# FY 2024 Pesticide Registration Improvement Act (PRIA) Annual Report

## **Table of Contents**

Executive Summary	2
Pesticide Registration Service Fee Actions	2
FY 2024 Completions	2
Renegotiation of the PRIA Due Date	3
Number of PRIA Applications Pending at the End of FY 2024	3
Denial or Do Not Grant Decisions	3
Implementation of PRIA Process Changes	4
Avoiding Overpayment when Multiple Categories Applied	4
Recoding, Renegotiation, and Additional Preliminary Technical Screen Requirements	4
Reduced Risk Determinations	5
Data Waiver Determinations	5
Recoding of PRIA Applications	5
Registration Review	5
Database Enhancements	6
Data Associated with Conditional Registrations	6
Endangered Species Database	7
Pesticide Incident Data System	7
Sources of Pesticide Usage Data	8
Federal Government Sources	8
State Government Sources	9
Proprietary Sources	9
Design for the Environment for Pesticide Products	10
Maintenance Fee Set-Asides for Farmworker Training and Education, Health Care Provider Training,	
Partnership Grants, and the Pesticide Safety Education Program	
Pesticide Surveillance (SENSOR) Program	
Registrant Submissions Not Covered by Fee Tables (Non-PRIA Actions)	
Initial Content and Preliminary Technical Screens	
Staffing	
Third-Party Process Assessment	
Appendix A	
Appendix B	26

## **Executive Summary**

The Pesticide Registration Improvement Act, or PRIA, was first authorized in 2004 and created a registration service fee system to provide supplemental resources to the Office of Pesticide Programs (OPP) to achieve more predictable and faster registration decisions. PRIA provides two funding sources: 1) one-time registration service fees (i.e., PRIA fees) to evaluate new applications; and 2) annual Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) maintenance fees assessed to products currently in the marketplace and that mainly fund EPA's reevaluation of older chemicals under the registration review program. PRIA has been reauthorized four times, the most recent being the Pesticide Registration Improvement Act of 2022, or PRIA 5, which was signed into law December 29, 2022, and is effective through September 30, 2027. Under Section 33(k) of FIFRA, OPP is required to publish an annual report, which must include the Agency's implementation of PRIA 5.

## **Pesticide Registration Service Fee Actions**

Section 33(k)(1)(B)(i) of the FIFRA requires that, to the extent practicable, EPA provide data for each fee-for-service action that is completed during the fiscal year covered by the report or pending at the conclusion of that fiscal year, organized by registering division. The following data are to be provided:

- Action code;
- Application receipt date;
- Tracking number assigned at time of submission in the Pesticide Submission Portal;
- PRIA due date assigned to the action based on the statutory decision time-frame;
- Renegotiated due date(s) and the dates those renegotiated dates were approved, if applicable;
- Reasons for renegotiation, if applicable;
- If submission recoded, reassigned code and date of recode, if applicable;
- Completion date, if completed;
- Status of action (e.g., completed, pending, rejected, withdrawn); and
- Reason for denial or do not grant decision, if applicable.

#### **FY 2024 Completions**

PRIA completions are provided in Table 1 below, and the number of completions by category, along with average days to complete, is found in Table I in Appendix A. Table 2 provides the number of actions within the decision review time period and the number of actions completed past the statutory decision time period (i.e., late). Codes for PRIA categories are prefaced with a letter designation for the type of application (A = Antimicrobial, B = Biopesticide, R = (Conventional) Registration, I = Inert, and M = Miscellaneous). See the file, [PRIA Completed FY24.xlsx] for individual completed PRIA actions.

Table 1: PRIA Completions by PRIA Category Type

DDIA Catagory Type	A	В	R	I	М	OPP
PRIA Category Type	Codes	Codes	Codes	Codes	Codes	Total
Overall Completions	153	151	631	26	508	1,469
Withdrawn/Rejected for Non-Payment	2	0	0	0	4	6
Withdrawn/Rejected in 21-day	0	0	0	0	0	0
Completeness Screen	U	U	U	0	0	0
Withdrawn/Rejected in Preliminary Tech	10	9	6	0	0	25
Screen	10	9	O	U	U	25
Withdrawn	31	19	71	1	19	141

Table 2: PRIA Completions Early or On Time vs. Past Statutory Decision Time Period

PRIA Category Type	A Codes	<b>B</b> Codes	R Codes	I Codes	M Codes	<b>OPP Total</b>
Overall Completions	153	151	631	26	508	1,469
Completed Early/On Time	30	58	67	3	218	376
Completed Late	123	93	564	23	290	1,093
% Completed Late	80%	62%	89%	88%	57%	74%

#### Renegotiation of the PRIA Due Date

The passage of PRIA 5 in December 2022 changed the circumstances under which decision review time periods can be extended through negotiation of the due date. Prior to PRIA 5, there were no limitations on reasons for renegotiation as long as the renegotiation was mutually agreed to by both EPA and the applicant. Because PRIA 5 limited the reasons for renegotiations, EPA curtailed renegotiations beginning in the spring of 2023. However, many of the PRIA actions completed in FY 2024 had already been renegotiated prior to the enactment of PRIA 5 and full implementation of these new requirements across the registering divisions. Renegotiation rates described in Table 3 below partially reflect these earlier renegotiations.

Table 3: Actions Renegotiated and Percentage of Overall Completions

PRIA Category Type	A Codes	<b>B</b> Codes	R Codes	I Codes	M Codes	OPP Total
Overall Completions	153	151	631	26	508	1,469
<b>Completions Renegotiated</b>	39	55	70	0	1	165
Percentage Renegotiated	25%	36%	11%	0%	0%	11%

#### Number of PRIA Applications Pending at the End of FY 2024

Table 4 summarizes the pending registration applications (counted as decisions) in each of the PRIA categories as required by FIFRA section 33(k)(1)(B)(i). The number of PRIA actions pending, by category, as of September 30, 2024, is found in Table II in Appendix A. See the file, [PRIA Pending End of FY24.xlsx] for individual pending PRIA actions.

Table 4: PRIA Applications Pending as of the End of FY 2024

PRIA Category Type	A Codes	<b>B</b> Codes	R Codes	I Codes	M Codes	<b>OPP Total</b>
Pending Actions as of 9/30/24	366	305	1,409	39	83	2,202

#### **Denial or Do Not Grant Decisions**

FIFRA section 33(k)(1)(B)(i)(X) requires that EPA, to the extent practicable, provide a summary of the reason for any denial or "do not grant" decision, if applicable. There were no PRIA applications denied in FY 2024. Forty-seven PRIA applications were closed out with a "do not grant" determination, which closes the PRIA action but keeps the registration or amendment application itself pending. Deficiencies are communicated to the applicant, who is often provided the opportunity to submit additional information for review so that EPA can make a determination on the application.

Reasons for Do Not Grant determinations included:

- Guideline studies deficient;
- · Guideline studies not submitted or cited; and
- Risk concerns not addressed by additional data/information from registrant.

A table listing the PRIA applications which were closed with a Do Not Grant determination, including the reasons for the determination, is in Appendix A included as Table III.

## **Implementation of PRIA Process Changes**

FIFRA section 33(k)(1)(B)(i)(XII) requires that EPA, to the extent practicable, provide a review of progress made by EPA in carrying out each requirement of FIFRA sections 33(e) and (f), including recommendations for the allowance and use of summaries of acute toxicity studies.

#### **Avoiding Overpayment when Multiple Categories Applied**

FIFRA section 33(e) addresses EPA efforts to identify and evaluate reforms to the pesticide registration process with the goal of reducing decision time periods for fee-for-service actions, as well as efforts by EPA to develop and implement a process to determine the appropriate fee category or categories for an application that qualifies for more than one category to assist applicants and prevent unnecessary payment of fees for multiple categories.

In FY 2023, EPA began identifying scenarios where multiple fee-for-service categories are applied to a single application. Most commonly, this occurs when multiple amendments are requested on a single proposed label. An example is a proposal to add a new use to a registered product label (e.g., R170) concurrent with a proposed label amendment requiring science review with an associated amendment of an established tolerance (e.g., R298). Another scenario where multiple codes can be applied is when new active ingredients or new use submissions require review across registering divisions. While the M005 category exists for new products which require cross divisional review, these combination categories do not exist for new uses or new active ingredients.

EPA has historically used the discretionary refund provision of PRIA to avoid overcharging an applicant based on the activity being requested. Under FIFRA section 33(b)(8)(C), EPA has discretionary authority to issue a partial refund (up to 75 percent) of the registration service fee for one the following reasons:

- In reviewing the application, EPA has considered data submitted in support of another pesticide registration application;
- EPA has completed portions of the review of the application before the effective date of section 33 of FIFRA; or
- EPA has rejected the application under the initial content or preliminary technical screen.

The first condition is the most common for a discretionary refund. The primary/secondary <u>guidance</u> provided on EPA's PRIA webpage is an example of the discretionary refund provision being used up front to reduce a fee when the first condition is met.

As part of conversations with industry counterparts in the development and review of PRIA category interpretations, industry trade groups highlighted certain scenarios where they perceive overpayment to be occurring. As a result of those discussions, EPA developed internal guidance on coding, for certain scenarios, to address the scenarios.

EPA will continue identifying and evaluating reforms to the pesticide registration process as part of and outside of its digital transformation effort.

