident data
22 and risk assessments and risk management decisions.
23 Then, be better at sharing information with partners and
24 stakeholders.

25 With that, I'll pass the mic.

1 MR. DUMAS: My job is to be the pitchman for
2 the PPDC workgroup. So, when we're all done,
3 we'll all be excited about signing up for this workgroup.

4 One thing sort of going to fuel (inaudible)
5 from Melissa in this schematic of what we're planning or
6 would like to do really illustrates it is this whole
7 incident effort is not a sprint; it's a marathon.
8 Getting a real nice usable system is not going to happen
9 in six months. It's going to take some time to get it
10 right. That's why we really want people involved today
11 from basically all types of stakeholders so we do get it
12 right and don't build something that people will say, I
13 don't want to play or you forgot an important piece of
14 information.

15 So, what you'll see here is sort of the rough
16 order of how we see getting stakeholder involvement.
17 Actually, you could replace stakeholder involvement with
18 charges for the PPDC workgroup, essentially. As Melissa
19 mentioned, clearly, making sure what we get in a data
20 incident report, what data we collect, and house is the
21 right information.

22 We've worked a lot to try to figure that out,
23 but we're ready to sort of role it out. There might be
24 one element that we neglected that would be critical to
25 the states, and we might want to build that in. Or,

1 there will be ones like, really, what do you get out of
2 this.

3 So, that's really our first step. We really
4 want to start rolling out and having a discussion of the
5 data elements that we've developed internally so far to
6 see if they're the right ones. I would think they're
7 mostly right, but I'm sure there's lots of opportunities
8 to make them better and more efficient.

9 I think at some point when we get those nailed
10 down, we might think of some sort of pilot, which was for
11 collecting incidents for people who have them. It could
12 be registrants, it could be states. We're not sure
13 what that might mean, but the idea is maybe some sort of
14 pilot to test whatever we come up with.

15 Another big, big part that we're really going
16 to need a lot of help on is how to build the right
17 system. We want something that's very good for sharing,
18 people can input information for us or get information to
19 us in an efficient way. But also, we want it so it will
20 be useable to other people who care about incidents
21 information.

22 I think many of you in this room care about
23 incident information and would love to know what's going
24 on in another part of the country or similar sort of
25 issues. So, that's really the goal that we have this

1 workgroup, the PPDC workgroup, to help us along the way.

2 Then, the other side I'm not going to spend a
3 lot of time on. These are sort of, we'll call them,
4 stand-alone projects. As Melissa said, everything is
5 interrelated. But things that we're sort of going to be
6 looking at and plugging away with, sort of the sidelines.
7 One, I think we're going to take a little time and take a
8 good look at what we've learned, re: the current 6(a)(2).

9 Certainly, something that's in 6(a)(2) today
10 that I'm sure drives registrants crazy is if there's a
11 requirement for paper reporting. Technically, you can't
12 submit electronically or you can but you have to do it in
13 paper, too. So, that would be something that seems like
14 a no-brainer that we would want to work towards fixing
15 the rule in that respect.

16 Then, there's a few IT sort of projects. Right
17 now we have the ecological information system as a free-
18 standing document, database, and we have the incident
19 data system which has human health and ecological. We're
20 in the process of importing it all into the IDS
21 system. In fact, that's a fairly short-term effort. I
22 think we've just sort of figured out a path for doing
23 that. So, that should be something that might happen
24 within the year, hopefully more like less than six
25 months.

1 Then there's the outreach part. That's here,
2 but I think this is was sort of a kickoff. We'll be
3 talking to SFIREG next month about our workgroup and sort
4 of getting people interested in trying to help us do it
5 right, ultimately.

6 In internal guidance, the consistency that
7 Melissa already talked about, we're actually got a
8 workgroup working on developing the OPP guide. EFED has
9 had their own guidance for a number of years, I believe.
10 HED sort of has one. The idea is trying to come up with
11 something that would be uniform that all risk assessors
12 could look at when they're considering incidents in their
13 risk characterization documents.

14 So, there's a lot of efforts going on. Some of
15 them, you are uniquely qualified to help us.

16 The next slide is really very much I've kind of
17 said all of this. The areas that we're going to be
18 seeking your advice on would be, first and foremost, the
19 data elements. We'd like to know where there's other
20 sources. We know that states, NGOs, others have some
21 good incident data that might inform our decision making
22 or even where we focus some of our resources. So, help
23 in directing us to those. We've got a few specific
24 things that we need to think about as we're getting data
25 incidents from many sources.

1 Certainly, the needs of the stakeholders. We
2 want this to be an exchange. We're not just saying, oh,
3 we want your data. We want to have a system in which
4 we're creating something for the public consumption that
5 would be useful to many parties and many types of
6 stakeholders. We certainly need your help to figure out
7 what the right questions and directions are.

8 Then, as we're building the systems, I'm sure
9 we'd need guidance on what has worked. Some of you have
10 probably built big data systems or data collection
11 systems. You know some of the things that have and
12 haven't worked. So, we're really looking forward to that
13 kind of input as we move down the road. That's probably
14 a later charge for the PPDC, but it's certainly something
15 to keep in the back of minds with our goals.

16 So, just quickly sort of talking about each of
17 those a little bit, we've already put together a set of
18 data elements. It's by category. That is, we have a
19 pollinator one, we have one for pets, we have one for
20 human health, we have one for ecological, and then sort
21 of the general information that we would need for every
22 incident, like who is reporting it, where did it happen,
23 those types of questions.

24 So, that's what we're talking about when we say
25 data elements. What piece of information would be really

1 useful to collect in some sort of uniform and strategic
2 way so that it would be useful to us and others? So, our
3 first step is to seek your advice on what those elements
4 are.

5 The next thing is what I would see as sort of
6 being maybe concurrent and ongoing, helping us identify
7 where there might be some valuable incident data out
8 there already. I think there's a few questions we need.
9 There's identifying the sources, but I think one of the
10 biggest fears when you start getting data from multiple
11 sources is that there's duplication. So, how do we
12 safeguard that we aren't counting the same incidents five
13 times? That's not terribly useful and it's a waste of
14 resources and actually gives us potentially bad
15 information.

16 And then, what might be the right data, what
17 can we share with the states, the public, in general, how to do it,
18 and what do people really want to see. They might not
19 want to see every data element we collect. There might
20 be certain salient ones that we find just about everyone
21 cares about.

22 Then, we want to create something that's easy
23 to use for collecting the data. We want the ability to
24 collect and share the information and know what sort of
25 the key characteristics of the data should be. Again,

1 we're going to be looking for your advice as to what
2 might be the right things we should be looking for in any
3 data we collect, above and beyond the data elements.

4 Then, the system question will be coming to
5 you, I'm sure, many times. Right now, we have the portal
6 effort that is really pretty much a registrant-focused
7 effort, how to get studies in efficiently and so on.
8 We're certainly going to keep our eyes open and see if
9 there's a way to start building incidents data into this.

10 It may or may not pan out, but we certainly
11 would like to seek advice before we start putting lots of
12 resources into an approach that, from your experience, we
13 know isn't going to work, or something that will really
14 work and is nice and efficient. Certainly, we want to
15 get some information and thoughts on what data to
16 collect, how to collect it, and so on.

17 Why a PPDC workgroup? Well, obviously, this is
18 a group of great cross section of interested parties in
19 our work. So, you're sort of uniquely positioned for us
20 to be able to approach multiple types of stakeholders in
21 one venue. Having been involved in a couple PPDC
22 workgroups, I find that the cross pollination across
23 different NGOs, and all sorts of stakeholders, has really
24 been invaluable in getting us to a better place and one
25 that's more acceptable to the people who might ultimately

1 want the outcome.

2 Well, this is really the last thing. The way
3 we see this as being structured is pretty much like any
4 other PPDC workgroup. We might have a meeting right
5 before, a live meeting, conference calls, and e-mails.
6 So, open the floor from here.

7 MS. MONELL: If we could initially address the
8 specific question about whether or not the PPDC would
9 recommend that we create a workgroup, that would be most
10 helpful feedback at this point. Thanks.

11 MR. HOUSENGER: Cheryl.

12 CHERYL: I didn't put my card up for that. How
13 do you want to do that? How do you want to do Marty's
14 request?

15 MS. MONELL: Go ahead, since your card was up
16 before I --

17 CHERYL: Okay. I'm not sure what to do with
18 what you just said. So, we're clarifying that you've had
19 an internal workgroup within EPA, which was referred to
20 in the beginning. Now you're asking for form a workgroup
21 within PPDC.

22 MS. MONELL: We want stakeholder involvement in
23 this entire process. We've gone just so far within the
24 program, but we need help.

25 CHERYL: It sounds good to me, but I don't

1 know, Jack, how you want to finish that question. Then I
2 have comments.

