U.S. ENVIRONMENTAL PROTECTION AGENCY

PESTICIDE PROGRAM DIALOGUE COMMITTEE MEETING

Wednesday, November 13, 2024

11:00 a.m.

DAY 1

PESTICIDE PROGRAM DIALOGUE COMMITTEE ROSTER

November 2024

NAME	AFFILIATION
User/Grower Groups/ Farmer Representatives	
Andrew Architect	National Pest Management Association
Bob Mann	National Association of Landscape Professionals
Claudia Arrieta	Cargill
Gary Prescher	National Corn Growers Association
George Parker	National Agricultural Aviation Association
Grant Morris	National Potato Council
Jill Schroeder	Weed Science Society of American
John Wise	IR-4 Project
Kim Brown	University of Tennessee
Patrick Johnson, Jr.	National Cotton Council
Robert Nielsen	Gold Course Superintendents Associations of America
Environmental/ Public Interest/ Animal Welfare Groups	
Alexis Temkin	Environmental Working Group

NAME	AFFILIATION
Anna van der Zalm	People for the Ethical Treatment of Animals
David Shaw	Mississippi State University
Ed Hardy Kern	American Bird Conservancy
Nathan Donley	Center for Biological Diversity
Rosemary Malfi	The Xerces Society for Invertebrate Conservation
Farmworker Representatives	
Becca Berkey	Northeastern University
Mily Treviño-Sauceda	Alianza Nacional de Campesinas, Inc.
Public Health Representatives	
Alanna Bares	California Environmental Protection Agency
Joseph Grzywacz	San Jose State University
Marc Lame	Indiana University
Chemical and Biopesticides Industry/Trade Associations	
Anastasia Swearingen	American Chemistry Council

NAME	AFFILIATION
Daren Coppock	Agricultural Retailers Association
Karen Reardon.	Responsible Industry for a Sound Environment
Keith Jones	Biological Products Industry Alliance
Ligia Duarte	Household & Commercials Products Association
Lisa Dreilinger	Arxada
Manojit Basu	CropLife America
Terry Kippley	Council of Producers and Distributors of Agrotechnology
State/Local/Tribal Government	
Brian Verhougstraete	Association of American Pesticide Control Officials
Wendy Sue Wheeler	Washington State University
Federal Agencies	
Ed Messina (Chair)	Office of Pesticide Programs Environmental Protection Agency

NAME	AFFILIATION
Gina Shultz	Ecological Service US Fish and Wildlife Service
Kimberly Nesci	Office of Pest Management Policy US Department of Agriculture
Walter Alarcon	National Institute for Occupational Safety and Health Centers for Disease Control and Prevention

I N D E X

P R O C E E D I N G S

DAY ONE - NOVEMBER 13, 2024

MEETING LOGISTICS

JEFFREY CHANG: Good morning. Welcome to the members of the public, Federal Advisory Committee members, workgroup members, EPA, and other agency staff who have joined virtually. This is Day 1 of the November 2024 Pesticide Program Dialogue Committee Meeting.

My name is Jeffrey Chang, the Designated Federal Official for the PPDC and moderator for the next two days.

If technical issues arise, please bear with us. If you have any technical questions, please email Kevin Annas at A-N-N-A-S.K-E-V-I-N@epa.gov.

Accommodations, ASL, CART, and translation services are available.

In just a moment, I'll pass it over to the Director of the Office of Pesticide Programs, Ed Messina, to officially open the meeting.

Before I do, I want to go over some quick housekeeping items as we get started today. I want to draw your attention to the interpretation button on the bottom panel of your Zoom window to the right

of your screen. In just a moment, I will enable interpretation. Regardless of your preferred language, you need to click on that button and select either English or Spanish and mute original audio to be able to fully participate in the meeting. This will place you in either the English or Spanish channel. And as we anticipate a bilingual meeting today, it is important that you choose one of these channels.

For our Spanish-speaking colleagues, I will now turn it over to our interpreter, Jackie, who will provide these instructions in Spanish in the main channel.

(Spanish instructions.)

JEFFREY CHANG: Thank you, Jackie.

Closed captioning and live transcription is available to those who use the service by clicking the closed captioning button in the bottom panel of your Zoom screen. We also have an ASL interpreter today and CART provider. These services can also be accessed through the interpretation button used to select Spanish translation.

If you are a member of the public, you will be in listening mode for the duration of the event. Members of the public who have expressed

interest in providing comment during the registration period will have an opportunity to provide comment at the end of the day. If you did not preregister for comment, you may email me chang.jeffrey@epa.gov or use the raise hand function once we come to the comment period at the end of the day, and we will do our best to recognize you during the public comment sessions on each day of the meeting after we recognize those who signed up in advance.

PPDC and workgroup co-chairs are designated as panelists in Zoom, meaning that they can request to be recognized during the discussion session by using the raise hand function and can unmute themselves and activate their webcams after being called upon. It is important that you remain muted with your webcam off unless you are recognized to speak.

Today's meeting is being recorded for the purpose of having meeting transcripts and minutes produced. We ask that all presenters speak slowly and clearly to ensure that everyone can understand and participate fully in the meeting. This is also important for our Spanish translators.

Conversations should take place orally.

The chat function should only be used to contact meeting hosts.

Finally, as I recognize members of the PPDC and public for comments, I'll do my best to correctly pronounce your names, but I apologize ahead of time if I mispronounce your name and I ask that you please correct me in case that I do.

I will now hand it over to Ed Messina, Director of the Office of Pesticide Programs to give a welcome message.

Welcome, Ed.

MEETING WELCOME

ED MESSINA: Thank you, Jeffrey, and a very warm welcome to our PPDC members and members of the public who have joined today's meeting. Appreciate you showing interest in the work that we do in the Office of Pesticide Programs.

As many of you know, we have members from various organizations a great representative from industry, nonprofit organizations, universities, and many other associations who do their best to represent the broad swath of stakeholders that care about the work that we do here at OPP. And we appreciate that you are here and really interested in an open dialogue around the topics that are on a

really packed and wonderful agenda that was set by the PPDC members with their input.

I wish we were in person. As you know, as you'll see later on today, I've got some presentations to talk about OPP's budget for '24. We're still operating under a continuing resolution for '25. So we thought it was prudent to have this meeting virtually, although we do appreciate the ability to do in-person meetings and not ruling out a future in-person PPDC meeting. But as it stands, the budget picture for us to be able to support having this in-person wasn't -- we weren't able to do that for this meeting, although we have in the past.

And as Jeffrey will cover, we have a pretty full agenda today and tomorrow. I'm going to talk a little bit about today at the opening, after we do introductions, the Office of Pesticide Programs activities that occurred in '24. I'll talk a little bit about the PPDC charter and sort of, you know, why we are here today and the benefit of this Federal Advisory Committee and the conversations that ensue.

So as many of you know, the Office of Pesticide Programs is entrusted with the important

responsibility of ensuring that Americans are not exposed to unsafe levels of pesticides in foods, protecting Americans from unreasonable risk, educating pesticide applicators and others who may be exposed to pesticides, and protecting the environment, special ecosystems, and wildlife from the potential risks to pesticides. We are proud about the work that we do to help growers put food on people's tables and to ensure that the public is protected during those activities and while they're consuming those great products.

So in terms of PPDC, I'll refresh some of you and we have some folks that are newer to PPDC, sort of, you know, what is it and why was it chartered and what are we hoping to accomplish today. PPDC is what's called a Federal Advisory Committee. It was formed in 1995 under the Federal Advisory Committee Act. We generally refer to that as FACA. Congress passed the FACA statute in 1972, designed to create an orderly procedure by which federal agencies can seek collective advice from diverse customers, partners, and stakeholders. And the FACA establishes procedures for the management of the Federal Advisory Committees and ensures that there's transparency for the Federal Advisory

Committee's decision-making and ensures balanced representation. And through the procedures of our Designated Federal Official, Jeffrey, we've ensured that we have balanced representation on this Committee and appreciate the input from all the stakeholders that are involved.

PPDC supports EPA in performing its duties and responsibilities under many of the statutes that it implements, the Federal Insecticide, Fungicide and Rodenticide Act, the Federal Food, Drug and Cosmetic Act, the amendments to both of these, and major statute updates, including the Food Quality Protection Act, the Pesticide Regulatory Improvement Act, and the Endangered Species Act. And these are directly linked in the charter's objectives, scopes, and activities.

If you are interested in seeing the charter for PPDC, we have a website which has lots of great information about prior meetings. There's transcripts of prior meetings, there's presentations from prior meetings, there's agendas, a wealth of information for all of the advice that's been dispensed over the years from the PPDC.

Generally, there are different types of FACAs and we do participate in other federal

advisory groups, the Children's Health Advisory Group, the NEJAC, FRRCC. But PPDC is the premier policy-oriented committee for OPP that provides policy advice, information, and recommendations to EPA. PPDC provides a cooperative public forum to collaboratively discuss a wide variety of pesticide regulatory development and reform initiatives that involve public policy and program implementation issues.

There's lots of evolving issues that have been discussed over the many years, policies and science. So specifically, you know, resistance management, emerging viral pathogens, emerging technologies, environmental justice, climate change, endangered species pollinators. So there's a whole host of issues that are of importance to the many stakeholders that are representative of the Pesticide Program Dialogue Committee, which we'll start introducing.

So with this background and the charter in mind, I want to also give a little bit of background about some of the workgroups that you'll be hearing from today and tomorrow and a refresher about sort of the structure and how those workgroups are formed and why the Federal Advisory Group and PPDC benefit

from these workgroups. And I'd like to take a minute now, as I'll do throughout the sessions, of thanking the many volunteers that are on the sub-workgroups that are supporting the PPDC. Without these subgroups, we couldn't really get the information we needed on, you know, research-gathering and documentation and supporting documents and charge questions and really providing input to the PPDC to recommend to EPA policy changes.

So generally workgroups are formed to assist the Federal Advisory Committee with research information, as I mentioned, gathering information to help PPDC members make decisions, documenting prior decisions. And as outlined in the PPDC charter itself, the workgroups and subcommittees are formed by either EPA or with EPA's approval for any purpose consistent with the charter. The subcommittees or workgroups may not work independently of the charter committee and must report their recommendations and advice to the chartered PPDC for full deliberation and discussion.

So as the subcommittees discuss their topics, there will be some recommendations to PPDC members, either to adopt certain reports and submit them to the agency and -- you know, and PPDC is

really the entity that is charged with making those decisions with input from the subcommittees. The subcommittees or workgroups don't have any independent authority to make decisions on behalf of the charter committee and nor do they directly report to EPA.

So there were four PPDC workgroups in 2020. Over the many years of PPDC, there's been many workgroups, but there were four that were formed in 2020, that started late in 2020. These groups explored charge questions on topics related to emerging viral pathogens, emerging agricultural technologies, farmworker and clinician training, and pesticide resistance management. These are all pressing issues for the Office of Pesticide Programs and we are continuing to develop practical and protective approaches that work with our stakeholders based on many of the recommendations that were brought from these subcommittees through the PPDC memberships and continuing to implement many of those approaches.

The reports and the presentations, like all the materials for this session and past PPDCs, as I mentioned, are on our website, including the full transcripts of everything that was discussed

during that meeting.

In 2022, the PPDC voted to form the Label Reform Workgroup and the Resistance Management Workgroup Number 2 to handle three charge questions that came out of the original Resistance Management Workgroup. And you're going to hear from those workgroup members today and tomorrow. And at the fall 2023 meeting, the PPDC voted to reform the Farmworker Workgroup. So there was a farmworker group, it had been sunsetted. And then in '23, a new Farmworker Workgroup was established.

So what this means is the PPDC currently has four active workgroups, the Label Reform Workgroup, the Resistance Management Workgroup Number 2.0, the Emerging Pathogens Implementation Committee and the Farmworker Workgroup.

So the Emerging Pathogens Implementation Committee and the Resistance Management Workgroup are going to present their final reports after lunch. Members will have a chance to vote on the formal report submission to EPA and sunsetting the groups at their recommendation. So you'll hear from them. And the Label Reform Worker will give their update on the progress that they've made, which has been pretty impressive. And we will hear from the

Farmworker Workgroup tomorrow afternoon. Each session is going to be followed by a discussion amongst the whole PPDC, and we welcome active member engagement and direction to the workgroups and discussion, and then, ultimately, based on the workgroups' recommendations, PPDC voting on a recommendation for EPA if that is called for in those sessions.

So in addition to the workgroup updates, we have a lot of interesting sessions over the next two days. This is based on input from our PPDC members on suggested agenda topics. We're going to start off with the presentation that I will do, as is custom, on all the work that OPP has done the past year or since the last PPDC meeting. And we're going to talk about all the science and technology and deliverables that occurred last year, a pretty impressive number of deliverables as you'll see from the presentation.

And then we'll follow that with the discussion of the PPDC members. They can discuss amongst themselves any of the topics that were raised. Not generally an opportunity for Q&A for me. I prefer to have the PPDC members discuss the topics or, you know, make any recommendations for

future topics at the next PPDC meeting based on my presentation. And then we'll also have some time in the wrap-up for Day 2 to talk about what we'd like to do for the next Pesticide Program Dialogue Committee.

In addition to the workgroup updates and the Office of Pesticide Program updates, we're going to share some updates on endangered species activities, drone risk assessments, and biocontrol issues. So those were topics that were also added to the agenda.

So the PPDC has a history over these many, many years of engaging in these open dialogues and respectfully sharing different opinions with the goal of working together as a committee and providing advice to EPA. We are confident that the meeting today and tomorrow will result in really helpful feedback as it has in the past with many of the recommendations that come forward and with the implementation that EPA has taken on some of these recommendations, and really appreciate the time that PPDC members devote to this committee.

In particular, we want to thank the subcommittees for all the work they did to make this meeting successful. Thank you to all the folks

surrounding this meeting, including Jeffrey, our translation service folks, the administrative folks that are helping support the technology in the background to make this go as smoothly as possible.

Bear with us. If we do have any technological issues, we'll try to remedy them as quickly as we can. But we really appreciate everyone's time today and interest in the topics that OPP has before it and the policy and science issues and difficult questions that we have to answer on a daily basis and really appreciate the different perspectives that are part of this multifaceted group of individuals who are really, I would say, respected in each of their own careers and in their own right and really bring an amazing varied perspective, which helps the agency make better policy decisions. So appreciate your time there.

So with that, I will turn it back to Jeffrey. We will do our member introductions and then after that we will pick up with the agenda on the Office of Pesticide Program updates.

So back to you, Jeffrey.

JEFFREY CHANG: Thank you, Ed. Let's take a minute to walk through the agenda. In just a

moment, I will roll call members of the PPDC. After that, Ed will give an update on the Office of Pesticide Programs. Then we will break for lunch starting at 1:00, reconvening at 1:45 for an update on the Emerging Pathogen Implementation Committee and vote on their final report. At 2:30, we will hear from the Pesticide Resistance Management Workgroup and vote on their final report. After, we will receive an update from the Pesticide Label Reform Workgroup. At around 4:05 is the public's Opportunity for comment.

This is the only time we will hear from the public. As mentioned before, we will open the meeting up to those who signed up to provide comment and we'll get to as many of those who have contacted us during the meeting as time will allow before we adjourn at 4:30.

PPDC MEMBER INTRODUCTIONS

JEFFREY CHANG: Now, I will roll call members of the PPDC. I will call these in alphabetical order by first name. The list of members will be shown on screen. When I call your name, please unmute your microphone and tell us your name, role, the organization or group you represent and their mission. And as a reminder, please mute

your microphone when you are finished.

First up, we have is Alanna Bares.

ALANNA BARES: Hi, I'm Alanna Bares. I am a public health medical officer with the California Environmental Protection Agency's Office of Environmental Health Hazard Assessment, and my team, we do education and outreach on the health effects of pesticides, mainly focusing on clinicians and nonclinicians. Thank you.

JEFFREY CHANG: Alexis Guild, I believe she's out today.

Alexis Temkin?

ALEXIS TEMKIN: Hi, everybody, I'm Alexis Temkin. I'm a senior toxicologist with the Environmental Working Group, which is a nonprofit organization. We're based in D.C., and we work on consumer education awareness on health effects associated with pesticides, as well as research on pesticide toxicity and exposure.

JEFFREY CHANG: Anastasia Swearingen?

ANASTASIA SWEARINGEN: Hi, I'm Anastasia Swearingen, the Executive Director for the American Chemistry Council Center for Biocide Chemistry. We are a trade association representing antimicrobial pesticide registrants, and our mission is to promote

the safe use and regulation of antimicrobial pesticide products in their various uses.

JEFFREY CHANG: Andrew Architect?

ANDREW ARCHITECT: Hey, good morning. Andrew Architect with the National Pest Management Association. We're a trade association based in Fairfax, Virginia that represents pest control operators, So those folks that do pest control in and around homes, businesses and food facilities to keep out rats and bedbugs and mice and those kind of pests that invade our structures.

JEFFREY CHANG: Anna van der Zalm?

(No response.)

JEFFREY CHANG: Becca Berkey?

ED MESSINA: Hey, Jeffrey. Anna was talking, but --

JEFFREY CHANG: Oh, sorry.

ED MESSINA: And Anna is off mute, but we don't hear you, Anna. I don't know if you're double-muted. Yep, I've done it to myself. Now you're off -- now you're on mute in Zoom. And maybe there's a mic setting in Zoom you might want to explore. Try now. No, still don't hear you.

ANNA VAN DER ZALM: Can you hear me now?

ED MESSINA: Yes.

ANNA VAN DER ZALM: Great. I'm so sorry about that. Yeah. So I'm Anna van der Zalm. I'm here representing People for the Ethical Treatment of Animals. I'm an advisor for the PETA Science Consortium International, and we're an international group of scientists working to advance reliable and relevant nonanimal toxicity testing approaches to protect human health and the environment. So thank you again for having me, and I'm sorry for that mix-up.

JEFFREY CHANG: Yes, just let me know if anyone's on mute.

Becca Berkey?

BECCA BERKEY: Hi, everyone. My name is Becca Berkey and I am in Boston, Massachusetts where I work at Northeastern University as the Senior Director of Integrative Engagement and Global Impact. But I'm here as a farmworker representative with my work with the Farmworker Health and Justice Team of Coming Clean, which is a national organization. And this specific working group, which includes farmworker advocates, healthcare professionals, health experts, scientists and attorneys, is really guided by the needs of farmworkers and the voice of farmworkers to really

campaign for better working conditions, stronger health and safety regulations, and reduce toxic chemical exposures for farmworkers.

JEFFREY CHANG: Bob Mann?

BOB MANN: Good morning, everyone. Bob Mann with the National Association of Landscape Professionals. Good to be with you this morning.

