

**WSSA Liaison to EPA-OPP (Office of Pesticide Programs)
Interim Report to the WSSA Board of Directors**

Quarter 2, 2014

Second quarter expenses to visit EPA-OPP offices totaled \$4,325.31.

April 11

Michael Barrett arranged a meeting between Amy Asmus, of Asmus Farm Supply in Iowa, and BEAD. Luther Smith also participated in the meeting. Both he and Amy represent Certified Crop Consultants. I participated in the meeting by phone. Amy and Luther discussed how herbicide non-performance reports are handled at the retailer and consultant levels. They described how the process and resolution was handled, and how this differs between pesticide companies. Amy also discussed the record keeping required for the process and how field problems were diagnosed. She also differentiated between lack of weed control and crop injury complaints. Amy emphasized that an herbicide stewardship program should use all available weed management tools, not just herbicides, and that scouting, both pre and post application, and rotating MOAs are critical parts of an effective program. She also felt that there are parallels between herbicide stewardship programs and nutrient management plans.

May 13-15

Michael Barrett visited the offices of EPA-OPP in Arlington, VA. During the visit, he visited with personnel from the Registration Division (RD), the Biological and Economic Assessment Division (BEAD) and the Pesticide Reevaluation Division (PRD). The first morning I met with Rachel Holloman, who will be the Chief of a new Fungicide-Herbicide Branch in the Registration Division (RD). We discussed an herbicide training program for employees of the new branch, the reorganization of the EPA-OPP, the transition plans for the new branch, the process of handling new ai's and new uses, and plans for my next visit. Late that day, I learned how a registration proposal is constructed, including how different parts of EPA-OPP give input and opinions, and how this is pulled together in the RD. RD then writes a document for public comment that is meant to be understandable by the public and other constituents in the agricultural and other communities. During my visit, I also took time to begin work on a letter from WSSA to EPA concerning the Enlist Duo registration. Part of this was to take input, through phone calls, from WSSA members concerned with the registration proposal.

I also had the opportunity to meet with Michael Goodis, Associate Director of PRD. He explained to me the reevaluation process, the pipeline of cases and how priorities are set, and the decision making process. I have more to learn about this including how WSSA can be a resource for PRD.

The morning of May 15 I met with Lee Van Wychen and Donn Schilling, Chair of the WSSA Science Policy Committee. Part of the discussion concerned the formation of a special WSSA

committee to examine the herbicide resistance monitoring and mitigation program that is part of the proposed Enlist Duo registration. We discussed the objectives of such a committee and possible members. Later that day, Donn, Lee, Joe DiTomaso and I met with Rosalind James, new National Program Leader for NP 304, the national USDA- Agricultural Research Program dealing with weed and insect management, to discuss the WSSA and the regional weed science society concerns with the program. Following the meeting with Dr. James, the four of us then met with Marty Draper, USDA-NIFA National Program Leader – Plant Pathology/Integrated Pest Management. This discussion concerned how IPM funds were prioritized and distributed to the land-grant colleges.

May 19-21

Michael Barrett traveled to St. Louis, MO to meet with the Herbicide Resistance Summit II planning committee. During this meeting, we reviewed the different outlines for presentations at the summit and general plans for the organization of the meeting.

June 3-5

Michael Barrett visited the offices of EPA-OPP in Arlington, VA. During the visit, he visited with personnel from the Registration Division (RD), the Biological and Economic Assessment Division (BEAD) and the Environmental Fate and Effects Division (EFED). I was also able to visit at the same time as Mark Whalon from Michigan State University who is the Entomological Society of America (ESA) EPA-Liaison. Mark and I met with the EPA-OPP “Smart Label” team. This group is working to standardize a new electronic label submission system. One of the problems with the current system is that items such as weed names are not standardized or checked against synonyms. We discussed lists of weeds and insects maintained by WSSA and ESA and we have offered to make these lists available for EPA use in the label approval process. The WSSA President has tentatively approved use of the WSSA weed list by EPA but a more formal request from EPA and approval is expected in the future.

I also met with personnel from EFED to try and begin to understand the issues surrounding endangered species protection and estimates of risk to them from herbicide use. One interesting thing is that endangered plant species on private land are exempt from consideration. This means that the only consideration for endangered plant species is from off-site movement. However, this exemption does not extend to other taxa like animals, birds, and insects. Indirect effects on these organisms, such as when the food source for an obligate feeder is injured or killed, can be considered too. We also discussed the kinds of tests the EPA requires to estimate risk (herbicide toxicity) to off-site endangered species and how this works with models to estimate off-site movement from run-off or drift from herbicide applications and how this establishes risk and possible buffer zones. I have a lot more to learn and understand about this but the threat to endangered species will be a more and more important consideration in approval of herbicide uses.

During this visit, I offered my first installment of “Herbicide 101” (attached) for the EPA-OPP staff. Approximately 25 people attended an hour-long seminar designed to introduce them to some basics concerning herbicides and their use. The focus is on herbicides as this is the material most pertinent to the work at EPA-OPP. However, I hope to include additional broader information about weed science if time allows. Topics included in this first session included systems of herbicide classification, herbicide application types, an introduction to herbicide movement in plants, and types of herbicide selectivity as part of the discussion on herbicide classification. I plan to offer a new session during each of my visits to EPA-OPP.

June 12

Michael Barrett made a short visit to the offices of EPA-OPP in Arlington, VA while traveling through the area. During the visit, he visited with personnel from the Registration Division (RD) and the Biological and Economic Assessment Division (BEAD). One discussion concerned the relative importance of aerial applications in various crops. This is a subject I was unsure of so I have contacted the National Aerial Applications Association for data on this which I will be sharing with EPA-OPP.

Month of June

A significant amount of time was spent working with a WSSA Special Committee, which I co-chaired with Mark Peterson of Dow AgroSciences, whose task was to draw up a response from WSSA to EPA-OPP concerning the requirement for a herbicide resistance monitoring and mitigation program to be submitted before the end of the public comment period, June 30. Other members of the committee were Amy Asmus, Stanley Culpepper, Les Glasgow, Michael Horak, Bill Johnson, Jill Schroeder, Larry Steckel, and Mark Van Gessel. The committee held several conference calls and circulated drafts of a document which was forwarded to the Science Policy Committee the week of June 23. The letter was finalized with further input from both committees the evening of June 30 and submitted to EPA before the midnight deadline.

Industry Interactions

During my visit to DC the week of May 13, I also visited with a group from Monsanto at the company’s DC office. During the meeting we discussed Monsanto’s concerns about the herbicide resistance monitoring and mitigation program being proposed by EPA-OPP as part of the Enlist Duo registration consideration. I was able to learn and discuss how the Monsanto non-performance claim and resolution process differed from that of other companies.