3 MS. MONELL: I'll answer for Jack.

4 MR. HOUSENGER: I was writing down names.

5 MS. MONELL: Why don't you continue with your
6 comment now that you've cast your vote?

7 CHERYL: Okay. So, my question is, we launched
8 into a discussion of incident reporting without really
9 having defined what you meant by incident. 6(a)(2) is
10 adverse effects incidents. You can take incidents a lot
11 of places. You can even take it into product performance claims.
12 So, I think it's going to be really important to make
13 sure you don't overreach and that you have clear, clear
14 definition of incident. You're nodding your head so I'm
15 not telling you anything you don't know.

16 So, the other piece, as you can imagine, when
17 you start talking about how you're going to use the data,
18 you're going to make sure that you've got data for the
19 purpose of whatever you're going to do with it. If
20 you're going to look at screening trends, that's one
21 thing.

22 If you're going to integrate it into risk
23 management decisions, then the quality and the
24 validation, especially the exposure, not just hearsay but
25 true follow up, you've validated it, you know there was

1 exposure associated, that becomes really important if
2 you're going to try to use that in a regulatory decision.

3 Along those lines, on one of these slides you
4 said you wanted to obtain more detailed information on
5 ecological incidents to improve risk assessments. The
6 same thing would apply for humans.

7 MS. PANGER: It would apply to all of those,
8 that's correct, not just eco.

9 MS. MONELL: And all of those comments that you
10 just made would be perfect subjects of conversation among
11 a workgroup.

12 MR. HOUSENGER: Tom.

13 TOM: Cheryl added some of what I was going to
14 say, especially the definition. If there's a workgroup,
15 I'll be the first one to join. I'm not promoting that
16 there be one, but if there is, I've spent many years
17 investigating incidences and having to evaluate them as a
18 pesticide regulator. I want to make sure the Office of
19 Compliance, OECA, is involved with this because that's a
20 whole other part of it.

21 I think the quality is one of the important
22 things of this, because I was part of the old PIMS
23 system, Pesticide Incident Monitoring Systems, which was
24 a bunch of garbage in there, which I always complained
25 about how it was used, because a lot was unverifiable.

1 So, again, that quality.

2 That list of sources you listed, there's a lot
3 of difference between those. Like, the National
4 Pesticide Information Center has very good information
5 and detailed information, and some of the rest of them
6 don't compare to that.

7 MS. PANGER: That's part of what we're after,
8 is to kind of standardizing data elements. Hopefully, we
9 can standardize some of the quality across the sources of
10 information.

11 MR. DUMAS: Actually, our workgroup has been talking
12 to OECA throughout. We're not necessarily moving -- at
13 one point they were developing their system. We were
14 hoping we could tap into that. But its purposes and what
15 they're developing is somewhat different. But we try to
16 keep a dialogue with them because it is important.

17 MR. HOUSENGER: Matt.

18 MATT: There's a couple things I just noticed.
19 When we're talking about incidents, my focus is generally
20 -- because I'm a physician in occupational medicine on
21 human health effects, one of the things I note is that
22 there was very little conversation about the enhancement
23 of the ability of the front line people to identify the
24 conditions that you consider incidents. It seemed like I
25 didn't see anything about that. Maybe I'm wrong, but I

1 missed it if it's there.

2 The other thing I would say is that at the
3 present time, in our country, 30 states require pesticide
4 reporting as a requirement. If it happens, it must be
5 reported. The remainder do not. That seems to be should
6 be part of the conversation. Obviously, you can't force
7 a state to make it a requirement, but you can talk to a
8 state about making it a requirement. It would enhance
9 your ability to identify incidents in human beings, at
10 least, quite substantially.

11 I'm going to pick up on what Cheryl said about
12 the validation of exposures. It seems to me the
13 importance of the validation of exposures can't be
14 overemphasized. I'd go back to the biomonitoring
15 committee, subcommittee, who are struggling with what are
16 the tools we use to diagnose pesticide poisoning in a
17 human being, ergo, validating the exposure.

18 We don't have very good tools. We have
19 cholinesterase for organophosphates and carbamates.
20 We've got anticoagulants, PT for anticoagulants, and a
21 couple of other things that we have at our disposal. But
22 generally speaking, on the practical use of diagnostic
23 tools, there are very few for the practicing clinician to
24 do it. That talks to validation.

25 Finally, the other thing I mentioned is in the

1 process of surveillance on human beings, a monkey wrench
2 has been thrown into the works, and that's HIPAA. HIPAA
3 has really created a significant fear in clinicians about
4 the process of sharing clinical data with anyone. The
5 monumental cost of divulging information on a personal
6 medical experience and being then somehow identified as
7 having divulged that without appropriate authority is an
8 extremely scary thing for clinicians.

9 In these cases of voluntary reporting systems,
10 I would wager that it's virtually impossible for a
11 clinician to muster the courage to even talk to a
12 voluntary reporting system, because if it's not required,
13 they're not released from the responsibility of keeping
14 that information confidential.

15 So, you've got a number of things that I think
16 you really need to be talking about that I didn't hear
17 talked about in this conversation. I ask you to include
18 those in your conversation. I, unfortunately, can't join
19 your group because I'm no longer on the PPDC as of July.

20 MS. MONELL: Oh, yes, you can.

21 MATT: Well, I virtually can join your group.

22 MR. HOUSENGER: It's not quite that easy.

23 Jerry.

24 JERRY: First of all, I think it's a great
25 idea, so another yes vote to answer your question

1 directly, Marty.

2 I think a higher level of what Cheryl said is
3 she's talking about exposure. I think you really need to
4 look at quality control, quality assurance of every
5 incident, especially as you open it up to people that
6 aren't in this room that may or may not have a different
7 motive. You may have some unnecessary things come in
8 there. The last thing you want to do is make a
9 regulatory decision based on information that's false or
10 misleading. So, quality assurance/quality control is
11 probably a big thing you have to consider.

12 MR. HOUSENGER: Ray.

13 RAY: I'll just speak up to support the concept
14 of the workgroup and volunteer myself or find somebody.
15 I'll volunteer somebody else.

16 MR. HOUSENGER: Marylou.

17 MARYLOU: This is a very interesting workgroup,
18 and I'd be interested in joining. Although I am not
19 going to be in PPDC, I will join that workgroup.

20 You probably already know this, but California
21 has a very extensive database on human pesticide illness
22 reporting and so does Geoff Calvert's group. The
23 validation, all the points that were already said is
24 really important to take note.

25 In California, it is a reportable incident.

1 Pesticide illness is a reportable incident, so we do
2 receive them from physicians and the poison control
3 centers. We do receive over 2,000 cases, but only 1,500
4 are really pesticide illness, definite, probable, or
5 possible. So, the validation really is very important.
6 The investigation and all that is so critical to this
7 type of database. But it's really a great project.

8 MR. HOUSENGER: Virginia.

9 VIRGINIA: I also support the idea of a
10 workgroup. I think it's a good idea.

11 One comment on the data elements, I think
12 specifically within the human health, you should have a
13 category just for workers and their family members. I'm
14 a little concerned about the emphasis on the quality and
15 validation, on their number of barriers to workers and
16 their family members reporting incidents. There's a lot
17 of fear of retaliation if it's a work-related incident.
18 So, they're concerned about keeping their job. Many
19 farmworkers do not have health insurance and access to
20 medical services. It's limited.

21 Workers who may initially report an incident,
22 if the information that they're providing is not
23 anonymous or confidential, they will not follow through.
24 That doesn't mean that that wasn't a valid incident. So,
25 you can't discount a lot of these incidents, because you

1 can't verify them. Among farmworkers, many of these
2 pesticide incidents are underreported.

3 Finally, I just want to say that again, for
4 farmworkers, a passive surveillance system is not going
5 to be very effective. I think you also have to include
6 interviews, or surveys, or qualitative data to capture a
7 lot of this information and look at some of the barriers
8 and the depth of the problem. Otherwise, incidents will
9 continue to be underreported.

10 MR. HOUSENGER: Nichelle.

11 NICHELLE: One of your slides called what are
12 our goals, you have improved reporting, improved quality,
13 efficiency. I would like to see improved training for
14 those that are first responders to taking or reporting a
15 pesticide incident. Our organization, we tend to get
16 some calls from the public wanting to report an incident.
17 We will typically refer them to the relevant state
18 agency. Oftentimes, you will hear back saying that they
19 got conflicting information on who they should be
20 reporting to.

21 Now, this may just be on a state-by-state
22 basis, but I feel like there is a need for some improved
23 training for those on the ground on how to determine
24 whether this is an incident or just for the state
25 agencies to know which ones should be collecting these

1 incidents.

2 MR. HOUSENGER: Cynthia.

3 CYNTHIA: The American Bird Conservancy is
4 excited to see this proposal to elevate incident
5 reporting in the PPDC, for several reasons. The
6 requirement of paper submissions was clearly written in
7 the dinosaur age, and it's a good move to eliminate that.

8 As we discussed earlier, the thresholds are
9 absurdly high for required incident reporting under
10 6(a)(2), so hardly anything is getting reported, whether
11 you're requiring 50 mammals of a herding species or 50
12 song birds or 1,000 schooling fish.

13 There's also a need to coordinate databases.
14 EPA has the EIIS and the IDS, and Fish and Wildlife
15 Services coming out with the IMRS database which will be
16 mainly for birds but also for bats. So, apparently, not
17 by species.

