

Endangered Species Data Requirements: Critical Elements

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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