**Recoding, Renegotiation, and Additional Preliminary Technical Screen Requirements**FIFRA Section 33(f) goes over the calculation of decision time review periods. New requirements introduced by PRIA 5 include:

rules around the recoding of PRIA applications by EPA (including recoding of an application
which was submitted under a reduced risk action code but was determined by EPA to not
qualify and is therefore recoded);

- specific activities that EPA shall include in the preliminary technical screen;
- conditions under which EPA and the applicant can pursue negotiation of the decision time review period; and
- prioritization of applications for which the decision time review period is missed or extended.

#### **Reduced Risk Determinations**

FIFRA section 33(f)(4)(B)(iv) was amended by PRIA 5 to require that EPA determine whether an application qualifies as reduced risk within the preliminary technical screen period of 90 days from the fee-for-service start date. Furthermore, PRIA 5 also specifies that if the application for a reduced risk new active ingredient or a reduced risk new use is determined not to qualify as reduced risk, the applicant shall pay the difference in fee for the corresponding non-reduced risk application and the new decision time review period for the non-reduced risk category will be based on the submission date of the original application.

In FY 2024, one application submitted under a "reduced risk" PRIA category was denied "reduced risk" status and recoded to the counterpart non-reduced risk PRIA category.

#### **Data Waiver Determinations**

PRIA 5 also amended FIFRA section 33(f)(4)(B)(iv) to require that EPA grant or deny any data waiver request submitted with a covered application as part of the preliminary technical screen. EPA is developing the capacity in its workflow tracking system to report on data waiver completion dates in relation to the preliminary technical screen due date. In general, EPA has not been able to complete waiver determinations before the due date for the preliminary technical screen and expects this will continue to be a challenge. Waiver rationales are frequently complex and often involve considering a weight-of-evidence argument. The preliminary technical screen timeframe (45 or 90 days) is not adequate to complete the in-depth process of reviewing and finalizing a determination. EPA is considering process improvements such as normalizing the tracking of previous data waiver rationales and determinations to better inform related or similar waiver requests.

#### **Recoding of PRIA Applications**

PRIA 5 amended FIFRA section 33(f)(4)(B)(iv) to require that EPA verify and validate the accuracy of the fee category selected by the applicant and notify the applicant, in writing, if a new or different fee category is required. Additionally, if a new category is required, the new decision review time is to be calculated based on the original submission date. In FY 2023, EPA began to assess compliance with the requirement that PRIA actions be recoded prior to the conclusion of the preliminary technical screen, where appropriate. Some later recoding of PRIA actions occur based on the submission of additional information by applicants or following a partial analysis of the application. Additionally, delays in frontend processing of PRIA actions in FY 2023 and FY 2024 presented a challenge to the registering divisions when applications were not received from the front end until near to or after the preliminary technical screen due date. EPA did implement the provision to the extent that the decision timeframe of a recoded application would be based on the original submission date.

Section 33(4)(4)(B)(i)(III) specifies that the fee category for a covered application may not be changed, without providing the information to the applicant, after completion of the preliminary technical screen. EPA did implement this and does provide the information to the applicant.

## **Registration Review**

The FY 2023 Consolidated Appropriations Act set a new deadline of October 1, 2026, for completing cases previously due by October 1, 2022. There are 793 registration review cases due by October 1,

2026 – 726 cases carried forward and 67 new active ingredients were registered after FY 2007 with registration review due dates before October 2026. The 67 cases also include cases that had a Final Decision for their first cycle of registration review between 2007 and 2011 and have a second cycle registration review due by October 2026.

Of the 793 registration review cases, as of the end of FY 2024 there were:

- 719 cases (or 91 percent) for which draft risk assessments are completed (74 remain)
- 628 cases (or 79 percent) for which final or interim decisions are completed (165 remain)

FIFRA section 33(k)(1)(B)(i)(XIII) requires that EPA review the progress in carrying out registration review under FIFRA section 3(g). The specific reporting elements and results by division are reported below in Table 5.

Table 5: Registration Review Metrics as of the end of FY 2024

<u> </u>			
Data Element	AD	BPPD	PRD
# of pesticides or pesticide cases reviewed and the # completed, including	92	143	393
# of cases canceled	29	29	88
# of cases requiring risk mitigation measures	33	0	355
# of cases removing risk mitigation measures	0	0	0
# of cases with no risk mitigation needed	59	143	38
# of cases in which risk mitigation has been fully implemented	9	0	68

Many of the remaining 165 registration review cases are scientifically complex. EPA continues to work towards meeting the 10/1/26 deadline for completion of all 793 cases, while incorporating compliance with ESA.

#### **Database Enhancements**

FIFRA section 33(k)(1)(B)(i)(XIV) requires EPA to provide a review of progress made towards implementing enhancements to the electronic tracking of conditional registrations and the endangered species database.

#### **Data Associated with Conditional Registrations**

The Pesticide Registration Improvement Extension Act of 2012 (PRIA 3) amended FIFRA to provide funding to improve information systems capabilities for EPA. The amendments provided this funding to support enhancing EPA's information system capacity to track pesticide registration decisions, including the status of conditional registration decisions and the data required to be submitted by registrants to meet the conditions of the registration. While this maintenance fee set-aside was discontinued in the next reauthorization of PRIA (PRIA 4), PRIA 4 and 5 continued to require EPA to report on progress towards enhancing the electronic tracking of conditional registrations.

EPA maintains a consolidated spreadsheet that covers all new pesticides conditionally registered since October 1, 1999. It lists by active ingredient each of the data requirements imposed as a condition of registration and identifies when the data were due, when received, and the status of the agency's review. The office is using this spreadsheet to ensure either that registrants submit data in a timely fashion or that EPA takes appropriate regulatory action under FIFRA section 6(e) to cancel products with delinquent data. The office is also monitoring the review of conditionally required studies to determine whether the new data would warrant changes in the terms of the registration. This compilation of information is publicly available from EPA's FIFRA section 3(c)(7)(C) conditional

<u>registrations webpage</u>. Tracking of these requirements is being transitioned into the new workforce tracking platform as part of EPA's overall IT upgrade.

#### **Endangered Species Database**

EPA previously used a database referred to as the ESA Knowledgebase to store endangered species information that EPA staff gathered from U.S. Fish and Wildlife Services and National Marine Fisheries Services documents relevant to conducting a biological evaluation (BE). The PRIA 3 reporting requirement, which was continued in PRIA 4 and PRIA 5, relates to providing update on enhancements made to that database. However, EPA's process for conducting BEs has evolved considerably since the Knowledgebase was created and populated over a decade ago. As EPA began to automate its BE processes and respond to the 2013 National Academy of Science's recommendations regarding its ESA assessment methodology, EPA needed to store information in a manner that could more readily be extracted and integrated into its evolving processes. As a result, EPA transitioned away from use of the ESA Knowledgebase, which was a repository of data that might be used in ESA assessment and is now using a spreadsheet-based system to store its endangered species information in a way that helps its scientists determine how a pesticide registration might impact a listed species. This new system more closely aligns with EPA's current analyses included in its BEs and contains all the information EPA needs to make effects determinations for listed species. EPA's process for storing data necessary to perform its evaluations continues to evolve as its evaluation methods and associated tools continue to evolve. For example, EPA is beginning to include analyses to predict whether or not Fish and Wildlife Service and National Marine Fisheries Service are likely to make jeopardy (J) or adverse modification (AM) determinations in their biological opinions, and, if so, identify mitigations to avoid J/AM. These analyses require additional information that EPA uses to make these predictions.

## **Pesticide Incident Data System**

FIFRA section 33(k)(1)(B)(i)(XV) requires EPA to report on progress in updating the Incident Data System (IDS) and making the data available to the public. EPA has made improvements in the collection and electronic recording of incident data received pursuant to FIFRA section 6(a)(2) as well as from consumer reporting. OPP created a new website in July 2023 containing ten years of incident data. OPP published two sets of data: 1) one of individual incidents that were submitted to EPA with a description of the incident (e.g., how and where the incident occurred); and 2) another of incidents that were submitted in aggregate (and only contain information on the product and the severity of the incident, aggregated under the conditions outlined in the Agency's Pesticide Registration Notice 98-3). EPA released these data to help the public understand the nature and frequency of reported incidents, including in response to recommendations from environmental justice, public health, and farmworker organizations. The Agency continues to make monthly updates to the data by adding the most recent month's reports to the online databases. Users can filter and sort the data by location (down to the county level), product, date, or severity of the incident. The data may also be downloaded in different formats (CSV, Excel, PDF) to allow for more complex analysis and use.

EPA is continuing to work with a variety of organizations to improve incident data sharing (e.g., through EPA's continued cooperative agreement with the National Pesticide Information Center at Oregon State University; via periodic interactions with Canada's Pest Management Regulatory Agency; via a Memorandum of Understanding being developed with the U.S. Fish and Wildlife Service; and through FIFRA cooperative agreements with states). EPA uses incident information when developing risk mitigation options to ensure the continued safe use of pesticide products. To help improve the

timeliness of responses that may be needed quickly, EPA has also implemented a process that will screen incidents as they come into the Agency to identify those that may need immediate attention.

## **Sources of Pesticide Usage Data**

Section 33(k)(1)(B)(i)(XVI) of FIFRA requires that EPA summarize the sources of publicly available pesticide usage data.

The following are the primary sources of usage data used by EPA from Federal, State, and proprietary sources. Examples of supplementary sources are also included. EPA routinely seeks and reviews additional sources of usage data to determine appropriate use.