JEFFREY CHANG: Brian Verhougstraete?

BRIAN VERHOUGSTRAETE: Hey, you nailed the pronunciation. Good job. Brian Verhougstraete here. I'm the Pesticide Program Administrator for the Michigan Department of Agriculture and Rural Development. I'm also here representing the Association of American Pesticide Control Officials, AAPCO. We are the association made up of state pesticide regulatory officials throughout the states -- and also territories throughout the United States.

JEFFREY CHANG: Caleb Ragland?

(No response.)

JEFFREY CHANG: No?

Claudia Arrieta?

CLAUDIA ARRIETA: Hello, everybody. This is Claudia. I am in Cargill, working in Cargill. I am a pesticide applicator and also doing WPS training and my specific use for pesticides in

greenhouses and also R&D. Thank you for being here.

JEFFREY CHANG: Daniel Markowski?

(No response.)

JEFFREY CHANG: Daren Coppock?

DAREN COPPOCK: Good morning everyone. My name is Daren Coppock. I am the President and CEO of the Agricultural Retailers Association. We're a national trade association based in Arlington, Virginia, that represents the companies that work with farmers to help them grow crops.

JEFFREY CHANG: David Heimer?

(No response.)

JEFFREY CHANG: David Shaw?

(No response.)

JEFFREY CHANG: Hardy Kern? Oh, David --

HARDY KERN: I think David just came off mute as well, so I'll let him go.

JEFFREY CHANG: Got it. Yes.

DAVID SHAW: Sorry about that. Yes, David Shaw. I'm at Mississippi State University and I represent the Weed Science Society of America. WSSA focuses on promoting research, education, extension and outreach, activities related to weeds, providing science-based information to the public and policymakers and fostering awareness of weeds

and their impacts on managed and natural ecosystems.

JEFFREY CHANG: Hardy Kern?

HARDY KERN: Good morning, everyone. Hardy Kern, he/him, with American Bird Conservancy. I'm Director of Government Relations and I also oversee our Pesticides and Birds Campaign. ABC -- we just got a new slogan. We just rebranded so you might notice a new logo. We are dedicated to taking bold actions for birds and their habitats across the Americas, and our Pesticides and Birds Campaign specifically looks at ways to reduce the impacts of pesticides on birds and their habitats.

JEFFREY CHANG: Emma Torres?

(No response.)

JEFFREY CHANG: Eric Gjevre?

(No response.)

JEFFREY CHANG: Gary Prescher?

GARY PRESCHER: Good morning, everyone. I am here representing National Corn Growers Association. My journey to this committee started through the Minnesota Corn Research and Promotion Council, serving on the Discovery and Development Team, and then on the National Corn Growers Production Technology and Sustainability Teams.

The mission of the national organization

is to coordinate with state checkoff organizations working together to help protect and advance corn grower interests. Thank you.

JEFFREY CHANG: George Parker?

GEORGE PARKER: Good morning. George Parker. I am an aerial applicator from Idaho and I am representing the National Agricultural Aviation Association following in Damon Reabe's footsteps on the PPDC.

JEFFREY CHANG: Gina Shultz?

GINA SHULTZ: Good morning. I'm the Deputy Assistant Director for Ecological Services at U.S. Fish and Wildlife Service and I work closely with EPA to ensure that the registration of new AIs and new uses, as well as reregistration of existing pesticides are in compliance with the Endangered Species Act.

JEFFREY CHANG: Grant Morris?

GRANT MORRIS: Hi, my name is Grant Morris. I'm a potato grower from Washington State, and I'm here today representing the National Potato Council, which represents all potato growers in the country on federal issues in Washington D.C.

JEFFREY CHANG: Jill Schroeder?

(No response.)

JEFFREY CHANG: Joseph Grzywacz?

JOSEPH GRZYWACZ: Hey, good morning, everyone.

JEFFREY CHANG: Oh, sorry.

JILL SCHROEDER: My name is Jill Schroeder. I'm here as a Professor Emeritus of Weed Science from New Mexico State University, and I'm representing the Weed Science Society of America that David Shaw just discussed. Thank you and looking forward to a good discussion today.

JEFFREY CHANG: Joe Grzywacz?

JOSEPH GRZYWACZ: Good morning, everyone. My name is Joe Grzywacz. I am the Associate Dean for Research in the College of Health and Human Sciences at San Jose State University, and I sit on the PPDC in representation of both public health research and the implications of pesticides for public health, as well as for farmworkers themselves. It's nice to meet everyone.

JEFFREY CHANG: John Wise?

(No response.)

JEFFREY CHANG: Karen Reardon?

JOHN WISE: Good morning, everybody.

JEFFREY CHANG: Sorry.

JOHN WISE: Sorry. Sorry for the delay.

I'm John Wise, trained as an entomologist, and representing the IR-4 Project in this meeting. Thank you.

JEFFREY CHANG: Karen Reardon?

KAREN REARDON: Good morning, I am Karen Reardon. I'm the Vice President of Public Affairs for the trade association Responsible Industry for a Sound Environment. And we represent the manufacturers, formulators and distributors of pesticides used by professionals and consumers in nonagricultural settings.

JEFFREY CHANG: Keith Jones?

KEITH JONES: Good morning. Keith Jones I'm with BPIA. We are the trade association representing the biopesticides industry.

JEFFREY CHANG: Kelly Bills?

(No response.)

JEFFREY CHANG: Kim Brown?

KIM BROWN: Good morning, everybody. My name is Kim Brown. I'm with the University of Tennessee.

JEFFREY CHANG: Kimberly Nesci?

KIMBERLY NESCI: Yes. Good morning, everyone. This is Kimberly Nesci. I am Director of USDA's Office of Pest Management Policy. We

represent the voice of the growers in regulatory conversations between EPA and industry and serve as a coordinator across USDA on pesticide regulatory issues. Glad to be here. And I'm here representing USDA.

JEFFREY CHANG: Ligia Duarte?

LIGIA DUARTE: Hi, everyone. My name is Ligia Duarte. I'm a Senior Director of Regulatory Affairs at the Household and Commercial Products Association. HCPA is a trade association representing companies that make and sell products used for cleaning, protecting, maintaining and disinfecting in homes and commercial environments. And our mission is to protect, promote and enhance the household and commercial products industry and the consumers and workers who use our members products. Thank you.

JEFFREY CHANG: Lisa Dreilinger?

LISA DREILINGER: Hi, everyone. Lisa Dreilinger, Global VP of Regulatory at Arxada. We are a global leader in preservation. Thanks.

JEFFREY CHANG: Manojit Basu?

(No response.)

JEFFREY CHANG: Marc Lame?

MARC LAME: Good morning, everyone.

Thanks for your participation. I'm Marc Lame. I am a professor at Indiana University School of Public and Environmental Affairs in Bloomington, Indiana. I'm a medical entomologist and have some knowledge of integrated pest management, which is something I've been doing for about 40 years. I'm here representing public health. Thank you.

JEFFREY CHANG: Mily Trevino-Sauceda?

MILY TREVINO-SAUCEDA: Yes, hello. This is Mily Trevino-Sauceda. I'm the Executive Director of Alianza Nacional de Campesinas. This is the National Alliance of Farmworker Women. We have 18 member organizations and all led by -- they're all women-led organizations. And another thing is that we're in 20 states, and by next year, we're going to be in 42 states representing farmworker women and their families around the issues of pesticides. Thank you.

JEFFREY CHANG: Nathan Donley?

NATHAN DONLEY: Hey there. Nathan Donley. I'm based in Olympia, Washington. I am the Environmental Health Science Director at the Center for Biological Diversity and we're an environmental nonprofit dedicated to protecting people and wildlife from pesticide harm. Glad to be here.

JEFFREY CHANG: Patrick Johnson?

PATRICK JOHNSON: Good morning, I'm Patrick Johnson. I farm in Tunica, Mississippi, grow cotton, rice, corn, and soybeans, and I represent the National Cotton Council on the PPDC. The Cotton Council represents the seven segments of the U.S. cotton industry. Thank you.

JEFFREY CHANG: Robert Nielsen?

ROBERT NIELSEN: Hi, my name is Bob Nielsen from Bedford Golf and Tennis Club. I am here representing the Golf Course Superintendents association of America, which represents over 20,000 men and women who manage some of the most critical community green spaces in the world. Thank you.

JEFFREY CHANG: Rosemary Malfi?

ROSEMARY MALFI: Hi, everyone. I'm Rosemary Malfi. I am with the Xerces Society for Invertebrate Conservation. I'm the Director of Conservation Policy. We are a national science-based nonprofit organization that's dedicated to conserving invertebrate species, which are essential for healthy ecosystems. I also have a background in research and pollinator health. And it's great to be with you all today. Thanks.

JEFFREY CHANG: Terry Kippley?

TERRY KIPPLEY: Good morning, I'm Terry Kippley. I'm the President and CEO of CPDA. That stands for the Council of Produce Producers and Distributors of agrotechnology. We are a national trade association located in Arlington, Virginia. We represent over 75 companies that are in the space of adjuvants or inert components that go into the formulation of active ingredients, as well as the -- post-patent companies that manufacture those products and distributors. We represent about 85 percent of the approximately $3 to $4 billion crop protection market in the United States. I grew up on a dairy farm in Wisconsin and ran a post-patent chemical company before coming on board at CPDA three years ago.

JEFFREY CHANG: Walter Alarcon?

(No response.)

JEFFREY CHANG: Wendy Sue Wheeler?

WENDY SUE WHEELER: My name is Wendy Sue Wheeler, and I am the Director of the Washington State University Pesticide Resources and Education Program. The organization that I represent is AAPSE, the American Association of Pesticide Safety Educators. AAPSE's mission is to enhance public health and the environment through involvement in

education, outreach, and research which directly benefits pest managers, policymakers, and public for nearly 2 million people across the U.S. This includes farm laborers, backyard gardeners to inner city and remote rural communities with education and outreach each year. It's great to be here.

JEFFREY CHANG: Thank you to the members of the PPDC for being here today and for your service to EPA. I will now hand it over to Ed Messina to give an update on the Office of Pesticide Programs. Thank you.

ED MESSINA: Thanks again, Jeffrey.

(Pause)

OPP UPDATES: RECENT ACTIVITIES, ACCOMPLISHMENTS, AND WORKLOAD METRICS

ED MESSINA: All right. So let's talk about what the Office of Pesticide Programs did in 2024, and sort of the structure of the organization and some of the amazing work that we completed.

All right. So we had a couple of additions to the Office of Pesticide Programs. With Mike Goodis' departure as the Deputy Director for Programs, we recently brought on board Elizabeth Vizard. She is now the new permanent Deputy Director for Programs. Leo Gueriguian was also made

the permanent Director for Management. He was brought on almost a year ago.

And Monique Perron continues to serve as a senior advisor -- Senior Science Advisor; Catherine Aubee, Senior Science Advisor for Endocrine Disruption Screening Programs, which had a very successful year in putting out policies related to that program in our renewed effort to carry forth the science there; and then Susan Jennings, our Senior Advisor for Public Health, who was instrumental in getting out the antifungal framework and the white paper last year related to ensuring that antibiotics and antifungal pesticides are reviewed related to any potential resistance that could occur in human drugs. So if you haven't seen that announcement, that's an announcement we did a little bit ago. And that's the immediate office.

There's other folks in the intermediate office of Office of Pesticide Programs. Steve Schaible, who's doing our PRIA work. We have good laboratory practices, so lots of activity occurring in the immediate office. Of course, the Endocrine Disruptor Screening Program, which is part of the immediate office in OPP. So just a couple of changes there.

Antimicrobials Division. Anita Pease continues to be the Director; Biopesticides Pollution Prevention, Madison Le is well known to the associations that that division deals with; Billy Smith, Registration Division; and then Anne Overstreet as Pesticide Reevaluation Division. She had come over from the Biological and Economic Analysis Division. So there was a vacancy there. And we filled that recently with the permanent hire of Don Wilbur, who is now the Director of the Biological and Economic Analysis Division. Neil Anderson had been doing an amazing job serving as both the Director and the Deputy. He has now returned to his role as the Deputy in that Division.

Jan Matuszko, Environmental Fate and Effects Division, and then Dana Vogel, Health Effects Division, rounding out the senior leadership within Office of Pesticide Programs. So just a couple of changes that occurred, wanted to make people aware of.

In terms of priorities, they were, you know, pretty consistent for ‘24. PRIA 5 implementation was top of the list, and we are continuing with those priorities. And for ‘25, we’re really trying to continue some of the

activities that are in PRIA 5 that ask us to complete many of the tasks that were accompanied with the additional fee money that was provided, and so really transparency, specifically transparency for registrants related to where their actions may be in flight and you know, due dates. We've, as you know, been upgrading our information technology resources and so we're hoping in the -- and we have been doing some transparency. I've got some slides that show that. And we're really trying to, in '25, focus on creating additional transparency for individual actions for registrants.

Of course, updating our IT is going to continue and was a big priority for '24. We are, as folks know within OPP, an office that relies on lean practices and continuous improvement. So we had a number of continuous improvement activities that occurred in '24 and we're looking forward to, as part of PRIA 5, having a third party come in and examine our processes to suggest ways to improve them and streamline them. And so we're hoping to kick that off in '25.

There's also PRIA 5 requirements that training for new OPP staff be pulled together by a contractor. There are set-asides for that. So

we've got a contract that's going to help us bring our materials together to ensure that OPP staff are receiving great training.

And then, of course, bilingual labeling, there's been a lot of activity in '24, and we continue to have that be a pretty big '25 priority where we'll start to see labels coming on board and tracking the extent to those labels being implemented and then also to the extent that those labels are making their way to farmworker communities that have access to bilingual labels for pesticides.

The other priorities, obviously, registrations, approving new registrations and then registration review. I've got some future slides on our progress there.

ESA efficiencies and progress on ESA obligations. We're having a whole session on that, so stay tuned for an update on all of our ESA activities.

Obviously, for '24, environmental justice, climate change, there were a couple of items that were related to spray drift assessments that relate to environmental justice, making sure that we're adequately accounting for any spray drifts. So

there were some activities that were tracked under those priorities. And then state of the art science, new science issues, PFAS, obviously an issue that we're tracking, Endocrine Disruptor Screening Program and new approach methods are some of the science topics that I'll cover a little later.

Other priorities, rulemaking guidance documents, the litigation that was occurring. There's a lot of litigation that's starting to be reduced a little bit, which is nice. And I've got some slides to show some of the impact of the prior litigation.

OIG, we've been pretty quiet lately in terms of open investigations, but there's certainly some implementation issues. We closed out an OIG investigation related to conditional registrations which was helpful tracking whether and how much we were doing conditional registrations, really having incentive to not do those where we don't have to, and that was in closing out of the corrective actions we completed for that OIG recommendation.

Petition responses continue to focus in triaging and understanding which of those petition responses are priorities. Obviously, the treated

seed petition response was a priority for '24, and there was recently oral argument held on our approach and response to treated seeds. We also had the Advanced Notice of Proposed Rulemaking for treated seeds. So that's related to our petition response priorities.

Obviously, digital transformation and then employee experience and organizational development. I even have a slide later on about one of the metrics that we're tracking of the hundreds that we get for our EBS scores.

So a pretty big volume of work came in last year. We had over 12,000 submissions that were received through our front end portal. This includes resubmissions as well. So when you break it down to just PRIA and non-PRIA actions, we received about 5,800 PRIA and non-PRIA actions. I'll say that the 12,000 submissions I think is -- I saw different numbers and we're still working on that, but I think it was almost 80,000 documents is what those 12,000 submissions represent. It's over 50- and somewhere near 80,000 documents that are related to that 12,000 submissions. So it just gives you a sense of the breadth of work that came in through our front end portal.

As I mentioned, 5,800 PRIA and non-PRIA actions received. And then we actually completed, for the first time in a while, more than we got in. So we completed 8,700 PRIA and non-PRIA actions, about 1,400 PRIA actions, including 428 gold seal letters, and then 7,200 non-PRIA actions. The PRIA actions were down based on historical numbers and the non-PRIA actions were substantially increased in terms of completions based on historical numbers. I've got a graph that will show that later on.

We still have a pretty big backlog. We have about 16,000 actions that are currently pending in our system. So when you think about the, you know, 12,000 submissions we got this year, the overall total number of submissions we currently are managing is 16,000. And that does not include resubmission. So it's a total of about 2,000 PRIA actions and 14,000 non-PRIA actions. So we've, you know, got a pretty big backlog still. But that backlog has been reduced, and I'll show a little later on how that our efforts in non-PRIA has reduced the backlog for non-PRIA actions.

We registered 20 new biopesticides active ingredients last year. The Biopesticide Division has a record number of new active ingredients that

they're managing, which represents a significant workload. So we're pretty proud about the fact that they were actually able to register 20 new biopesticides.

The Registration Division proposed two new conventional active ingredients that were compliant or that considered Endangered Species Act. So, you know, for the first time in many, many, many years, we are actually, you know, issuing new active ingredients that are considering Endangered Species Act review. And then one new active ingredient from Antimicrobial Division proposed so that they're -- you know, they don't tend to get a lot of new active ingredients, but we're pretty excited to propose through the Antimicrobials Division one new antimicrobial active ingredient.

We had 37 Section 18s last year. I think that goes to the nature of the emergencies that are occurring out in the states. So we're pretty proud about that work. That is above average. I think last year we had about 25-ish Section 18s. So this year represents more work for Section 18s. And then we also helped our regional folks out with reviews of products, about 80 products that were submitted from regional offices and state partners to

determine compliance with device regulations and determinations related to enforcement cases. So pretty proud about that work.

Individually, just I'll leave these slides for your later viewing pleasure. But RD -- the next couple of slides are each individual Registration Division and how much work they did in '24. 5,500 PRIA actions -- sorry, 550 PRIA actions for the Registration Division. As I mentioned, the two new active ingredients. 100 new uses approved as well and then 445 PRIA new products and amendments, 26 inert actions, and then a record number of non-PRIA actions completed by RD based on lean process improvement approaches to look for ways to streamline our non-PRIA reviews as dictated by PRIA.

700 product chem reviews, 500 acute toxicity reviews, 28 efficacy reviews, 12 child resistant packaging reviews. They launched Salesforce in their system in September of last year and then continued to develop, and then we published the Notice of Availability announcing mitigation measures for pesticide-flexible packaging pouches, so one of the science issues that came out of RD.

AD, similarly, large number of actions. 335 PRIA actions including three new uses and three

Design for the Environment amendments, about 1,000 PRIA and non-PRIA acute toxicological chemistry reviews and then 110 PRIA efficacy reviews and closed out about 2,400 non-PRIA actions, including notifications and fast tracks based on our Salesforce metrics, which enables us to better track where the work is.

