US EPA ARCHIVE DOCUMENT

PPDC Incident Workgroup Report Out

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OPP's Long-term Goal Regarding Incidents Data

- Build a sustainable framework that:
  - Improves reporting to:
    - Make reporting easier for both voluntary and required incident reports
    - Reduce time on FIOA requests
  - Enhances efficient use of incidents data to:
    - Obtain more and higher quality incidents for risk assessments
    - Improve consistency in reporting
  - Supports quality science-based decision making
  - Encourages data sharing within EPA and between other agencies and stakeholders

Pesticide Incident

EPA defines a pesticide incident as any exposure or effect from a pesticide's use that is not expected or intended. Pesticide incidents may involve humans, wildlife, plants, domestic animals (*e.g.*, pets) and bees.

Limitations Of Current Incidents Reporting System

- Primarily files and not “data”
- Manual data entry
- Inconsistent information/missing information
- Submitted to various parts of the organization
- Submitted in various forms
- Does not “talk” with other systems

PPDC Incidents Workgroup Objectives

- Support development of a 21st century incidents system, which will include:
  - Input on data elements needed to make for a useful incident report to support risk-management decisions and also would benefit other stakeholders
  - Systems development and testing of an incidents system
  - Identification of additional sources of incidents data
- Identify and provide advice on additional issues associated with developing a high-quality, publicly available incidents system
- Other issues the Agency wishes to bring to the workgroup's attention

First Charge: Data Elements

- Goal: Identify elements that would ideally be included in a quality incident report
- Process:
  - OPP developed draft list of “ideal” data elements for incidents involving:
    - General, Human Health, Fish and Wildlife, Insect pollinators, Pets and Domestic Animals & Plants
  - Workgroup reviewed and discussed all elements by grouping
    - Some elements added for consideration by the workgroup
  - Workgroup ranked value of each element from essential to not needed
- Most elements ranked high although a few were ranked low that will likely be dropped
- Workgroup is generally supportive of the data elements

Moving Forward Towards a 21st Century Incidents System

- Provide Advice on Building the Framework including, but not limited to:
  - Which data are worth collecting?
    - Determine data element definitions.
  - How to collect data?
    - To enhance ease of submission
    - To ensure quality verifiable data.
  - What safeguards are critical?
    - QA/QC of data being reported
    - Which data are publically available
      - Must safeguard PII and sensitive business information
  - What mechanisms or systems exist that can inform the development

Relationship to 6(a)(2)

- The data system would house all voluntary and required incidents reports
- Industry is concerned that any new data elements could have implications for future 6(a)(2) requirements.
- Industry is concerned that they would be expected to adopt “new” non-required data elements.
- NGOs would like to see the reduction or elimination of thresholds in current rule
- NGOs would like to see the elimination of aggregate reporting.

Any change to rule implementing 6(a)(2) [40CFR 159] would require a rule change and is not a planned topic for the workgroup.

Considerations as We Move Forward

- Mandatory vs voluntary reporting
  - Already reporting system in place under FIFRA 6(a)(2) for registrant reporting of incidents
  - Any changes to these requirements would require rule-making (a separate process than being discussed here)
- Mechanism for data collection
  - Web based portal for general population/pesticide product users
  - What are implications for Registrant 6(a)2 info
  - How does project fit with State agency incident data and collection?
  - Others? e.g. Physicians and Veterinarians/Environmental Monitoring Entities
- Data Verification and Incident Validation
  - How and who will first verify plausibility?
  - How and who will second validate/confirm cause and effect
  - How and who will determine “misuse” vs labelled use

Considerations as We Move Forward(cont.)

- Database release?
  - How and which data will be public?
  - What are resources to maintain database?
- Distinguish between complaints and incidents (see incident definition)
- Number of Data Elements
  - May need smaller number of elements for certain kinds of incidents
  - Account for elements not being available
  - Trade-off between the costs and benefit of additional data elements
- Develop a communications plan for the overall project.
- Coordination of EPA's pesticide incident system with other agencies.
- How can new database "speak" to other databases.
- Improve public access to data without time- and resource- intensive Freedom of Information Act requests.

Next Steps

- Developing an improved, publically available incident database will be a long-term process
- We appreciate the feedback already received by the PPDC Incident Workgroup
  - We will keep the considerations discussed in mind as we move forward
  - We look forward to continued feedback and discussions
  - This feedback is exactly why we did not want to build a new incident database in isolation!
- At our next PPDC Incident Workgroup meeting we will start discussing the second charge to the Workgroup, how we think the specific data elements should be collected
  - This is the next step in developing an improved incident database
  - This will require revisiting the data elements
    - Through this iterative process, some data elements may change

QUESTIONS?