18 But how can these databases be coordinated?
19 It's my understanding that the soon-to-be-released
20 signing of the MOU between Fish and Wildlife Service and
21 EPA envisions such coordination under the Migratory Bird
22 Treaty Act.

23 And then, another question, how to make more of
24 this information public? Perhaps not all deaths of frogs
25 or owls or prong horns need to be state secrets.

1 Certainly, FOIA is a time-intensive, resource-intensive
2 process for all of us.

3 As we discussed earlier, this complements well
4 EPA's efforts under the Endangered Species Act to see how
5 these pesticides are affecting/threatening endangered
6 species in the real world and whether our mitigation is
7 actually working.

8 Finally, incident reporting is a really useful
9 reality check or backstop as EPA moves away from animal
10 testing and the cumbersome 158 data requirements and
11 moves towards greater reliance on more theoretical
12 modeling and computational toxicology.

13 Finally, I agree with Matt's comments on the
14 importance of diagnostic tools for humans and also for
15 wildlife, for neonic poisoning and other pesticide
16 poisoning. Thanks.

17 MR. HOUSENGER: Robin.

18 ROBIN: I vote yes for a workgroup, and I'll be
19 happy to be on it.

20 MR. HOUSENGER: See, that's how it's done.

21 Matt.

22 MATT: I would just add one other thing.
23 Marylou has prompted my memory of it. Electronic medical
24 records, which are now by law almost
25 ubiquitous. That's a real resource that we really ought

1 to be looking at for surveillance.

2 One of the meaningful use criteria for
3 inclusion of elements into electronic medical records is
4 syndromic surveillance, which I think will really serve
5 our purpose well in terms of utilizing that. It can be
6 anonymous. It doesn't have to be identifying
7 individuals. But it can be used anonymously so it can
8 avoid the HIPAA requirements, if you can engage with some
9 of the electronic medical record companies or find other
10 mechanisms to get that kind of data.

11 MR. HOUSENGER: Valentin.

12 VALENTIN: I just want to echo what Virginia
13 said in terms of fears of reporting pesticide incidents.
14 It's not just about fear of losing their job, but also
15 it's fear of losing or being evicted from the housing
16 that's being provided by the farmers. A lot of them, at
17 least in Oregon, we get migrant workers who come up to
18 Oregon for two months and then they go back.

19 The other thing is there is a lack of adequate
20 training. One of my jobs is to do presentations about
21 pesticides to parents, to farmworkers, their family
22 members. One of the things I keep hearing is that
23 sometimes it's the first time that they received training
24 about pesticides. The other thing we've noticed is that
25 people are unable to identify the health effects that

1 pesticide exposure could cause.

2 Lastly, I think the farmworker population is
3 very diverse. A big percentage of them speak Spanish.
4 So, I would consider those demographics when we try to
5 improve incident reporting.

6 MR. HOUSENGER: Donny.

7 DONNY: First of all, I support the working
8 group. I think it's a great idea. I look forward to
9 working and determining how we can take a report and turn
10 it into data so that it can be used, it can have a value.
11 I'm willing to be a member of the workgroup.

12 MR. HOUSENGER: Dawn.

13 DAWN: Thank you. I enthusiastically support
14 the proposal to form the working group. I just wanted to
15 give you something to think about. This is just within
16 my little sphere of where I work. The most egregious
17 pesticide use is usually over-the-counter products used
18 by residents for self treatment for bed bugs. Rarely, if
19 ever, does that approach ever actually result in the
20 remediation of the bed bug infestation.

21 I am beyond convinced that this is having
22 significant human health impacts. Once maybe you are
23 past all of the catastrophic incidents reporting, I would
24 encourage you to focus some attention on the nonlethal
25 but chronic health effects that some of those specific

1 instances trigger heinous pesticide use patterns in
2 society. Thank you.

3 MR. HOUSENGER: Okay. Let's take a 15-minute
4 break, and then we can get into the EPA web site and then
5 our quick updates. So, 3:15 by that clock.

6 (Whereupon, a brief recess was
7 taken.)

8 MR. HOUSENGER: Our next session is about our
9 web site. There is an agency initiative to redo the
10 whole EPA web site, and probably some of the material
11 that you've seen up there is going away, and it's in a
12 different place. We just kind of wanted to walk
13 everybody through it to tell everybody what we're doing.

14 Claire Gesalman in our Field and External
15 Affairs Division is going to give this briefing.

16 MS. GESALMAN: If you visit EPA's web site, you
17 might have noticed that there have been some changes over
18 the past year or so. As Jack said, some things that are
19 on the web site now might be in a different place, or
20 look a little different, or whatever. We're hoping that,
21 for the most part, what's happening for people will be a
22 positive experience. If people have concerns about
23 things, we can work with you to help make it better. So,
24 I'd like to talk about the changes and how they are
25 affecting the pesticide web site and some possible ways

1 that folks in this group can help us do the best job
2 possible.

3 One thing that is important to note is that
4 EPA's web site is very popular with the public, and so is
5 the pesticide web site. In both areas, there are a lot
6 of visits with people looking at our web pages,
7 downloading documents, and that sort of thing. So, we're
8 concerned about making sure that people have the best
9 experience possible.

10 That's what's really driving the EPA web
11 transformation. The idea is to improve web content, and
12 update the format, and better serve the audiences that
13 are coming to the web site. What we're trying to do
14 throughout the process is focus on who the audiences are
15 and what they're trying to accomplish when they come to
16 visit us; in other words, what the task is that they're
17 trying to accomplish.

18 In many cases, it's fairly clear. If you're in
19 the pesticide manufacturing business and you're coming to
20 our web site, a lot of times you're looking for
21 information about registering a pesticide. So, that's
22 one of the things that we focused on.

23 We're also, at the same time, potentially
24 eliminating or archiving pages and documents that really
25 don't serve audiences or tasks. If you look at

1 statistics on web usage, there's a lot of web pages
2 across EPA that maybe have a couple visitors a year.
3 It's like, well, what's the point of that.

4 We'd like to provide a better web experience
5 for mobile users. How many people in this room use
6 mobile devices, either a phone or a tablet or something,
7 to get web information? A lot of people. So, the latest
8 research study showed that as many as 40 percent of
9 people are using a Smartphone or tablet to access
10 government information. That is something that is
11 growing and growing, and growing extremely rapidly. So,
12 that's something that we're focusing on in terms of the
13 way the web site is being designed and managed going
14 forward.

15 We started this project under direction of the
16 administrator. We have a schedule that's been set by the
17 administrator's office as well. Our deadline is getting
18 our materials transformed by the end of this September.
19 The current web servers will at that point be used for
20 something else.

21 We basically started looking at our current web
22 site and developed a list of projects to do
23 transformation based on what we had already. As you
24 probably know, we have a lot of (inaudible). The focus
25 is on making sure that we have high priority content

1 transformed as quickly as possible. As part of that,
2 we're evaluating that information, making sure it's up to
3 date, and potentially rewriting some things that maybe
4 could be a little plainer, could be a little more clear
5 in terms of how things (inaudible).

6 We're also identifying some of the older
7 contents for archiving, and I'm going to talk a little
8 bit more. If you go to the web site, some of the newer
9 pages, you'll notice that the format is different from
10 what you've seen before.

11 UNIDENTIFIED MALE: Could you increase the
12 volume?

13 MS. GESALMAN: Pardon me?

14 UNIDENTIFIED MALE: Could you increase the
15 volume? We can't hear you back here.

16 MS. GESALMAN: Is that better? Sorry about
17 that. Everybody good now?

18 So, we're looking at some of the older
19 documents to be archived. We've written things more
20 clearly. We have some new features as part of the web
21 transformation. If you went to the announcement of the
22 PPDC meeting, there was an option on the event page that
23 was linked from the announcement to add it to your
24 calendar, which is something that we had not had before
25 this new format.

1 We expect that search will work better. Our
2 experience is that it really is working better for a lot
3 of things already. The new web pages have a lot more
4 structure in terms of the description and the key words
5 that are used and other what's called metadata to help
6 the search engines work the best that they can on our
7 content. This is true from both outside the agency as
8 well as our internal search engine.

9 The URLs will be changing for web pages and the
10 web kind of general areas that we have. So, if you have
11 bookmarks to information, I suggest that you take a look
12 at those and make sure that they are linking to the new
13 format pages as opposed to the old pages. We have a lot
14 of redirects in place from the old pages to newer
15 information, but those redirects will actually end when
16 the web servers are turned off in September, except for
17 -- and this is a very big exception -- except for a few
18 specific things that are currently on pesticide labels.

19 We have a process worked out with the folks
20 that manage all this so that those pages will continue to
21 redirect to the correct page. That may not be forever,
22 but that's something that we'll be able to deal with on a
23 longer term basis. So, for now, all those URLs that are
24 required to be, like (inaudible) credits -- I forget what
25 some of them are, but they are going to continue for the

1 time being.