And then BPPD, 145 PRIA actions, 26 new active ingredient decisions, as I mentioned that occurred, 10 new uses, three EUPs, 38 M009 determinations, 27 new product decisions, and four biochemical classification decisions, and about 500 non-PRIA actions.

So how did we get all that done? We did it with the budget that we got from Congress. I'll give some folks a little deeper dive on, you know, some of the budget issues associated with OPP. This is something that PPDC members have expressed interest in. This is not me asking anyone to lobby Congress for additional money. This is just me articulating the budget that we've received and sort of some of the choices that we've had to make because of the decreased budgets that have occurred over time and just gives a window into, you know, with all the work we have, we sort of have to make

some choices, including having this meeting remotely.

So when PRIA 5 passed, the minimum appropriations level was raised up to $166 million. The ‘23 budget did have an increase from historical amounts to up to $138 million, but the ‘24 budget had a $6 million cut. The President’s ‘25 budget -- this is the prior or, you know, the current President, there’ll be a new President installed in January, so the ‘25 President’s budget was $175 million, so even above the PRIA minimum in terms of asking for resources for OPP.

And here’s just a graph that shows the prior minimum appropriations for PRIA was about $126 million. Over time, Congress had not funded that amount. So there was, you know, over many years, tens of millions of dollars of, sort of, you know, reduction that we received over those many years. And then you can see that in ‘23, the bump-up up to $138 million, still shy of the $166 million that was the PRIA number. And then in ‘24, our budget was reduced.

The other thing that’s impacting OPP in terms of dollars for our budget is we had projected about a $26 million fund from the PRIA fees, and

that was based on the increase that PRIA 5 had put in place for the individual actions, about a 30 percent increase. But what has happened is we've received less applications since PRIA 5 and the amount of money collected was about $17 to $18 million. So we've got another -- in addition to sort of having the $6 million cut from appropriations, we're sort of dealing with about a $10 million shortfall in what we had expected to be collecting from PRIA fees.

And so that's where some of the next slides will show the reduction in FTE if we hold contract spending constant and then where we expect to be with a 60 percent cut to our contracts budget to maintain the appropriate level of FTE. Since we've brought some folks on board and it's really hard to train individuals and we really value the staff within OPP and their expertise, holding on to the FTE is important for us, in addition to getting our work done.

The lack of the science contract support, though, is going to greatly slow down our ability to process applications because those contractors were sort of the first place where the information was arrayed in a manner that the OPP staff could access

it and sort of do a first cut so that the staff will be having to do that, which will, you know, greatly slow down some of the production flows that we have within Office of Pesticide Programs.

If you look at the projected, let's say, '25 budget as the same as '24, which depending on if Congress appropriates a continuing resolution, if they do that, then they'll probably do it at the '24 number. With increasing costs, that represents basically a 5 percent cut to our budget. And so you will see the FTE level that we can support in OPP dipping below 500, projected to go down to 460 in 2026. That is if we hold the contract levels constant.

What we intend to do is take a cut of, as I mentioned, a 6 percent cut to contracts, and that will enable us to have the FTE numbers about at the 557 level and going down to 540. The 557 was 2024. So we'll be dropping that number by about 30 FTE in 2025. We intend to get there through attrition. And so that's generally the number of folks that leave OPP each year and then we generally would -- if we were backfilling, we would usually hire 30 to 40 people and we would lose 30 to 40 people. So we will have a hiring freeze for '25 and also cut

contracts by 60 percent to address the budget that we are anticipating for ‘25. If those conditions change, then we’ll change our projections.

This is a more detailed chart to show, hey, Ed, why are your FTE numbers decreasing, even though, you know, you got some money in ‘24, that was higher than what had been previously given, going from ‘25 --you know, 125 million to 132 million. And the answer in this chart is that column that is just above the OPP Appropriations and Fees number, which is the first bolded number at the bottom in each column, and the row that is above that is the PRIA 4 maintenance fee carryover. And so we have been using that money in the past to supplement our ability to support a higher level of FTE.

As you can see from 2021 to our projected 2025 usage, that number is decreasing and has decreased by about $30 million. And so that is one of the reasons why, although some of the appropriations has increased, the FTE numbers for OPP is decreasing. So this provides a somewhat detailed flow of how the money comes in through appropriations, how we send the money to the regions and the states through the EPM and STAG funding,

some of the centrally funded accounts for IT that supports Office of Program Support and Office of Mission Support.

Then we get some additional money from the Endocrine Disruption Screening Program. We get our fees that we collect that are projected from the FIFRA fees, from all the pesticides that are currently in the marketplace, and then we have our projections for what we're going to collect from the new submissions under PRIA fees, plus that maintenance fee for carryover, and that gets you, in 2021, what amounted to $175 million total OPP appropriations and fees. And you can see that in 2025, that number has decreased down to $152 million, thus the decrease in FTE from about 600 to 543 and, as I mentioned, going down to 400-and-change with the contract cuts supporting a higher number.

We've also been paying a decent amount of money to settle the lawsuits. So in 2022, we paid about $300,000 in fees to settle the lawsuits. Those are attorneys fees after we indicate that, you know, we have completed the case and people seek attorney's fees. In 2023, it was a million dollars; in 2024, it was about $1 million; and in 2025, we're

projecting some of the cases that we recently settled about 1.2 million and counting. So you think about the hit we take there.

It's important, and I show this slide to understand that it is important for EPA to propose registration actions that are legally defensible where we have an argument that we have completed our Endangered X Species Act review requirements and also our Endocrine Disruption Screening Program requirements. So if we haven't completed those and people sue us on them and we don't have an adequate defense, then basically we'll be paying attorneys' fees for the cases that we lose. And this is the historical representation of what that's looked like for the last three years and projected for 2025.

This is the last slide I wanted to talk about in terms of budget, but it sort of represents another way of looking at the inflation-adjusted pesticide funding that has occurred over the years. So although there were some increases in PRIA 5 -- and we appreciate PRIA 5 passing early and appreciate industry's agreement to increase the per funding amount for each individual applications -- the total funding for OPP on an enacted inflation-adjusted number, which is that yellow line, has

actually decreased over time and that's because the costs of the computers, the lights, all the things that support the full-time employee and FTE, including salaries, has increased over time.

So when you look at the -- over time, you can see that the President's budget, that purple line, was generally decreased starting in 2017, started increasing in 2019, has been increasing in terms of the proposed President's budget. The enacted has been the red line that's been fairly flat over time. You can see the pre-PRIA 5 trigger in that green line and then you can see the PRIA 5 trigger going up to the $166 million trigger and you see the President's budget going above that for '24. However, the actual enacted in that red line has looked fairly constant with a bump and then a decrease. But that yellow line, which is the inflation-adjusted line, has actually been -- in real dollar terms, our budget has decreased since 2012 pretty consistently over those many years.

All right. Let's talk about all the things we did for PRIA 5. So there's a website that you can go to and visit and all the deliverables that are in PRIA 5 and how we've completed each one of them, you know, 20 or 30 different things that

are in PRIA 5 that I won't go into today.

Some of the highlights are putting out a PRIA annual report. We issued that in 2023. Reducing the non-PRIA backlog, there were lots of efforts there. I've got some charts that show what that looked like in reality. IT modernization efforts, bilingual labeling, launching the Vector Expedited Review Voucher Program, or VERV, and then the DER process implementation. So if you visit that website, there's plenty of information on all of our completions.

We had set-asides to develop and administer training to EPA staff. We're developing a grant program to compete in '25 and the contract, as I mentioned, that we're hoping to complete very soon. We had continuation of the existing cooperative agreements, including the Pesticide Safety Education Program cooperative agreement and new partnership grant for the National Pesticide Information Center. There were new set-asides for farmworker training, you know, about $10 million to support these programs, healthcare clinician training, and grant technical assistance cooperative agreements.

We requested stakeholder input on the

program design for both the farmworker and healthcare provider training grants. So that was well received. And then as I mentioned, we will be, in 2025, inviting a third party to audit OPP's procedures related to our workforce assessment and implementation.

The digital transformation continues. It was, I would say, you know, given some of the hiccups we had in 2023 with the servers going down and the backlog in the front end, we've still experienced some of that, but it's been reduced in 24, but still existing. And that's in part because we have some pretty old servers that need to be modernized and moved to the cloud with new software. That is a year-long project that is, you know -- still we're paying the debt, the technical debt that exists, you know, that is built over time for failing to upgrade these IT systems over many years. So we're finally tackling that issue.

We're hoping and, you know, there -- our big four categories for digital transformation include a new portal for registrants. Hoping to see some of that in the beginning of 2025 in January. There's been some discussions and there will be some kickoffs in December and there's already been some

conversations around this.

The e-CSF and e-label project, you're going to hear from the Label Team subworkgroup for PPDC about some of the, I would say, ground setting that's going to help us make an e-label successful. So those are really connected and it's something we want to continue in 2025.

DCI Modules, sending and receiving and tracking progress on information requests specifically related to the Endocrine Disruptor Screening Program, which enabled us to settle potentially. You know, we put out a proposed settlement of that case where they were interveners as well from industry. So we're hoping that puts us on a path to comply with the Endocrine Disruptor Screening Program and do that analysis.

And then improving our analytics, modernizing performance metrics, identifying the needs. I think the big topic on transparency for '25 is going to be the portal. But with the portal comes the need to understand, within the science divisions, how long their work is taking so that they can better surface that to the registering divisions, like RD, to understand how long RD might have to provide a -- you know, not a new PRIA

deadline because that was changed in PRIA 5, but, at least, some indication of when an expected completion date might be with some error bars around that, obviously, to take into account, you know, hiccups that occur along the way.

But our big focus is really going to be using the Salesforce system to implement that within the science divisions to provide industry with a better -- better information about when products might be expected to be due. And we've already provided some dashboards that provide some analysis on how long each of the individual PRIA codes are taking and how many of those things we have in-house.

So here's a timeline for some of the major transformation projects we are undertaking. I will say we did not put any new FY '25 dollars into our budget. We are only using '24 money. It is possible that we run out before the end of the fiscal year and it is possible we have some stop work. But we -- as you can imagine, we were already cutting the science divisions by 60 percent and the science contracts. So we didn't feel like we had additional money to put towards the IT development, even though it is important. We had some -- we're

just going to use the money that was Left over from 2024 to continue these major transformation projects.

So the big thing on the application experience, this is, you know, one of the four things. I just have this as an example of the various steps that occur. We have one of these for each of the four main areas. But we've got scoping requirements, gathering, deployment, and then deployment and redeployment. We're using agile development, so we're going to be putting out minimal viable products. They will be a first run at it and then we'll continue to take comment and iterate and improve on the system.

So, you know, the first time you see it, it may not be the best thing you've ever seen, but as people start using it and we're able to rapidly deploy and issue new updates, the functionality will improve over time. And as it has in many other areas where we've deployed these digital transformations, we just continue to add new functionality.

We were going to try to do, you know, eight to nine releases of new functionality for '25, but with the budget constraints, we're probably

doing maybe three to four releases for ‘25. So just an example of some of the impacts from the budget cuts.

All right. So here’s an example of some of the, you know, metrics. You can see there’s many, many dashboards. I just pulled out a couple. But what this is showing is the non-PRIA notification and amendments closed versus received in each quarter.

So starting in the most recent quarter, which is the fourth one of 2024, on the federal fiscal year ending -- it’s on September 30th -- you can see we, for the first time, did more non-PRIA actions than we received. So the green line there is above the red line. And that started happening in the third quarter of 2023, which is great news, and you can see that.

Before that time we could never do more than what we received. We always did less than what we received. So the backlog that exists for non-PRIA actions is actually the area that’s under the red line and above the green line, and you can see how we got a pretty large backlog.

Similarly, for PRIA work, it’s been up and down, but this is basically every quarter back to

the first quarter of 2020, ending with the fourth quarter of 2024. There was a number of quarters where we actually completed more PRIA work than we received. And you can see the slow downward trend of PRIA actions received. And you can also see the downward trend of PRIA actions completed as well. So that's slightly different from the non-PRIA work. But, you know, indicates that we're -- for many months and many quarters, we were actually completing more than we received for PRIA work. Obviously, you know, there's a backlog that exists.

And the next slide demonstrates this backlog and that the backlog is decreasing, but there's still a backlog. So you can see that in that top chart, total pending cases at the beginning of FY25 through FY21. So that was total pending cases. So the bottom yellow line shows in '21 we had 18,000 cases in-house that was left after we had, you know, received and completed all of our work. So the backlog was about 18,000 actions. That increased in 2022 to 20,000 actions and then '23 to 22,000 actions. So you can -- you know, the backlog was just becoming insurmountable.

And thanks to the efforts, process improvements largely focused in Registration

Division and also in AD and also in BPPD, we reduce the backlog or total pending cases that existed at the beginning of the fiscal year down to 19,000. And now in '25, we're down to 16,000. So a pretty substantial reduction. Still 16,000 pending cases, that's a lot of work. But you can see we're finally starting to reduce the backlog of total actions.

That is different from pending PRIA cases, where you can see starting in '21, it was at 1,400, and then over the years, it was about 1,500, and then '24 was 1,900, and now we're at 2,100 in terms of total pending PRIA cases at the beginning of the fiscal year over the last five years. But the total backlog is decreasing; the PRIA backlog is increasing.

And this is just another way to represent that. And really it was -- you know, the Salesforce data that surfaces some of this information, you know, we sort of knew it and we had some Excel files that showed us, you know, where these backlogs were. But, you know, when you visualize it as these are part of lean process improvement parts is when you visualize that data and you can really see, you know, where the backlogs are, where are the late actions, how do we clean out the backlog for late

actions, how do we focus. You know, RD did about 17 different process improvement techniques to reduce the non-PRIA backlog and pretty impressive work. And it's just shown in these charts pretty readily.

This is another way of looking at the total PRIA cases completed and the average days late. So when you look at 2020, we completed about 2,600 PRIA actions and the average days that those items that were completed were late was about 37 days past the PRIA deadline. We are now, on average, you know, we are completing less PRIA actions. So 2024, the 1,400 that were completed. And the average days late for those PRIA actions that were completed was 133 days late and so just another way. And, right now, in 2025, we've already completed 132 actions and the average number of days that those 132 actions accounted for was -- we were 154 days past the PRIA deadlines.

All right. So let's talk about, you know, what are we doing, what were some of the notable process improvement activities for OPP. As I mentioned, we reduced the non-PRIA backlog equated to, you know, 1,750 in '23 and 3,500 in FY24. Pretty impressive work.

BPPD also analyzed data from about 1,000

deficiencies in their 10- and 75-day letters and they cohosted an industry workgroup to provide information on common mistakes in applications to improve the submission quality, to hopefully, you know, improve the packages so that they can be successfully approved and there isn't time wasted on getting better packages, so one of the aspects that for that lean process improvement approach.

There's the label implementation program. It allows AD Reevaluation Branch to review and approve AD product labels with registration review label implementation all within the branch, allowing other branches to focus on the registration actions. So that was one activity that was undertaken.

There was the Tolerance Rulemaking Process and tracking updates that PRD implemented improvements to those tolerance rulemaking process and launched an internal tolerance tracking database creating efficiencies and consistencies not only across PRD, but the OPP divisions for tolerance rules.

I put this slide out here, too, because in terms of the workload, this is one of the questions from the EVS survey that is administered every year to all employees across government. This is OPP

slice of the answer to the question. My workload is reasonable and only, you know, just above 40 percent of the people who responded indicate that, yes, my workload is reasonable. So 60 percent of the folks believe their workload is unreasonable. That is way worse than EPA as a whole and we are also worse in terms of the office. So individually, OPP unfortunately wins the award for staff indicating that they have a pretty high workload and that their workload is not reasonable.

So you know, all of the process improvements, all of the IT upgrades that we've been undertaking, the goal has first been to help employees manage their giant workload, help the systems manage it in a way that takes the administrative burden of managing their workload off of their plates. And then as we continue to implement more automation within the system, things like automatic letter-generating techniques, we're hoping to, you know, increase the ability for staff to manage their workload.

So I included this slide just to give a snapshot of, you know, what is happening within OPP, you know, how incredibly hard the staff and OPP are working and the incredible volume of work that they

have to manage.

Pesticide Registration Review, obviously, one of our main priorities. We have a 2026 deadline coming up. As of September, end of the fiscal year, we were about 91 percent of the way done with the draft risk assessments and we're about 80 percent of the way towards final or interim decisions that remain.

So as you know, we -- this is a very public process. We do three different comment periods, the preliminary work plan, the draft risk assessment, and the proposed interim decision. And, obviously, as we are also administering and trying to address our Endangered Species Act obligations, there will be proposed biological evaluations from EPA and proposed biological opinions for the services, and then that will eventually get wrapped up into the Pesticide Registration Review cases and will hopefully, at some point, in cooperation with the Endocrine Screening Program, be able to issue final decisions. That's our goal at the end of the day, is to issue more final decisions.

And so this represents obviously a huge volume of work. You know, the draft risk assessments, the proposed interim decisions, the

interim decisions, all the science that goes into each of these voluminous documents, responding to comments, working with registrants to reduce risk where it's identified, mitigating labels where it's important to mitigate, and in some cases, removing uses that no longer meet the safety threshold for FIFRA or FFTCA.

In terms of our transparency, we continued to focus on following the law, following the science and being transparent about it. Last year, we did 83 OPP updates. It's in line with the increase in OPP updates we've done over the many years. Last year we did 96; the year before that was 66; and then our record COVID year was about 99 -- was exactly 99 OPP updates. But we continue with our transparency.

At the end of this slide deck is every OPP update that we published since the last PPDC. So you can look at those after I present it.

And these are some of the notable OPP updates we had. 4/24, if folks were following, we issued an emergency order to suspend the chemical DCPA to address hazards to unborn babies and pregnant mothers. So that was an emergency order. First time in 40 years that the agency had issued an

emergency order. We were working well with the company that owned this chemical, but we couldn't find a way to address the risks that were identified. And much of the time the uses that do get removed from labels -- and this happens a lot -- is worked through voluntary conversations with registrants which occurs through the PID stage, mainly for registration review.

So there's a lot of work that goes into managing the risks of pesticides and approving new ones and also looking at the existing ones to address any newly identified hazards.

We did additional sulfuryl fluoride safety measures as well to prevent deaths and serious injuries when people reenter their homes after necessary fumigations for infestations. We, as I mentioned, created new PRIA 5 funding opportunities for pesticide safety education. There was new bilingual labeling requirements that were updated. We published final revisions to the Worker Protection Application Exclusion Zone provisions. That was part of an Executive Order mandate. And we, as I mentioned, we completed the advanced notice of proposed rulemaking to determine how to regulate treated seeds.

