Climate Adaptation Implementation Plan Fiscal Year 2024 Addendum



U.S. EPA Office of Chemical Safety and Pollution Prevention

May 1, 2024

This document serves as an addendum to the EPA's Office of Chemical Safety and Pollution Prevention (OCSPP) Climate Adaptation Plan (CAIP) which is publicly available¹ This document addresses the priority actions for Fiscal Years (FYs) 2024 and 2025. There have been a few minor administrative changes associated with the CAIP that do not significantly impact it.² The vulnerabilities described in the 2022 CAIP remain unchanged. Additionally note that with regard to available resources, there are no changes with regard to resources allocated as described in the existing CAIP.

<u>Fiscal Year 2024 Priority Actions:</u> The priority actions which OCSPP has committed to achieve are described in the tables below. Projected 2025 values are also supplied for context given that those actions are directly tied to the deliverables for FY 2023 and 2024.

LTPG 1.2.1: OCSI	PP Climate Adaptation Priority Action	Item A : Increase the number of streamlined processes		
for bringing climate	ate favorable chemistries to the marke	t.		
Expected Outcom	me: Increasing the number of streamli	ned processes in order to bring more climate favorable		
chemistries to th	ne market will be manifested by identif	ying and completing the noted case studies to identify		
and implement t	he developed criteria.			
Sub-priority A.1	- Actions to directly support climate ad	aptation related to new chemistries and innovative		
technologies or o	other related processes			
FY 2023	Develop a strategy under TSCA to dire	ectly support climate adaptation related to new		
PM 1.1	chemistries, innovative technologies,	and/or other related processes.		
	FY 2023 Target: 1	FY 2023 Result: 1		
FY 2024	Pilot to gain experience with strategy	from candidates to build upon and refine efforts for		
PM 1.1	future activities (e.g., Mixed Metal Ox	kides (MMOs) are preferred candidate).		
	FY 2024 Target: 1	FY 2024 Result:		
FY 2025	Implement process adjustments related to new chemistries, innovative technologies,			
PM 1.1	and/or other related processes based	on applicable case study findings.		
FY 2025 Target: 1 FY 2025 Result:				
Metric Details	Baseline: No strategy was implement	ed to directly support climate adaptation in FY 2022.		
	In FY 2023 the strategy for developing a process for integrating climate adaptation was			
	developed.			
	Data Source: Report out from OPPT/I	New Chemicals Division		
	Misc.: In FY 2024 and 2025, EPA is ex	ploring strategies in areas such as electric vehicle		
	batteries, biotechnologies, and hydro	fluorocarbon replacements. Limited introduction of		
	strategy for notable adaptation areas	(e.g., mixed metal oxides (MMOs), new chemical		
	submissions using IRA flags). Indigenous Knowledge constructs will be incorporated in the			
products associated with this metric as available and applicable in a manner compliant with				
<i>X</i> -1	guidance on its use. Similarly, Environmental Justice constructs will be considered and			
integrated into products associated with this metric as applicable and appropriate.				
Sub-priority A.2 - Consider impact of climate change and the resulting effects (e.g., on evolving pest				
complexes such as novel invasive and disease vectoring pests, shifting crop production patterns, and risk				
management options).				
FY 2023	FY 2023 Develop a strategy for evaluating the processes associated with FIFRA Section 18s to			
PM 1.2	PM 1.2 determine potential efficiencies and/or process improvements.			
	FY 2023 Target: 1 FY 2023 Result:			
FY 2023 Target: 1 FY 2023 Result:				

¹ https://www.epa.gov/system/files/documents/2022-10/bh508-OCSPP_ClimAdaptPlan_FINAL_09-27-2022_pub%23.pdf

² Anna Lowit is now the permanent Science Policy Advisor for the Office of Pollution Prevention and Toxics (OPPT). Also, Monique Perron is now the permanent Science Policy Advisor for the Office of Pesticide Programs (OPP). Also, priority Actions A and B have been combined into 2 subparts related to OPPT and OPP, respectively given they are similar in nature related to streamlining processes for bringing climate favorable chemistries to market.

FY 2024	Pilot Section 18 related action to gain experience with process from an example chemical to			
PM 1.2	build on and refine the strategy for future activities.			
	FY 2024 Target: 1 FY 2024 Result:			
FY 2025 PM 1.2	Implement process adjustments associated with Section 18s based on applicable findings.			
	FY 2025 Target: 1 FY 2025 Result:			
Metric Details	Baseline: Zero strategy for considering the impact of climate adaptation and the resulting effects in FY 2022. In FY 2023 the strategy for developing a process for integrating climate adaptation was developed. Data Source: Report out from OPP/Registration Division Misc.: Strategy could include accompanying guidance as well. Indigenous Knowledge constructs will be incorporated in the products associated with this metric as available and applicable in a manner compliant with guidance on its use. Similarly, Environmental Justice constructs will be considered and integrated into products associated with this metric as applicable and appropriate.			