#### **Federal Government Sources**

United States Department of Agriculture National Agricultural Statistics Service (USDA NASS)

Chemical Use Surveys - www.nass.usda.gov/Surveys/Guide to NASS Surveys/Chemical Use/ USDA

NASS conducts grower surveys to collect pesticide usage data on approximately 90 use sites including major field (e.g., corn, cotton, and soybean), vegetable, and fruit crops in states that account for the bulk of production of these crops. Currently, USDA NASS conducts chemical use surveys for field crops in cooperation with USDA Economic Research Service (ERS) as part of the Agricultural Resource

Management Survey (ARMS) program. USDA NASS also develops partnerships with state agencies either to use data a state collects itself (e.g., California) or to collect additional data for a state (e.g., Minnesota, North Dakota, Washington, and Wisconsin). The USDA NASS survey design targets a minimum of 80 percent of the acreage/production for every fruit, vegetable, and field crop surveyed. These data are collected via crop surveys that are conducted on various schedules, determined by USDA NASS.

**USDA NASS Census of Agriculture** - <a href="www.nass.usda.gov/AgCensus/">www.nass.usda.gov/AgCensus/</a> USDA NASS also produces the Census of Agriculture, which consists of uniform, comprehensive data on agricultural production, operator characteristics, and pesticide usage data in each county and state, as well as the U.S. as a whole. The Census aims to capture all farming operations that produce at least \$1,000 in food, and some animal commodities, annually. The Census is conducted at 5-year intervals.

United States Department of Agriculture National Institute of Food and Agriculture (USDA NIFA) Supported Crop Profiles managed by the Southern Integrated Pest Management Center - www.northeastipm.org/ipm-planning/crop-profiles/ With USDA NIFA funding, the Integrated Pest Management (IPM) Centers produce Crop Profiles that provide information about crop production (e.g., production regions and cultural practices) and insect pests (e.g., common pests and chemical and non-chemical pest management options). Each Crop Profile describes how a commodity is produced, with emphasis on critical pest management needs and strategies used for their management, including the role of chemical pesticides in integrated pest management (IPM) and resistance management programs. These are usually produced on a state-by-state basis.

United States Department of Agricultural Foreign Agricultural Service (USDA FAS) World Agricultural Supply and Demand Estimates (WASDE) Production Supply and Distribution Online Database (PS&D) - apps.fas.usda.gov/psdonline/app/index.html#/app/downloads The data housed in the PS&D database include summaries of global agricultural production as well as the annual supply, import, and distribution volumes of selected agricultural commodities. Data for those commodities published in the WASDE Report are reviewed and updated monthly.

*United States Department of Agriculture Economic Research Service (USDA ERS) Commodity Cost and Returns Reports* - <a href="www.ers.usda.gov/data-products/commodity-costs-and-returns">www.ers.usda.gov/data-products/commodity-costs-and-returns</a> Cost and return

estimates and crop budgets are reported at the national and regional level for high acreage field crops and animal products. The cost of production estimates is updated frequently, and the database retains historical data.

#### **Supplementary Federal Government Sources**

EPA consults with other federal agencies (USDA Animal and Plant Health Inspection Service (APHIS), USDA Office of Pest Management Policy (OPMP), Department of Defense (DoD), Bureau of Land Management (BLM), Forest Service (USFS), etc.) as needed for inquires on available usage data relating to pesticide products that are limited to federal programs or programs that function under specific federal oversight such as invasive species eradication, disease quarantine, and federally recognized state managed phytosanitary programs.

#### **State Government Sources**

#### **Primary source**

California Department of Pesticide Regulation (CDPR) - www.cdpr.ca.gov/docs/pur/purmain.htm The California Department of Pesticide Regulation collects usage information by conducting a pesticide-usage census in the state. The database contains detailed records and summaries of agricultural applications of pesticides on crops based on application permits. All agricultural growers must submit their production agricultural pesticide use reports monthly and pest control businesses must submit pesticide use reports within seven days after their application. As such, CDPR data is a census of all usage rather than a survey and is published annually. Pesticide usage reports are published annually for all agricultural uses and some non-agricultural uses.

#### **Supplementary Sources**

Ag Risk & Farm Management Library - <u>agrisk.umn.edu/</u> The Ag Risk & Farm Management Library compiles a variety of state and county-level crop budgets. This database includes a variety of field crops, as well as vegetables, livestock, fruits, nuts, pasture, and rangeland. The geographic breadth of these studies encompasses 37 states.

**New Jersey** - www.nj.gov/dep/enforcement/pcp/pcp-pubs.htm Through collaboration with Rutgers University, the New Jersey Department of Environmental Protection Pesticide Control Program (NJDEP) collects pesticide use information from private applicators in New Jersey. These surveys are typically conducted every three years.

**New York** - <u>psur.cce.cornell.edu/</u> In collaboration with Cornell University, the State of New York collects Pesticide Use data from commercial applicators, who are required to report each pesticide application, at least annually.

**Minnesota** - www.mda.state.mn.us/pesticide-fertilizer/pesticide-use-sales-data The Minnesota Department of Agriculture publishes annual pesticide sales data for pesticide active ingredients based on registrant reporting requirements.

**Washington** - <u>agr.wa.gov/</u> The Washington State Department of Agriculture provided EPA with usage data describing statewide usage of pesticides on hops in 2014 and 2021. These data are collected through surveys of members of grower groups and are updated periodically, but not at regular intervals.

#### **Proprietary Sources**

**Kynetec USA Inc.** - <u>www.kynetec.com/</u> Kynetec is a primary source of proprietary pesticide usage data for agricultural crops. The data are widely used by government entities as well as industry. The data are

collected by annual surveys of agricultural users in the continental United States and provides pesticide usage data for about 60 crops, including both specialty and row crops. The survey design targets at least 80 percent of US acreage/production of the surveyed commodities. The survey methodology provides statistically valid results, typically at the state and national levels. These data are available for insecticides, fungicides, herbicides, nematicides, and growth regulators.

Kline and Company - www.klinegroup.com/ Kline is a source of proprietary non-food and non-agricultural pesticide usage data of various market segments including but not limited to seed treatment, consumers, professional pest management, turf and ornamental plants, biopesticides, mosquito control, and industrial vegetation management. Kline also includes some data on antimicrobial pesticide usage. Surveys cover sales and usage of pesticides in these markets. Data are collected via surveys of pest management companies, suppliers, dealers, distributors, food-handling establishments, trade associations, consumers, and retailers. Market sizes and brand shares are determined by analyses of sales and other data obtained through interviews and are sufficiently accurate for screening-level needs at the national level. Market reports reflect usage by class/market segment and chemical and are based on sales information (manufacturer and retail) and end-user surveys. Study frequency varies by market sector.

Ben Kirk Seed Treatment study - <a href="mailto:hbkirk2@cs.com">hbkirk2@cs.com</a> The Ben Kirk Seed Treatment study is a primary source of information on the usage of seed treatment products on a limited number of major agricultural crops at a national level. The data are collected annually via structured and unstructured interviews with seed treatment market professionals from the supplier, distributor, and retailor company levels as well as from universities and crop associations. The report covers the product sales, area treated, and volume applied.

## **Design for the Environment for Pesticide Products**

FIFRA section 33(k)(1)(B)(i)(XVII) requires that EPA provide a review of pesticide products that have received the Design for the Environment (DfE) certification, specifically the number of the active ingredients, new uses, and pesticide end use products granted in connection with the DfE program (or any successor program). EPA approved the use of the DfE logo for one additional product in FY 2024. For a full listing of EPA registered pesticide products that have received DfE certification, please visit the Design for the Environment Logo for Pesticide Products webpage.

# Maintenance Fee Set-Asides for Farmworker Training and Education, Health Care Provider Training, Partnership Grants, and the Pesticide Safety Education Program

FIFRA section 33(k)(1)(B)(i) (XVIII) of FIFRA requires EPA to report on the amounts and use of maintenance fees to carry out activities relating to worker protection, to award partnership grants, and to carry out the pesticide safety education program. This information is summarized in Tables 6, 7, and 8, below and elaborated further in Appendix B.

In addition to reporting on the amounts and use of maintenance fees to carry out activities under these set-asides, EPA is also required to include in its review:

• An evaluation of the appropriateness and effectiveness of the activities, grants, and program under subparagraphs (G), (H), (I), and (J) of FIFRA section 4(i)(1);

- A description of how stakeholders are engaged in the decision to fund such activities, grants, and program in accordance with the stakeholder input provided under such subparagraphs; and
- With respect to activities relating to worker protection carried out under subparagraphs (G) and (H) of section 4(i)(1), a summary of the analyses from stakeholders, including from worker community-based organizations, on the appropriateness and effectiveness of such activities.