We issued draft risk assessments for formaldehyde, final efficacy test methods for Legionella in cooling towers. We modernized our disinfectant lists. We reset the activation of the Emerging Viral Pathogens Policy to address Mpox and new outbreaks of Mpox in Central Africa and allowing Emerging Viral Pathogens Claims.

We expanded the human health spray drift analysis to new registration decisions, allowing the agency to provide human health protections to a wider range of pesticide regulatory decisions. And then, of course, in keeping with our desire to complete human health risk assessments for organophosphates, we completed an updated draft human health risk assessment for dimethoate and malathion.

We issued the world's first sprayable RNA biopesticide that is targeted towards a particular beetle. So that was a pretty notable science activity for BPPD and for OPP, the first registered one in the world. So there were lots of conversations with our international partners about this and that was put out in '24.

We had a federal advisory for beekeepers. Of course, we developed ESA approaches for

biopesticides as well. So in addition to the items that we frequently talk about and all the strategies, we've been also continuing to work on ESA for biopesticides as well.

We looked at, as I mentioned, many M009 determinations. Those are PRIA determinations where companies can seek input from the agency about the extent to whether something is required to be registered or not. So we had some documents around peak plant growth regulators, plant-incorporated protectants. We developed an interactive web-based tool for modified microbes working with USDA. We released two PFAS analytical methods to detect PFAS in pesticide products and we developed and published the interagency framework on antifungal and antibacterial resistance, as I mentioned.

Here's a bigger slide, more information on our endocrine work. Very proud of this work. In addition to doing the white paper, in addition to doing the strategy, we've updated the list of conventional pesticide active ingredients that have adequate estrogen and androgen data for humans.

We identified 111 conventional pesticides with updated two-gen reproductive toxicity or extended one-gen reproductive toxicity studies, and

then we continue to prioritize and actually where data is not obtained or we do not have, we issued 49 DCIs for the 23 Group 1 chemicals and Salesforce helped us do that. We were able to -- you know, new tracking system there. We hadn't been able to issue DCIs in, you know, a little over a year just because the old IT system that we had didn't support it and there were many areas that were broken. So rather than just fixing the old system, we developed some new functionality in the -- as part of the digital upgrade for Salesforce. That is an example of some of the automation that translates to all aspects of OPP.

There's an ESA update coming later on in the talk, so I'll leave this for further reading. But I'll just briefly mention herbicide strategy, insecticide strategy, Vulnerable Species Action Plan, work on our PULAs. We continue to do biological evaluations and we also continue to work on our strategy for Hawaii and then ESA guidance to registrants. But we'll have a further session on ESA later.

Also, IPM, an important topic, that our IPM center hosted eight webinars. We reached about 11,000 attendees and responded to about 2,800 calls

and emails related to integrated pest management. We increased the email distribution on IPM for folks that are interested to about 40,000 subscribers, and we've worked with industry on PRIA and non-PRIA information on the quarterly stakeholder meetings, and staff have participated in many projects and conferences on IPM throughout 2024.

And then there's a link to our working effectively with EPA's Office of Pesticide Programs. The PRIA coalition put that together for their members and we shared that with our staff for how registrants can seek to work more efficiently with the Office of Pesticide Programs. So we linked that and that was -- appreciate the RISE and PRIA coalition members for putting that webinar on. So a shout-out to the some of the stakeholder engagement that occurred in '24.

Lastly, crop tours, a very important part of OPP work, visiting growers where they are, you know, meeting them where they are and talking about their needs. We actually were able to -- there were 20 grow groups that showed interest. We were able to satisfy 17 of those. We sent 242 staff out on crop tours. 100 of those were local tours, so, you know, Maryland, Pennsylvania, you know, DC. So we

were able to, you know, use our travel dollars efficiently by doing local tours. So this was higher than last year. Last year was about 196 staff that we sent out. This year we were able to send out more. Lots of discussions around ESA challenges, which was great and -- you know, for some of the tours that we had.

Our budget next year is probably going to not allow us to support these important crop tours as much as we had. But we'll make sure we get to send folks out.

So some notable ones, we have the Rodenticide Tour hosted by the Colorado Department of Agriculture, Wyoming Department of Agriculture, the Wyoming Weed & Pest Council, and then EPA Region 8, Denver, Colorado and Douglas, Wyoming; the Florida Fruit and Vegetable Association tour in Fort Myers, Florida in March; September was the Wild Blueberry Commission of Maine in Bangor, Maine; and then June was the Aquatic Ecosystem Restoration foundation tour in Fort Myers, Clewiston and Orlando. We had the Michigan IPM tour in Southwest Michigan. There was the June tour, the North Dakota Grain Growers Tour that was in the middle there. We have the Snake River Sugarbeet Association in Idaho;

IR-4 in Pennsylvania; California Specialty Crops Council in Southern California; and then the Cotton Foundation in Memphis, Tennessee in August. So lots of great educational opportunities for our EPA staff.

So if you haven't already and you want to sign up for all the OPP updates, some of what I touched on today, but not all, hard to believe, there's still more to talk about, but I'll -- you know, I'll save some times for some time for a conversation around this, but please sign up for our pesticide updates.

And then at the end of this slide deck there's another 30 or 40 slides on the OPP updates that have occurred since the last PPDC meeting and a link to each one of them with sort of bullets on the various activities that OPP has engaged with.

So with that, I'll stop sharing my screen and open it up to a discussion of the PPDC members. Thank you for listening to me for so long. I apologize for the long presentation, but as you can tell, lots of incredible work, once again, for the staff within the Office of Pesticide Programs that I'm honored to be a part of.

JEFFREY CHANG: Thank you, Ed.

Now, the PPDC members will have time to discuss amongst themselves what was presented. Please use the raise hand function and I will call on you in the order that you raised your hand. Please state your name and affiliation again and just speak slowly for the translators. Thank you.

All right. First up, we have is Nathan Donley.

NATHAN DONLEY: Great. Thanks, Jeffrey. And thanks for the overview, Ed. And, you know, before jumping into a few things from your talk, I kind of want to address the elephant in the room, which is the election. And, you know, I know this is not the appropriate forum to discuss politics, and I certainly won't, as difficult as that may be. But, you know, being a federal advisory committee, we've all, to some degree, worked with federal employees in our work. You know, as many of you know, I have been -- I'm getting some feedback.

Yeah, I've been and, you know, I continue to be kind of critical of how the institution of OPP works and the decisions that are made there. But, you know, that in no way trickles down to the individual public servants who work there. Over the years, I've communicated with and gotten to know

many OPP employees that I know to be hard workers and very earnest people and who got into this line of work to genuinely make our society a better place.

And, you know, through no fault of their own, federal employees now find themselves in a position where they will be taking orders from the top down, almost certainly from people who think the Federal Government should be dismantled to some extent, particularly EPA, and that your job is not worthy of investing in or even retaining for that matter. And I've never been unfortunate enough to work in an environment that toxic before. So any words of encouragement I have are going to sound, you know, kind of desperately hollow.

But I just want to recognize the turmoil that's consumed your professional lives, your personal lives. You know, this is how you make your living and feed your families and the strain that you are all going through right now, you know, you don't deserve this and no one does. And for those of you who stay at the agency, who stick with it -- and I hope many of you are able to -- even though things are going to get really heated and maybe a little dark this next four years, you know, just

know that your presence and your work is important and it's valued by so, so many people in this country. So, you know, for whatever it's worth.

And, you know, jumping into some of the issues here, I really want to give EPA credit for its actions on DCPA. It was a really strong action and it was justified. I do want to offer one note. It took about 10 years from the original data calling that was issued to when the agency had decided to cancel and, meanwhile, future human beings in the womb were being harmed. And I just hope that the agency can reflect on what happened here and learn from it, and in the future when companies are cynically stringing the agency along with continued failure to provide much needed data, that the EPA enforce those requests in a much more timely manner because this didn't have to take a decade and it really shouldn't have taken a decade to accomplish.

And then I was hoping you'd touch on this in your talk, but you didn't. But I want to just mention something quick about atrazine and -- you know, clearly it's EPA's opinion now that 9.7 parts per billion is protective of aquatic plant communities in the water, and I strongly disagree.

But even giving EPA the benefit of the doubt here that 10 parts per billion is protective of aquatic plants, aquatic species, in general, are most certainly not. And this is not just my opinion. This is the consensus opinion of the 2012 Atrazine FIFRA Scientific Advisory Panel.

EPA asked the panel point blank whether a CELOC of 4 to 7 parts per billion was protective of aquatic animals, and the Panel unequivocally said that cannot be supported by the available data. So that was four to seven parts per billion. And now since the CELOC is going to raise to basically 10 parts per billion, there's going to be considerable gaps and protection for aquatic animals. And EPA now has to mitigate that harm in other ways. That's just kind of the consequence of having a really high water standard water quality threshold. And that doesn't even count the further ESA mitigations that are now going to be needed throughout much of the Midwest as well with this unprotective CELOC.

So I hope the agency is thinking about this. Fish and amphibians are getting hit hard by this poison and, you know, we need EPA to really do something about this here.

And one last quick thing, Syngenta's

request to suspend the Atrazine Ecological Monitoring Program is meritless, and I hope EPA will deny that request immediately.

That's all for me. Thank you.

ED MESSINA: Thank you, Nathan. Other comments from PPDC members?

Mily?

JEFFREY CHANG: Mily, you're welcome.

MILY TREVINO-SAUCEDA: Yeah, thank you, Nathan. The farmworker community is also very concerned. And maybe -- I mean, you opened it up, Nathan, so I'm just going to add a little bit. This is -- in its past administration -- and I'm sorry, I'm not going to name the person that's going to take over the presidency -- there's a lot of things that go in my mind when I think about that person, so I'm just going to say it.

When he had his past administration governing, there was a lot of issues that happened within our communities and there were several rules and regulations that were approved in 2015 to start under the Worker Protection Standards. And what his presidency did was -- or his administration did was, you know, turn back a lot of that work that had been done that the administration had approved in terms

of better regulations that would improve protection to farmworkers. And it went as far as lawsuits during that administration.

And, right now, this administration had to deal with -- and I know that EPA had to deal with many things that were just not dealt, in my view, in the right way. And we are concerned about what will happen this time, because if we already have a lot of issues that are happening with farmworkers, it will not only continue, but it -- we had acquired protections, we feel that we're going to lose some of those protections and we're kind of worried about that.

And I just wanted to include that I agree with everything that Nathan was talking about and feel that we will be here, we're not going to go, and we will be calling on things that we see that are not right based on the lives of human beings. And this is not just about farmworkers being poisoned within the workplace, which is already a lot, but also communities that live around agriculture, which have been affected many, many times and the nature has been affected.

So everything that you were talking about, Ed, was very important, and everything that EPA has

gone through and what workers from EPA or OPP will have to deal with with this new administration. So we're here and, in my case, I'm going to be around. Alianza is going to be around. We are going to be monitoring in all these places that I say we're going to be representing.

Thank you.

ED MESSINA: Thank you, Mily.

Hardy next.

HARDY KERN: Thank you, Ed. And I want to say thank you so much for the update. I'd love to echo everything that Nate and Mily have both just said in terms of thanking everyone at EPA, especially civil servants, for continuing to do such a difficult job. And I also like to give a special shout-out to all the work that has gone into Endangered Species Act compliance and the planning around that. I'm really excited to hear more about that soon and talk more about that.

And I've got two things for the wider group. Number one, with the -- you know, from a wildlife perspective and Endangered Species Act, there's been so much progress that's been made by EPA over the last couple of years with a ton of input from everyone on this call and everyone in our

communities and I think it's really important that we not let all that progress backslide, that we stay on top of it and make sure that the strategies that have been developed get put into place, that the front-loaded, front-ended, if you will, consideration of impacts on species are still what happens as we're registering and going through registration review.

I think there's a lot of ways folks in this group can work together on that, and I just think it's really worth all of our time and all of our interest to make sure that that stays where it is and also that we don't -- we can work together to find a way to make sure that OPP is not completely steamrolled and gutted in the future. I think there's a lot of opportunities for these groups to work together outside of these meetings as well to do that. So this is a great facilitation space.

And I wanted to ask in general if anyone else on PPDC with the field visits what that experience has been like and what would be the value in making a case for those keeping up, moving forward, because especially as we're seeing these ESA strategies rolled out, I think that could be a really interesting tool. So if anyone here has

insight on that, I'd love to hear now or, you know, you can shoot me an email as well, whatever you'd prefer.

Thank you.

ED MESSINA: Thanks, Hardy. I don't know if it was Kimberly or Anastasia who had their hand up first.

ANASTASIA SWEARINGEN: Kimberly was before me.

ED MESSINA: Okay, thank you, Anastasia.

KIMBERLY NESCI: I wasn't sure, but thank you, Anastasia, for noticing. And I don't know if you want to respond to Hardy's question about the crop tours, crop tour funding before I ask.

ED MESSINA: I'll probably -- I'll do a sum of kind of all the things that I've heard and give you my reaction.

KIMBERLY NESCI: Okay, great, thanks. So I'm hearing what people are saying, what Hardy and Mily and Nate have all said about important things -- things that EPA is doing that are really important to them and really are important, I think, to all of us. What I'm wondering is whether, considering the percentage reduction in FTE for OPP -- and I expect that there will be -- based on that,

there seems to be like that there will be a need for some things not to get done or some things not to be prioritized.

What I'm wondering is if, you know, even despite all of our different perspectives, if there are some things that we can all agree to that are important for EPA to maintain, to continue to happen. And I don't necessarily think we need to discuss that in detail at the moment, but it might be something that we think about all along for the course of the meeting because it seems pretty clear that EPA, if not OPP in particular, is not going to be able to get all of the things done that it has been doing to date.

ED MESSINA: Thanks, Kimberly.

Anastasia?

ANASTASIA SWEARINGEN: Hi. Oh, my camera's at a weird angle. Hi. Thank you so much for the update, Ed.

I just want to echo what the others have been saying about, you know, we continue to be so impressed with how much you are willing to engage with stakeholders and your openness to discussing these issues. I think it's a really challenging budget situation that's clearly not going to get

better. So I think Kimberly's suggestion about, you know, how can we come up with some things that are the most important for us to get accomplished is a great one.

From the industry perspective, you know, continuing to see those actions move through the non-PRIA and the PRIA process are top of mind for us and we really appreciate the engagement that the leadership teams have been having and talking about process improvements and ways that we can be supportive and help these things move forward. So just giving that perspective from industry and thanking you again for your presentation today and looking forward to the rest of the discussion with the other updates later today.

JEFFREY CHANG: We have Kim Brown on the line.

KIM BROWN: Hey, I'm sorry, I cannot find my raise hand function, but anyways I wanted to address the field tours and just say that we hosted -- the Cotton Council came and brought EPA folks here to Jackson, Tennessee, and we had a really great experience, great dialogue with them for a half a day. And then the year before we also hosted full SFIREG with some EPA folks here in Jackson and

again had great dialogue with ESA in particular. So, I mean, I've seen great communication from EPA and our folks boots on the ground, especially here in the mid-south, which I've been very thankful that we've developed those relationships with EPA and we would like to continue to see that.

Moving forward, I do understand the budget situation. But like I said, I can't say, Hardy, how great of an experience we had from our perspective as producers and as university folks here at Tennessee.

HARDY KERN: Thanks, Kim. That's really helpful. I appreciate it.

ED MESSINA: Any further comments?

(No response.)

ED MESSINA: Okay. I'll wrap up this session. I appreciate all the comments, I really do. I think on the atrazine piece, I would stay tuned, Nathan. Obviously, we've got some updates coming out probably in the next two weeks on atrazine. And as you know, everything we do is put out there for folks to see. So you'll see some activity on atrazine happening soon.

But my perspective is maybe slightly different from yours in that, you know, this is

probably one where we went out and we've had multiple SAPs on the levels and there was some prior history on atrazine related to which levels we -- you know, staff were sort of directed in the past to consider, and then we had litigation. So my perspective, although I'm not discounting what you're saying and your views, that this has been through a pretty hearty process and it's an important chemical and I think it should be. So it's had many years of science reviews and multiple SAPs and science.

So we will put something out in the future and you can comment on whether we got that right or not. And then, obviously, you have other avenues to pursue if you don't like what we did there.

I think on the crop tours, we will be doing some crop tours. Those will continue. So I don't want to leave anyone with the impression that we're not going to do any crop tours. Obviously, we'll have to see as the new administration comes in what their priorities are and budget resources. But, certainly, at the OPP level, we feel that they are very valuable for our staff and I expect that to continue. But just be on the lookout for some reductions.

And you'll have these slides, Kimberly, too. So if you've got questions about the FTE numbers, the one slide in particular is -- you know, there's the chart which has every year with actual dollar numbers in and then there's the actual graph that shows the reduction down in FTE. So folks will have that.

And then I the last thing I'll leave us with and wrap up this session is on changes in administrations, any change, whatever it is, creates stressors for anyone going through it. My approach and my conversations with staff is, you know, we're going brief the new incoming administration folks when they arrive. We're going to tell them all the great work we've been doing. We're going to see what policy changes they may want to make, and we will adjust.

We are charged with implementing the statutory requirements that Congress provides for us. So to the extent that those statutory requirements continue to exist -- and there's no expectation that they won't -- you know, we're going to have to meet those obligations.

As I sit here and think about what was mentioned, the Endangered Species Act, my approach

there has always been to have a workable solution that protects Endangered Species Act and also has to be implementable for growers. And I know as we've been on this journey, there's been examples of where that has occurred and there's been examples of where, you know, growers have been nervous about their ability to carry out, you know, these mitigations that we're putting in place.

I'm really proud of the work that occurred to get us to the place we're in. My hope is that all the stakeholders who are impacted in these new approaches will continue to be vested in ensuring that they continue and continuing to work through the implementation of these policies so that they are workable. If it turns out that folks don't think it's workable, then I'm a little concerned about a total reset. But that's just my -- sharing my own personal thoughts.

I will have a new boss, and I will be happy to work with that person, let them know the great work OPP is doing. Folks have asked if I'm sticking around, and I have no intention of leaving at this point. What I've said is I've got to get a new boss, and my boss has to like me and I have to like my boss. And then at the end of the day, you

know, I will work with whoever's in the chair and try to present them with the best advice that I can provide. And that's kind of where I'm at, one day at a time. And I think most staff are sort of taking that approach.

I've also worked under the prior administration as well. So, you know, we were really involved in all the COVID response activities during the past administration, prior to this one that we're in now. So, you know, we'll see. I appreciate everyone's thoughts. Everyone is thinking about the change, but we're all professionals here and we're happy to work with whoever's in the chair and we'll continue the professionalism that OPP has and continue to follow the science, follow the law, and be transparent about the actions that we're doing, as an example of the meeting that we had -- this group today, that sits here today and the discussions we're having now.