LTPG 1.2.1: OCSPP Climate Adaptation Priority Action Item B: Establish and Implement training programs				
related to climat	related to climate adaptation for all OCSPP employees.			
Expected Outcor	Expected Outcome: The climate adaptation training curriculum for the OCSPP training program was			
developed in FY	2023 and in the upcoming years the pro	ogram will be implemented for OCSPP employees in		
order to integrat	e climate adaptation into EPA program	is and policies. The outcome will be completed climate		
adaptation traini	ng by OCSPP staff.			
FY 2023	Complete training climate adaptation curriculum.			
PM 2				
I	FY 2023 Target: 100% FY 2023 Result:			
FY 2024	Conduct trainings on climate adaptation to OCSPP employees.			
PM 2				
	FY 2024 Target: 1 FY 2024 Result:			
FY 2025	Complete trainings on climate adaptation to OCSPP employees; update as needed.			
PM 2				
	FY 2025 Target: 1 FY 2025 Result:			
Metric Details	Baseline: Zero trainings on climate cl	hange topics relevant for risk evaluation and risk		
	management in FY 2022. In FY 2023 the curriculum for the training was developed.			
	Data Source: Report out from climate training workgroup.			
	Misc.: This activity will include implementing the training program across all OCSPP offices			
2.54	(e.g., tracking via Fed Talent or similar mechanism). Indigenous Knowledge constructs will			
	be incorporated in the products associated with this metric as available and applicable in a			
	manner compliant with guidance on its use. Similarly, Environmental Justice constructs will			
4.0,	be considered and integrated into products associated with this metric as applicable and			
	appropriate.			

	LTPG 1.2.1: OCSPP Climate Adaptation Priority Action Item C: Increase the number of risk assessments and			
risk managemen	risk management decisions that incorporate climate adaptation.			
Expected Outco	me: Increasing the number of risk asse	ssments and risk management decisions that		
incorporate clim	incorporate climate adaptation into EPA rulemaking processes will be manifested by identifying and			
completing the r	noted case studies to identify and imple	ement the developed criteria.		
FY 2023	Develop criteria for incorporating climate adaptation into risk assessment and risk			
PM 3	management documents.			
	FY 2023 Target: 100%	FY 2023 Result:		
FY 2024	Pilot incorporating climate adaptatio	n into risk assessments and risk management		
PM 3	documents to gain experience with criteria from candidates.			
FY 2024 Target: 2 FY 2024 Result:				
FY 2025	Implement process adjustments incorporating climate adaptation into risk assessments and			
PM 3	risk management documents based on applicable case study findings.			
FY 2025 Target: 2 FY 2025 Result:				
Metric Details	Baseline: Zero criteria for considerin	ng the impact of climate adaptation and the resulting		
	effects in FY 2022. In FY 2023 the strategy for developing a process for integrating climate			
	adaptation was developed.			
	Data Source: Report out from OPP ar	nd OPPT		
	Misc.: Criteria could include science a	approach, risk management approach, and		
	accompanying guidance. Limited introduction of criteria for notable adaptation areas (e.g.,			
	worker health and safety issues). One case study from each office (OPP and OPPT).			
	Indigenous Knowledge constructs will be incorporated in the products associated with this			
	metric as available and applicable in a manner compliant with guidance on its use.			
	Similarly, Environmental Justice constructs will be considered and integrated into products			
	associated with this metric as applicable and appropriate.			
	.,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,			

LTPG 1.2.1: OCSPP Climate Adaptation Priority Action Item D: Use the most up-to-date and appropriate tools and data related to climate change in risk assessments including for vulnerable populations. This will be manifested by identifying and completing the noted case studies to identify and implement the developed criteria.			
FY 2023	Develop framework for systematically ensuring latest tools and data are included into risk		
PM 4	assessments to account for climate adaptation for vulnerable populations.		
F	FY 2023 Target: 100% FY 2023 Result:		
FY 2024	Pilot the framework for ensuring latest tools and data are included in the risk assessments		
PM 4	to account for climate adaptation for vulnerable populations.		
	FY 2024 Target: 2 FY 2024 Result:		
FY 2025 PM 4	Implement process adjustments in the risk assessments ensuring latest tools and data are included to account for climate adaptation for vulnerable populations based on applicable case study findings.		
FY 2025 Target: 2 FY 2025 Result:			
Metric Details	Baseline: Zero systematic look at data and tools related to considering the impact of climate adaptation and the resulting effects in FY 2022. In FY 2023 the strategy for developing a process for integrating climate adaptation was developed. Data Source: Report out from OPP and OPPT Misc.: Criteria could include science approach, risk management approach, and accompanying guidance. One case study from each office (OPP and OPPT). Indigenous Knowledge constructs will be incorporated in the products associated with this metric as		

LTPG 1.2.1: OCSPP Climate Adaptation Priority Action Item D: Use the most up-to-date and appropriate tools and data related to climate change in risk assessments including for vulnerable populations. This will be manifested by identifying and completing the noted case studies to identify and implement the developed criteria.

available and applicable in a manner compliant with guidance on its use. Similarly, Environmental Justice constructs will be considered and integrated into products associated with this metric as applicable and appropriate.