#### **Description of Set-Aside Provisions**

Under FIFRA section 4(i)(1), subsections (G) through (K), EPA is authorized to use maintenance fees from the Reregistration and Expedited Processing Fund from FY 2023 through 2027 for the following:

Table 6 – Set-Aside Provisions: Descriptions and Maintenance Fee Amounts

Set Aside	Description	Total Amount
		FYs 2023 2027
(G) Farmworker	Grants for facilitating the training and education of	Up to
Training and	farmworkers on pesticide safety and the Agricultural Worker	\$7,500,000
Education	Protection Standard (WPS); and development of related	
	materials and trainings and outreach methods.	
(H) Healthcare	Grants for facilitating training and technical assistance for	Up to
<b>Provider Training</b>	healthcare providers related to the recognition, treatment,	\$2,500,000
	and management of pesticide illness; and the development of	
	related informational materials and outreach methods.	
(I) Partnership	Grants for a partnership program.	Up to
Program		\$2,500,000
(J) Pesticide	Grants to support the Pesticide Safety Education Programs.	Up to
Safety Education		\$2,500,000
Program		
(K) Technical	Grants for technical assistance to recipients of, and potential	Up to
Assistance to	applicants to, the programs under set-asides G and H.	\$1,750,000
Grantees		

#### FY 2024 Grants Funded or Initiated under Set-Asides (G) through (K)

In FY 2024, EPA used maintenance fees to partially or fully award grants under set-asides (G) through (K) as follows:

Table 7 – FY 2024 Grants and Maintenance Fee Amounts under Set-Asides (G) through (K)

Set Aside	Program Name	Grant Recipient	FY 2024 Funding
	National Farmworker Training Program	Association of Farmworker Opportunity Programs (AFOP)	\$500,000
(G)	Pesticide Educational Resources Collaborative (PERC) 2.0	University of California at Davis, with Oregon State University	\$600,000
	Farmworker Training and Education Program	N/A	\$0 – initiated
(H)	Pesticides Health Care Initiative	N/A	\$0 – initiated
(1)	National Pesticide Information Center (NPIC)	Oregon State University	\$500,000

(1)	Pesticide Safety Education Funds Management Program	Extension Foundation	\$500,000
	Grants Application Technical Assistance – Noncompetitive	UFW Foundation	\$40,000
(K)	Grants Application Technical Assistance – Noncompetitive	Northwest Regional Primary Care Association	\$40,000
	Grants Technical Assistance Program	N/A	\$0 – initiated

The National Farmworker Training Program trains farmworkers, agricultural community members, and growers on reducing risks from pesticides. The program also trains educators to conduct interactive pesticide safety trainings and runs national outreach campaigns via social media and radio.

The Pesticide Educational Resources Collaborative (PERC) 2.0 develops and disseminates national pesticide safety educational resources to implement the Agricultural Worker Pesticide Standard (WPS) (at 40 Code of Federal Regulations (CFR) Part 170) and Certification of Pesticide Applicators rule (at 40 CFR Part 171). The program also grants subawards to nonprofits for community-based pesticide safety projects.

Beginning in FY 2025, a new *Farmworker Training and Education Program* will educate farmworkers and their communities on the WPS and pesticide safety, through a WPS training program and a separate subaward program for pesticide safety projects by community-based farmworker nonprofits. The <u>Notice of Funding Opportunity</u> (NOFO) for this program was published in Q4 of FY 2024, informed by a previous <u>Request for Information</u> (RFI). The NOFO was also translated and published in Spanish.

Beginning in FY 2025, a new *Pesticides Healthcare Initiative* will train healthcare providers on the prevention, recognition, treatment, management, and reporting of pesticide illness. The <u>NOFO</u> for this program was published in Q4 of FY 2024, informed by a previous <u>RFI</u>.

The National Pesticide Information Center (NPIC) provides objective, science-based information about pesticides to the public via a phone hotline and informational resources. It also compiles reports about pesticide use from the information conveyed by callers.

The *Pesticide Safety Education Funds Management Program* disburses subawards to Pesticide Safety Education Programs (PSEPs) at Land Grant Universities. With these subaward funds, PSEPs create trainings and materials to support the certification of pesticide applicators as required under the Certification of Pesticide Applicators rule.

In the first quarter of FY 2025, two *noncompetitive awards for grants technical assistance* provided relevant federal grant support for applicants and potential applicants of the Pesticides Health Care Initiative NOFO and Farmworker Training and Education Program NOFO. These grants were awarded in Q4 of FY 2024.

Finally, beginning in FY 2025, a *Grants Technical Assistance* agreement will support the recipients of the *Pesticides Health Care Initiative* and *Farmworker Training and Education Program* with grants management and reporting. It will also support potential applicants to subsequent iterations of these programs. The <u>NOFO</u> for this program was published in Q4 of FY 2024.

### FY 2024 Accomplishments under Set-Asides (G) through (K)

In FY 2024, the grants funded under set-asides (G) through (K) produced the following outputs. Note that these are select accomplishments. For an expanded list of FY 2024 accomplishments, see Appendix B.

Table 8 – Select FY 2024 Grants Accomplishments under Set-Asides (G) through (K)

Program	Select Accomplishments  Select Accomplishments
National Farmworker Training Program  PERC 2.0	<ul> <li>212 WPS trainers certified</li> <li>45,598 farmworkers, community members, and employers trained on pesticide safety and heat illness</li> <li>44,500 copies of pesticide safety educational materials distributed</li> <li>8,892 reached through social media and awareness campaigns</li> <li>15,199 copies of pesticide safety educational resources distributed electronically</li> <li>Over 88,414 pesticide safety educational resources distributed in hard copy</li> <li>9 subawards for community-based projects across 7 states; over \$1 million awarded</li> <li>2 educational resources on WPS inspections developed,</li> </ul>
Farmworker Training and Education Program	<ul> <li>2 educational resources on WPS inspections developed, with farmworker input</li> <li>2 applicator certification manuals and exams in process</li> <li>Over 510,000 impressions via social media and awareness campaigns</li> <li>RFI published on January 25, 2024</li> <li>RFI translated into Spanish</li> <li>NOFO published on September 27, 2024</li> <li>NOFO translated into Spanish</li> <li>H) Healthcare Provider Training</li> </ul>
Pesticides Healthcare Initiative	RFI published on September 25, 2023
resticides neartificate illitiative	NOFO published on September 27, 2024
	(I) Partnership Program
National Pesticide Information Center (NPIC)  (Previous agreement, ended 2024)	<ul> <li>3,021 responses to hotline and email inquiries on pesticide safety in 3 languages</li> <li>31 noteworthy cases reported to EPA</li> <li>10 special data reports prepared for EPA and coregulators</li> <li>1 fact sheet developed</li> <li>Website maintained and expanded; over 2 million views in 2 quarters</li> </ul>
NPIC (New agreement, began 2024)	<ul> <li>NOFO for new agreement published on June 20, 2023</li> <li>Awarded on January 24, 2024</li> </ul>

	<ul> <li>3,818 responses to hotline and email inquiries in 4 languages</li> </ul>
	174 misapplications recorded
	<ul> <li>48 noteworthy cases reported to EPA</li> </ul>
	<ul> <li>7 special data reports prepared for EPA and coregulators</li> </ul>
	2 Spanish infographics developed or translated
	<ul> <li>Website maintained and expanded; over 2.7 million</li> </ul>
	views in 2 quarters
(J) P	esticide Safety Education Program
Pesticide Safety Education Funds	52 subawards to PSEPs
Management Program	<ul> <li>52 materials and trainings in development to support</li> </ul>
	pesticide applicator certification (English, Spanish,
	Mandarin)
	<ul> <li>1 collaboration with a Minority Serving Institution</li> </ul>
	<ul> <li>Training and technical assistance for subaward recipients</li> </ul>
(K)	Technical Assistance for Grantees
Noncompetitive Award for	<ul> <li>Awarded on September 30, 2024</li> </ul>
Application Technical Assistance	
Noncompetitive Award for	<ul> <li>Awarded on September 30, 2024</li> </ul>
Application Technical Assistance	
Grants Technical Assistance	<ul> <li>NOFO published on September 27, 2024</li> </ul>
Program	

#### Outcomes and Stakeholder Engagement under Set-Asides (G) through (K)

EPA's grants are continually evaluated for effectiveness. For example, AFOP reports quarterly on the effectiveness of its WPS pesticide safety trainings, administering pre- and post-evaluations to the agricultural workers trained. Post-evaluation scores in FY 2024 averaged 98.2% correct responses regarding the content covered during the training. All of EPA's NOFOs ask applicants to specify how they will evaluate their programs, and the new NOFOs additionally require evaluations with community involvement, such as pilot testing of WPS training materials with farmworkers. In the same way, while developing resources for WPS inspections in FY 2024, PERC 2.0 convened farmworker and inspector focus groups to evaluate its materials and revised them in response. (See Appendix B for full list of grants accomplishments, including evaluation activities.)

Consistent with its PRIA mandate, EPA sought extensive stakeholder feedback when developing NOFOs in FY 2024. In 2021, a dedicated workgroup of the Pesticide Programs Dialogue Committee (PPDC), a Federal Advisory Committee (FAC), put forward recommendations for the designs of the grant programs under set-asides (G) and (H).<sup>1</sup> On September 23, 2023, and January 25, 2024, EPA published RFIs<sup>2</sup> proposing program designs for the new grants and seeking public input on these designs. The RFIs drew directly on the PPDC workgroup's recommendations. For example, the proposed program design for farmworker training and education (set-aside (G)) included crop- and chemical-specific trainings to supplement those required by the WPS, including ensuring the trainings and materials support the

<sup>2</sup> The RFI for farmworker training and education under set-aside (G) can be found at docket <u>EPA-HQ-OPP-2023-0643</u>. The RFI for healthcare provider training under set-aside (H) can be found at docket <u>EPA-HQ-OPP-2023-0457</u>.