So appreciate all the thoughts. Hopefully, that answered some of the questions that were out there. And then I will kick it over to Jeffrey and we will reconvene with lots more discussion and great activities for the future

meeting.

JEFFREY CHANG: Thank you, Ed.

So that concludes our first morning session. We are going to break for a 45-minute lunch. But before we do, I need to give you some Zoom instructions.

During lunch, please mute your mics, but don't click the "leave meeting" button. In other words, just stay in Zoom on mute. This will ensure that everyone gets back to the meeting on time.

So let's break for lunch and come back a few minutes before 1:45. Thank you.

(Meeting recessed for lunch.)

JEFFREY CHANG: So welcome back, everyone. I hope you had a good lunch. Our next session is the Emerging Pathogens Pathogen Implementation Committee. We will hear from Tajah Blackburn, Senior Scientist, Antimicrobials Division in OPP; Anastasia Swearingen, Senior Director of the American Chemistry Council; and Rhonda Jones, CEO of Scientific and Regulatory Consultants, Incorporated.

Welcome all.

EMERGING PATHOGEN IMPLEMENTATION COMMITTEE UPDATE

TAJAH BLACKBURN: Good afternoon. This is Tajah Blackburn. I'm going to share my slides.

Will you please let me know when they're visible on your side?

JEFFREY CHANG: I can see them.

TAJAH BLACKBURN: Fantastic. So we'll get started.

Good afternoon. My name is Tajah Blackburn, and I'm the Senior Scientist in the Antimicrobials Division's Efficacy Branch at the EPA. Additionally, I serve as one of the three chairs of the Emerging Pathogen Implementation Committee, EPIC, along with Rhonda Jones and Anastasia Swearingen. This afternoon, we will provide our fall and final EPIC update.

Are the slides advancing on your slide?

JEFFREY CHANG: I'm still seeing the home slide.

TAJAH BLACKBURN: Okay. There we go.

Before we plunge into the workgroup updates and information, I want to highlight the EPIC core members. These individuals have served for a minimum of two and a half years, some as long as the former Emerging Pathogen Workgroup's existence. These members served in technical roles with other supporting technical experts, contributing tirelessly through amazing

collaborations, which I refer to as these nerd-out sessions, generating recommendations and technical documents that will assist the Agency for decades to come. Thanks again, core members.

Through the next couple of slides, I will provide the background and timeline of events; I will briefly share the genesis of the current workgroup; then each workgroup chair will provide their respective updates and closing recommendations. I will highlight some of the high-level Emerging Pathogen Workgroup and EPIC accomplishments and then, lastly, we will pose two motions to PPDC for a closing vote.

In the fall of 2020, the initial workgroup was conceptualized and proposed to PPDC by the Centers for Biocide Chemistries. The original proposal envisioned a group charged with conducting a retrospective analysis of EPA's antimicrobial response to the COVID-19 pandemic. From concept to reality, the formation of the official initial group, Emerging Pathogen Workgroup, EPWG, occurred in December 2020, with the first official meeting in January of the following year.

The initial group consisted of 20 individuals from the regulated industry, academia,

trade associations, regulatory and technical consultants, the transportation industry, and the Centers for Disease Control and Prevention, CDC. These 20 members were dedicated to addressing four charge questions through biweekly meetings over the span of two years. At the workgroup's sunset, greater than 85 recommendations were given to EPA AD to consider, prioritize and, if adequately developed, implement.

Within the Antimicrobials Division, we prioritized all 85 recommendations and the results of this exercise were presented in the spring 2022 PPDC meeting. During that same meeting, PPDC voted to, number one, form a new workgroup to refine, develop, and provide a pathway for implementing the recommendations and then, secondly, to expand the focus to other antimicrobial pathogens.

So with this vote from PPDC and then the ask to expand the antimicrobial landscape, the Emerging Pathogen Implementation Committee was formed in July 2022 for a two-year commitment with an extension for an additional six months.

The current workgroup, EPIC, as part of their final action, submitted their final report with recommendations to PPDC in October of 2024.

We'll now hear updates and final recommendations from the Policy Workgroup, followed by the Technical Workgroup, and then finally the Education and Communication Workgroup.

Anastasia?

ANASTASIA SWEARINGEN: Thanks, Tajah. Are you driving the slides?

TAJAH BLACKBURN: I am doing it. We'll see if it's successful or not.

ANASTASIA SWEARINGEN: Thanks so much. Well, before I start, I just want to thank Tajah and Rhonda for just being excellent co-chairs. This has been such a pleasure to work on this, and I am both happy and sad that we are recommending the sunset of this committee because it has been so fruitful.

So the policy workgroup, you've heard us present previously about some of the recommendations to address a few of the challenges that came out of the Emerging Viral Pathogens Committee. So we are looking at the first issue, which is that one of the struggles for users of -- or those who are looking for products that might be eligible for the Emerging Viral Pathogens Policy to work against one of these emerging viral pathogens is that it's difficult for the user to determine whether a product is eligible

for the EVP policy at the point of sale.

And so we talked about that in the previous committee that Rhonda -- or, sorry, that Tajah mentioned and explored in this Policy Workgroup what are some solutions that could address the concern from the user community that you want to understand what product would work against a pathogen at the point of sale with the practical implications of not wanting to necessarily put something on package once the EVP expired. So we looked at the QR code as a potential solution for addressing both of those issues.

And with a QR code, a single QR code could direct a user to a menu of options, such as the bilingual labeling under PRIA 5's requirements. So you could get the Spanish labeling information that you need or you could also get the information on whether a product would be eligible for the Emerging Pathogens Policy activation. And so what we're recommending here is that a QR code could be a pathway to have EPA-approved language in response to the EVP activation without having to put anything new on label because the registrant can change the information available at the QR code link in response to whether an EVP is activated or

subsequently sunset.

So if we move on to the next slide, the other issue that we identified in looking back from what went on during the COVID-19 pandemic is that there was some struggle with the Section 18 submission process and training for those who are submitting Section 18 applications in response to a nationwide public health emergency. And so as we looked through and discussed the available tools, including the excellent training programs and modules that already exist for Section 18 applications, the Section 18 checklist, we looked at how could this be better tailored to future public health emergency submissions under the Section 18 process.

And our recommendation here is that EPA could provide an addendum to the Section 18 checklist to assist applicants during public health emergencies. What we noted is that they are very tailored right now to agricultural pests or other regional outbreaks where a Section 18 application is needed. And if there are resources that allow, which we know from Ed's presentation is likely not in the near future, but should EPA resources and grants allow, we do recommend updating the existing

Section 18 emergency exemption training modules with a module that would be specific to public health emergencies and the information needed to provide there.

So with that, that concludes our Policy Workgroup recommendations. So I will turn it to Rhonda.

RHONDA JONES: Thanks, Anastasia. I'm super excited. Tajah, go ahead and roll it to the next one.

To give you our final update, also very sad, as Tajah mentioned, I had the pleasure of working with this esteemed group of scientists and registrants and academicians to bring a lot of those 80 items -- we're focused on the technical pieces. So this is the team that has worked tirelessly for two and a half years, all excellent scientists and more than willing to negotiate and duel over a lot of very challenging gaps in the literature and that type of thing to bring the final recommendations to you. So many thanks for this honor and to each of these folks for their time over this period of years.

Next. So my team really had two responsibilities. One was to take the existing 2016

Emerging Viral Pathogen Policy and take all of those 80-some recommendations from the prior learnings from COVID and address those and revise that policy. And with EPA's permission, we just went directly into a red line of that policy so that it was as easy as possible to transition into a future policy. And then, lastly, we went about building four new policies for bacterial sporeformers, mycobacteria, fungi and yeast, and bacteria.

Along the way, this particular group of folks could not help themselves and wanted to provide additional recommendations which we grouped in your final report into a sixth appendix. And those are recommendations that range from fixes that need to be made inside the test methods, better test strains, just all manner of scientific types of recommendations for EPA to consider as time and resources allow in the future.

And it also provided some statements where we felt the literature trended in a direction of support, but maybe was insufficient so that we could say to the agency, if you are really in a pinch providing an appropriate supply of these products to meet the need, here are some other areas that on a case-by-case basis you might consider extending

further beyond the published policy. And I'll show you that in a minute.

But as you can see, all of the items are done and have been submitted in the final report and we await EPA's vetting and publication of those recommendations.

Next. So for those of you who may not be familiar or new to PPDC this term, the way the existing policy works is the policy is directed at registrants who own these registrations and are adding claims to them. And it is a voluntary path to preregister for a future emerging pathogen that might face us. It allows the agency to take a look at the standardized claim template, and the scientific studies that are on file are being submitted with the action and decide that there is appropriate scientific studies to support these future emerging pathogen claims. And we do that by organism-by-organism structure.

Claims are strictly off-label in the current policy. Anastasia spoke a minute to the QR codes. We're hoping to, in the revisions, tiptoe towards being able to have some point of sale QR codes that would provide this information. But as of today, it remains an off-label type of claim.

The claims can only be activated by a registrant once EPA has done their research and triggered the pathogen policy. This takes place formally at the webpage that was developed in response to comments that were made in the earlier working group.

There are currently five items on the list and we actually just expired our first one and we've had some items extended. So that website has become sort of the central processing place to find all of this information. So we can see there when EPA has determined the triggers have been met and the strain has been sufficiently identified, it will be transmitted via surfaces or per use. And that's also, again, as I said, where EPA will tell us when to halt the use of claims. They're generally granted for two years and then the EPA goes through a process of deciding if it should be extended or not.

Once the strains become available for testing, then it's up to the registrants if they voluntarily want to go ahead and do the testing and file a submission and actually add claims on the label. And this could happen during the EVP two years if the strains become available that quickly. Usually it takes longer to get the strains available

into the laboratories, get the testing done, get the submission reviewed, get state registration, et cetera.

So this is a pathway that allows us to be prepared for future emerging pathogens without having to wait a two- or three-year period for testing or registration.

Next, please. So here's a list of all of the changes that were recommended for the Emerging Viral Pathogen Policy. Expanding the surface type, so the existing policy is only for general and healthcare disinfectants.

Currently, we are proposing extending to hard and soft surfaces, fabric surfaces, laundry, food contact, nonfood contact, sterilants, residual products as well.

We have also expanded the eligibility criteria. So in addition to viruses of greater stringency supporting the emerging pathogen, we're also suggesting sporicidal data could support that as well.

We've expanded the communication language. We've allowed it to be in a table form and given some additional options to the original policy.

Of course, the web page was developed as

the central communication hub and that's already actively happening.

We are proposing the QR code or equivalent sort of on-label link to these kinds of communications so they can be there at point of sale.

We have urged the agency to expand their consideration and not wait for these new emerging pathogens to come geographically to our soil, but to look for things that threaten us that are not here yet. And we already see them doing that in the actions they've taken over the last couple of years. But we're proposing the text and the policy to align with that.

We have also expanded the policy from the standpoint of the regulatory authorities that EPA can rely upon and look to to help them do the investigation of the strain to identify what the structure is, to identify whether it's transmitting via surfaces. This included USDA relying on the CBC Health Action Network alerts, things like that.

And then we updated the registration process to reflect what is being done today. And we produced a number of templates so the review can be as standardized and as fast as possible. So

standard cover letters, standard terms of agreement, standard master label language, et cetera, to try and make it as-efficient-as-possible process,

Next. And then we launched -- using that viral framework, we then launched into the other four microbe policies. And much of -- as you've had a chance to look at your final reports, much of those documents are the same. The registration process is the same between all of them. Really the core of what changes is the scientific hierarchy. And I'll give you some tables in a moment to kind of show you where the team netted out. And then, of course, we have our general recommendations report as well.

Next. So this is an example of the Viral Policy. There is a table in every one of these policies that basically show you existing registration categories. These come from our 810 Efficacy Guidelines. Products may or may not have all of these claims, but we reviewed the methodologies and the organisms that these claims are built on and we pulled in all the published literature that could be found.

Our folks at USAMRICD shared a lot of internal Department of Defense data. They also

hooked us into UK Department of Defense data on spores. And CDC brought a lot of their unpublished data. And it was just a great collaboration of the current contract labs that do this testing and have for decades, the registrant companies that have labs that do this types of testing, and everybody just equally shared this mountain of information and data on what they had seen, where the exceptions were, where the gaps were, and where there was really strong confidence that a claim out of this registration category could support a future emerging pathogen. Again, it's all based on organism structures and cell walls and that type of thing.

So just a quick visual on these charts, anywhere you see green, these are areas where we are making the recommendation that these claims can support future emerging pathogens. Sometimes there's some footnotes here, sometimes they're only supporting half of a category of microbes. So you have to really read into the details to see that.

Next. I'll just run through, this one is the one that was made for bacterial sporeformers. So these are Bacillus, Clostridia, Clostridiodes. In this particular case, you can see we've expanded

to show three different surface types. So because the testing involved allows you to look at hard, nonporous surfaces, hard porous surfaces, and soft surfaces, when those test carriers have been tested, we have expanded the recommendations to include all of those surfaces.

So again, the green spaces are where we had strong published and expert support to make a recommendation to you. You will see some probably-too-small blue print here to really look at. That was my way of indicating to you where the group made a case-by-case recommendation to EPA. So the blue items would not go in the published policy, but EPA would have those sort of softer recommendations that we believe the data trended towards a support for this, but we're a little hesitant based on the amount of data to make our full recommendation that it go in the policy. But it's something EPA can have in their hip pocket should they see that the supply is not keeping up with the demand for these type of products.

Next slide. For mycobacteria, again, a nice amount of green there and some of the blue recommendations for case-by-case. We did monitor the number of active registrations in each of these

rows and try to really look at that, although that's not a guarantee that a product is available and ready for sale and has been through state registrations. But where there were a few there we really pushed ourselves to try and make more recommendations and case-by-case recommendations, so if we did have a national emergency, the demand would meet the need.

Next. Again, same format for fungi and yeast. Just wanted you guys to have the whole set. As you can see, we're actually going in harder-to-easier-to-kill order as we go through these and so are the tables. You can see as we get to the easier-to-kill organisms, there's more and more green as you go down the table as well.

Next. And, lastly, bacteria so you can see, again, same kind of setup for this and this is all detailed out in the appendices in your final report as well.

Next. So where do we go from here? EPA has all of these draft policies all written in the draft form similar to the one that's posted now. So they will go through a vetting process. The viral revisions, I think, started being vetted last year and that may be closer to done and we're hopeful

that that is coming soon. It had to wait because it relied on citation to a Viral Sanitizer Claim Policy that was just published two weeks ago. So we're hoping it's coming in 2025.

EPA will need to post each of these documents we're recommending for public comment. However, for the Revised Viral Policy, the group is recommending that that be published for immediate use while comments are being taken, whereas the others, due to how novel they are and as they haven't been out there before, we're recommending, first, public comment and then finalization of policy. So those are the three steps that really are now on EPA's shoulder to do as resources allow.

Next. So here was the Group's final four recommendations to you. Number one really is to vet and publish the Revised Viral Pathogen Policy so that we are ready for the next emerging viral pathogen, which seems to be more routinely what we are facing, and also just the statement on taking public comment, but to publish it for immediate use while the public comment period is taken.

The second recommendation is, as I just stated, to take the four other micro policies and publish them as drafts for public comment and then

move to final comments after considering the public's input.

The third recommendation is this is likely going to take some time to get through five of such substantial documents with periods of public comment, but that PPDC would maybe consider requesting an annual update on the progress of each of these five as we move forward.

And then, lastly, that EPA or PPDC should think about creating a process to periodically reassess these policies, you know, perhaps on an every five-year loop, relook at the literature and people's experience. Also, to add new test methods that are coming down the pike, but to basically have this period of being able to refresh this policy and learn from the pandemics and add in all the new things. So that is where the Technical Workgroup has netted out.

Tajah, I'm going to hand it back over to you and say, again, many thanks to Tajah and Anastasia for their support and this team of amazing scientists that I was able to work with.

TAJAH BLACKBURN: Perfect. Well, I'll take us home.

The Education and Communication Workgroup

members contributed their time to interviewing sectors where antimicrobial products are used and condensing that information into products, resources, and additional recommendations and the recommendations in this final phase of the workgroup's operation.

Unlike in the earlier phase of this workgroup's existence where deliverables were really measurable, this workgroup faced hurdles in the development and implementation of actual education and communication resources.

Just briefly, this workgroup assumed the mantle of gaining information regarding the charge question, What education is needed during a pandemic or other emergency for the public, end users, and other regulating authorities?

In the workgroup's first operational year, we gathered specific information from a broad range of sectors that use antimicrobial pesticides to better understand the specific education and communication gaps. From the information-gathering phase, most of the aha moments resonated around four recurring themes regardless of sector. We prioritized the two middle points as the central focus to address during the last operational year;

that is, dispelling the confusion and misinterpretations around disinfectants and sanitizers through generating tools that would bridge the literacy and language gaps.

Building these resources proved to be significantly challenging. We sought out stakeholders who use infographics or pictograms on a daily basis to better facilitate using their products and clarifying product differences. These joint stakeholder discussions were successful regarding cobranding, but in the remaining time, unfortunately, we could not resolve the legal issues concerning cobranding as an option, which leads us to to this workgroup's final recommendations.

And these recommendations are expanded more in the actual report, but, just briefly, the recommendations center around developing tools to address sector gaps by generating infographics and pictograms to mitigate literacy and translation issues; expanding translation of current and future documents into multiple languages; facilitating and encouraging development and cosponsorship of training documents and centralizing those documents for ease of access and use; incorporating pictograms and infographics into existing emerging viral

pathogen-related resources, especially when depicting viruses associated with Tier 1, 2, and 3 claims; developing descriptors around porous and nonporous surfaces and indoor and outdoor uses when current descriptions are not intuitive; requesting EPA address the frequency of antimicrobial use per sectors through hyperlinks and/or joint trainings; creating opportunities for joint training and codevelopment of resources and tools where jurisdictional confusion exists; and then, lastly and similarly with the Policy Workgroup's recommendation, expanding opportunities to use QR codes for training and education at the point of sale for better-informed product selection.

In closing, I am always excited to highlight some of the high-level accomplishments across the initial Emerging Pathogen Workgroup that fed over into the Emerging Implementation Committee Workgroup as well.

The first one is the landing page. That landing page centralizes all EVP-related resources. The next accomplishment would be the Spanish translation of EVP-related resources. Third, the proposed revisions of the EVP guidance with expanded features for viruses and other microbes; the

continuation of EPA and stakeholder engagements through process efficiency proposals and future products; and then, lastly, an entire compendium of technical documents to assist EPA in preparation for future microbial emergencies and even steady state operations.

