

EPA Guidance on Managing Pesticide Resistance PPDC Meeting November 1, 2017 – Session 5

EPA has released two Pesticide Registration Notices (PRNs) that are aimed at combating pesticide resistance. These include PRN 2017-1, entitled “Guidance for Pesticide Registrants on Pesticide Resistance Management Labeling” and PRN 2017-2, entitled “Guidance for Herbicide Resistance Management Labeling, Education, Training, and Stewardship.” PRN 2017-1 provides general guidance on resistance management labeling for all conventional agricultural insecticides, fungicides and herbicides. This PRN is a revision of an existing Notice (2001-5), that provides general guidance on this topic to registrants of all pesticides except *Bt* crops and homeowner-use products. The other PRN (2017-2) is a new Notice that focuses specifically on guidance for herbicide registrants. PRN 2017-2, which specifically focuses on herbicides, provides guidance for labels, terms of registration, education, training and stewardship. The Agency focused on the holistic guidance for herbicides (*i.e.*, PRN 2017-2) because they are the most widely used agricultural chemicals, no new herbicide mechanism of action has been developed in last 30 years, and herbicide-resistant weeds are rapidly increasing.

Date Finalized (published in the Federal Register): September 22, 2017

Webpage address for all PRNs:

<https://www.epa.gov/pesticide-registration/pesticide-registration-notices-year>

Pesticides can be used to control a variety of pests, such as insects, weeds, rodents, bacteria, fungi, etc. Over time, many pesticides have gradually lost their effectiveness because pests have developed resistance – which can be described as a significant decrease in sensitivity to a pesticide. Resistance reduces the utility of these pesticides, and has become a major economic factor in crop production and resulted in losses to growers. To address the growing problem of resistance and preserve the useful life of pesticides, the Agency has embarked on a more widespread effort that is aimed at helping pesticide users combat and slow the development of pesticide resistance. The release of these two PRNs will allow the Agency to communicate strategies to combat pesticide resistance.

Stakeholder Involvement: In mid-2016, the Agency released and solicited public comment on drafts of the labeling PRN (2017-1) and the herbicide PRN (2017-2). During the public comment period, the Agency received comments from several interested stakeholders including the U.S. Department of Agriculture, the Weed Science Society of America, herbicide registrants, academic and extension specialists, crop consultants and advisors, and non-governmental organizations. The Agency has revised both PRNs based on the comments received, and developed response-to-comment documents for both PRNs¹. In addition, updates on both PRNs were provided at the Fall 2016 and Spring 2017 Pesticide Program Dialogue Committee (PPDC) meetings.

Implementation: In order to support the policy goals of these PRNs, EPA encourages registrants to add the appropriate resistance-management statements through any of the agency’s regulatory

¹ The Agency’s response-to-comments document for each PRN can be found in the docket at www.regulations.gov/ using docket identification (ID) numbers EPA-HQ-OPP-2016-0242 and EPA-HQ-OPP-2016-0226.

mechanisms. In particular, the addition of these proposed statements will be permitted, for existing products by (1) notification, (2) amendment or (3) as part of an application for a new product. The addition of the statements identified in the PRNs, without other changes, will not result in the imposition of fees in association with the Pesticide Registration Improvements Act (PRIA).

In regards to the herbicide resistance management PRN, OPP is beginning to implement herbicide-resistance measures for existing herbicides during registration review. In registration review, EPA will include herbicide-resistance elements in every herbicide proposed interim and final decision. For registration actions, OPP is implementing herbicide-resistance measures for all end-use herbicide products including commercial turf and sod farms, ornamental production in the open, and non-agricultural use sites such as golf courses, aquatic vegetation, rights-of-way and vegetation management along roadways; herbicide products labeled for use by the general consumer, such as residential use pesticides, are not included.