<sup>&</sup>lt;sup>1</sup> Recommendations for the farmworker training program under set-aside (G) can be found <u>here</u> and recommendations for the healthcare provider training program under set-aside (H) can be found <u>here</u>.

content are provided in a manner the workforce can understand. The RFI was also translated, and responses accepted in Spanish. The proposed program design for healthcare provider training (under set-aside (H)) included an emphasis on occupational health screenings and cultural relevance. It also proposed a partnership with a local healthcare organization serving populations at high risk of pesticide illness.

RFIs were disseminated to a wide array of stakeholders: nonprofits that serve farmworkers and healthcare providers, healthcare organizations, institutions of higher education, coregulators, and other federal agencies. EPA received 16 comments on the healthcare provider training RFI and 27 comments on the farmworker training and education RFI, including five from farmworkers and community health workers. Comments on the healthcare provider training RFI were supportive of the proposed program design, highlighting its focus on occupational screenings and cultural relevance, as well as the emphasis on reporting incidents of pesticide exposure. Comments on the farmworker training and education RFI were similarly positive and included further recommendations, such as more topics and languages for educational materials, and examples of others in farmworker communities who would benefit from pesticide safety education. The comments helped EPA refine the NOFOs as they were developed, which were published in September 2024 and disseminated to more than 200 stakeholders via email and to another 40M subcommittees/workgroups, PSEPs, coregulators, and farmworker nonprofits.

EPA's current grant recipients have and continue to work collaboratively with farmworker nonprofits, growers, agricultural extension professionals, officials at various levels of government, and others. For example, PERC 2.0 has an advisory board composed of representatives of PSEPs, farmworker nonprofits and legal aid organizations, state lead agencies, and growers. The Pesticide Safety Education Funds Management Program encourages partnerships among pesticide safety programs and organizations in the development of materials for pesticide applicators. All of EPA's NOFOs ask applicants to specify their history of stakeholder engagement and how they will continue such engagement over the life of the grant. Moreover, EPA's new technical assistance grants (set-aside (K)) represent a collaborative effort to build capacity among different types of organizations to participate in pesticide safety grant programs.

Previously, EPA received input from stakeholders on the need for its grants to support communitybased projects in agricultural communities. EPA continues implementing that feedback: since 2021, PERC 2.0 has funded subawards for community-based projects to improve agricultural. Nine projects have received funding: (1) Trainings by the Ag Health and Safety Alliance on safe pesticide handling and PPE usage in Mississippi; (2) Pesticide safety trainings by the National Center for Farmworker Health for Mesoamerican Indigenous farmworkers in the Texas Rio Grande Valley; (3) Pesticide safety trainings by Surry Medical Ministries for migrant and seasonal farm workers in North Carolina; (4) Trainings, materials development, and outreach on pesticide safety by Campesinos Sin Fronteras for people who live and work around agricultural fields in Yuma, Arizona; (5) Outreach on the WPS by Toxic Free North Carolina to migrant and seasonal farmworkers, the agricultural community, and adjacent stakeholders in North Carolina; (6) Development of videos on WPS topics by the Farmworker Association of Florida, with involvement from Florida farmworker communities; (7) Development of culturally-tailored pesticide education program for Hmong farmers in the central valley of California by the Sequoia Foundation; (8) Development of training by The Center for WorkLife Law on prenatal pesticide exposure and legal rights of pregnant workers in California; and (9) Education of Spanish-speaking farmworkers on respiratory hazards by The New York Center for Agricultural Medicine and Health to improve understanding of respirator fit and usage to mitigate exposure.

EPA continues to seek input from stakeholders on pesticide safety project needs and priorities more generally. In addition to the PPDC, EPA engages with other FACs, the Association of American Pesticide Control Officials, groups representing PSEPs, farmworker nonprofits, and other federal agencies such as USDA.

Depending on continued funding, EPA's pesticide safety and education cooperative agreements will continue to enhance the capabilities of partners and stakeholders to develop and implement programs and activities that prevent and reduce pesticide risks to humans, communities, and ecosystems and contribute to cooperative federalism.

## Pesticide Surveillance (SENSOR) Program

FIFRA section 33(k)(1)(B)(i)(XX) requires that EPA provide a review of the progress made in implementing the pesticide surveillance program. FIFRA section 4(k)(8) created a new maintenance fee set-aside to support the Sentinel Event Notification System for Occupational Risk (SENSOR) pesticide program. For each of fiscal years 2023 through 2027, EPA is to use not more than \$500,000 of pesticide maintenance fees in the Reregistration and Expedited Processing Fund to support the interagency agreement with the National Institute for Occupational Safety and Health (NIOSH) to support the SENSOR-Pesticides program, with a goal of increasing the number of participating states, prioritizing expansion in states with the highest numbers of agricultural workers, and to improve reporting by participating States.

The Centers for Disease Control (CDC)'s National Institute of Occupational Safety and Health (NIOSH) manages the SENSOR-Pesticides program. The SENSOR-Pesticides program was created to monitor incidents of occupational pesticide-related injury and illness, including incidents among agricultural workers and their families. With EPA's support, NIOSH funds, trains, and advises the participating states on how to monitor, investigate, and report pesticide incidents. NIOSH maintains the database that compiles pesticide incident data from states and provides this dataset to EPA. NIOSH works with state partners to analyze the data and publish papers on important findings in pesticide incident trends. Participating states include California, Florida, Illinois, Iowa, Louisiana, Michigan, Nebraska, New Mexico, North Carolina, Oregon, Texas, and Washington.

In FY 2024, EPA provided \$500,000 of maintenance fees in support of the interagency agreement with CDC/NIOSH in support of the SENSOR program. The funding was used to support ongoing state pesticide illness surveillance activities.

#### In FY 2024, NIOSH:

- Continued funding Texas, North Carolina, and Washington in support of state pesticide surveillance work.
- Awarded Georgia's Department of Health with two years of funding to begin conducting pesticide surveillance activities.
- Provided EPA with updated pesticide incident data from 2018-2021.
- Held annual training workshop for state surveillance coordinators in October 2024.

Budget constraints may impact levels at which funding is provided through the interagency agreement.

## **Registrant Submissions Not Covered by Fee Tables (Non-PRIA Actions)**

Under FIFRA Section 33(k)(1)(B)(ii), the Agency is to provide data for each registrant submission not covered by section 33(b)(3)(B) that is completed during the fiscal year covered by the report or pending at the conclusion of that fiscal year, organized by registering division, including:

- the submission date;
- the electronic portal tracking number assigned to the application at the time of the submission of the application to the electronic submission portal;
- the type of regulatory action, as defined by statute or guidance document, and the specific label action;
- the status of the action;
- the due date:
- the reason for the outcome; and
- the completion date, if applicable.

EPA is able to report on all of the required information except for the reason for the outcome. This information is not currently captured in EPA's system in Salesforce. Table 9 summarizes fast track/minor formulation amendment and notification completions for the fiscal year. See the file, [NonPRIA Completed FY24.xls] for individual completed Non-PRIA actions.

Table 9: Non-PRIA Actions Completed

Application Type	AD	BPPD	RD	<b>OPP Total</b>
Fast Track and Minor Formulation Amendments <sup>3</sup>	323	173	1,138	1,634
Notification <sup>4</sup>	643	117	2,208	2,968

#### Non-PRIA Actions Pending as of the end of FY 2024

For purposes of this reporting, EPA is presenting results for fast track/minor formulation amendment and notification actions which were received in, and after, FY 2020. EPA is also currently evaluating older pending applications to determine whether they have been superseded by more recent actions, as well as engaging with industry stakeholders to identify those applications for which EPA review is still desired. The reporting below and the files attached in the Appendix reflect non-fee PRIA applications which were received in FY 2020 and later.

Table 10: Non-PRIA Actions Pending at the end of FY 2024

Application Type	AD	BPPD	RD	<b>OPP Total</b>
Fast Track and Minor Formulation Amendments <sup>3</sup>	673	163	1,138	1,974
Notification⁴	546	50	728	1,324

See the file, [NonPRIA Pending End of FY24.xls] for individual pending Non-PRIA actions.

## **Initial Content and Preliminary Technical Screens**

FIFRA section 33(k)(1)(B)(iii) requires that EPA provide data for the initial content screens and preliminary technical screens that are completed during the fiscal year covered by the report or pending at the conclusion of that fiscal year, organized by the registering division. These metrics related to EPA screens of fee-for-service actions under the 21-day Completeness Screen and the 45/90-day

<sup>&</sup>lt;sup>3</sup> Action Codes 300, 302, 307, 310, 345, 362, 392, and 397

<sup>&</sup>lt;sup>4</sup> Action Code 332

Preliminary Technical Screen, as well as notifications to applicants of deficiencies under 40 C.F.R. section 152.105, otherwise known as 75-day letters.

The ability to report on certain metrics relating to the 21-day Completeness and Preliminary Technical screens is being developed within the new workflow platform. Once full tracking ability and visual displays for the new annual reporting requirements have been developed in the new platform, EPA will be able to fully address the screening reporting requirements.

FIFRA section 33(f)(4)(B) directs the agency, not later than 21 days after receiving an application and the required registration service fee, to conduct an initial screening of the contents of the application, and if the application fails the content screen and cannot be corrected by the applicant within the 21-day period, the agency is to reject the application. During FY 2024, no applications were rejected or withdrawn for significant "content" deficiencies, but four applications were rejected or withdrawn for non-payment of PRIA fees.

