

US EPA ARCHIVE DOCUMENT

CARAT Transition Work Group Recommendations

DRAFT July 18, 2003

On July 17-18, 2003, the Transition Work Group of the Committee to Advise on Reassessment and Transition (CARAT) met to develop a set of draft recommendations regarding transition. These recommendations are intended for review, discussion, and approval by the full CARAT. An initial set of draft recommendations served as a starting point for the working group discussion. They were gleaned from six pest management examples examined during the winter and spring of 2003. The examples were selected to provide “real world” examples of how the transition process is taking place in almonds, carrots, cranberries, peaches, potatoes and walnuts. The goal was to identify barriers to transition from these examples and, based on what was learned, develop potential recommendations to EPA and USDA.

The case examples were identified via a conference call of the Work Group. A team from the workgroup then developed two questionnaires, one to examine pest management problems that have or had IPM project and another to examine pest management problems without IPM projects, to elicit the desired information. Work Group teams worked with representatives from commodity groups to address the questions raised. Following this, Work Group members and representatives from the case examples participated in conference calls to identify and clarify the most important lessons learned. The recommendations made by participants in the case examples were compiled by EPA and USDA and presented to the Transition Work Group at the July 2003 meeting. Over the course of this two-day meeting, Work Group members worked in small groups and plenary sessions to review, refine, supplement, categorize and prioritize these recommendations. The following draft recommendations to USDA and EPA on how to assist growers with transition will be presented to the full CARAT for review and consideration, and unless noted otherwise, represent the consensus of the Transition Work Group. They are presented in five categories: Planning/Strategy, Research and Resources, Communication, Registration, and Implementation/Delivery/Monitoring Systems. The two highest priority recommendations are presented below as ‘Priority Recommendations’ and are followed by additional recommendations listed by category.

PRIORITY RECOMMENDATIONS

1. EPA and USDA should use the Pest Management Strategic Plans (PMSPs) to make decisions regarding registration priorities (EPA) and research, education and grant priorities (USDA). PMSPs have shown their effectiveness in pinpointing growers’ pest management problems and can tie growers’ identified concerns back to EPA and USDA for action. USDA should continue to support and make funding available for the development of PMSPs as they are an important tool in the transition process. USDA should provide leadership in integrating environmental stewardship with grower objectives through PMSPs. USDA should facilitate connections between small and dis-aggregated grower groups so that they can develop PMSPs, and should explore how to broaden participation and public knowledge of PMSPs.

2. USDA should utilize Farm Bill Conservation Title resources and capacities (e.g. Environmental Quality Incentives Program (EQIP), Conservation Security Program (CSP) etc.) to support transition. OPMP should be dedicated to working with Natural Resources Conservation Service (NRCS) on how best to assist minor crops with transition. Case studies could be developed to introduce NRCS to transition issues.

3. Enhance the role of Regional IPM Centers in carrying out transition activities.

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CARAT Transition Work Group was unanimous in its praise for the IR-4 as a model for an effective program. Among the salutary characteristics of IR-4 noted were its timely delivery of high quality products, extensive stakeholder involvement, comprehensive priority setting process, and stable funding through CSREES and ARS. The Regional IPM centers are well suited to replicate these characteristics in meeting transition needs. They provide high quality information through Crop profiles and PMSPs and have created stakeholder involvement mechanisms for setting Center priorities, and have strong working relationships among organizations and institutions in their Regions. It is recommended that USDA administer USDA programs relevant to transition (CAR, RAMP, PMAP, et al) through the Regional Centers. (This has already begun with the administration of the Regional IPM grants.) It is also recommended that USDA establish stable funding for Centers through parallel funding of \$2-3 million through the Office of Pest Management Policy. (The source for the funds would be ARS, which already funds OPMP.)

ADDITIONAL RECOMMENDATIONS by CATEGORY

Planning/Strategy:

- USDA should conduct a thorough review of its pest management research, education, extension, and implementation capacities to insure that: 1) there is a strong and consistent infrastructure in place that is capable of facilitating transition activities; 2) there are mechanisms in place to mount a robust response to emerging pest management transition needs; and 3) these activities are well coordinated with other USDA initiatives such as air, water, and soil quality programs. Specific mechanisms that are recommended include: base and formula funds to maintain ongoing geographically dispersed regional pest management centers, competitive grants to respond quickly to emerging needs, using the IPM Roadmap to insure a long-term strategy for the pest management infrastructure and using appropriate 2002 Farm Bill provisions to implement pest management transition programs.
- EPA should better integrate its pest management programs with other Agency programs on water quality, air quality, biodiversity conservation, and worker safety in order to enable greater synthesis of available information so that farmers can address interrelated transition issues in a comprehensive and holistic manner. The PMSPs are a good approach and model how this can be accomplished.

- EPA and USDA should act to implement the recommendations forthcoming from PMSPs in a timely manner.

Research and Resources:

- USDA should review the current status and trends of extension services and develop a strategy for how to strengthen them in support of transition. Priority services that should be supported include:
 - applied research/demonstration projects
 - education and outreach to growers
 - training and education for students and future IPM researchers
 - on-the-ground coordinators for IPM projects and other transition efforts. The extension system has played a crucial role in transition activities to date. It is critically important that resources be allocated in support of these activities. If current trends continue, the capacity to conduct transition effectively will be severely curtailed.
- Regarding research on measuring IPM adoption, USDA should use NASS to help with surveys on adoption and ERS to help analyze economic considerations.
- USDA and EPA should work together to identify funds available for transition activities and should coordinate efforts to ensure that these resources are directed to support transition efforts.
- USDA and EPA should facilitate interactions with commodity groups and processors to identify ways to provide incentives for implementation of IPM projects. One suggestion is for USDA to share risk with growers by providing crop insurance.
- EPA and USDA should earmark additional resources to research, development and demonstration (RD&D) and dissemination of reduced risk pest management tools.
- USDA should prioritize and reward (financially support) projects that have developed PMSPs and are on a demonstrated path to reduced risk and non-chemical pest management strategies. USDA should help link these projects to innovative sources of funding such as rural development grants.
- While the IR-4 program does not utilize large amount of resources, it has been extremely effective. It should receive increased support and its approaches should be replicated where possible. Specifically, the following characteristics of IR-4 should be replicated: concise and clear mission, deliverables, and

accountability. Continued funding for the bio-pesticide program should be a priority.