2 Up to this point, we have a list of about 30
3 projects that we're doing, and we've completed 19 of
4 them. Pesticide registration was one of the early ones
5 that we completed, since that's a very high priority for
6 the program. Pesticide reevaluation. Bed bugs has been
7 on the top 10 list of the agency at some times. It isn't
8 right this minute, but it often is. So, that was another
9 early one that we did. Pollinator protection, of course,
10 is a very popular issue in one way or another right now.
11 So, that's another one that we have a new site for. Of
12 course, the site that includes the information about this
13 advisory committee.

14 So, the EPA.gov pesticide site lists all the
15 sites that we have transformed. I will show that to you
16 in just a minute. We're working on transforming the rest
17 of the sites that we have to by sometime this summer so
18 that over the last month or so, we'll just be like
19 cleaning up little bits and pieces as opposed to
20 undertaking major projects.

21 Some of the sites that we're working on right
22 now include pesticide labeling information, the tolerance
23 information, how we set tolerances and things like that,
24 endangered species, which you heard a little bit about
25 earlier today, and worker safety is another big area that

1 we're working on. Obviously, there's a lot going on in
2 all of those areas. So, they are very important
3 projects.

4 So, one of the things I wanted to show you is
5 sort of the old versus new. Here's an example of one of
6 the old pages, registering pesticides that contained
7 information linked to various places. Over a period of
8 time, it kind of became like a Christmas tree in
9 different areas of the site where things go to different
10 places. Maybe it's not so easy to find all the details.

11 So, here is the highlight section of our
12 current web site where you can see the list of projects
13 that we've completed. This is the list of the 19
14 projects. From here, you can link to any of the sites.
15 I'm going to go to registration which I just showed you
16 on the screen shot of the old site. Here's the new site.
17 You can see that it looks quite a bit different from what
18 it looked like before.

19 One of the things that we have on this site is
20 kind of a focus on the critical things. Like here is the
21 pesticide registration manual. Here's your fee
22 information for PRIA, which actually has its own site,
23 but we linked to it from here as a big part. If you come
24 down farther, you can see that we have information that
25 is separated out by the different types of registration.

1 So, you can easily get to your antimicrobials, or inerts,
2 or whatever you're looking for for registration
3 information.

4 One of the interesting things on this new site,
5 and we don't have it on all of them, but some of them we
6 do, when they're a big site like this, is you can search
7 just within this site. So, one of the things that I
8 search for fairly often, because we're doing updates on
9 it, is child resistant packaging. So, if I just put in
10 CRP for child resistant packaging, I go right to a couple
11 different links that get me to those pages. So, it's
12 very targeted to this particular site area.

13 So, for bed bugs, we had a site that was
14 basically in the past a single long page with a lot of
15 pretty good writing. It had bullets and some graphics
16 and that sort of thing, but it was fairly limited. So,
17 when we updated bed bugs, we added a lot of new
18 information. If you have concerns about bed bugs, we'll
19 give you some advice on how to get rid of them, like a
20 step-by-step guide to controlling bed bugs, as well as
21 information about chemical and nonchemical options and
22 things like that.

23 One of the things that I think concerns people
24 fairly often when they hear about the web transformation
25 is the concept of the archives. EPA decided that this

1 would be a good way to declutter the web site. If you
2 think of your office, and I think of my office, there's
3 paper. There's a lot of stuff and it's like what do I do
4 with all this. Well, if I can figure out how to put it
5 someplace that is out of the way in a file cabinet or
6 something, things are a lot easier to find for the things
7 that I really need.

8 So, that's what the archive is all about. That
9 is going to be for things that are still of some use,
10 maybe for historical reasons or for research or for
11 whatever, but it's not something that people are using on
12 a daily basis. Maybe the information is a little bit
13 older. The older years of PPDC is a good example of
14 that, as well as the old workgroups on the advisory
15 committees called TRAC and CARAT, if you've
16 been around for awhile. Those are in the archive.

17 Those documents will be available to you by
18 search, by going to the archive site, which will be live
19 starting in about September, and doing a search. Now
20 they are on the current site and actually cause some
21 confusion because the web page for the PPDC that is the
22 archive actually shows up first in the search results,
23 unfortunately. We modified it a little bit to try to get
24 people to the correct page a little more easily.

25 We're in the process of designating things for

1 the archive as we go through the review process for
2 sites. We won't be linking to specific documents in the
3 archive. If we were linking to it, it would be something
4 we should have on the current site.

5 Finally, I would like to give you the
6 opportunity over the longer term -- I mean, you can make
7 comments right now. I know we're a little behind
8 schedules, so probably we don't want to spent too much
9 time on that -- in terms of things that have been giving
10 you trouble or things that you'd like to see on the web
11 site that maybe you aren't there yet. That may be a
12 longer term project.

13 Or, if you see some of the things we're still
14 working on, like the labeling or the tolerance
15 information, or whatever, if you have ideas about how we
16 might want to organize or things that we might want to
17 emphasize, you can e-mail this address,
18 pesticidewebcomments@epa.gov and let us know things that
19 are of concern to you.

20 The last thing is that in the web design and
21 implementation process, one of the really useful things
22 to do is testing. We did some testing on the
23 registration site with some actual registrants and an
24 industry association who came in and spent some time with
25 me looking at things, doing some tasks on the site, and

1 gave us some really good feedback on some very specific
2 things that helped for some implementation there. We'd
3 like to do more of that on some of the sites that have
4 already been launched in that list of 19, as well as some
5 of the ones we haven't done yet.

6 Now, whether we have time to really do a lot of
7 that before we get to the end of September, I don't know,
8 but we'd like to have people's interest in that. If you
9 are interested, just let me know. As we sort of move
10 through some of these things, we can set up a session.
11 If you're here for a meeting and you'd like to do a
12 little testing, I can sit in the conference room with you
13 and in an hour go through some stuff and maybe make some
14 suggestions or whatever. So, that's another option, just
15 very informally set those things up.

16 That's basically it. If there's time for
17 questions or comments now or people can contact me later.

18 MS. JAIN: Hi I'm Komal Jain with the
19 ACC Biocides Panel. Claire, we definitely support what
20 EPA has done with the web site. This is very clean, and
21 it looks to be an efficient system. I know you've heard
22 from us. We've sent a couple of letters in about the
23 content. I just have a couple questions about the
24 archiving because that's something we've been very
25 concerned about.

1 You have a statement in a slide that says that
2 there won't be links to specific documents. Can you
3 explain to me what that means? If I put in a search and
4 I'm looking for pesticide registration, will I get a list
5 of documents with links?

6 MS. GESALMAN: I'm sorry, that was not clear, I
7 guess. Basically, from the new sites, like the
8 registration site, if I go to anyplace on this site, we
9 will not be linking from this site to something that's in
10 the archives. But if you go and search the archive,
11 you'll get a list of results that will link to individual
12 items, or pages, or whatever that are in the archives.
13 But we just won't be linking to those documents from
14 sites like this.

15 KOMAL: Okay. And then we've
16 noticed in the past, probably the past year, that certain
17 documents have already started to be archived or have
18 been deleted from the web site. Have you been
19 maintaining a list of those documents or should we
20 provide you a list of documents that we find important
21 that we're no longer locating?

22 MS. GESALMAN: If you or anyone else have
23 things that you are not able to find, please let me know
24 specifically what those are, because there have been a
25 few cases where something somehow got moved or changed in

1 a way that was not transparent, is the best I can say
2 about that. In most cases, there were some changes that
3 were made to try to structure things for the future
4 archives. That may have messed up some of people's
5 bookmarks. But generally speaking, most things are still
6 on the web site.

7 If it was something that was actually
8 transformed, that page may have been deleted because it's
9 now here. That old information is no longer necessary on
10 the old web site. So, we've deleted some things that
11 were in the new sites. But, for the most part, if
12 something was not moved into the new site, it's still on
13 the old web site.

14 MR. HOUSENGER: Wayne.

15 WAYNE: You may have stated this and I may have
16 just missed it, but are all the WW2 stems modified?

17 MS. GESALMAN: Yes. WW2 is the URL currently
18 for the sites that are in our new system. When September
19 comes, they're all going to go back to WWW. But even if
20 you put in W2, it will still go to the correct place.
21 So, it's all going to be combined in September or
22 October.

23 MR. HOUSENGER: Pat.

24 PAT: So, one of the areas that obviously the
25 animal welfare groups are most interested in is starting

1 to promote some of the nonanimal methods that are now
2 available for some of the test requirements. I know
3 there's information on the site, and it's in a number of
4 places. There's some policy documents. There's some
5 references to the actual validated methods.

6 I think it would be great if maybe there is
7 cross referencing among various pages. But if there was
8 a page perhaps just devoted to alternative methods, how a
9 registrant might go about using them -- I know you do
10 some preconsulting before a product is registered as to
11 what tests need to be done and so forth.

12 Maybe in the interest of trying to promote some
13 more of these uses, some more of these methods, they're
14 out there now. I know I've talked to Jennifer and some
15 others. There's not a lot of results coming in with
16 people using them yet. So, if you could try to maybe
17 work on that, that would be great.