FIFRA section 33(f)(4)(B) also directs the agency to conduct a preliminary technical screening of the application to determine if the data are accurate, complete, and consistent with the proposed labeling and any proposal for a tolerance or exemption. The technical screen is to be completed not later than 45 or 90 days after the PRIA start date, and if the application fails the technical screen and cannot be corrected within 10 business days, the agency is to reject the application.

Primary reasons for applications being rejected or withdrawn in association with the Preliminary Technical Screen include:

- Data deficiencies/missing data, rationale, or waiver request
- Uncleared inerts/missing or invalid inert data
- Inert ingredient mis-identified
- Data matrix/data compensation issues
- Unacceptable bridging arguments

Table 11: Reporting Metrics for PRIA Screens and 75-Day Deficiency Letters

Reporting Requirement	A Codes	<b>B</b> Codes	R Codes	I Codes	M Codes
Applications that did not fail the PRIA screens (includes applications for which a screen was not completed)	215	85	709	32	515
Applications that failed the screening process for each type of screen	138	57	6	0	9
Notifications issued under FIFRA section 33(f)(4)(B)(ii)(II) ( <i>10-day letters sent</i> )	20	57	3	0	4
Notifications issued under section (f)(4)(B)(ii)(I) and the number of applications resulting in a rejection (actions rejected/withdrawn as a result of preliminary technical screen)	10	9	6	0	0
Notifications issued under 40 C.F.R section 152.105, and to the extent practicable, the reasons for that issuance (75-day letters sent)	37	44	56	0	0

## **Staffing**

FIFRA section 33(k)(1)(B)(iv) requires that EPA provide data on the staffing relating to work covered under PRIA 5, organized by registering division, including:

- the number of new hires and personnel departures
- the number of full-time equivalents at the end of each fiscal year
- the number of full-time equivalents working on registration review activities; and
- the number of full-time equivalents working on registrant submissions not covered by FIFRA section 33(b)(3)(B).

The values in Table 12 represent actual staff who were hired or departed, not full-time equivalents, or FTEs, as provided in Table 13. An FTE is the number of scheduled hours worked for an employee divided by the employer's hours. In an employer's 40-hour work week, employees who are scheduled to work 40 hours are 1.0 FTEs. If an employee is scheduled for 20 hours in that work week, this represents 0.5 FTE. Overtime and holiday hours worked by an employee are not counted in FTE calculation. Annual leave, sick leave, compensatory time off, and other approved leave categories are considered "hours worked" for purposes of FTE calculation. In a 52-week year, one full time employee would count as 2,080 work hours. FTE breakouts by division and OPP total are provided in Table 14 below.

The breakouts of FTEs spent working on registrant submissions not covered by FIFRA section 33(b)(3)(B) (Non-PRIA FTEs) are provided in Table 15 below. Non-PRIA FTE levels are calculated by adding OPP tracking categories for "FIFRA (non-PRIA) registration" and "Fast Track Amendments." "Non-PRIA registration" covers a variety of activities, including but not limited to EPA review of notifications, minor formulation amendments, and FIFRA section 6(a)(2) incident data.

Table 12: Office of Pesticide Programs (OPP) New Hires and Departures in FY 2024

Division	AD	BEAD	BPPD	EFED	HED	PRD	RD	10	<b>OPP Total</b>
<b>New Hires</b>	4	2	3	12	2	3	4	3	33
Departures	9	1	2	5	4	7	5	1	34

Table 13: OPP FTEs at the End of FY 2024

Division	AD	BEAD	BPPD	EFED	HED	PRD	RD	Ю	OPP Total
FTE at end of FY 2024	75.79	56.29	66.14	82.12	94.34	59.31	106.34	16.74	557.1

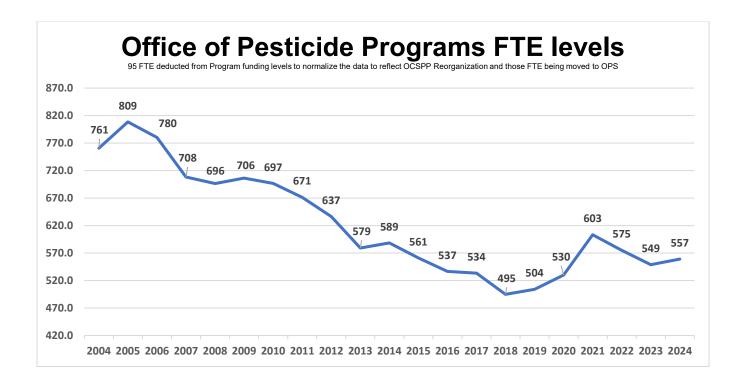
Table 14: FY 2024 FTEs- Reevaluation

Division	AD	BEAD	BPPD	EFED	HED	PRD	RD	10	<b>OPP Total</b>
FTEs: Reevaluation	15.43	23.01	4.75	13.1	30.59	30.74	0.59	0	118.2

Table 15: FY 2024 FTEs- Review of Non-PRIA Actions

Division	AD	BEAD	BPPD	EFED	HED	PRD	RD	10	OPP Total
FTEs: Non-PRIA	6.88	1.37	3.65	2.19	2.98	0	20.49	0	37.57

The following graph displays FTE levels at the end of each fiscal year from FY 2004, the beginning of PRIA. It demonstrates a gradual decline in resources for OPP over the duration of PRIA 5, broken by an increase in FTE levels starting in FY 2019 after the passage of PRIA 4, which eliminated an appropriations constraint (the "one to one" provision) which prevented EPA from being able to fully spend maintenance fees and resulted in a surplus. EPA began spending down the \$51 million surplus in FY 2020. The increase in FTE levels from FY 2019 to FY 2021 reflects increased hiring as the maintenance fee surplus was spent down. As of the end of FY 2023, the surplus had been reduced and elevated maintenance fee spending above collections was not available moving forward.



## **Third-Party Process Assessment**

FIFRA section 33(c)(3)(C)(iii) directs EPA to procure an independent contractor to conduct a third-party assessment of specific pesticide registration processes. OPP has procured a contractor and expects a report of findings and recommendations in 2025.

# Appendix A

Table I. PRIA Actions Completed in FY 2024 and Average Days to Completion, by Category

PRIA Category	Category Type	Number of Cases	Average	Maximum	Allotted Days
	Category Type	ivanibei oi cases	Days to Complete		Allotted Days
R363	New Product	1	259	259	183
R352	Amendment	14	297	562	243
R351X2	Amendment	1	256	256	243
R351	Amendment	63	345	820	243
R350	Amendment	26	505	908	274
R340	Amendment	35	304	561	122
R334	New Product	61	549	2560	340
R333	New Product	36	462	922	315
R331	New Product	1	245	245	91
R320	New Product	6	387	578	365
R319	New Product	1	402	402	304
R318	New Product	2	454	505	274
R316	New Product	1	737	737	274
R315	New Product	2	532	719	274
R314	New Product	15	581	1157	243
R310	New Product	58	342	961	213
R301	New Product	65	392	796	120
R300	New Product	58	261	656	121
R298	Tolerance Petition	7	562	609	395
R295	Tolerance Petition	5	1094	1233	456
R292	Tolerance Petition	6	1792	3008	335
R290	Tolerance Petition	6	551	642	456
R281	Tolerance Petition	1	444	444	365
R278	Other PRIA	3	142	178	152
R272	Other PRIA	23	180	309	91
R260	New Use	1	864	864	365
R230	New Use	1	108	108	487
R190	New Use	22	679	1147	456
R180	New Use	3	3004	3010	304
R175	New Use	29	629	1147	309
R170	New Use	48	805	2891	456
R140	New Use	2	563	582	456
R124	Other PRIA	2	355	367	183
R010	New Active Ingredient	1	680	680	730
M014	Misc. Other	1	489	489	243
M012	Misc. Other	13	119	251	30
M010	Misc. Other	2	268	285	122
M009	Misc. Other	55	161	725	164
M007	Misc. Other	3	477	608	365
M006	Misc. Other	436	75	984	30
M005	Misc. Other	1	496	496	274
M001	Misc. Other	1	477	477	274
1018	Inert Other	5	145	183	91
1017	Inert Other	2	295	332	243
1016	Inert Amendment	1	826	826	395
1009	Inert Non-food	1	346	346	122
1008	Inert Food	4	374	579	198
1007	Inert Non-food	1	301	301	152
	ı	1	L	1	·

