

WSSA Liaison to EPA-OPP (Office of Pesticide Programs)

Quarter 4, 2015

Fourth quarter expenses to visit EPA-OPP offices totaled \$3,205.33.

October 28 – 30

Michael Barrett visited the offices of EPA-OPP in Arlington, VA from October 28 to October 30. During the visit to EPA, I visited with personnel from the Registration Division (RD) and the Biological and Economic Assessment Division (BEAD). Wayne Wilcox from Cornell University, the American Phytopathological Society liaison to EPA-OPP, also visited during this period.

During discussions with representatives of the RD, the issue of assessing benefits of potential registrations was raised several times. FIFRA is a risk-benefit statute and EPA is well versed assessing risks associated with pesticide registrations. However, it can be more difficult for EPA to assess the benefits (value) associated with a pesticide registration. Going forward, there is a desire on EPA's part to more fully describe benefits of a registration as part of the decision documentation. It is not surprising that can be difficult for EPA reviewers given the wide range of cropping and other situations in which pesticides would be used, it is not possible to be an expert on all these situations and there may not be material available to assess potential benefits. This was apparent when we reviewed the publically available work plans for the RD groups. There were many proposed registrations for minor crops, often associated with the IR-4 program, which would be difficult to place into a benefits context. We discussed getting material supporting the IR-4 requests from that agency as one place to start. I also had the opportunity to discuss in general terms and work through an example with one of the reviewers how I might approach assessing benefits. In the case of a proposed herbicide use on a crop, I suggested efficacy (weeds controlled by the new registration difficult to control with the currently available materials), reduced environmental risks (including human health and the environment), and advantages for herbicide resistance management as areas that might be assessed for benefits. As a first step, the reviewer would need to know what was currently labeled for use in the situation of interest. While this would be a daunting task for some major crops, in the case of a minor crop I was able to show how to use publically available databases to determine the herbicides used in the crop presently. Once the currently available herbicides are known, they can be compared to a proposed registration. However, this will still be a challenge as it requires a depth of knowledge on herbicide chemistry and utility.

Related to this topic, Dan Rosenblatt, Deputy Director of the Registration Branch, lead a discussion on potential ways, and legal constraints, the liaisons could help with the benefits question. This discussion was continued in conference calls between visits.

During this visit, Michael Barrett made a presentation on "An Introduction to Herbicide Resistance and the Case of HPPD Inhibitor Resistance". Wayne Wilcox made his first presentation in a "Fungicides 101" series. The topic of the presentation was "An Introduction to Fungicides" and I was able to help him structure the presentation.

Discussions with BEAD continued on the elements that might be included in an herbicide resistance management plan structure. Additional discussions with BEAD focused in ideas about how to assess the amounts of crop and weed seed on the soil surface and available for consumption by birds and other animals. This type of information may be helpful in risk assessments for nontarget organisms.

December 1-3

Michael Barrett visited the offices of EPA-OPP in Arlington, VA from December 1 to December 3. During the visit to EPA, he visited with personnel from the Registration Division (RD) and the Biological and Economic Assessment Division (BEAD). On December 3, I met with the planning group for the Herbicide Summit at the USDA-OPMP offices. On December 3, he also attended a seminar on herbicide resistance for congressional staff presented by David Shaw.

During his visit to EPA, I presented a seminar on PPO Inhibitors as part of the Herbicides 101 series. The discussion with BEAD on crop and weed seed availability on the soil surface continued. I shared information on crop planter efficiency supplied by agricultural engineers and agronomists to BEAD.

I was shown material from a webinar for registrants on the Smart Label initiative. This is a program to develop a system to allow registrants to build labels electronically, standardize nomenclature, and allow better tracking of registrations and labels by EPA. The weed lists maintained by WSSA are already being used for populate weed information in this system. I was able to make other suggestions on weed science related nomenclature, and contrast to the terms used in other pest management disciplines. I believe this may be a place for continuing input from WSSA.

The discussion on assessing benefits also continued. Dan Rosenblatt led a meeting with representatives from RD and BEAD on this topic. It was suggested the liaisons could write one-page descriptions of Mechanism of Action groups as an introduction for reviewers. Groups that were suggested as priorities included the PPO inhibitors, HPPD inhibitors, and the sulfonylureas. I will be working on a template for these write-ups as a model as what is actually going to be useful to the reviewers is still being considered.