18 MS. GESALMAN: Okay, that's helpful. One of
19 the things that we're working on right now is the site
20 that will deal with science and risk assessment. All
21 those things like that would be part of that site.

22 You mentioned the test guidelines. Would that
23 be like the harmonized test guidelines? Is that what
24 you're talking about? Okay, because that's a separate
25 site, but we can make sure that there are cross links as

1 appropriate.

2 MR. HOUSENGER: Okay, thanks, Claire.

3 Our next session is eight topics. It's an hour
4 long. So, it's 7.7 minutes per topic without any
5 questions, which we're not going to take, any questions
6 or comments. Keep these topics in mind for later on when
7 we talk about things that we want to talk about at the
8 next PPDC. Or, if you have immediate questions, you can
9 always feel free to contact the staff here.

10 Our first one, and Marty has assured me that
11 she will not go beyond 7-1/2 minutes, is comparative safety
12 statements.

13 MS. MONELL: Thanks, Jack. If you recall,
14 about four years ago, PPDC voted to create a workgroup to
15 look at the issue of comparative safety statements on
16 pesticide product labels. This was in an effort to
17 acknowledge and do something so that the consumer would
18 have some more information about the relative greenness
19 of a pesticide product.

20 We essentially entered into a pilot program
21 some four years ago that has been extended a couple of
22 times. Basically, we agreed upon working with our sister
23 organization, the toxics program, and their design for the
24 environment, third-party certification program as to the
25 hazard components of chemical properties.

1 So, we have launched that. We have been
2 successful thus far in improving six active ingredients.
3 A seventh is in the works. There are about 10 products
4 for which federal labels have been approved, have the
5 logo on it. Regrettably, no states are allowing it now.

6 We have been working with SFIREG and AAPCO to
7 try to address their concerns about the use of allowing
8 these logos. There seems to be mixed rationale for why
9 they are collectively not allowing it. Some states feel
10 that they have statutes that prohibit it. Some states
11 are uncomfortable with it still.

12 So, we're working it because as you may have
13 heard, the DFE program in OPPT has recently announced its
14 transformation into the safer choice program. Under our
15 current regulations, we cannot allow the use of those
16 words in a logo of any sort on a pesticide product. So,
17 our workgroup right now is looking at options.

18 We will continue the pilot for another year as
19 we explore our different options for paths forward, which
20 may include rulemaking. That determination has not been
21 finalized yet, but that's certainly on the table and
22 being discussed.

23 The other piece of our pilot coming out of this
24 workgroup is a factual statement. This initially was
25 allowing statements such as dye free, fragrance free,

1 which are very easily determined based on the submission
2 on labels. That has been very successful. In fact, it's
3 been so successful that the workgroup is recommending
4 that the program just adopt that as an operating
5 principle. We will be checking, and there is an easy
6 mechanism to do so. It is information that is valued by
7 the public, so we are going to, absent any resounding no
8 from you, we will be proceeding with that.

9 Then, other statements about corporate
10 commitment to sustainability or to use of less toxic
11 ingredients or the like, we also have had a very positive
12 experience with. We have issued a disclaimer language,
13 essentially two registrants, saying if you put it on your
14 web site, it's part of the label, any claims in that
15 regard to the corporate commitment, that could be
16 enforced again if it were abused.

17 It was acknowledged, actually, at our workgroup
18 meeting yesterday, that, in fact, an enforcement action
19 has been taken against the company whose web site did
20 contain inappropriate assertions, and they would not
21 remove it. So, these things are followed up on. Again,
22 we're going to institutionalize that. So, these items
23 will no longer be a part of the pilot.

24 Other areas that we have been pursuing are use
25 of biodegradability, the allowance of statements as to

1 whether or not all of the ingredients in pesticide
2 products are biodegradable or whether a surfactant used
3 in the formulation of a pesticide product is
4 biodegradable. We've had two surfactants that have made
5 it through the DFE screen and then our process
6 internally. They have been allowed to make those
7 statements on their product labels.

8 The USDA program regarding promoting biobased
9 ingredients, we have had a lot of interest initially in
10 companies being allowed to use that. We were reluctant
11 at first because we were afraid that the consumer may be
12 confused by yet another logo being on a pesticide product
13 label. So, we agreed to allow it in a pilot fashion with
14 a disclaimer at the bottom essentially stating that it
15 does not indicate anything as to the safety of the
16 product. Just by virtue of having a logo doesn't mean
17 it's safe, or safer.

18 There's a lot going on in this workgroup around
19 the DFE logo and the transition to safer choice. If
20 you're interested in any more information, please let me
21 know. I'm Monell.Marty@EPA.gov. I'll be happy to
22 include you in further conversations about it. That's
23 it.

24 MR. HOUSENGER: All right, take note, other
25 presenters.

1 Phil Villanueva is going to talk to us about
2 SmartLabels.

3 MR. VILLANUEVA: I appreciate this opportunity
4 to share with you an update with our SmartLabel
5 initiative. By show of hands, could I see those of you
6 in the audience that are already familiar with this
7 program, so that I can focus more on the updates. Okay,
8 it looks like a majority of folks. So, I'm not going to
9 spend a whole lot of time on the initial slides, then.

10 Most of you are familiar that we're undertaking
11 an effort to get our master pesticide labels in a
12 structured format. I have a couple slides to kind of
13 illustrate exactly what that means. It's mainly to
14 address some of the pain points that we have with
15 reviewing the labels and also implementing that
16 information into our risk assessments.

17 It's part of our vision to have instantaneous
18 access to quality information. We think that will be a
19 large step in improving the quality of the label
20 information that we receive. It is inclusive of all EPA
21 registered products. So, we're working with a group of
22 folks that have conventional pesticide labels,
23 biopesticide labels, and antimicrobials, home use as well
24 products.

25 We're building on previous work that the FDA

1 has already done. They have pharmaceutical labels that
2 are submitted to them in a structured format. We're
3 going to continue to work with FDA. We've been working
4 with them closely over the last year or so.

5 So, some of our label pain points -- I'm not
6 going to spend a lot of time on here. It's a very manual
7 process to extract the label information out of there to
8 support our risk assessment process. Sometimes the label
9 information is unclear or duplicative, certainly
10 inconsistent across different types of labels, and
11 results in various interpretations of the same
12 information.

13 We're very limited in our ability to query
14 across label types that may have something in common that
15 we're interested in looking at. Here is just a brief
16 illustration of kind of the difference between
17 unstructured information. Typically, even if it's in
18 electronic format, a lot of the information is
19 unstructured, meaning there's no simple way to extract
20 the information out of there, besides a manual kind of
21 copy and paste.

22 An example of that would be maybe collecting
23 the address information for a pesticide label for the
24 company that's registering it. A very simple
25 illustration of structured data would be getting those

1 individual fields that would be important for us. That's
2 a very simple example here, but it allows us to kind of
3 grab those bits of information that are easily tagged and
4 importing those into our existing information systems.

5 So, we'll be looking at getting stuff more
6 complicated than that into our system. For example, this
7 one is a little bit closer to home. Currently, our
8 master labels are unstructured. They are available in
9 PPLS's electronic documents. Sometimes they're scanned.
10 More recently, we've been working very hard to make sure
11 that all of our documents that are in PPLS are actually
12 the PDF versions that are electronically signed to more
13 easily manually extract the information.

14 Here's an example of two different bits of
15 language that kind of indicate the same thing. Really,
16 what you're interested in in a structured format is being
17 able to capture the mode of action, that it kills
18 whatever the target pest is. So, that's a nice example
19 of how we can capture structured information that can
20 support our risk assessment decisions.

21 So, we've been working on a pilot. We were
22 really ambitious last year and thought that we'd be able
23 to get through this really quickly. It ended up being
24 something that's very complicated and very hard for us to
25 do. We have several folks working from across all of our

1 divisions on this initiative. We've also reached out to
2 the registrants so that they can help us to develop what
3 that data model will look like.

4 So, since December 2014, we've been gathering
5 feedback from the registrants. They are listed up here.
6 We kept it to nine participants, so it's pretty limited,
7 but we think we've kind of come across the whole sector
8 of pesticide products, and also different sizes of
9 companies, too. That's been very important.

10 Back in December, we basically went through
11 what we're calling the data model, kind of what it looks
12 like. Those were basically Word documents and Excel
13 tables, just to kind of show the granularity of the
14 information that we're hoping to collect for these master
15 labels. So, that was a brief overview in December.

16 We came back in February, after asking them to
17 go away in December and kind of enter a sample master
18 label into that data model. We got a lot of feedback.
19 Not all of it was good, but it was a lot of feedback. We
20 took that into account. After those meetings, we set up
21 webinars for April and May. Actually, they're probably
22 still meeting upstairs, the team, with the pilot
23 registrants. We're getting a lot of positive feedback
24 from them.

25 Here's an example of some of the feedback that

1 we got in December and February. As you can see, it was
2 a very labor-intensive data entry exercise. Our response
3 to that was really we were testing out the data model.
4 This was not the data entry mechanism. In fact, that's
5 coming in the future.