LTPG 1.2.2: By September 30, 2026, assist 400 federally recognized Tribes to take action to anticipate,				
prepare for, adapt to, or recover from the impacts of climate change. ³				
PM 1.2.2	Assist federally recognized Tribes to take action to anticipate, prepare for, adapt to, or recover from the impacts of climate change.			
FY	2023	2024	2025	2026
Target	1	1	1	
Result	0			
Metric Details	Baseline: No data was taken to ascertain if federally recognized Tribes took action to anticipate, prepare for, adapt to, or recover from the impacts of climate change in FY 2022 based on training provided. Data Source: Report out from OPP and OPPT Misc.: Data collection timing could hamper proper timely reporting of progress on this metric.			

LTPG 1.2.3: By September 30, 2026, assist 450 states, territories, local governments, and communities,				
especially communities which are underserved and disproportionally at risk from climate change, to take				
action to anticipa	action to anticipate, prepare for, adapt to, or recover from the impacts of climate change. ³			
	Assist states, territories, local governments, and communities, especially communities			
PM 1.2.3	which are underserved and disproportionally at risk from climate change, to take action to anticipate, prepare for, adapt to, or recover from the impacts of climate change.			nge, to take action to
				te change.
FY	2023	2024	2025	2026
Target	1	1	1	
Result	0			
Metric Details	Baseline: No data was taken to ascertain if states, territories, local governments, and			
	communities, especially communities which are underserved and disproportionally at risk,			
	took action in FY 2022 based on training provided.			
	Data Source: Report out from OPP and OPPT			
	Misc.: Data collection timing could hamper proper timely reporting of progress on this			
	metric.			

³ Note that for Long Term Performance Goals 1.2.2 and 1.2.3 the targets were left at 1 event per year, because without any data (because of how it is reported), there is an inability to change and require report back after training and other interactive events. Thus, there is no way of predicting more refined performance targets.

Integration of climate adaptation into BIL and IRA investments⁴: Recently, for IRA, summaries of the Environmental Product Declaration Assistance (IRA Section 60112) and Labeling Program for Low Embodied Carbon Construction Materials (IRA Section 60116) efforts have been developed.⁵ This illustrates how efforts are enabling \$4.15 billion in GSA (General Services Administration) and FHWA (Federal Highway Administration) spending on low carbon construction materials as described in our IRA 60503 and 60506 Interim Determination. The program's reach will grow as it continues to develop and implement the label program. Additionally, the application review process for our Environmental Product Declaration (EPD) Assistance grants is currently ongoing and awards ~\$100 million are expected by the end of the fiscal year. Contract support was recently initiated and the program will begin providing direct technical assistance through this contract to construction material manufacturers to support their efforts to measure and report greenhouse gas emissions later this summer.

For BIL, public information is provided related to P2 (Pollution Prevention) STAG (State and Tribal Assistance Grants) that provide P2 technical assistance to businesses.⁶ Approximately \$28 million in BIL P2 grants has been awarded so far, and another round of grants for \$14 million was recently announced. This effort also includes approximately another \$10 million for P2 grants under regular appropriations as described in the associated press release.⁷

Exploration of ways to integrate Indigenous Knowledge (IK) into projects and decisions: For all priority actions, language related to the incorporation of Indigenous Knowledge (IK) and Environmental Justice (EJ) have been integrated into each as stipulated in climate adaptation activities moving forward. With regard to IK, OCSPP will participate in American Indian Environmental Office's (AIEO's) quarterly IK and Climate Change discussions and implement at least one action that incorporates IK in climate adaptation actions. OCSPP will report actions to AIEO and AIEO will report to OP quarterly on our behalf. AIEO will coordinate EPA's incorporation of IK into climate-related priorities and actions.

<u>Increase the climate literacy of your staff and any external partners:</u> OCSPP has developed an on demand virtual training program for its staff. Additionally, OCSPP staff participate in public events to provide overviews of its climate adaptation efforts wherever feasible (e.g., annual symposium at the American Chemical Society national meeting in 2022 and 2023, additional planned for 2024).

Successful effort working with an external partner (e.g., a state, Tribe or community) to adapt to climate change:

EPA's PREP Program is an educational program designed for state, tribal and territory managers who implement pesticide regulatory and enforcement programs. PREP provides practical training on technical, policy, and management issues, as well as a wide array of cutting-edge pesticide topics.

⁴ BIL = Bipartisan Infrastructure Law, IRA = Inflation Reduction Act

⁵ https://www.epa.gov/greenerproducts/reducing-embodied-carbon-construction-materials-through-inflation-reduction-act

⁶ https://www.epa.gov/p2/bipartisan-infrastructure-law-pollution-prevention-grant

⁷ https://www.epa.gov/newsreleases/biden-harris-administration-announces-24-million-pollution-prevention-grants-under

Climate change discussion was included with 75 state and tribal participants during three recent Pesticide Regulatory Education (PREP) courses.