So in closing, there are two final motions for consideration. The first motion is to sunset the workgroup and then finally to accept the report that was provided by EPIC to PPDC. So, Ed, I'll turn it over to you.

ED MESSINA: Thanks. Great presentation. So we can open it up for discussion for the larger PPDC group and then we can see if there's any motions and seconds and we can kind of vote on the things you'd like us to vote about. So reactions from PPDC conversation?

JEFFREY CHANG: Lisa.

LISA DREILINGER: Thanks. Obviously, I was on the group. I just want to say thank you to Tajah and Rhonda and Anastasia and to all the members of the group and all the hard work that went into the recommendations that are presented today. I think they are going to make a real difference in how we operate in the future in terms of emerging

pathogens and other crises that will come up. So I just wanted to say thank you. I'm looking forward to the vote today.

ED MESSINA: Other discussions?

LIGIA DUARTE: Yeah, I just wanted to chime in as well and say thank you to the workgroup and the workgroup leaders. This is really great work. HCPA is supportive of the recommendations that have been put forward forth and we're also looking forward to the vote. Thanks, everyone.

JEFFREY CHANG: Kim Brown.

KIM BROWN: Yeah, I just want to say one thing. This is a very impressive document. Whenever we -- in regards to education, just as a brief reminder, extension is a big part of across the country for an educational standpoint, of course. I was just skimming through some of the educational stuff. I just want to make a reminder that we are there, you know, pesticide safety educators. I know we did a lot during COVID originally. And so just as a reminder, don't forget about extension. We're a good resource for education.

ED MESSINA: Okay. Having given time for discussion and seeing that no more hands are raised,

is there a member of the PPDC that would like to put the Motion Number 1 to the floor? Lisa?

LISA DREILINGER: I'll put the motion to the floor, yeah, and request the motion that we, the PPDC, vote on submitting the final report to EPA OPP for consideration.

ED MESSINA: Thank you, Lisa. Is there a second?

ANASTASIA SWEARINGEN: I'll second that, Ed, if that's all right.

ED MESSINA: Definitely all right as long as you're a PPDC member, which you are.

Okay. Any further discussion needed, please raise your hand.

Seeing no hands, I will ask those in favor to raise your electronic hand, and Jeffrey will tally the votes.

JEFFREY CHANG: Yes, please keep them up. I will count as best as I can. I have 21 so far.

ED MESSINA: That's the magic number you need, right?

JEFFREY CHANG: Yes. There's 42 members, so...

ED MESSINA: Oh, you need 22 then.

JEFFREY CHANG: Okay. Claudia says raise

her hand and -- okay. Twenty-three.

ED MESSINA: Okay. So the motion passes. The report will be submitted to EPA from the PPDC. Everyone can lower their hands.

Is there someone who would like to propose another motion from the PPDC?

LISA DREILINGER: I'll motion again, the motion to PPDC to vote to sunset the EPIC Group.

ED MESSINA: Is there a second?

UNIDENTIFIED FEMALE: I'll second.

THE COURT: Time for discussion. Please raise your hand if you'd like to discuss.

Kimberly?

KIMBERLY NESCI: Sorry, I thought we were voting.

ED MESSINA: Yep. Oh, you jumped the gun.

KIMBERLY NESCI: I did.

ED MESSINA: Any hands for discussion? Seeing none, we will take a vote on the second motion presented of sunsetting the EPIC. All in favor, raise your hand.

JEFFREY CHANG: Yep, keep them up. Twenty-three. I think it's the same 23.

ED MESSINA: With 23 members indicating approval, we have a majority, so congratulations.

The Emerging Pathogen Implementation Committee has been sunsetted. Thank you.

Let me echo everyone else's thanks. I know this group was very energetic over multiple years of stamina, so really appreciate all of the work that went in. And I think it's also important recognizing that the original group that helped the agency develop an Emerging Viral Pathogen Policy was the sole reason as to why we were able to react so quickly when the pandemic happened recently. So if we didn't have that policy, we would not have been in the position that fortunately we were to react.

So all of the folks that have historically been on this group, the agency owes you a debt of gratitude and the American people owe you as well for your work on this topic and continued work throughout the years. So thank you.

TAJAH BLACKBURN: Thanks, Ed.

ED MESSINA: Back to you, Jeffrey.

PESTICIDE RESISTANCE MANAGEMENT #2 WORKGROUP UPDATE

JEFFREY CHANG: Let's now pivot for an update from our Pesticide Resistance Management Workgroup Number 2. For that we are joined by Nikhil Mallampalli, Biological and Economic Analysis Division in OPP, and Cameron Douglass, USDA Office

of Pest Management Policy. Welcome.

CAMERON DOUGLASS: Hi. Thanks, Jeffrey. I think I was the only -- Nikhil is not a panelist today, so I think it's just me and that should be fine.

JEFFREY CHANG: Okay. And just remember to speak slowly when you're presenting.

CAMERON DOUGLASS: Sounds good. Hold on one moment, let me --

MARC LAME: I'm here for you, Cameron.

CAMERON DOUGLASS: Thank you, Marc. I appreciate that.

All right. Can everyone see my slides?

JEFFREY CHANG: Yes.

CAMERON DOUGLASS: All right. So today, we are here, myself and Nikhil, who's in the background virtually, to represent our final report from the second iteration of the PPDC Resistance Management Workgroup.

Before I get too far into the brief details I'll present today, I wanted again to thank all the participants and members of our workgroup. We had a relatively small workgroup, but I think we accomplished a lot in the two to two-and-a-half years that we operated. I was also very proud that

we had a very diverse and representative group of stakeholders, including folks from academia, also several other government colleagues, several growers and/or crop consultants, at least one representative from a nongovernmental organization, folks from the pesticide community and also from the retail community. So I think that these diverse perspectives really helped inform the breadth of our recommendations.

A little bit of history, much like EPIC, we have been operating or we have been working, some of us, on resistance management since about 2020. In 2020, the first Resistance Management Workgroup was approved and began working for PPDC. About a year and a half later, they submitted their final report with five recommendations that broadly suggested EPA take a more proactive role in resistance management.

At that PPDC meeting, PPDC members wanted that work to continue and for another workgroup to flesh out some of the first workgroup's recommendations and suggest some improvements on implementation specifically. So in the fall of 2021, PPDC voted to form the second Resistance Management Workgroup, which is the group whose final

report you'll be considering today.

At the last PPDC meeting in May, we presented our final report and I won't go into a lot of details today on that final report, since we've already provided that more detailed presentation, but, very broadly, this workgroup was dealing with three charge questions, again furthering the work on developing implementation strategies for EPA, developing pesticide resistance cost-benefit analysis frameworks and exploring leveraging IPM.

The workgroup -- and this is detailed in our report, which you should all have a copy of -- had roughly 14 specific recommendations along four themes. The first, in response to the first charge question, was strengthening partnerships both within and outside the Federal Government, including through the creation or reappropriation of existing resources for a resistance management coordinator within OPP.

The second theme was to integrate resistance cost-benefit assessments into EPA's decision-making on pesticide registrations. The third recommendation theme was to improve work with external stakeholders on the rigor and transparency of pesticide resistance data. Lastly, the workgroup

recommended that EPA explore opportunities for removing regulatory barriers to alternatives to conventional pesticides.

Following our presentation in May, several PPDC members representing the antimicrobial product community voiced some concerns with the broad scope of the report and the lack of representation from experts from that community. We had a chance since the May PPDC meeting to meet with those PPDC members and others from that community and we had a very constructive, positive meeting. So I really appreciate their feedback and their very constructive advice. We discussed their concerns and working with those PPDC members, we have now added a new brief section at the beginning of Section 1 of our report.

Here's that new addition in its entirety. I'm not going to read this whole thing because you can read it in your report. Essentially, this new addition to the report clarifies that the scope of the recommendations only apply to pesticides whose uses are regulated by the Biological and Pollution Prevention Division, BPPD, the Pesticide Reevaluation Division, PRD, and their Registration Division, RD. So they are not intended to address

resistance issues related to products solely regulated by the Antimicrobials Division or AD.

This language was satisfactory to the PPDC members who had voiced concerns about the scope. So I think the report is in a much better place now and I'm optimistic about the outcome of the vote that we will recommend today.

Because our report sort of carves out these antimicrobial uses, we did sort of include a little bit of caveat in our report and/or prompt for further discussion by PPDC either at this meeting or at a future meeting, where PPDC could consider a few approaches towards trying to account for resistance management for these antimicrobial products.

I'll actually start with Option 2 because it sort of represents what the status quo is now, which is that there already is considerable work by the antimicrobial community on resistance management. And PPDC could simply allow that work largely outside of EPA, but also within EPA -- and I know that staff from AD are actively engaged in a lot of this work -- could simply allow this work to continue. If, however, PPDC wants to dive into this issue a little bit more, of course, they could vote

to form a new workgroup.

So this is the new addition to the report. Otherwise, the report was unchanged from the version that we presented in May.

And so at this time, we put forward two motions similar to those that you just considered for EPIC. We request that PPDC vote on submitting our revised final report with a new addition clarifying the scope of the report to EPA for their consideration. And, relatedly, we request the PPDC vote to sunset the second iteration of the Resistance Management Workgroup.

And that's all I had to present today. Doing my work to keep everyone on time.

JEFFREY CHANG: Thank you, Cameron. We can move into discussion. Does anyone have anything to add here?

Okay. So I see Patrick Johnson. I'm not sure if that was a legacy hand, but...

Oh, Anastasia.

ANASTASIA SWEARINGEN: Hi. I just wanted to thank Cameron for all the work to listen to our feedback and concerns and that we're really supportive of the revised final report and appreciate all those who were in the workgroup and

listened to us and had such a productive dialogue.

JEFFREY CHANG: Anyone else?

(No response.)

JEFFREY CHANG: Would someone like to motion to put forth the final report?

DAREN COPPOCK: Is it permissible to do both in one motion or do it in separate motions?

ED MESSINA: You can do it all in one motion if you'd like. Jeffrey, your thoughts?

JEFFREY CHANG: Sure. Yep.

DAREN COPPOCK: I would move to approve both of those motions.

JEFFREY CHANG: Okay.

KIMBERLY NESCI: I second.

JEFFREY CHANG: Thank you. Okay.

ED MESSINA: And just for the transcript and the record, Jeffrey, if you want to read the motion into the transcript and then we can take a vote.

JEFFREY CHANG: Yep. So the first motion is to submit the final report from the Pesticide Resistance Management Workgroup Number 2 and the second motion is to sunset that workgroup. So we're going to vote now on both those motions.

Please raise your hands and keep them up.

Twenty-eight. I'm seeing 28. Great. So the motion passes. Thank you.

ED MESSINA: Thanks, everyone.

All right. Looks like we have some time, Jeffrey. Do you want folks to reconvene at 3:05? Is that where we're at?

JEFFREY CHANG: Yes. The Pesticide Label Reform Workgroup is supposed to present at 3:05. Since we are a little early, do you guys want to present at 3:00 instead, Michelle and Sarah, Lisa?

UNIDENTIFIED FEMALE: Sure.

JEFFREY CHANG: Okay.

UNIDENTIFIED FEMALE: Yep. That's fine by me.

JEFFREY CHANG: Okay. So return at 3:00 then, please.

ED MESSINA: Thanks, Jeffrey.

JEFFREY CHANG: Thank you.

(Meeting break)

PESTICIDE LABEL REFORM WORKGROUP UPDATE

JEFFREY CHANG: We are at our last session for today. This will be the Pesticide Label Reform Workgroup. And this will be led by co-chairs Lisa Dreilinger, Arxada; Sarah Hovinga, Bayer; and Michelle Arling, Office of Pesticide Programs.

Welcome.

LISA DREILINGER: Thanks, Jeffrey. Thanks, Sarah and Michelle, and thank you to everyone for giving this opportunity to us to update on the Label Reform Workgroup.

I will, of course, start by thanking Sarah and Michelle and then going through the agenda and just a general thank you to everybody who serves on this group. Michelle's going to share who that is specifically, but it is a very passionate group of individuals that I am proud to be a part of. So just a general thank you, since I'm not going to be doing that slide.

Michelle, can you go to the next slide?

Awesome. So really quick, the agenda for today, we are going to tag team this presentation. Michelle is going to share the workgroup information, the members, who they are, how often we're meeting and, of course, how we're collaborating. Sarah and I -- oh, I think Michelle will also go over the charge questions, and then Sarah and I will go over the short-term proposal on their structured label.

I think Michelle will also share who we've been meeting with. We've been meeting with some

external partners and I think it's really important for stakeholder engagement to understand what others are doing in this area. And then, of course, we've been looking at what the optimal electronic experience looks like, ideally starting from scratch and hoping that we have no predetermined expectations. And so we want to share the outcome of that exercise with everyone. And then, of course, we have recommendations and next steps.

So I'm going to pass it to Michelle.

MICHELLE ARLING: Thanks, Lisa.

As Lisa mentioned, our workgroup is very big and very committed. So on the screen you'll see a list of everyone who's participating, and then I'll go to the next slide and let you see the makeup of our workgroup. It really represents diverse stakeholder groups across a lot of different sectors and interests, and this group does an exceptional job of working really well together and listening to different viewpoints. So it has been a good experience.

Next up, we've shared this before and updated it for this meeting, but here are the timeline and tools that we're using to work together. So we meet weekly on Thursdays for an

hour and we've been doing so since we formed the workgroup last summer. So it has been lot of work and a lot of commitment from the workgroup members. So I'll echo Lisa's thanks to them. So we gave you an update at the last few PPDC meetings, and our target is to get our completed recommendations to you at the next meeting in the spring. And then we stay in touch and collaborate with each other using a Teams site.

The next thing is the workgroup charge questions and these we've presented to you before. They're the same questions we presented when the workgroup was chartered. Overall, we're working to develop recommendations on digital labeling, the labeling process efficiency and consistency, and adoptability. We're doing this by focusing on a few charge questions, both short and long-term questions around the submission and approval and technology used for labeling, and then questions around the content and accessibility of labeling for users and reviewers.

So the last thing I'm going to cover right now is one of the things we've spent quite a bit of time on since we met with you last. We have been doing a lot of information gathering on existing

technologies and how they're used. We reached out to all of these groups and asked them to come and talk to our PPDC workgroup about what they do and how they do it in terms of providing label information to users or accepting label submissions from registrants.

So we got a variety of perspectives and learned a lot about that experience -- of those experiences and used that information to move forward with what we'll talk about later the rest of our time since our last meeting was spent doing.

And, now, I will turn it over to Sarah to talk about structured labeling.

SARAH HOVINGA: Yeah, thanks so much, Michelle. And you may remember from spring of last year -- Lisa will give a brief peek at that after I'm presenting on this -- but one of the first steps to get really quality label information on the other side, for example, with the end user community, is to really ensure that there's quality information and a quality process from the very beginning. And so this is really the idea of starting with this short-term label structure approach.

And what I'll walk through here is a little bit of what you heard, but then I think it

will be reemphasized with some of the new information that we're presenting today. So really recommending to EPA for consistent data elements, so those individual pieces of pesticide label data elements, and that will become a little bit more clear what we mean there in the order of the data elements. So that's really what we mean when we talk about structure, where some of these standard or mandatory phrases, pick list options, and/or controlled vocabulary would really begin to standardize pesticide product labels. And really this short-term approach is to have an initial goal of improving that label creation, review and comprehension because of the pieces going into it.

So some of the concepts that we've learned with going through this process and will be presented here today is really that all pesticide products do share and should share a common set of data elements under FIFRA. And this data element is really the starting backbone to what could be utilized for the structure of all pesticide products. However, because there are different types of pesticide products, those will differentiate in some of the different details either for specific data elements that might be

unique for certain pesticide types or the details of those similar data elements. And so they will have some different templates or modules for different pesticide types, again utilizing the common backbone among them all.

So we can go to the next slide. Just a little bit of progress of what this group has done relating to this short-term approach, so you saw the antimicrobial structure in the spring. I'll go over briefly the conventional structure that the group worked on as examples of what I just mentioned in terms of the data elements being identified, where users can really find guidance on what should go in that data element, be it Code of Federal Regulations in the Label Review Manual or perhaps a PR notice; where possible, you know, really identifying where there's some efficiency improvement possibilities like pick list, standard or mandatory phrases, controlled vocabularies or interoperability with other databases.

We know things like, you know, bilingual labeling, ESA, and other projects like that are starting to get some of these other databases. So that's really what that's speaking to. And, also, where there's data elements with potential

placeholders to minimize the review time on the EPA side, and for an example, areas where there's QR codes or websites to be representative there.

And really what this group was able to do -- and we'll get to a slide showing a little bit more of the detail there -- was to start to compare the structures of now what we have two of them, the antimicrobial and also the conventional structures using agricultural products as an example to really understand this concept of common and unique data elements.

And so what would be needed to progress on this work is utilizing other pesticide types to understand how these might also differentiate according to their unique attributes, but also where there's common data elements and incorporating that learning into the minimum set of the common data elements and then also utilizing the same exercise, basically going through and identifying options for that controlled vocabulary, but also understanding the governance.

So for example, you know, if you have a list of controlled vocabulary for crops, you know, who's owning that list, who's managing it, who's updating it and some of the data governance around

that and really checking with users to make sure that it's going to be working. And then, yeah, lastly, piloting this approach to really understand are these efficiency gains that we hoped to get out of this really paying off and also where can we have learnings for further areas of improvement.

So I have a couple slides going through this agricultural example of a conventional structure. And we don't have time on the call today -- I'll work with Jeffrey to actually get the structure on the PPDC website so you can go in and look there. But really this first bullet point, so the PPDC working group was -- expertise was really utilized to align on some of these major points.

So you see, you know, the information that is on, in this case, using agricultural products as an example and agricultural label and some of the sub-bullets under there. So general information that would appear on the front panel, first aid elements, precautionary statements, directions for use, restrictions and precautions, target site and pest use directions, the pests controlled or partially controlled, endangered species requirements, storage and disposal, and marketing claims. And so those are the big sections there.

And I'll get to the next bullet point if you don't mind going to the next slide, Michelle.

It's the same text, but it just gives you an example of a couple of these different data elements, because really the idea is going through -- and this is what you'll see in the structure if you go through sub-bullet by sub-bullet, again, you get to what was identified from the group as being important to flag for more efficient label creation from the registrant side and also review, because, again, if we can be aligned on what the common data elements are that need to be there and the guidance around what actually goes into that data element, it's going to make either side of either the submission or the review and then ultimately the label comprehension for what ends up being on the label more standardized.