1004	Inert Non-food	4	378	671	183
1004	Inert Food	8	921	1569	395
B910	Other PRIA	2	166	183	91
B910	Amendment	6	153	168	183
B885	New Product	1	231	231	183
B884X2		2	1679	1870	365
B884	New Active Ingredient	4	1220		
	New Active Ingredient	7		1849	365
B773	Amendment	2	215	215	274
B685X2	Amendment	1	240	240	152
B685	Amendment	9	153	175	152
B683	Amendment	2	239	293	183
B681	Amendment	13	265	398	213
B680	Amendment	6	208	512	152
B674	New Product	2	54	100	122
B673	New Product	2	421	442	304
B672	New Product	4	470	498	411
B671	New Product	2	886	946	517
B670	New Product	12	324	494	248
B660	New Product	7	230	353	183
B650	New Use	1	477	477	213
B644	New Use	1	616	616	243
B630	New Use	6	808	1232	395
B621	Amendment	3	47	71	213
B617	Other PRIA	5	187	274	152
B614	Other PRIA	7	99	196	91
B600	New Active Ingredient	2	419	713	426
B590X2	New Active Ingredient	3	1249	1505	548
B590	New Active Ingredient	44	895	1505	546
A572	New Product	3	501	642	274
A571	Other PRIA	1	723	723	548
A560	New Product	2	222	231	183
A535	Other PRIA	5	740	814	183
A532	New Product	6	304	461	152
A531	New Product	10	240	476	122
A530	New Product	14	185	496	122
A521	Other PRIA	2	264	284	122
A500	New Use	1	352	352	365
A471	Amendment	1	455	455	152
A470	Amendment	53	202	486	122
A463	New Product	1	270	270	274
A462	New Product	2	287	401	213
A461	New Product	1	292	292	183
A460	New Product	15	235	482	152
		l	l	1	1

For detailed descriptions and interpretations of the PRIA categories above, please see <a href="https://www.epa.gov/pria-fees/interpretations-pria-5-fee-categories">www.epa.gov/pria-fees/interpretations-pria-5-fee-categories</a>

Table II. Number of Pending by Category as of the End of FY 2024

Table II.	Numbe
A380	1
A410	5
A410.0	1
A431	1
A431.0	2
A450	1
A450.0	1
A451	1
A451.0	1
A460	59
A460.1	2
A461	6
A462	7
A463	2
	4
A464	
A464.2	3
A465	1
A465.1	3
A470	85
A470.1	8
A471	3
A472	3
A472.1	1
A500	6
A521	5
A522	1
A523	2
A530	41
A531	34
A532	22
A535	3
A540	7
A541	2
A550	8
A560	10
A560.2	3
A565	1
A570	15
A572	2
A573	3
B590	26
B590.0	62
B590X2	2
B600	15
B600.0	13
B612	1
B612.0	3
B613	1
B613.0	1
B617	10
B630	1
B630.0	1
B641	2
B641.0	2
B643	1
B643.0	1
B644	7
B660	7

g PRIA A	<i><b>Actions</b></i>
B670	30
B672	10
B672.1	2
B672.2	3
	_
B673	8
B674	2
B680	13
B680.0	1
B681	12
B683	2
B684	1
B685	9
B690	1
B710	7
B720	3
B721	4
B721.1	1
B750	1
B750.0	1
B780	2
B800.0	1
B820	3
B820.0	2
B880	5
B884	4
B884.0	9
B884X2	1
B884X3	2
B903	1
B906	1
B909	1
B910	5
B932	1
1001	17
1002	1
1003	3
1004	13
1008	1
1009	1
1017	3
M001	1
	_
M002	2
M005	3
M006	15
M008	2
M009	40
M011	2
M012	2
M13	1
M19	3
M22	5
	3
M23	_
M25	1
M29	1
M30	2
R010	6
R010.0	20
R020	8

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R020.0	24
R020.1	11
R060	2
R060.0	5
R122	4
R122.0	10
R122.1	1
R124	11
R140	1
R140.0	3
R150	2
R150.0	9
R17	1
R170	42
	135
R170.0	
R170.1	1
R170.2	10
R170.3	6
R170.4	4
R170.5	2
R175	8
R175.0	20
R180.0	2
R180.5	1
R190	8
R190.0	14
R230	15
R230.0	15
R230.1	1
R230X2	1
R230X3	2
R240	3
R240.0	2
R240.1	5
	_
R260	7
R260X2	1
R272	6
R272.4	1
R272x2	1
R273	7
R273.0	4
R276	1
R276.0	2
	3
R281	
R281.0	1
R281x2	1
R281X5	1
R290	12
R290.0	1
R290x2	2
R291	1
R292	3
R293	1
R294	1
R295	1
R295.0	12
R296	1
D200	1

R298

3

	1
R298.0	7
R299	1
R299.0	5
R300	85
R300X2	1
R301	112
R310	123
R310.1	12
R310.2	1
R314	27
R314.1	1
R315	9
R315.1	2
R317	3
R318	21
R318.1	4
R319	4
R320	24
R321	7
R331	3
R333	61
R333.1	42
R333.2	9
R333X2	2
R334	75
R334.1	26
R334.2	27
R334X2	9
R334X21	1
R334X3	1
R340	50
R341	3
R345	1
R350	36
R350.0	2
R350.1	17
R351	78
R351X2	4
R351X3	2
R351	19
R352.1	2
R370	1
1.370	1

Table III. Do Not Grant Letters Sent FY 2024

Case	PRIA	Admin	Response	Response Code Comment
Number	Category	Number	Date	· ·
00408020	A532	100058-R	3/6/2024	Acute Toxicity Deficiencies
00409815	A540	101707-R	1/4/2024	Efficacy Requirement Deficiencies
00438366	A540	92513-11	3/18/2024	Acute Toxicity Deficiencies
00473970	R301	83529-GRO	5/2/2024	75-day DNG for lab issue
00476840	R333.1	83529-240	5/2/2024	Deficient regarding validity and accuracy of the submitted data
00471536	R333.1	83529-245	5/2/2024	Deficient regarding validity and accuracy of the submitted data
00472036	R334	91278-L	10/17/2023	Deficient, missing data
00472630	R301	83529-GUG	6/11/2024	Deficient regarding validity and accuracy of the submitted data
00473410	R310	95576-U	10/25/2023	Deficient, missing data
00473411	R334	101128-R	12/13/2023	Deficient regarding validity of the submitted data
00473458	R334	102474-R	9/19/2024	Deficient regarding validity and accuracy of the submitted data
00473674	R340	81824-11	3/1/2024	Deficient regarding validity of the submitted data
00474098	R301	83529-GUR	5/2/2024	Deficient regarding validity and accuracy of the submitted data
00474111	R333.1	83529-GNE	5/2/2024	Deficient regarding validity and accuracy of the submitted data
00474224	R334	91813-OT	12/21/2023	Deficient regarding validity of the submitted data
00474389	R301	83529-GRG	5/2/2024	Deficient regarding validity and accuracy of the submitted data
00474684	R318	228-TAE	12/27/2023	Deficient, missing data
00475452	R315	2517-RIR	10/31/2023	Deficient, missing data
00475731	R334.1	91234-291	4/1/2024	Deficient regarding validity of the submitted data
00475812	R301	83529-ETA	5/2/2024	Deficient regarding validity and accuracy of the submitted data
00475872	R300	83529-EIE	5/2/2024	Deficient regarding validity and accuracy of the submitted data
00476332	R334.2	101128-E	12/13/2023	Deficient regarding validity of the submitted data
00481161	R300	83529-GRT	5/29/2024	Deficient regarding validity and accuracy of the submitted data
00476660	R333	83558-GO	11/2/2023	Deficient regarding validity of the submitted data
00476825	R301	83529-GRA	5/2/2024	Deficient regarding validity and accuracy of the submitted data
00477075	R301	83529-GRU	5/2/2024	Deficient regarding validity and accuracy of the submitted data
00477437	R315	2517-RTO	10/31/2023	Deficient regarding validity of the submitted data
00482142	R333	82633-II	5/23/2024	Deficient, missing data
00478577	R351	7969-243	1/10/2024	Deficient, missing data
00478768	R301	83529-GET	5/2/2024	Deficient regarding validity and accuracy of the submitted data
00479141	R301	83529-GRE	5/2/2024	Deficient regarding validity and accuracy of the submitted data
00479427	R351	62097-36	3/11/2024	75 day DNG - PC deficiency
00479536	R334	91278-U	10/17/2023	Deficient, missing data
00480161	R334	91278-G	10/17/2023	Deficient, missing data
00480175	R334.2	91234-GLN	1/30/2024	Deficient, missing data
00481240	R301	83529-GRL	5/2/2024	Deficient regarding validity and accuracy of the submitted data

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00481392	R333.1	83529-GNR	5/2/2024	Deficient regarding validity and accuracy of the submitted data
00481466	R340	100-618	11/14/2023	Deficient, missing data
00482291	R301	83529-GUN	5/29/2024	Deficient regarding validity and accuracy of the submitted data
00482430	R318	45002-AA	8/5/2024	Deficient regarding validity of the submitted data
00482554	R351	62097-35	3/11/2024	75-day DNG for PC deficiency
00483443	R334	46923-RG	9/19/2024	Deficient regarding validity and accuracy of the submitted data
00486694	R300	83529-GUL	5/29/2024	Deficient regarding validity and accuracy of the submitted data
00486911	R340	2749-615	9/26/2024	Deficient regarding validity of the submitted data
00487128	R301	83529-GLO	5/29/2024	Deficient regarding validity and accuracy of the submitted data
00488313	R310	89459-RUL	9/3/2024	Deficient regarding validity of the submitted data
00488340	R310.1	89459-RUA	9/3/2024	Deficient regarding validity of the submitted data
00488376	R333.1	83529-GAG	8/12/2024	Deficient regarding validity and accuracy of the submitted data
00488448	R310.1	89459-RUT	9/3/2024	Deficient regarding validity of the submitted data
00488452	R310.1	89459-RUO	9/3/2024	Deficient regarding validity of the submitted data
00488450	R310.1	89459-RUI	9/3/2024	Deficient regarding validity of the submitted data
00488513	R301	83529-GAT	5/8/2024	Deficient regarding validity and accuracy of the submitted data
00490154	R333.1	82633-OU	9/30/2024	Deficient regarding validity and accuracy of submitted data
00490207	R333.1	82633-OL	9/30/2024	Deficient regarding validity and accuracy of submitted data
00490247	R333	82633-OA	9/30/2024	Deficient regarding validity and accuracy of submitted data
00490283	R333.1	82633-OT	9/30/2024	Deficient regarding validity and accuracy of submitted data
00490281	R333.1	82633-OI	9/30/2024	Deficient regarding validity and accuracy of submitted data
00491693	R333.1	82633-RNL	9/30/2024	Deficient regarding validity and accuracy of submitted data
00492524	R301	83529-GAO	5/2/2024	Deficient regarding validity and accuracy of the submitted data
00492815	R301	83529-GTN	5/29/2024	Deficient regarding validity and accuracy of the submitted data
00603556	R301	83529-ETA	5/2/2024	75-day DNG sent relating to Lab issues
00603732	R334.2	91234-GLN	1/30/2024	Deficient, missing data
00603711	R310	83529-EII	5/2/2024	75-day DNG for lab issues

