

Initial Registration Review Implementation Work Group Recommendations

PPDC Meeting
May 10, 2007

Registration Review Overview

- 1996 FQPA mandate; rule effective Oct' 06
- Covers all pesticides; periodic review
- 1st dockets opened in Feb. and March 2007 for conventional pesticides
- 1st biopesticide dockets opened in April
- 1st antimicrobial dockets to open soon

Purpose of Registration Review Implementation Work Group (RRIW)

- Provide stakeholder input on several initial registration review dockets
 - Input on docketed presentation of what EPA knows and how it has been presented in the Agency's preliminary work plan
 - Has EPA emphasized the right topics in the summary document?

- Advise the PPDC on registration review docket recommendations to give to the Agency

- Suggest improvements to EPA in the initial stages of this new regulatory program

RRIW: Docket Structure

Recommendations

- ❑ Guidance on how to navigate/use Federal Document Management System (FDMS) dockets
- ❑ Organize dockets and identify documents better
- ❑ Provide more detail on incidents
- ❑ Include all available background documents if possible
- ❑ List Pesticide Registration Improvement Act (PRIA) schedule

RRIW: Summary Document

Recommendations

- ❑ More summary/highlighting Agency conclusions up front
- ❑ Less jargon; write in clear language
- ❑ More consistency in format and better flow between sections
- ❑ Give more usage information including 24(c) registrations

RRIW: Summary Document

Recommendations (continued)

- ❑ Highlight data requested or not requested with rationale
- ❑ Include product/trade names in which each active ingredient is used but recognize the potential complexity in trying to do this
- ❑ Provide information and Internet sites for analytical methods to aid states
- ❑ Don't go overboard on information: awareness of Agency's limited resources

RRIW: Suggestions for R.R. Status Page

- Provide links to pertinent information on each active ingredient

RRIW: General Suggestions

- ❑ Develop water quality benchmarks for those pesticides lacking them
- ❑ Interest in diagnostic biomarkers of pesticide exposure
- ❑ Clarify when and how stakeholders could provide information for endangered species assessments in registration review e.g., usage, crop and species location

RRIW: Positive Feedback

- ❑ Water Quality Data Submission SOP is very helpful
- ❑ Clomazone and hexythiazox PowerPoint presentations for RRIW meeting are very clear, consider doing this for other dockets
- ❑ Pleased to get an early picture of EPA's thinking and plans for dockets –helps to focus comments
- ❑ Apparent EPA put a lot of thought into how to organize dockets and create summary documents

Initial docket improvements

OPP has made some initial improvements:

- ❑ Dated signature page included on the front of registration review summary document
- ❑ List of all product registration numbers is in the summary document to facilitate label searches
- ❑ Included incident reports in the docket when available
- ❑ Fixed the docket “basic search” function, to enable searching on open dockets by pesticide name in addition to docket number, making dockets more user friendly

Next Steps

- ❑ PPDC considers RRIW input & makes registration review docket recommendations to EPA
- ❑ EPA considers recommendations for docket improvements
- ❑ RRIW will meet again this summer to consider initial biopesticide & antimicrobial dockets
 - May be need for additional work group meetings on dockets
- ❑ Consider need for PPDC input on subsequent registration review steps e.g. final work plans