

WSSA Liaison to EPA (Office of Pesticide Programs – OPP)
Interim Report to the WSSA Board of Directors – Quarter 1 2013
March 28, 2013

First quarter activities: During the first quarter, I attended the WSSA meeting in Baltimore. I met with the Board of Directors and attended the Science Policy and S71 committee meetings and the business meeting. I presented the summary and conclusions for the “Herbicide Resistance Management - The Path Forward” symposium. I was asked to chair the selection committee for the next EPA liaison. The committee has submitted a nomination to Jim Kells, president WSSA, for action by the board of directors.

I also attended the Western Society of Weed Science Society meeting. One outcome of the WSWS meeting was a question to the Biopesticides and Pollution Prevention Division (BPPD). The question was in two parts – first what risk assessment is conducted prior to registration of biopesticides, and, second what is the difference between biopesticides and biocontrol agents. I appreciate the quick response that Dr. Chris Wosniak provided for WSWS meeting (Range and Natural Areas Discussion Section) participants:

Regarding biopesticide risk assessment: “BPPD needs to deal with many of the same issues (animal and plant toxicity, environmental persistence, non-target effects, product characterization) as those assessing chemical pesticides, however, we also deal with the reproductive capacity of the microbe since it is assumed it is likely to reproduce in the environment and possibly spread. Hence, pathogenicity tests are also part of the data submission. One must show clearance of the organism from the test animal (rat or mouse) following oral and likely intraperitoneal administration. Skin and eye irritation or toxicology/pathogenicity tests may also be required. All data requirements listed in 40CFR 158.2140 and 2150 (regulations) must be fulfilled, some may be satisfied by data waivers where appropriate. For example, if an organism does not grow at human or avian body temperatures, it may be possible to ask for a waiver for certain toxicity/pathogenicity tests. This is something that is normally done at a pre-registration meeting between the registrant / applicant and the staff here in BPPD. When an organism is a known plant pathogen, non-target plant impacts will be a key consideration in the risk assessment. That is, what is the host range?”

Regarding the difference between biopesticides and biocontrol agents, “FIFRA and 40 CFR have definitions for biopesticides and biological control agents. EPA does not register or regulate what some term classical biocontrol agents like ladybird beetles, lacewings, etc... EPA does regulate microbial agents such as algae, bacteria, fungi, viruses and protozoa, or organisms used to control weeds.”

“The EPA website shows registration information for other mycoherbicides like those intended for control of citrus strangler vine http://www.epa.gov/pesticides/chem_search/reg_actions/reregistration/red_PC-111301_15-Feb-06.pdf and dyer’s woad

http://www.epa.gov/opp00001/chem_search/reg_actions/registration/fs_PC-006489_01-Jun-02.pdf and

http://www.epa.gov/pesticides/chem_search/reg_actions/registration/decision_PC-006489_1-Jun-02.pdf”

February 19-21, 2013: I visited EPA/OPP and visited with individuals from the Herbicide Branch of the Registration Division, the Biological and the Health Effects Division, and Mark Whalon, SME Entomology. The topics of workgroup meetings attended by both Mark Whalon and I included endangered species, pesticide resistance management, and IPM definitions. We also met with Lois Rossi, Registration Division Director, to update her on society liaison activities. I accompanied Lee Van Wychen to a meeting with the EPA Division of Transportation and Climate for a discussion about the invasive species/bioenergy crops issue. Please see Lee’s reports for more information about the issue and outcomes.

Second quarter plans: I plan on traveling to Washington, DC the week of April 15 to meet with individuals at EPA/OPP and to meet with Dr. Mark Whalon, the SME representing the Entomology Society of America. This

will probably be my last solo trip to Washington, DC in the role of EPA SME. I will coordinate with my successor to visit EPA at their earliest convenience.

Respectfully submitted,
Jill Schroeder
WSSA SME/liaison to EPA