# **Appendix B**

Table I. FY 2024 Accomplishments under PRIA Set-Asides Section 703(a)(1) (G) through (K)  PRIA set aside from Section 703(a)(1)				
Summary of Activity	A set aside from section 703(a)(1)			
Program Name  Recipient  Amount of maintenance fees awarded in FY 2024	FY 2024 program accomplishments/activities as reported by cooperative agreement recipients and/or EPA.			
	nworker Training and Education Grants			
	agreements under PRIA set-aside Section 703(a)(1)(G) and solicited			
National Farmworker Training     Program  AFOP	<ul> <li>212 WPS trainers certified through 15 trainings</li> <li>45,598 farmworkers and community members trained         <ul> <li>15,380 on the WPS</li> <li>8,090 on take-home pesticide exposure</li> </ul> </li> </ul>			
\$500,000	<ul> <li>16,680 on heat stress prevention</li> <li>5,404 on pesticide exposure and pregnancy</li> <li>638 children on pesticide safety</li> <li>588 employers on the WPS</li> <li>44,500 copies of educational materials distributed</li> <li>10,647 WPS evaluations administered</li> <li>8,892 reached through social media campaigns and more through radio PSAs         <ul> <li>3 campaigns during national awareness weeks</li> <li>Bilingual social media toolkit developed for partner organizations</li> </ul> </li> <li>18,000 long-sleeve shirts distributed to farmworkers to protect from pesticide exposure         <ul> <li>162 locations in 35 states</li> <li>261 partner organizations</li> </ul> </li> <li>4 focus groups with farmworkers on accessibility of bilingual pesticide labels</li> </ul>			
2. PERC 2.0  University of California at Davis, in collaboration with Oregon State University \$600,000	<ul> <li>15,199 educational resources downloaded from PERC's website</li> <li>88,414 hard copies of pesticide safety educational resources distributed (English and Spanish). Includes:         <ul> <li>83,450 Laundry Magnets with washing instructions for pesticide-laden work clothes.</li> </ul> </li> </ul>			
	<ul> <li>4,964 sales of WPS posters and manuals</li> <li>6 agricultural community-based projects ongoing</li> <li>In five states: Arizona, North Carolina, Florida, Mississippi, and Texas</li> <li>844 farmworkers trained on pesticide safety</li> <li>6 WPS training sessions and 2 training-of-trainers workshops</li> <li>2 fotonovelas on pesticide safety for migrant, domestic, and H2A farmworkers</li> </ul>			

	o 4 videos on WPS topics o 3 Indigenous language translations of a WPS training video o 1 curriculum for pesticide handlers o 1,200 pesticide safety resources disseminated o Over 2,270 reached on social media o Over 12,000 reached weekly through radio PSAs  • 3 new agricultural community-based projects awarded o In two states: California and New York  • Over 510,000 impressions on website and social media promoting pesticide safety materials • 2 educational resources (flip chart and guide) developed to improve cultural competency of WPS inspections o Focus groups conducted with farmworkers and inspectors • 2 manuals and exams in process for certification of pesticide applicators (core and soil fumigation) • Task force launched to assess needs for educational materials related to pesticide applications by Unmanned Aerial Vehicles (UAVs)  • RFI published on January 25, 2024 o Translated into Spanish o 27 comments received • NOFO published on September 27, 2024 o Translated into Spanish  Healthcare Provider Training new cooperative agreement under PRIA set-aside Section
Healthcare Provider Training  No recipient in FY 2024	<ul> <li>RFI published on September 25, 2023</li> <li>o 16 comments received and reviewed during FY 2024</li> </ul>
\$0	<ul> <li>NOFO published on September 27, 2024</li> </ul>
	(I) Partnership Grants
In FY 2024, EPA closed out one cooperat 703(a)(1)(I).	tive agreement and initiated another under PRIA set-aside Section
1. NPIC  Oregon State University \$0	<ul> <li>Final year of five-year cooperative agreement with activities into Q2 of FY 2024 with no additional maintenance fee funds added.</li> <li>3,021 responses to inquiries on pesticide use and safety via tollfree hotline, voicemail, and email         <ul> <li>Over 90% of inquiries were from the general public</li> <li>27 responses to government officials</li> <li>25 responses to medical professionals</li> <li>7 responses to public health services</li> <li>8 responses to pesticide retailer employers</li> </ul> </li> </ul>
	o 2 responses to pest control professionals

	<ul> <li>o 270 languages available; information provided in 2 besides English (Spanish and Hindi)</li> <li>• 31 noteworthy cases of potential pesticide misuse or exposure reported to EPA</li> <li>• 10 special data reports prepared for EPA and coregulators</li> <li>• 1 fact sheet developed on correct use of pool/spa chemicals</li> <li>• Website with pesticide safety information maintained:         <ul> <li>o 2,212,296 page views</li> <li>o 4 new pages added to the web site (3 English, 1 Spanish)</li> <li>o 177 pages were updated</li> <li>o 18 vetted external resources added to web site</li> </ul> </li> <li>• 13 expert consultations/outreach events with external organizations</li> <li>• 1 webinar to explain and promote use of NPIC services</li> <ul> <li>o 148 attendees representing 26 state lead agencies, 8 tribes, 8 universities, 5 other organizations, and EPA staff</li> </ul> </ul>
2. NPIC (continued) Oregon State University \$500,000	<ul> <li>NOFO for new agreement published on June 20, 2023</li> <li>Awarded on January 24, 2024, and continued NPIC activities under new agreement.</li> <li>3,818 responses to inquiries on pesticide use and safety via tollfree hotline, voicemail, and email         <ul> <li>Over 90% of inquiries were from the general public</li> <li>36 responses to government officials</li> <li>31 responses to medical professionals</li> <li>3 responses to public health services</li> <li>89 responses in languages other than English</li> <li>270 languages available; information provided in 3 languages besides English (Spanish, Hindi, French)</li> </ul> </li> <li>48 noteworthy cases of potential pesticide misuse or exposure reported to EPA</li> <li>174 misapplications recorded</li> <li>7 special data reports prepared for EPA and coregulators</li> <li>1 new infographic developed in Spanish, on controlling vector-borne disease</li> <li>1 infographic (on proper use of boric acid) translated into Spanish</li> <li>Website with pesticide safety information maintained:</li></ul>
	esticide Safety Education Program
Pesticide Safety Education Funds     Management Program	<ul> <li>ive agreement under PRIA set-aside Section 703(a)(1)(J).</li> <li>52 subawards made to PSEPs at Land Grant Universities</li> <li>52 materials and trainings in process to support pesticide applicator certification, including:</li> </ul>

	7
Extension Foundation	o Certification manuals and exams
\$500,000	<ul> <li>Applicator training courses and workshops</li> </ul>
	o Translations of educational materials and trainings
	into Spanish and Mandarin
	Administration of subawards:
	o Requests for Applications for Years 1 and 2
	<ul> <li>o Grants management system and</li> </ul>
	application/appeals process launched
	<ul> <li>o 2 live training sessions and a recorded video</li> </ul>
	training on submitting applications
	o 12 drop-in sessions to provide technical assistance
	on applications, invoicing, and reporting
	<ul> <li>o 1 evaluation of subrecipient satisfaction with</li> </ul>
	application process
	o Continual technical assistance via email and in
	person
	<ul> <li>2 rubrics and resource lists created to improve</li> </ul>
	collaboration among PSEPs and MSIs
(K)	Technical Assistance to Grantees
In FY 2024, EPA initiated two cooperative	ve agreements and solicited applications for one under PRIA set-aside
Section 703(a)(1)(K).	
1. Noncompetitive technical	Awarded September 30, 2024
assistance cooperative	• Ends March 31, 2025
agreement – farmworker	
training	
UFW Foundation	
\$40,000	
2. Noncompetitive technical	<ul> <li>Awarded September 30, 2024</li> </ul>
assistance cooperative	• Ends March 31, 2025
agreement – healthcare	
provider training	
Northwest Regional Primary	
Care Association	
\$40,000	
3. Grants Technical Assistance for	<ul> <li>NOFO published September 27, 2024</li> </ul>
the Health Care Initiative and	<ul> <li>Closed for applications on December 5, 2024</li> </ul>
Farmworker Training and	
Education Program	
No recipient in FY 2024 \$0	