

US EPA ARCHIVE DOCUMENT

# Endangered Species Data Requirements: Critical Elements

Jennifer L. Shaw, Syngenta  
On behalf of CropLife America  
Presentation to the PPDC  
May 12, 2005



# FIFRA Data Requirements for Endangered Species

- Registrants must provide to EPA information on the proximity of Federally listed species to pesticide use sites in order to support registrations and reregistrations
- Information provided by registrants will be used by EPA together with other information for preparing endangered species effects determinations
- *Therefore*, registrants are seeking clarity as to how to satisfy these endangered species data requirements



# Both General *and* Pesticide Specific Data Are Necessary to Satisfy this Requirement

- General data are information, databases or tools that are not pesticide specific but can be applied to evaluations of a pesticide
  - *e.g., species locations, crop locations or tools to systematically manage this information*
- Pesticide specific data help characterize the pesticide
  - *e.g., maximum use rates, typical use patterns, types of taxa potentially at risk*



# Both General *and* Pesticide Specific Data Are Necessary to Satisfy this Requirement

- EPA has provided an excellent overview of data and methods used in endangered species assessments
  - See EPA’s “Overview Document”
- *However*, guidance is sought on how to combine general data sets with pesticide specific information in a way that will provide information on the proximity of Federally listed species to pesticide use sites



# A Consistent Approach to Implementation is Necessary

- EPA has clearly articulated the “trigger” for requesting endangered species data providing *transparency* to stakeholders
  - See EPA’s “Overview Document”
- *However*, data should be *consistently* required by EPA to support implementation of the new Counterpart Regulations
- Registrants must provide both general data and pesticide specific data in order to satisfy the data requirement by citing to existing data or developing their own



# Quality Standards for Data Must Be Met

1. *Standardized* data inputs
  - e.g., Ag Census data for crop locations
2. *Standardized* comparisons of data (e.g., use sites and species) and reporting
3. Measures to check on *reliability* of sources for species location and biology data
4. *Quality criteria* for determining the acceptability of input data
5. *Consistent* retrieval and application of general data to pesticide specific evaluations



# Quality Standards for Data Must Be Met

6. *Integrity* proven by thorough underlying documentation
7. *Transparency* through clearly defining the
  - data deliverable and
  - process for completing assessments and decision-making
8. Demonstrated *utility* of data in adequately informing regulatory decision-making
9. *Quality criteria* for determining acceptability of the data submission and developing Evaluation Records





# In Summary

- Registrants need clarity from EPA on how to satisfy pesticide specific endangered species data requirements
  - Guidance on how *to* utilize general data together with pesticide specific information to evaluate proximity
  - Guidance on *quality criteria* for determining acceptability
  - *Transparency* on the process by which EPA will rely on this data
- EPA should consistently impose data requirements when these are triggered
- Affected registrants must consistently respond by
  - Providing both general data and pesticide specific data in order to satisfy the data requirement
  - Do this by developing their own data or citing to existing data