6 Certain fields were not applicable to
7 antimicrobial products. So, our response to that is that
8 those fields will not be available in our data entry
9 mechanism once you get to it. So, we're working with the
10 registrants to come up with what we call like our
11 validation, our business rules, so that if that's the
12 type of product that you're entering, then those fields
13 just would not show up.

14 Overly complicated, we are working to simplify
15 that. I'll say something about that briefly. It seemed
16 that some fields were new, but actually, there's nothing
17 new that's required in there. We're just trying to
18 structure and standardize that format.

19 So, here's some of the pain points. I'm not
20 going to go through that. These are the pain points we
21 covered earlier. Basically, we have a strategy for
22 addressing each one of those pain points. So, here's
23 just a quick list. You have these slides in your
24 documents, so you'll be able to review it at your
25 leisure. You can see some of the benefits and the

1 different parties that will benefit from addressing these
2 pain points.

3 So, we've had really good feedback today,
4 actually came downstairs. The second round we developed
5 are guidance document a little bit more to help kind of
6 hold the hands of the registrants as they enter in their
7 master label information. They said it was much easier,
8 much less time consuming.

9 Part of the way that we simplified the process
10 is that we actually split out. You can see this phased
11 approached. We split out the label sections so that
12 we're collecting data elements and vocabularies. We're
13 providing guidance documents. All that is for the label
14 sections themselves. There is limited structured
15 information that is gathered in that part.

16 We're going to pilot the X form, which is our
17 web-based data entry mechanism. That's coming up in two
18 weeks. So, we'll be working with them via webinar so
19 they actually get to feel what this data entry mechanism
20 is like. So far they've had to work with Word documents.

21 In September, we're targeting the use table
22 which is a harder piece of information to ratchet down on.
23 It's very complicated. There's a lot of information that
24 we want to collect. Also, we found, again from our
25 feedback from the registrants, that it was kind of

1 combining two different aspects of their business
2 process. They have the folks that kind of develop the
3 labels, what you actually see on the label, and then they
4 also have their risk assessment folks that are more
5 familiar with the use tables and what would be
6 particularly useful for risk assessment. So, we're kind
7 of splitting those two pieces apart right now. We're
8 hoping to bring those back together, but it's a phased
9 approach that kind of tackles those separately so we can
10 deal with the same set of folks for each one of those
11 sections.

12 We're going to continue to collaborate with the
13 states industry and FDA. We've done a number of outreach
14 efforts. Last month, we went to the all-star meeting.
15 We have SFIREG contacts. We've been updating some of our
16 state partners individually as well.

17 So, I don't want to take any more time.
18 There's more information on the web site. These are the
19 project leads, in addition to myself.

20 MR. HOUSENGER: Thanks, Phil.

21 The next update is regarding a couple rules
22 we're doing to further protect farmworkers and pesticide
23 handlers. Kevin Keaney from our Field and External
24 Affairs Division is going to give that update.

25 MR. KEANEY: When the worker protection changes

1 went out for public comment, we had a table on our web
2 site that outlined the existing provisions and then the
3 proposed changes relative to those existing positions.
4 Those that didn't dutifully make a copy of that when it
5 went out, I'll put some of these on the table and
6 distribute them. When we go final, we'll have another
7 table that will do the same but indicate the final
8 position relative to our assessment of comments.

9 As you noted in the blurb I put in your packet,
10 there were an enormous amount of comments. There was
11 quite a bit of heavy lifting from my staff, relatively
12 small staff, to deal with that and then decide and work
13 through as a team what we would do as to the reaction of
14 the comments, maintain our position as proposed or change
15 our position.

16 There were a lot of useful comments. There
17 were, of course, a lot of surveys, check off the box
18 types of things that weren't particularly helpful for us,
19 but there were a lot of useful comments relative to the
20 ease of implementation or the ease of enforcement, or
21 lack of it, by what we were proposing. So, we did change
22 a number of our positions as a result of the valuable
23 comments we got.

24 We put together a response of comments
25 document. We have rewritten the regulatory text and the

1 preamble justification for our changes. The regulatory
2 process within the agency is to put it through final
3 agency review, which has the other offices that have
4 interest in it, to concur or concur with comments.

5 That package is in the process now. It's in an
6 expedited process. We do then send the package to USDA.
7 We send it to Sheryl Kunickis' group. That package has
8 gone there. When we get an indication it's been received
9 by the secretary's office, Sheryl's particular review
10 would take place. It has a minimum of 15 days review.

11 Then, at some point down the line, we'll be
12 sending it to the Office of Management and Budget. If
13 they maintain their schedule, we maintain our schedule,
14 it should be coming out final at the end of August or the
15 beginning of September.

16 There's a phased implementation. We've
17 developed and will continue to evolve a plan, a strategy
18 for how to implement, and how to communicate, and how to
19 engage a variety of stakeholders we have in this
20 exercise, so everyone understands what we are trying to
21 do, what the regulation actually sets up in its final
22 form.

23 There would be various segments we would focus
24 on, obviously, because the obligations would vary,
25 whether you're an agricultural employer, whether you're a

1 worker, a handler, or an applicator. So, there will be a
2 fairly extensive engagement over a year or so as we are
3 moving towards complete implementation.

4 So, that's pretty much what's going on and will
5 be going on with the ag worker protection regulation.
6 We are also amending an older regulation, the pesticide
7 applicator certification regulation, that tries to
8 establish competency standards for the applicators of
9 restricted use pesticides. That has been sent to OMB,
10 the package that will go out for public comment.

11 We anticipate, if everybody keeps to the
12 schedule, that that will go out for public comment in
13 July. It will go out for a minimum of 90 days and
14 usually gets petitioned for an additional period. So,
15 it's quite likely to be out for public comment for 120
16 days beginning sometime in July.

17 So, we'll be doing a lot of engagement, a lot
18 of webinar, a lot of communication, again like we did
19 with the worker regulation so that people understand what
20 we're trying to get at with this proposal and how they
21 can best comment productively on the proposal to help us
22 work through, again, the choice of what we proposed as
23 final or variations, depending on the value of the
24 comments that we receive.

25 Two very significant regulations covering a

1 very large population of agricultural labor and the
2 current applicators are numbering in the millions,
3 certified applicators. Obviously, the worker population
4 in agriculture covered by the regulation is in the
5 millions as well.

6 There is a provision in the certification
7 regulation that others can apply restricted use
8 pesticides under the supervision of a certified
9 applicator. We, frankly, don't have a real way to
10 determine that number, but it's a significant number of
11 those that are applying under the supervision of a
12 certified applicator. So, that adds to the population
13 that would be affected by both of these regulations,
14 because very often those that are applying under the
15 supervision, called handlers, are in that pool under the
16 agricultural worker protection regulation.

17 So, we are trying to address safety precautions
18 and the safety training that would be appropriate for
19 those that apply under the supervision. Currently,
20 there's no provisions to do that. As I said, it's a
21 wide-ranging pair of regulations, all addressed to,
22 essentially, pesticide worker safety. I'll take no
23 questions later.

24 MR. HOUSENGER: Smart.

25 Our next speaker is Jeff Dawson from the Health

1 Effects Division. He's going to update us on spray
2 drift and volatilization policy.

3 MR. DAWSON: Thank you. It's a pleasure to be
4 here. Just a brief update about where we are on the
5 spray drift and volatilization policies. I just remind
6 everybody that the spray drift policies, there were two
7 documents that were put out. One was related to human
8 health, and the other was related to ecological risk
9 assessment. Then we put out a volatilization policy,
10 which was really a screen of the conventional chemicals
11 where we identified some subset of those chemicals that
12 we need to do some additional work for.

13 These comment periods are both in 2014. We
14 envision that we will go forward with these in the
15 registration review process. We also envision that this
16 will be a living document kind of approach where as we
17 get additional information, we can make refinements to
18 these policies. That's what we'll do as we move forward
19 into the future and through registration review.

20 Some of the immediate goals for 2015, we want
21 to finish response to comments documents for all these
22 documents that we put out. We also have some technical
23 review of additional data that we need to complete.
24 We're, of course, working on revisions to the policies
25 based on the information that was submitted in the review

1 process.

2 We're also working on implementation plans,
3 particularly focusing on the volatilization and some of
4 the next steps associated with that. We're also thinking
5 about ways to continue stakeholder involvement and lines
6 of communication as we move forward. This will be
7 helpful with the living document approach.

8 Then, there's some related issues. For
9 example, you're going to hear just after me a discussion
10 of the drift reduction technology issue. That certainly
11 plays into the policy and the overall implementation of
12 the policy for spray drift.

13 Just a couple quick overviews of what we're
14 looking at and what we're trying to work through at this
15 point in time. For spray drift, we basically received
16 about 5,600 comments. They raised several science-
17 related topics and also some policy-related topics. The
18 science issues really predominantly focused on how we're
19 doing the drift calculations themselves. For example,
20 we've been made aware and had additional data submitted
21 that we need to look at to potentially refine how we're
22 doing the drift estimates.