So an example of a mandatory statement, you know, that shouldn't be open for human error, you know. Something like that has the ability to be auto-populated and also translated according to the needs, for example, of some of the bilingual labeling. You see the reference there for where that's looked at the guidance very clearly.

And then getting to the signal word,

again, there's the possibility for auto-population, you know, depending on the signal word, that could -- based on the controlled vocabulary, that's dependent on the toxicity category and, therefore, there's a certain icon that would appear under that signal word. And, again, you have guidance for where to get that.

And so just really highlighting these two as examples for what we're trying to get at. So really recommending that the agency is considering existing sources for this controlled vocabulary, standard phrases, required elements that really meet the needs for different stakeholders. And there's pieces that have already been worked on. So just looking to some of those past projects and learnings to potentially utilize the expertise and effort that went into those controlled vocabularies, for example.

And as I mentioned, the data governance around this, just ensuring there's updates happening, maintenance for these controlled vocabularies, and really with the idea that this is creating consistency across the labels that are submitted in the first place, minimizing that human error, also hopefully making the review process

easier because the data elements and the order of the data elements and also what appears in the data elements are more standardized and ideally enabling some sort of automation at the end.

So again, we'll work with Jeffrey to get this full structure on the PPDC website, so it's available, and going through bit by bit there.

So lastly, on the next slide here, I won't go into the full detail there, but it gives a little bit of appreciation for, again, this common backbone. So the colors, for example, so you have the antimicrobial structure on the left-hand side; you have the conventional agricultural example on the right hand side, and all the colors are just showing you where that data element is in either structure.

So those colored elements right there are really the common backbone, and you might have some elements that are unique to -- in this case, you know, Number 18 and Number 19 aren't found on agricultural labels. Hence, that should be consideration for antimicrobial-specific templates if someone's either submitting or reviewing that structure.

So getting into a little bit of the nitty-

gritty of the work, but I think this is the -- we think that this is the type of work that really needs to be done to understand, again, the common and unique elements of different pesticide types and that registrant industry groups could really be a source for this sort of information.

So that's the detail on that that I think we have time for today. But, again, we're open to feedback and questions on this because I know it's a lot of information.

So I'll hand it over to Lisa just as a reminder for what you saw last spring.

LISA DREILINGER: Thanks, Sarah. So this is the antimicrobial structured label. And I just wanted to take a minute and celebrate that in September, through our trades -- so a special thank you to CBC and Anastasia and Ligia at HCPA -- we had a joint meeting where we were able to go over the template and recommend its use and then get feedback on it. So we don't have feedback just yet, but we're hoping that the agency will start to see people and registrants using the template and then providing feedback on what worked and what didn't work.

We did not disseminate any pick lists or

anything with the structured template, only the structured template itself, which in itself is a win if it helps the agency find the material and the data elements and the order of the data elements in a consistent fashion helpful.

So we're hoping that this is a useful tool and that it will go beyond just the Antimicrobials Division, of course.

So once we pivoted from the short-term solution to what the optimal electronic experience might look like, we really had some fun with the group. We took all the members, which Michelle showed there are a lot of, and we broke into small groups. And then we really looked at each individual part of this experience, which we'll go into detail in just a moment.

As you can see, we've detailed the entire electronic labeling and product experience from submission of EPA all the way into enforcement and everything in between, including the part where registrants submit and EPA approves, and then how it goes to other stakeholders, like states. And then, of course, the final label container goes to the user and retailers. And then, of course, how do we make sure that the product that got registered

actually is what it says it is and does what it says it does? That's the enforcement part and, of course, commercialization.

So just a reminder that the process goes from left to right. We're going to go into detail on what the recommendations of the optimal experience is. The bottom is completely separate. We were also thinking about this in terms of our stakeholders. So we have registrants and, of course, EPA, states, and then, of course, you have your retailers, your vendors, label information and providers, and then, of course, your actual user of the pesticides.

So we want to highlight that although the -- sorry, the digital approach is recommended to be voluntary at first, we are hoping that we could incentivize users to adopt it. And we're going to go into more detail what that means, but we are just acknowledging that in order to make something like an electronics submission required, it requires a change in our current statute. And, right now, we've not tackled that part. We are just talking about what the overall experience optimally would look like and what it would do in order to build efficiencies.

Okay. Now, Michelle, you can go.

Okay. So the data needs to be fair. I should just take a step back and say these are overall system requirements, which we're then going to go into quickly because we only have 10 minutes, each and every one of those boxes and just highlight some of the discussions we had. So, overall, the data needs to be FAIR. That's findable, accessible, interoperable, and reusable. We're going to talk about what that means. But it was -- it's really important to consider how the data is going to be used and who needs to use it and who needs to access it and then what you're going to use it for.

The project, of course, needs funding and staff. I know we listened to Ed this morning. We know that's a challenge. But in order for this to be successful, we're, of course, going to need a commitment.

The structured content is important. We just heard our short-term solution, but we're hoping that we're able to take that short-term solution and what we put together and proposed for the short term would also translate into this long-term -- longer-term solution. And then, of course, that we would take that structured data element and then you could

use it with different platforms and different applications. And we compared this to email a lot. Where you could have Gmail or you can have Yahoo or you could have -- I'll date myself and say AOL -- and you can have -- it doesn't matter which system you're using, you can send anybody an email on any other system. So it's looking with, you know, a high level of compatibility.

Of course, we said this had to be voluntary for right now, but we're hoping to incentivize users and the agency with either faster reviews or lower PRIA timelines. And even if that isn't promised, we're hoping that the result of using this structured label and the electronic submission would just help the process go through faster. So the result would be faster review and communication and problem solving and collaboration.

Of course, we want to harmonize as much as possible with other authorities that are doing the same thing, and there are a number of them, including some that are international or within our own country. There are some states that have gone -- at least one state that I can think of has gone electronic. And, of course, we need to align with our stakeholders. It's critical that we meet the

needs of the states and the registrants and the users and the other stakeholders that, of course, are engaged on this topic.

So we've broken this into three big areas, submissions, EPA, routing the states, and then, of course, what happens with the user. So I'm going to focus on just the submission to EPA and, unfortunately, I'm going to have to go pretty quick. But we want to say we took a lot of thought in just thinking about the overall process, but we are really interested to hear feedback on if you think that there was something missed on the process or, of course, a stakeholder that you would like to add. We're still in the process of collating all the recommendations.

Of course, in order to -- the requirements we need to meet the EPA requirements. FIFRA-required elements must be met and, of course, the structured label must be readable and writable in order for us to appropriately communicate.

We would like the system to be two ways, which means that the EPA and the registrant could communicate through the system, which should speed things up, especially when you're talking about specific data. That would be in lieu of email, of

course, which is another option. But the system and talking about the documents directly might make things easier.

Of course, the system needs -- each data element needs to have a home on the structured label. We have been very intentional in not putting a miscellaneous section in. We want to make sure that both parties or all parties know where to find the information that they're looking for. And we felt that if we put a miscellaneous section in there, sometimes somebody would just use miscellaneous and not the individual data elements.

The system must capture, of course, the content of the master label with sufficient granularity. That is what Sarah was talking about on the structured template. So I'm not going to go into that much.

Of course, we talked a lot about pick lists and EPA-approved language, and there's an optimization potential with using approved language.

Of course, we want to minimize errors. You can make things mandatory so that there are certain fields that if they're not filled out, you will not be able to proceed with an automatic receipt confirming the submission of the file. Of

course, we think the system should have help and search buttons in case you need a tutorial on how to use the system.

The ability to request label changes in the system, that goes back to the two-way system. Being able to make changes by amendment or notification or non-notification in the system off of an approved label would potentially make things easier. And then, of course, you would have to submit a new application if you needed a new label. But there's still the ability to communicate through this system.

Next slide. Yeah. So when the EPA was reviewing, of course, we would like there to be a help desk that's reachable by phone or email, sort of an ombudsman-like communication on where the label is or where the package is if you can't see it. Hopefully, you would be able to see it in the system. Of course, we recommend that the tools that we have now would be updated to the digital system, like the Label Review Manual.

Of course, we would share initial and subsequent reviews by EPA, which means that the history of the package would be documented in the system so that you wouldn't have to have the same

conversations repetitively and that the decisions that were made after the discussions were had would be documented so that at least you could go back and refer, you know, and say, well, we just submitted this six months ago, we discussed it, and here's the result. And that would all be very easy to track and find. We're hoping that that optimizes resources.

Of course, the system should be built using modern technology. And I know we've had this discussion and we know the pictures that Ed showed this morning of the -- it's escaping me -- the modems and everything and, obviously, we need to go to the cloud and we need to upgrade the system. That was, you know, sort of what I picture when I think about this bullet. Of course, we need a modern system and we need it to be continually updated with the times.

We need to, of course, protect applicant and registrant communications with EPA from public disclosure, where appropriate, of course, meaning that there's certain content that's going to be shared that's CBI and it needs to remain CBI. So we need to make sure that that is protected. Of course, it would be nice to flag the different

complexity of different reviews, which reviews had to go to which stations and then which -- you know, if it just needed a chemistry review or a tox review or needed a total review that could be flagged in the system.

Of course, an app that was supported for use with third parties, meaning that we could communicate with EPA and enforcement and states and registrants and vendors could all talk on one system. And then the ability to export data to risk assessments and then, of course, determine label changes and different versions and have a compare tool so that you knew what was new and what was present before.

And then, of course, the stamp from the EPA -- sorry, Michelle. The document should be, of course, a single source of truth once it's stamped from EPA and then it should be a single source of truth that's used by all the other stakeholders once it's stamped until it's updated again. Of course, the tool could exist to pinpoint outstanding needs from the submission if it was a conditional approval or if it's missing a stability, for example, or anything. Hopefully, the system would be able to flag what requirements are still pending, if any.

Of course, it should incorporate version controls and tracked changes so that you can compare the document and, of course, define workflow and validation rules. That would need to be not only outlined, but then, of course, implemented and aligned, and ideally put in the Label Review Manual for everybody to -- or a guidance document for every everybody to be working off of this with the same ideas.

And then something that was really important and discussed a number of times is that PPLS and the capturing of the documents and the change of the documents over time is really important. So we would definitely want the database, either PPLS or something comparable, in this system to still exist. We think it's really important because that is a single source of truth and where people go now to look for the latest label that is public knowledge.

So I am now going to send it to Michelle to go through the states, the final label.

MICHELLE ARLING: Thanks, Lisa.

So moving on to the draft printed label or labeling, this is a subset of the master labeling stamped by EPA that moves to the next step of the

process where the information is put into a draft label that then goes through the state review and approval process.

So here we're talking about needs for the registrants and the states primarily. So definitely we need to have the data file functional across all state registration systems. Recognizing that some states are required to get hard copy files or PDFs, we'd like the option to also allow them to accept the data file and review it that way.

Because this should be a subset of the master labeling, the system should allow registrants at this phase to confirm that all the content on their draft printed label comes from the master label, kind of like a double check and then it reduces the chance for errors or missing information. Similarly, we want a mechanism to ensure all federally mandated content is on the label and then verification of the version used from the master labeling that produce the draft printed labeling. And that's just more for version control and tracking of versions of labeling.

So moving to the state review process, we want to have a system for states to check that all the content on the draft printed label came from the

master label and, again, that federally mandated content. We also talked about it would be really good to have a way for digital communication between the registrant, EPA and states, about any state requested changes to the master label. So this could be a two-way or a three-way system. It would be great if this system could track and allow the registrants to track which states have approved the product registration.

Again, Lisa mentioned the ability to flag the complexity of different types of reviews. If it's just a replacement of a graphic, that's different than a whole new use and it would allow the states to prioritize their work.

Supplemental labels and distributor product labeling sometimes are not things that are seen by EPA, but the states do review and approve. And so this system should allow for that to be included and then for verification of the contents of distributor product labeling against the parent registration.

And the last thing is to consider at this point the validation, sharing, and storage of the state-approved labeling with databases that kind of provide this type of service now, like NPIRS and

ALSTAR.

So moving on to the stamp from the state of this draft printed labeling, this should be a single source of truth for all subsequent versions of the printed container labeling. The tool should highlight any outstanding needs for submissions. Again, we're looking at version control and tracking the source of the original information. So we need to include a mechanism for version control and tracking changes, and the approved label needs to be stored in a database, ideally that's available to the public.

So the last thing I'm going to talk about is the final container labeling. So this could be combined with the user experience in that the final container label is what the user will see. And so we want to kind of marry the requirements for what needs to be on the finer container labeling with what the user needs to see. So there's a little bit of overlap.

We talked about the need to have simple language, clear and straightforward language for comprehension, as well as predictable structuring content, which we talked about earlier, with the structured static content, so that the users can

find information in the same place every time they look at a label.

In addition, at this point, any registrants who didn't have the ability to go through the digital submission and review process should be considered just to ensure they can provide a consistent experience. Then the system should allow mechanisms for addressing changes and mitigations and making information and uses available to users. So right now, for example, users have to check Bulletins Live! for endangered species. And so if that could be included in the labeling in an accessible way for users, it would help streamline the process.

And then, finally, the workgroup talked a lot about the utility of using web-distributed labeling to get users a copy of the most recently approved version of the label that matches the container in their hands. So that if there was a new use or a new mitigation, the user could follow those instructions without having to get a newer container of the product.

And now I will pass it over to Sarah.

SARAH HOVINGA: Yeah, thanks, Michelle. And you'll see some bullets, as Michelle mentioned,

it was discussed in the group that in an ideal world, some of the final container labeling and the user experience for the label information could possibly be combined. So I think just to start out on this slide, you know, this includes the actual physical final container label that you'll see on the product, but it could also include other information not on the label.

So Michelle gave a great example of the Bulletins Live! Two, so I'll just go with that. So that is considered labeling, but may not be found in full content on the label. And so that's really what that first piece is speaking to.

Also, the workgroup talked about how this could be applicable to people that are both physically handling the product -- so you think about the actual pesticide applicators or people that are coming into contact with that application or it could have implications for people that maybe don't handle the product physically, but need the information on the product label. So I just wanted to make sure that those two points came across clearly with the user experience.

And so, you know, a lot of what's been talked about before is also relevant here. So

information in a database that's easily available, accessible and searchable. For example, being able to identify what states a product is registered in, capturing adverse effects information should that appear, understanding what the rendering needs so what the final visual look is to be for the user.

So things like font size, color, visual aids for those with different visual abilities, really the ability to provide easy access to information for users, including multiple language and compliance with what's out there for ADA standards; supporting user's ability to get customized information, so depending on where they are, how they're applying the product, what type of problem they have could be easily done in a -- technically, for the digital tools that we have available now and possibly considering some future AI.

So artificial intelligence capabilities like a chatbot to get information to users and ensuring this interoperability with the data file and linking to, you know, different application equipment, maybe different applications on your phone. So ensuring that it's available to interoperate, interoperate with third-party pieces

from different stakeholders. And we talked about ESA and also ability to print out the information to support compliance.

And that's probably a good lead-in to our final slide on this piece, which is the enforcement side of things. And really to, again, you know, a lot of recommendations are coming out of these steps because each step is kind of its own project in this case. And so on the enforcement piece, you know, making sure that where possible, EPA is sharing the structured digital labeling system or approach technology with states and tribes for gaining efficiencies there. Also, understanding that enforcement is complicated. So there's information, you know, coming to the entity, going from the entity, the entity is looking to different sources. There's different versions of the label and labeling. And so just understanding the complexity there. And a lot of these points coming underneath, I think, speak to those two first bullets that I spent a little more time on.

So, you know, engaging with the current version of the label, there was a lot of discussion in the group around that. And so just understanding and retaining the capability of verifying that the

label used is the approved version. Really providing access to previously approved versions and verifying that they were changed in accordance with the need required there.

Understanding that unintended consequences could come from version changes affecting things like trade. So again, kind of understanding the complexity here, checking with distributor labels and aligning with the master label for what was registered at the parent level. Understanding to track and know who's able to use restricted use pesticides and, therefore, you know, legally allowed to purchase them when it comes time to understanding what deadlines are and making sure that stakeholders, like states and tribes, are understanding that.

Understanding how to possibly leverage artificial intelligence to match what's physically there on the product and comparing that to currently approved labeling and really understanding how to link some of these use reports back so it's done in a more efficient way as needed and required.

And so as you see this process, you know, it was a really great exercise for us to go through as a group because we were really able to utilize

the massive amount of expertise and diversity and really capture, at a high level, the needs of what this ideal electronic system would look like at the different steps of the stages according to the different stakeholder groups.

And so all of this, you know, we were able to come out with some recommendations, some further recommendations here. And I think I'll just highlight, for time's sake to make sure we have time for questions, some of the bullets that we haven't covered. And so really, again, this structured approach for some short-term wins for quicker submission and review, you know, at first being a voluntary approach, but with some incentives there that really incentivize use and adoption.

Understanding that there's a backbone that is quite possibly similar among all pesticide types, but that they will differ in their need for granularity and potentially different data elements. We talked about placeholders, we talked about data elements having a home. Just understanding where the guidance is, where users are utilizing to fill in those data elements that will go on the label.

There was discussion about the possibility to add free text. However, we do want to stress

that it should be limited and if it can be standardized, that an effort be made there, if not up-front, possibly with later system upgrades. Making sure the information is understandable to audiences, so things like abbreviations and jargon, for example, being minimized, and also being sure to check with different stakeholder groups to ensure comprehension and adoptability of what's being provided here.

This exercise was also very important for -- if we're working on a short-term approach now to ensure that the effort up-front is fit for purpose with a future sort of technology. So that exercise was really important for us to do from that perspective as well. And, again, you know, you've heard single source of truth many times.

So that would include, you know, label guidance that includes all of the things we've been talking about. So the structure of the data elements for all pesticide products, how these pesticide products may differ, and so leading to different templates, modules, again using that similar backbone, but where the unique elements might be for different pesticide types. And we got a good start there with the antimicrobial and

conventional examples, understanding, you know, how to manage and define these options for controlled vocabulary, pick lists, mandatory phrases, validation rules and interoperability rules for some of these data elements where that was identified as possible, and then having that guidance be reflected in the guidance that users need. For example, they're using right now the Label Review Manual, if that was the case, updating this guidance along with the changes that are being made here.

So I think I'll hand it over to Michelle for more of the long-term pieces.

MICHELLE ARLING: Sarah, I will go over just the highlights of some of the longer-term recommendations. We did talk about pick lists, and while there are a lot of good resources out there, there's a recommendation that we do continue to work with stakeholders to refine and maintain those, also to decide if other structures are needed and then kind of identify the industries and outline the elements that would be needed in those different structures.

Definitely measuring the ways to measure the impact of adoption and use of digital labeling. Having a pilot allowing people to test out

structured label submissions and capture areas where there is improvement, which aligns with EPA's kind of continuous improvement/refinement of systems approach.