- The existence of partnerships between land grant universities and private researchers, NGOs, Pest Management Centers, and minor crop groups should be one criterion considered in judging grant proposals. (*A suggestion was made to highlight here specific examples of partnerships between land grant universities and others that have resulted in successful transition strategies.*)
- Duration of grants should be extended to take into account the nature of the systems being developed (e.g. IPM systems can take 3-5 years to develop and evaluate).

Communication:

- EPA/USDA should designate a point person(s) to communicate decisions that are in the pipeline and the status of EPA/USDA actions regarding transition projects to researchers and commodity groups. This person would be responsible for systematically communicating issues regarding new registrations and the pending loss of existing registrations. Some existing Agency/Department positions that could possibly fill this role include: Pest Management Centers, PESP liaisons, ombudsman at USDA, minor crop person at EPA. Within **x (amount of time)**, EPA and USDA will review these options, determine the best way to address this need, and communicate the agreed upon approach to the key stakeholders. In addition, EPA should continue and strengthen the role of the designated EPA - FQPA Regional Resource people.
- EPA and USDA both need to more systematically communicate within their own organizations, between the Agency and the Department, and with other players in the system. Senior level people at EPA and USDA should continue to communicate directly with stakeholders and observe first hand what is happening in the field.
- USDA should coordinate assessment of the needs derived from projects conducted under Risk Avoidance and Mitigation Program (RAMP), Crops at Risk (CAR), Pest Management Alternatives Program (PMAP) and other grant projects to identify new products/practices that require registration prioritization by EPA.
- USDA-Economic Research Service (ERS) should develop measurement systems that will document farmers' role as environmental stewards and communicate the results via press explaining how farmers are transitioning to reduced risk products and alternative practices.
- EPA should provide more accessible information to increase understanding of what qualifies as reduced risk and how products get approved as reduced risk.

- USDA should improve communication on how to access funds through grants for growers, commodity groups and universities.

Registration:

- Modify the Experimental Use Permit (EUP) program so that field level testing can be done to learn how effective the reduced risk products are before they are registered. EUPs need to be non-crop destruct and not count toward registrants' priority requests. In accomplishing this, EPA should establish a process for evaluating changes to the EUP process and a process for stakeholder review and evaluation of those changes.
- The Work Group acknowledged the fact that transition is a process that takes time to accomplish successfully. Several Transition Work Group members stressed the need for time to transition from existing products to any needed replacements. As such, these Work Group members requested that EPA allow a "phase-out" period for cancelled chemicals for growers to learn how to use new chemistry. Other Work Group members responded by stressing the imperative of FQPA compliance and the importance that requests for extended uses be accompanied by demonstrated progress toward alternatives. The consensus was that registering alternatives that reduce risks should continue to be an EPA priority. To the extent possible, EPA should have new products registered in time for the use season. Timeframes for registration of products should be based on registration submittal date.
- EPA should review the Section 18 process to determine if modifications can be made to better support transition activities.
- Support and expand the work that IR-4 does to research and register alternatives. Continued priority should be given to IR-4 registration proposals.
- Preservation of some old chemical uses - consistent with FQPA requirements - is needed for IPM programs and rescue treatments. In making these decisions, EPA should assess progress being made in the development and implementation of new products/practices. PMSPs can assist in this process.
- EPA should work to overcome barriers to new innovations caused by regulatory structures and assess how they might be removed, for example, utilization of child-protective release systems to mitigate exposure to fruit fly baits containing kairomones (e.g. attractants).

Implementation/Monitoring/Delivery Systems:

- USDA and EPA should cooperatively develop ecological measures (indices) that demonstrate progress toward ecological and economic sustainability as a result of IPM practices (conservation measures). By developing these indexes NRCS

could apply its conservation programs to achieve measurable progress toward sustainable ecological systems.

- EPA and USDA need to recognize that any transition program has to consider efficacy, economics, resistance management, and impact on non-targets. Researchers and growers need to have the ability to test alternatives on a large-scale basis. They need the capacity to utilize rescue treatments should new technologies fail.
- The Federal IPM Coordinating Committee needs to solicit input from stakeholders – conducting a listening session is suggested.
- EPA and USDA should consider launching a project that could help systematically assess the effectiveness of these recommendations. Peaches have been suggested as a potential crop on which to focus this effort. Another possibility would be to categorize stages/types of transition scenarios (e.g. pest management problem with no solutions, pest management problem with one or few products/solutions, pest management problem with product /practices available but no IPM program) and assess how a range of crops drawn from each scenario is addressing transition issues. This type of project could help illustrate the complexities associated with transition (e.g. viability of alternatives, cost, research needs, etc.)
- USDA and EPA should expand their efforts to incentivize the role of the private sector in transition. One suggestion for how to do this was to make grant funding available for private sector efforts in support of transition. Certification of pest management private sector Technical Service Providers (TSPs) for 2002 Farm Bill conservation programs that cover pest management practices should be a priority.