

Suggestions to PPDC from the Public Health Workgroup

May 7, 2019

Foundational Definitions and Assumptions

Workgroup goal:

Develop suggestions for the PPDC to help the Office of Pesticide Programs (OPP) respond more effectively during an emergency, considering other agency involvement, and the harmonization of communication materials about pesticides.

Definition of an emergency:

Any unplanned event or series of events that cause an ongoing, tangible threat to human health that can be ameliorated by the proper and appropriate application of EPA-registered pesticides. Such an emergency event could occur when:

1. A new or reoccurring pathogen is introduced (e.g., Zika)
2. Conditions following a natural disaster lead to the sudden increase of a public health threat (i.e., flies, mosquitos, rodents or vector-borne viral, bacterial or fungal pathogens following a hurricane)
3. Human events or terrorist activity warranting a coordinated communication on the proper and appropriate use of pesticides (e.g., anthrax).

Events that can be readily planned for e.g. seasonal flu or peak vector-activity periods are not covered by this definition.

OPP's role in emergency:

OPP is not expected to be the lead responder in an emergency. Rather OPP serves a vital role when pesticides are needed, whether alone or as part of an Integrated Pest Management (IPM) program, to respond in an emergency, providing information on registered pesticides to control microbial, vertebrate, and invertebrate threats to public health.

Suggestions for OPP to be Better Prepared for Rapid Response in a Public Health Emergency

Response Area #1: EPA Roles and Responsibilities

Many key stakeholders and members of the public are unaware or ill-informed of the roles and responsibilities of the EPA during public health emergencies. This may result in confusion, mis-information, and the potential misuse of pesticides, which may lead to an ineffective response and failure to mitigate the emergency

Suggestion

- OPP supports other federal, state or tribal agencies as they lead responses to public health emergencies. OPP should clarify and publicize its primary and secondary roles and responsibilities before, during, and after public health emergencies in relationship to FIFRA or FIFRA-related activities. Statement should clarify and detail:
 - How OPP's role might vary by crisis type.
 - EPA's risk communication and general communication roles before, during, and after a public health emergency (EPA communications, NIMS communications, etc.).
 - OPP's roles in relation to other EPA programs, federal agencies, and stakeholder roles in a public health emergency.
 - OPP's role in identifying and preparing for emerging public health issues.
 - Description of OPP's roles and responsibilities for after action reviews for a public health emergency response

Response Area #2: Stakeholder Involvement

During an emergency OPP responds to queries from entities such as CDC, Department of Homeland Security, state pesticide regulators, state/municipal health departments, public, media, etc. on pesticide use and safety information. When OPP reaches out or engages stakeholders directly, stakeholders involved will vary based on the extent and type of emergency.

Suggestion:

Depending on the scope of an emergency and the need for information, OPP can reach out to stakeholders more quickly by: Using the email lists currently used for OPP updates and other pesticide announcements

Providing updates during regular meetings with States, Territories, Tribes, pesticide-related government officials and end user/specialty stakeholder groups.

- Using PPDC semi-annual meetings to communicate when appropriate e.g., if further actions are needed from stakeholders or a after action review of an emergency can be shared.
- Identified stakeholders include (but not limited to):
 - Federal, State, Territory, and Tribal Agencies (health dept, environment, or agriculture within agency).
 - Local government, health, and pesticide officials.
 - End User/Specialty Groups, such as mosquito control districts, Association for the Healthcare Environment (AHE), Association for Professionals in Infection Control and Epidemiology (APIC).
 - Professional and industrial trade associations and their members.
 - Pesticide Program Dialogue Committee.

Response Area #3: Pesticides, IPM, and other Control Tools

OPP can be better prepared for emergencies by preparing policies and materials in advance of an emergency. OPP also has a mandate to educate and encourage the proper use of pesticides and the corresponding use of IPM (which includes non-pesticide control). Maximum efficacy is especially critical during an emergency.

Suggestion

- Adapt existing education materials on regulatory processes (Section 3 or 18, EUP, existing or new products) to specifically address public health pesticides, since these processes may vary from those used in agriculture.
 - Audiences include: States, Territories, Tribes, other federal agencies, and registrants and other concerned parties
 - Clearly define the differences between an EUP and Section 18 exemption
 - Modify Section 18 roadmap so that it specifically addresses public health pesticides.
- Discuss roles and options for using pesticides that are not registered (25b, innovative uses not inconsistent with label, emerging pathogens, etc.), addressing any unforeseen need.
 - Include novel delivery options for pesticides.
 - state that EPA has no data to evaluate exempt products.
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- Establish clear guidelines of OPP's policy to expedite pesticide registration application process and/or new pesticide uses during an emergency.
- Create IPM materials specific to different types of emergencies and different pest, including antimicrobial pesticides and referencing industry-specific Best Management Practices (BMPs) where appropriate.
 - Include training, guidance for industry, guidance for intra- and interstate commerce and movement.
 - Refer to EPA Emerging Viral Pathogen Guidance for Antimicrobial Pesticides: <https://www.epa.gov/pesticide-registration/emerging-viral-pathogen-guidance-antimicrobial-pesticides>.

Response Area #4: Communications

During an emergency, accurate pesticide information is needed quickly. Consistent pesticide messaging is critical to community leaders who provide information for their specific audiences.

Suggestion

Though each emergency differs, the pesticide information needed, and existing communication methods available should be consistent. Preparing information proactively, will allow OPP to respond quickly and effectively, freeing agency resources to focus on the unique aspects of each emergency. Specific documents include:

- Actions and alerts for the public on pest controls tools being used (e.g., IPM outreach materials, and how to mitigate risk to themselves and their families).
- Develop a simplified message for vector control products applied by ultra-low volume (ULV) about risk of product risk to residents and bystanders.
 - Encouraging the production of simple explanations of product use, and mode of action from manufacturers in the form of:
 - Videos
 - Infographics
- Plain language information about risk and benefits of pesticides used to control pests and pathogens during public health emergency
- Create standard statements on pesticides during an emergency and issues such as endangered species protection, risk to the environment, organic farms, NPDES permits, environmental impact assessments, pollinators, parklands, etc.).

Style for these messages should be simple and inclusive:

- Plain language (follow federal guidance at <https://www.plainlanguage.gov/guidelines>).
- Build the public's confidence towards EPA's approach by improving communicate quality, quantity, and consistency.
- Ensure that the messaging is stakeholder-specific.
- Ensure messages are crafted to reach underserved populations