23 There are also some comments about scope
24 related to different kinds of use situations, for
25 example, forestry uses, particularly in the Pacific

1 Northwest. It's a little bit different there because of
2 the terrain and the application methods. So, we're
3 thinking about ways to better address that in the updated
4 policies.

5 Also, related to mosquito control and the
6 potential for exposures from mosquito control operations.
7 Policy topics on spray drift really are related to
8 continued stakeholder involvement and having open lines
9 of communication. Some issues related to stewardship,
10 for example, we want to implement drift reduction
11 technology, but how do we do that and how do we work
12 through, for example, development of label language to
13 have continuity and enforceability and all those issues
14 through the process.

15 Also related to implementation, this is an
16 example. One of the options that could come out of this
17 process is the implementation of buffers under certain
18 circumstances. So, how do we implement buffers in the
19 best, most effective way possible? I would perhaps point
20 to the process that we use for soil fumigants as maybe a
21 framework, starting point, for how we might do that.

22 A little bit on volatilization, we screened all
23 the conventional chemicals. Approximately 70 of them,
24 and I'll air quote this, failed the screen, which
25 basically means that we need to get some more information

1 to refine how the potential risk picture looks for those.
2 When we did the screen, we did it using the methods that
3 we laid out in our 2009 process that we took to the SAP
4 that year. We used the best available information that
5 we had. All this information is in a particular docket
6 for volatilization.

7 So, now we're looking at ways to refine and
8 better inform the process, particularly for the ones that
9 we identify potential issues with. That could be, for
10 example, getting better inhalation toxicity data, better
11 use information, and better constructure information
12 around how we would predict the emissions or the flux,
13 which is really the exposure component of that analysis.

14 Then, kind of the policy-related topics are,
15 what processes are we going to use to get to the next
16 steps. For example, in some cases, we may want to issue
17 data call-ins or there might be just information that the
18 impacted registrants look at the analysis they will have
19 and just provide it to us.

20 Then, the other thing that's important here is,
21 again, continued communication and stakeholder
22 involvement. Thank you.

23 MR. HOUSENGER: Thanks, Jeff.

24 Anne Overstreet isn't here, so Tracy Lantz is
25 going to give us an update on drift reduction technology.

1 MS. LANTZ: Thank you, Jack.

2 Just a real quick updated today. OPP has
3 received the first application for a DRT star rating for
4 a series of products. This manufacturer is the first of
5 several interested in developing and submitting data to
6 participate in a DRT star-rated program since the program
7 officially launched in the fall of 2014.

8 FEAD and EFED plan to meet with the applicant
9 to finalize the submission package and discuss some
10 technical questions, and then we plan to brief management
11 with a time line for review and assessing this star
12 rating.

13 We have also developed a template for DRT
14 submission, including guidelines for formatting and
15 analysis of spray drift data needed to assign the actual
16 rating. We have, as of today, posted that template on
17 our DRT web site to provide guidance to these applicants.

18 In an effort to increase outreach and
19 participation in this program, we've made presentations
20 to state, local extension services, and industry groups,
21 and these presentations are ongoing. Questions raised
22 include implementation, enforceability, and timing of DRT
23 technologies appearing on labels.

24 To find more information on the DRT program,
25 you can view our website at www2.epa.gov/reducing-

1 pesticide-drift. Thank you.

2 MR. HOUSENGER: Thanks, Tracy.

3 The next update is on the repellency graphic.
4 Martha Shimkin from FEAD is going to give that.

5 MS. SHIMKIN: So, the repellency awareness
6 graphic is a voluntary program that will give approved
7 use to registrants of tick and mosquito repellants, a
8 standardized graphic that would depict how long that
9 skin-applied repellent would work. Its goal is to
10 provide clear information to consumers so that they can
11 have confidence in the use of repellants and how long
12 they would work against ticks and mosquitos.

13 We started working on this voluntary project
14 about five years ago, and we did come to the PPDC and
15 worked with the comparative safety statements and public
16 health workgroups under the PPDC, and benefitted from
17 your input, and insight, and advice as we developed this
18 program. We launched it in 2013 with publication of a
19 guidance. Our last update to the PPDC last summer, I
20 think it was, is that we are open for business. We are
21 still open for business. That's today's update.

22 We have seen interest from registrants in
23 applying for and getting approval of this repellency
24 awareness graphic. We have not yet approved any uses,
25 but we hope to be able to see this graphic being used on

1 products possibly as soon as 2016.

2 We want to see the use of this graphic. We
3 know that from our research that we did, it will very
4 likely increase consumer confidence in the repellence
5 against ticks and mosquitos, which would increase
6 consumer use of those repellents and, therefore, increase
7 their protection from vector-borne diseases. That is the
8 update. Thank you.

9 MR. HOUSENGER: Thanks, Martha.

10 Next update is on glyphosate, which has been in
11 the news recently quite a bit. Neil Anderson from PRD is
12 going to give us an update.

13 MR. ANDERSON: Thanks, Jack. So, as Jack
14 mentioned, glyphosate has been in the news a little bit
15 lately, I guess from our perspective, where we are in the
16 reevaluation cycle for glyphosate. That's why I'd like
17 to talk a little bit about it this afternoon.

18 The registration review for glyphosate began a
19 number of years ago now with the initial docket opening
20 where we published our preliminary work plan and
21 additional documents which identified the types of
22 assessments that we've previously conducted for
23 glyphosate and the anticipated plan for the registration
24 review cycle for glyphosate.

25 We followed that with an issuance of the data

1 call-in to registrants identifying or requiring
2 submission of a handful of data requirements, both on the
3 ecological side of the exposure potential from
4 glyphosate, but also on the human health side.

5 The registrants have completed all the data
6 that we required them to conduct, and have submitted that
7 information to the agency. We have been working over the
8 last couple years reviewing all the information, as well
9 as the entirety of all the other information that's
10 available for glyphosate that's become available, either
11 through public literature or other studies that have been
12 conducted around the world. Our team here has been very
13 actively reviewing all that information and preparing the
14 risk assessments, the registration review risk
15 assessments, for glyphosate.

16 Along those lines, there will be released in
17 the next couple months the risk assessments for public
18 comment. There will be an ecological risk assessment
19 which will be a comprehensive review of all the potential
20 uses of glyphosate and their potential impact of the
21 exposures from glyphosate on the various taxa that
22 could be exposed from exposure.

23 This assessment will not include an endangered
24 species risk assessment, however. There will also be the
25 human health risk assessment, which will include a full

1 review and evaluation of the existing body of toxicity
2 data available for glyphosate and will present the
3 agency's estimates of the risks associated from exposures for
4 humans.

5 In addition to those assessments, we anticipate
6 putting out a document which discusses the issues for
7 weed resistance to glyphosate as they've developed within
8 the United States. There will be an evaluation, if you
9 will, of the extent or the amount of acreage and weed
10 species that have developed resistance to glyphosate, as
11 well as present a number of potential resistance
12 management tactics that may be employed to combat
13 resistance.

14 The agency has been coordinating our
15 reevaluation with glyphosate with Canada's pest
16 management regulatory agency. We've been collaborating
17 throughout the entire process and coordinated even the
18 data requirements, as well as review of the data as
19 they've become available to us.

20 So, there is more information available on our
21 review. In the handout that was provided, the web site
22 is listed there where you can get more information about
23 that.

24 One of the other things that's been, I guess,
25 in the news for glyphosate and just briefly mentioned

1 here is about the correlation between glyphosate use and
2 the potential impacts on monarch butterflies. We
3 received a petition last year from the Natural Resources
4 Defense Council to review and evaluate this potential
5 impact.

6 We are conducting a review. As part of the
7 ecological risk assessment, there will be a portion, if
8 you will, that will be looking at that potential exposure
9 and impact on monarchs as well as other invertebrate
10 species.

11 We are cooperating with the other government
12 agencies in the overall review as part of kind of a
13 larger global effort on the impacts on pollinators.
14 Monarchs are going to be considered as a part of that.
15 We are cooperating with the Department of Interior and
16 our international partners in North America, Canada, and
17 Mexico.

18 As we are going to be looking at this
19 particular issue, we're really not going to remain
20 focused just on glyphosate. The particular issue as it's
21 been brought up is how glyphosate and other herbicides
22 have the ability to control the milk weed plant, which is
23 a vital resource for monarchs. So, it's not unique to
24 just glyphosate; it's actually across many herbicides
25 that are used in agriculture and in other areas.

1 So, our review will be holistic across the
2 potential impact from herbicides use on various
3 landscapes and how that may potentially impact
4 populations of monarch butterflies. We'll be responding
5 to the NRDC petition this summer. I guess that's
6 basically it as it refers to glyphosate right now.

7 MR. HOUSENGER: Okay, thanks, Neil.

8 Our final update comes from Bo Davis from
9 Registration Division regarding comparative efficacy
10 claims.

11 MR. DAVIS: Good afternoon. So, the
12 Registration Division currently has in house a PRIA
13 action where a company is requesting that we add
14 comparative claims to the label. The claims imply in one
15 way or another that their product is more efficacious
16 than another product.