And then a big one is to continue working with states to understand their needs for an electronic system, because when we're working with states, there are many more entities than EPA. So finding some commonality there to let us move forward is necessary.

And then we've talked about the rest, kind of the digital submission process and workflows and document management.

So I will pass it over to Lisa to wrap us up.

LISA DREILINGER: Awesome. Thank you both.

So as you can tell, we have done a lot of work in terms of what the recommendations are going to be. There's a lot of information and requests and requirements for discussion not only with the agency but our stakeholders. And because of that, we are going to be formalizing our recommendations over the next few months and prepare to obviously make a formal submission to the PPDC in spring of

2025.

Our proposal is for the next six months for this group to stay and serve as an initial sounding board for the EPA portal feedback, which is supposed to come up in January of 2025, so we can help and support the implementation of that. After spring of 2025, we will assess the needs as to whether or not we've met the charge questions set before us and/or would need to redirect the group, which will be decided after the implementation is underway.

So a general thank you to Sarah and Michelle again and the whole group. As you can see, a lot of work went into this and a lot of discussion and a lot of heart. So thank you.

JEFFREY CHANG: Thank you. We can open it up for discussion.

LISA DREILINGER: It's good that there are no hands. We only left 10 minutes. I'm teasing.

JEFFREY CHANG: Just don't be shy.

Mily?

MILY TREVINO-SAUCEDA: Yes, I truly apologize that I was out for a little bit of time attending a meeting with a funder. Anyway, one of the main reasons why we formed the Farmworker

Working Group is because we want to make sure that any of our groups that are working towards -- that are relating their work towards farmworkers, that we always make sure -- I heard most of or a part of your presentation, not all of it, and it looked very, very detailed, and I really appreciate all the time and effort that you put in there.

But I just want to make sure that we are considering, in terms of the labels, to be not only bilingual, but done in a way where people will be able to understand the label. And everything that's been said many more times, farmworkers are not provided either a phone or anything so that they can look at information digitally or whatsoever. So I just wanted to mention this.

And there's other people that are part of the farmworker group, if you feel that this presentation was covering everything that we have talked about, that's fine with me. I might not have additional comments on this, but just to make sure that we are considering that people that would be reading labels, if it's for part of the farmworker community that would be spraying or using the chemicals, that they would have access to the information in their own language.

It's not only Spanish, but there's talks about if there are different languages to, also, you know, take -- you know, be concerned about that. Thank you. I hope I made sense.

SARAH HOVINGA: Yeah, you did. You did make sense, Mily. And one of the things that we talked about, which is important to make sure that not everybody is going to, you know, be able to convert or maybe ever convert to a full digital format. But one of the beauties of having the information be in a digital form is it can be rendered, or at the end of the process, produced in whatever format is most applicable for that user group.

So if the user group is using a cell phone for that sort of access or whatever sort of system, the data can be rendered in that way. And just like we're doing now with paper copies, it can also be rendered to some sort of paper output. And so that was definitely included in our recommendations to make sure to allow for inclusivity of the different points of access that a user would have to that information.

MILY TREVINO-SAUCEDA: Thank you.

JEFFREY CHANG: Terry Kippley.

TERRY KIPPLEY: Lisa, have you or has your group had a chance to think about what percent improvement this will be in terms of the overall process or savings in time or man hours that ultimately impact the backlog by doing things in a more efficient way, going electronically, and what is that number, so to speak?

LISA DREILINGER: Thanks, Terry. We have had that discussion and we do believe that this is certainly a way to drive efficiencies as you can tell by the first few slides that we presented in terms of the process, right? It's about a two-way system that will allow for quick communication, that will allow for some self-certifications, when appropriate.

Have we quantified that? No, I don't think that's something -- I don't feel comfortable quantifying it because I think I can't account. But that is something that we can do maybe with the people who are part of the EPA and are on the inside in terms of quantifying the resources and the time, right?. I mean, maybe we can quantify -- on the outside, I can quantify how much time, as a registrant, we're spending on the back and forth or how much time I believe we're spending, right?

That's something we could do. We've not yet. I mean, it's a good idea. But the short answer is no.

TERRY KIPPLEY: Well, you know, ultimately it would be great -- and maybe it's impossible -- that we would say, hey, if we could all get behind this and it meets everybody's needs, all the stakeholders, the farmworkers, et cetera, if at the end of the day, we could improve efficiency by 5 percent, that's a big deal for everybody given the constraints that we've talked about earlier today.

So I'd encourage any way to help put a number on this to help get our minds around this and create even more energy to try to move this faster because growers are hurting. Growers are really hurting. And there's tremendous science, innovation, technology there at the agency and there's constraints. It's a very difficult job. Anything we do to help the grower, I think it would be great. This looks to me like an exciting opportunity to improve efficiencies and do the smart things faster.

So thank you for all the work that this committee is doing.

LISA DREILINGER: Thank you. I wrote that down. I'm sure somebody else wrote down, too.

SARAH HOVINGA: Yeah. And I think we had included that, and to your point, Lisa, we had talked about it, but not to the point of getting into the detailed metrics of it. But we did identify that metrics to track the efficiencies would be good.

And I am generally a positive, optimistic person, but one thing that we also talked about for managing expectations a little bit is a lot of what we're recommending is going to be new, right? And so these efficiencies won't be gained overnight. You know, when you're learning how to do something in a new way and with a new system, perhaps, and maybe with some different stakeholders, it could be more painful at first and hopefully for a short period of time until kind of the efficiencies are obvious that are being gained with this new approach.

And so just to put that out there for managing expectations, it's something new and it's going to take time to learn and this will be a journey. As you saw our stages, you know, all of that can't be done overnight. But I think if we take the time to really do each stage, think about it as a whole, but then really do each stage in a

quality way, that's the way we're going to get to where we want to be.

JEFFREY CHANG: Kimberly?

KIMBERLY NESCI: Yes. Hi. Thank you so much for that. Clearly a lot of work has gone into that group, and everything that you pulled together, it was a lot. So thank you.

I have sort of two questions and I guess I'll just do them one at a time. The first question I have was why the focus on voluntary versus mandatory? And the reason I'm asking is because I know in order for there to be consistency, there does need to be a level playing field. And I think with a high goal towards a level playing field and labels looking similar for the consumer or for the grower, a mandatory approach might be necessary. So that's my first question.

And then my second question is I know that electronic labeling, electronic information is a topic of conversation in many other venues like WSSA and CropLife and other organizations. So I'm wondering how that's being accounted for and capitalized on, how that work is synergizing each other, if your group is working with that, with the other efforts.

LISA DREILINGER: Thanks, Kimberly. I can take the first question, and then I'll give Sarah the second.

KIMBERLY NESCI: Sure, sure, yeah.

LISA DREILINGER: So I mean, basically, there's been discussion about it being voluntary versus mandatory. And we understand, Kimberly, what you're saying, and we feel that our job here is to be facilitators in terms of what the group is telling us and the recommendations that are being made. The discussions, of course, between the group have been very, very, very much in favor of being voluntary and that nobody wants the exact language to be mandated and that there are people that would like to be able to differentiate their products even in the minute ways that are possible. So I hear you and we understand.

The overwhelming response so far has been for it to be voluntary. And I think it's really just about retaining freedoms and not having every product look identical. And I think it's going to end up being trial and error because I think in a lot of ways, a lot of the mandated language will end up being identical, and then maybe there's some language that doesn't need to be identical and there

could be some flexibilities. And I think that's what we were trying to do with the pick lists that we presented back in spring.

We did not obviously re-present the pick lists. We've only touched on them briefly in here. But when we do our final recommendation, I mean, in detail, we will share with the EPA, of course, the proposal of the data elements that --

(Interruption)

LISA DREILINGER: I think that in terms of there being data elements that have a higher probability of having pick list and very set language, right? And I think, at least for the antimicrobials, you're going to have some very clear data elements where it makes sense and then some very clear data elements like marketing claims, where maybe it makes less sense.

So I do think that we should have that open and ongoing dialogue. But what you're seeing is basically there isn't consensus for it to be mandatory, mandatory, mandatory, all the way across the board. So we feel our job is just to share the discussions that have been had and the discussions have resulted in the request for it to be voluntary.

KIMBERLY NESCI: Yeah, that makes sense.

Lisa, one question about the marketing claims, though, because I do understand, if I'm remembering it correctly, which I may not be, that a lot of the marketing claims are sort of regulated statements about efficacy or target pathogen for the AD chemicals. So I understand wanting to differentiate -- companies wanting to differentiate, but I don't know if marketing claims is the best example of that for the AD products at any rate.

LISA DREILINGER: I just meant even in the order of the words that you want to use, right?

KIMBERLY NESCI: Okay.

LISA DREILINGER: For example, kills germs versus kills bacteria and viruses. Even in the order of the words you're using, right? We're talking about creating a pick list which would determine the order even of the language, right? Because there are some statements like "keep out of the reach of children," where it has to say "keep out of the reach of children," right?

And that's all I meant is that I think there are -- it is very easy to identify some data elements where it makes perfect sense to have a pick list and not to have a choice. And then there are other options where you could not possibly put in

every order of every word, the possibility. It just doesn't make good sense where, where the meaning of the claim might be the same, but the words that somebody wants to use may not exist on the pick list.

To shortly answer your question, the reason why it's voluntary is because that's where the consensus was.

KIMBERLY NESCI: Okay, great. Thank you. Sorry.

SARAH HOVINGA: Yeah. And just to add on to what Lisa said -- and then I wanted to address your second question, Kimberly -- so, yeah, the discussions so far have been voluntary and I think -- largely, I think it's because a lot of folks, me included, co-chairs included, there's a lot of learning that is still going on in this phase. And so as you saw, we only had the ability to compare two structures and there's more stakeholder groups, more pesticide types that we need to understand.

And so from my understanding, kind of jumping to, at least in the short term, a mandatory approach to that would limit the ability of the learning and the stakeholder and really making sure that it's a process that's going to work before at

one point, hopefully, the benefits and what we're seeing in terms of the efficiencies make sense for it to be mandatory one day. That would be a hope at least I would like to see. But in the short term, yeah, Lisa's right that the discussions have been more voluntary.

And then to your point about interacting with different stakeholder groups, so that was definitely something that we wanted to make sure was happening. Michelle mentioned on slide 7, so we've had the ability to interact with a lot of different groups who are also thinking in this way. The Weed Science Society of America, you gave that example, so they came to give a great presentation about the order, the structure of the label. And so really, you know, hearing what they had to say and incorporating it into what we've been able to work on.

You mentioned CropLife America. So there's a digital label or digitization task force that that's happening there. And so we were able to also utilize that. We had them present -- I work in that group, too. So we came to present on the -- what would work for agricultural products in terms of the structure of the label. So really trying to

understand -- and just to mention another one, you know, DPR from California came to present on their CalPEST system. So we got to see some of this in practice.

And so all of all of these discussions have really helped us to understand, you know, what pieces we can incorporate in these different stages of the label journey and what would work for these different stakeholder groups. And that's not to say that that's like the one and only time that there should be this interaction. I think it really needs to be this continuous exchange of information and rowing all in the same direction, so to say.

KIMBERLY NESCI: Yeah, exactly. That's exactly what I was asking. That's great, Sarah. There are even more than I was aware of on the slide, so thank you. Absolutely.

JEFFREY CHANG: Gary?

GARY PRESCHER: Yes, Sarah, I appreciate your comments there on that common sense approach short term, and also allowing for, you know, a pilot approach to allow for improvements along the way is going to continue to be very important.

Kimberly, I can empathize with your comment about voluntary versus mandatory.

Personally having worked as a crop consultant and also on my own farm as an applicator, just an example of, you know, two companies bringing the same AI to the market with two different approaches is a very confusing. An example I would just leave for you to just work through this issue a little bit is one company brought an approach that said, my label, if it's on my label, here's what you can do, and the other company brought the approach, if it's not on my label, go ahead and do what you want to do.

So there's just a lot of confusion out there right now. So keep up the strong work and I look forward to your successes in the future. Thanks.

SARAH HOVINGA: Thanks, Gary.

JEFFREY CHANG: Any final comments?

(No response.)

JEFFREY CHANG: Great. Well, thank you guys. We can move on to our next session, which is the public comment period.

ED MESSINA: Yeah, let me just thank the Label Group before I move on, Jeffrey, and say, you know, great job. I really appreciate the presentation. And when the first group was forming,

we were sort of wondering, you know, how would this play into the digital transformation, was the timing right. And I think the timing really was right because it was, you know, laying the groundwork for what we need to think about as we're delivering on a new digital transformation for labels, you know, as we process them and for also publishing them.

So I really appreciate the workgroup's efforts here. Thank you for the update.

PUBLIC COMMENTS

JEFFREY CHANG: We are nearing the end of the first day of this two-day PPDC meeting and we want to give members of the public who have listened a chance to provide comments. Please raise your hand if you're registered to provide comments and are ready to speak. Our technical support team behind the scenes will promote each registered commenter to panelist, which will allow you to unmute your line.

Please wait until I call on you, going in order of those listed on the screen first, to turn on your mic, then deliver your remarks slowly and clearly.

When you are making your comment, please state your name and affiliation if you have one. We

ask that you limit your remarks to three minutes. I'll show a slide when you have 30 seconds left.

UNIDENTIFIED FEMALE: Jeffrey, I'm having trouble hearing you.

JEFFREY CHANG: Oh, really? Sorry. Can you hear me now?

UNIDENTIFIED FEMALE: Yes, that's better. Thanks.

JEFFREY CHANG: Should I repeat or are we good?

So, yes, public commenters, if you're registered to speak, please raise your hand and we'll call on you. Give me a second. I'm going to share my screen for the public commenters.

Up first we have John Bottorff. Let's see who's ready. Is John here?

(No response.)

JEFFREY CHANG: Okay. Lewis Ross Brown?

(No response.)

JEFFREY CHANG: Okay. We have Norrulanne Jan. I know you're here, so let me see if this works. Hey, Norrulanne.

NORRULANNE JAN: Hi.

JEFFREY CHANG: Perfect. You're welcome to speak.

NORRULANNE JAN: Okay. And cameras are not on, right?

JEFFREY CHANG: You can turn it on if you want, but it's not required.

NORRULANNE JAN: Okay, cool. I am not sure how to turn My camera on, so I will just give my comment.

I want to echo the sentiments of earlier from Mily and Nathan, specifically, that we appreciate EPA's hard work thus far, and we know that you all are in a tough position. But, again, we know and appreciate all of the work that you've done, even if it doesn't feel like it at times.

And on that note, I'm here to say that we think EPA should assess exposure for direct spray drift, which is movement of the spray plume that then settles on people or elsewhere other than the intended target. EPA is not currently assessing risk for this pathway of exposure, but it should for three reasons.

First, EPA's incident reports for some OP pesticides show that there are documented instances where workers recount feeling droplets from applications happening way further from them.

Second, the existing protections, such as

the “do not contact” label provision, are both necessary and insufficient to protect against this specific pathway of exposure. Incident reports, again, they show that label noncompliance is happening, and if it’s occurring, it should be accounted for.

And, finally, while we appreciate the EPA’s efforts to strengthen the application exclusion zone, we know that the zone is insufficient to protect against this specific path of exposure in two ways. First, reliable studies and modeling show that drift can travel much further than the zone’s maximum, which is 100 feet. And while it requires workers and their families to leave the zone, they can then return immediately to sprayed areas and areas immediately adjacent to sprayed areas where they will come into contact with pesticide spray and residues.

So we look forward to working with EPA as it figures out whether and how to assess risks of exposures from direct spray drift.

Thank you.

JEFFREY CHANG: Thank you.

Verna Stillwaugh. Yes, I See you’re here.

VERNA STILLWAUGH: Good afternoon. I am

Verna Stillwaugh. Can you hear me okay?

JEFFREY CHANG: Yes.

VERNA STILLWAUGH: Okay, thank you. Sorry about that.

Good afternoon. I am Verna Stillwaugh. I am the Vice President for Scientific Affairs at the Northwest Horticultural Council. We are based in Yakima, Washington. We represent the growers, packers, and shippers of apples, pears, and cherries in Washington, Oregon, and Idaho.

My comment is regarding insecticide resistance. We thank EPA and other agencies for all the great work that they have been doing for engaging with stakeholders. Tree fruit growers in the Pacific Northwest grow their crops using science and research-based best practices. They perform integrated pest management practices. They scout. They use economic injury levels and they monitor and have resistance management programs for several pesticides.

Growers don’t use pesticides unless they have to because costly. And in some cases, they have eliminated the use of conventional pesticides; for example, if there is a biological counterpart or an organic counterpart. All of this is considered

in resistance management programs, all with the purpose and the goal of managing resistance.

What is needed is new alternatives to conventional pesticides for which resistance has been developing with the recent cancellations, for example, of fungicides that are multi-site in mode of action. These are pesticides for which the evolution of resistance is delayed or is not possible because they target multiple sites in the pest. And more in new products or alternatives to conventional fungicides are needed so growers can have enough tools to grow food and, at the same time, outcompete pests and diseases.

We continue in the support of science, risk assessment, regulatory policies such as those required by FIFRA. And our growers want to continue to produce quality and healthy crops, but they need to be able to outcompete pests.

Thank you very much for your attention.

JEFFREY CHANG: William Jordan, are you here with us?

(No response.)

JEFFREY CHANG: Okay. Would anyone else from the public like to make a comment?

We have Kathy who has their hand raised.

I'm not sure if this is an accident or -- I think that is it.

We have made it through the full slate of public comments. A sincere thank you to our workgroup chairs who presented today, to our PPDC members, members of the public, who listened in and shared their views, and to all of the support staff that made today's session possible.

We will reconvene at 11:00 a.m. tomorrow using the same Zoom for Government link as today.

That's it for me. Thank you for your participation today, and I'll hand it over to Ed Messina to offer final words and adjourn the meeting.

Ed?

ED MESSINA: Thanks, Jeffrey. Thanks everyone for participating, for a great agenda today. Look forward to a jam-packed agenda tomorrow as well. So as Jeffrey indicated, we will be convening at 11:00, if you'd like to join a couple minutes early to make sure that, you know, connections are stable and everything. We'll get started at 11:05 with Endangered Species Act update, Farmworker Workgroup update, Drone Risk Assessments and Spot Treatments, Biocontrol, including

jurisdictional issues, and then a session on Moving Forward and Meeting Closing, where we'll talk about any other items that were discussed the last two days, and then future potential meeting topics that the PPDC members would like to see surfaced for the next meeting. And then we'll conclude with public comments and we'll adjourn at 5:00, as we did today, a little early.

Thanks, everyone. Have a great night.

(Day 1 adjourned.)