17 The agency has historically not allowed
18 comparative efficacy claims on labels. Therefore, if we
19 end up approving this action, it will be precedent
20 setting, and it will also open the door for other
21 companies to submit similar types of actions.

22 Since initially receiving the action, we've had
23 multiple internal meetings with upper management, product
24 managers and also efficacy reviewers. The discussions
25 have not only been focused on the action in house but

1 also have been more broad in about how we should handle
2 and review these types of actions. From the discussions,
3 we've come up with a list of questions and also some
4 initial concerns. It's these questions and concerns that
5 we will eventually like some feedback and some guidance
6 on.

7 On the question side, the first question that
8 is most prevalent is what type of data would we like to
9 see. Currently, we only require the submission of
10 efficacy data for public health pests and structural
11 pests. We do have guidelines for those that give some
12 recommendations and guidance on how to conduct the
13 trials.

14 However, they are very much focused on just
15 determining if the product is efficacious enough to be on
16 the market. We do not currently have guidelines or
17 guidance for comparing two products that are already
18 registered and comparing their efficacy.

19 Along the same lines, we also have questions
20 regarding how to define topics. For instance, better,
21 how much higher does the percent mortality need to be
22 before you can say your product is better than another
23 product? Speed of kill, what's the difference in speed
24 of kill before you can say your product is faster than
25 another product? What's the difference in residual

1 activity before you can say your product lasts longer
2 than another product? So, you can see that the
3 experimental design of whatever is submitted is very
4 specific to whatever the claim is.

5 On the concern side, we have several
6 concerns, initial concerns. The first is if we start
7 receiving actions like this, how will we handle them for
8 products that we historically have not required efficacy
9 data for? For instance, herbicides, fungicides, and then
10 also insecticides that are labeled only for pests that
11 are not public health or structural.

12 Another question that we have is, how will we
13 handle "me-too" registrations? An example I'd like to give
14 would be let's say we stamp a label with a comparative
15 efficacy claim. Then, after that, five other companies
16 come in and "me-too" that registration. So, they also
17 have the claim. And then all of those products are also
18 "me-too'd" by other companies. Now the claim is out on
19 multiple different products.

20 How do we handle situations if a company comes
21 in and provides efficacy data where the outcome is
22 contradictory to the original submission? So, the
23 question is, does that mean all the labels out there are
24 misbranded? If so, we need a process in place to be
25 able to handle that.

1 There's also questions on how that will impact
2 the states. We broached the subject at the last SFIREG
3 meeting. After thinking about it for a day or so, they
4 came back to us with similar concerns, questions of what
5 type of data would we need and how would we make the
6 determination of is the claim false or misleading.

7 Finally, meetings with upper management. One
8 idea that was thrown out is do we need some sort of
9 external review or third party verification. If so, who
10 would that be? Perhaps the Federal Trade Commission. If
11 we do go down that road, we'll need to have dialogue with
12 them and then develop an MOU.

13 So, that's where we're at right now, more
14 questions than answers.

15 MR. HOUSENGER: Well, that's a mess.

16 So, this brings us to the public comment
17 portion of our program. We have one person who has
18 signed up. I haven't seen Julie. Oh, there she is.
19 Julie Spagnoli representing herself.

20 MS. SPAGNOLI: I just wanted to make a little
21 comment regarding mosquito control. When I was a girl
22 growing up in Minnesota, mosquito was considered the
23 state bird. The best day of summer was when the mosquito
24 truck came through. We were excited, the mosquito truck
25 is here.

1 I now live in southeast Mississippi. In
2 addition to mosquitos, now I'm learning to live in
3 harmony with fire ants and black widow spiders, but
4 that's life.

5 I was a little bit concerned about the
6 description of mosquito products as a problem being they
7 can be used anywhere, and that that's somehow
8 problematic. Mosquito-control products are used where
9 they're needed to protect people from mosquitos. For
10 example, no mosquito-control products are used in the
11 Florida Everglades where there's millions of mosquitos
12 being born, but they are used in Coastal Florida where
13 those mosquitos go. That's where the products are used,
14 where people live and where they need to be protected.

15 So, the need to be applied anywhere is really
16 necessary because you don't know where that need might
17 arise. Natural events, such as floods and hurricanes,
18 can result in mosquito populations that weren't
19 previously there.

20 For example, in the State of Mississippi, right
21 after Katrina, there was a sudden explosion of mosquitos,
22 populations of mosquitos, at the same time people were
23 living in temporary housing, including tents, where they
24 didn't have protection from those mosquitos. As a
25 result, emergency funding was granted to 49 counties in

1 the State of Mississippi for mosquito control in the
2 areas that had been declared disaster areas. So, these
3 were not areas that had previously been treated for
4 mosquitos, but as a result of a natural disaster,
5 suddenly there was an emergency need.

6 I actually wish you could hear the story from
7 Dr. Jerome Goddard. He's the medical entomologist at
8 Mississippi State University. He's much more
9 entertaining. If you've ever heard him speak, he's the
10 best person ever to hear speak on public health pests.

11 What happens in the case of a product that's
12 only limited to use in the two or three counties where it
13 was routinely used and you have a natural disaster or
14 this kind of a thing, floods in the Midwest or hurricanes
15 in the South?

16 So, mosquito-transmitted diseases are truly a
17 serious issue. We know millions outside the U.S. die
18 from malaria and other diseases. But even within the
19 U.S., I think we had a wake-up call with West Nile Virus.
20 In 1999, there were 62 cases of West Nile Virus, all in
21 the State of New York. In the year 2000, that had
22 expanded to New Jersey and Connecticut. Up until the
23 last few years now, it is in 47 states and the District
24 of Columbia, reported cases of West Nile Virus resulting
25 in thousands of cases and hundreds of deaths.

1 It doesn't take that long for a mosquito-
2 transmitted disease to reach national proportions.
3 Though there's still no vaccine for West Nile Virus, now
4 you look at diseases like Eastern Equine Encephalitis
5 which, while it's still very rare, has a mortality rate
6 of around 30 percent, either mortality or severe brain
7 damage. So, even while it's still very rare, when it
8 does happen, it has to be addressed, because the
9 consequences are so high.

10 Now we have Dengue and Chikungunya. Dengue
11 is not a new disease. It affects a lot of
12 proportion of the world, but we have now seen cases in
13 the United States. It's also known as Break Bone Fever
14 because the pain associated with the disease is so strong
15 that it makes you feel like your bones are broken. So,
16 Chikungunya is, likewise, a fever and joint
17 pain.

18 Neither of these diseases have any vaccine.
19 The only real method of trying to keep them away is by
20 controlling mosquitos, or repellents are useful. Really,
21 repellents in conjunction with reducing mosquito
22 populations is a way to try to keep these diseases at
23 bay.

24 So, the fact that these diseases are maybe only
25 seen in a few localities within a couple of states, it

1 really isn't any reassurance because we see what happened
2 with West Nile Virus. It was a few cases in one state,
3 and a few years later it's across the country.

4 So, the bottom line is that in mosquito
5 control, we're looking for new global tools. We heard
6 about the Gates Foundation efforts. That's good, but we
7 also need to look at maintaining the tools that we have,
8 especially for controlling resistance. So, I think as we
9 look at how we're reassessing these products, I think we
10 really need to look at some flexibility in how we assess
11 mosquito-controlled products to make sure that we don't
12 inadvertently lose some of the most valuable tools that
13 we have for controlling mosquitos.

14 That's it, thank you.

15 MR. HOUSENGER: Thanks, Julie.

16 Are there any public comments from the phone?

17 I guess not.

18 Any other public comments before we conclude?

19 MR. GRAGG: This is Richard Gragg from Florida
20 A&M. I am just going to send my comments on the e-mail
21 to Dea.

22 MR. HOUSENGER: You don't want to tell us now?

23 MR. GRAGG: I guess I could. I just had some
24 comments from this afternoon up to now. There are just
25 three.

1 I'm saying that I understand the reason and
2 logistics of the state-based protection plans, but from
3 what I heard on the discussion, it seems to be that EPA
4 should consider some baseline uniform requirements for
5 all state plans. That may assist in gathering data on
6 the universal BMPs, and it also may present an
7 opportunity to collect incident data as it relates to
8 applicators and pollinators.

9 Then, for the web page discussion, I went on
10 the web page. I think there needs to be some more
11 visibility as it relates to environmental justice and the
12 significant EPA policy actions tools and guidance that
13 has taken place. I just think that's lacking on the
14 revised web site. I think it would be beneficial for
15 both EPA and the EJ stakeholders.

16 Then, my last comment is really a question. In
17 what role does mosquito control play in this whole issue
18 around pollinators and pesticides?

19 MR. HOUSENGER: All right, thank you very much.

20 MR. GRAGG: Okay, thank you.

21 MR. HOUSENGER: Anyone else? If not, we'll
22 convene tomorrow at 9:00 a.m. and hear about school IPM.
23 Have a good evening.

24 (Whereupon, the meeting was
25 adjourned.)

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