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U.S. ENVIRONMENTAL PROTECTION AGENCY

PESTICIDE PROGRAM DIALOGUE COMMITTEE MEETING

Thursday, June 6, 2024

11:00 a.m.

DAY 2

1 PESTICIDE PROGRAM DIALOGUE COMMITTEE ROSTER

2 June 2024

3 NAME AFFILIATION

4 User/Grower Groups/ Farmer Representatives

5 Andrew Architect National Pest Management  
6 Association

7 Bob Mann National Association of  
8 Landscape Professionals

9 Claudia Arrieta Cargill

10 Gary Prescher National Corn Growers  
11 Association

12 George Parker National Agricultural  
13 Aviation Association

14 Grant Morris National Potato Council

15 Jill Schroeder Weed Science Society of  
16 American

17 John Wise IR-4 Project

18 Kim Brown University of Tennessee

19 Patrick Johnson, Jr. National Cotton Council

20 Robert Nielsen Gold Course Superintendents  
21 Associations of America

22  
23 Environmental/ Public Interest/ Animal Welfare Groups

24 Alexis Temkin Environmental Working Group

25

1	NAME	AFFILIATION
2	Anna van der Zalm	People for the Ethical
3		Treatment of Animals
4	David Shaw	Mississippi State University
5	Ed Hardy Kern	American Bird Conservancy
6	Kelly Bills	Pollinator Partnership
7	Nathan Donley	Center for Biological
8		Diversity
9	Rosemary Malfi	The Xerces Society for
10		Invertebrate Conservation
11		
12	Farmworker Representatives	
13	Alexis Guild	Farmworker Justice
14	Becca Berkey	Northeastern University
15	Emma Torres	Campesinos Sin Fronteras
16	Mily Treviño-Sauceda	Alianza Nacional de
17		Campesinas, Inc.
18		
19	Public Health Representatives	
20	Alanna Bares	California Environmental
21		Protection Agency
22	Daniel Markowski	American Mosquito Control
23		Association
24	Joseph Grzywacz	San Jose State University
25	Marc Lame	Indiana University

1	NAME	AFFILIATION
2	Chemical and Biopesticides Industry/Trade	
3	Associations	
4	Anastasia Swearingen	American Chemistry Council
5	Daren Coppock	Agricultural Retailers
6		Association
7	Keith Jones	Biological Products Industry
8		Alliance
9	Ligia Duarte	Household & Commercials
10		Products Association
11	Lisa Dreilinger	Arxada
12	Manojit Basu	CropLife America
13	Terry Kippley	Council of Producers and
14		Distributors of
15		Agrotechnology
16		
17	State/Local/Tribal Government	
18	Brian Verhougstraete	Association of American
19		Pesticide Control Officials
20	David Heimer	Washington Department of
21		Fish and Wildlife
22	Eric Gjevre	Tribal Pesticide Program
23		Council
24	Wendy Sue Wheeler	Washington State University
25		

1	NAME	AFFILIATION
2	Federal Agencies	
3	Ed Messina (Chair)	Office of Pesticide Programs
4		Environmental Protection
5		Agency
6	Gina Shultz	Ecological Service
7		US Fish and Wildlife Service
8	Kimberly Nesci	Office of Pest Management
9		Policy
10		US Department of Agriculture
11	Walter Alarcon	National Institute for
12		Occupational Safety and
13		Health
14		Centers for Disease Control
15		and Prevention
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I N D E X

1  
2 Housekeeping -- Page 7  
3  
4 Endangered Species Act Activities Update -- Page 12  
5  
6 Farmworker Workgroup Update -- Page 54  
7  
8 PRIA 5 Implementation Update including Bilingual  
9 Labeling and Other Worker Protections -- Page 78  
10  
11 Communication and Pesticide Risk Reduction  
12 Programs -- Page 140  
13  
14 Moving Forward and Meeting Closing -- Page 173  
15  
16 Public Comments -- Page 203  
17  
18  
19  
20  
21  
22  
23  
24  
25

## 1 P R O C E E D I N G S

2 DAY TWO - JUNE 6, 2024

## 3 HOUSEKEEPING

4 JEFFREY CHANGE: We're going to get

5 started. Yes.

6 ED MESSINA: I wanted to welcome everyone. There is no minimum for  
7 funding *per se*. What I tell the program is you really should try to have  
8 enough funds to cover work for at least a month (e.g. divide the total  
9 proposed price by 12 - or add some buffer if you anticipate a lot more work  
10 at the beginning). Over the Call Order period of performance, you really  
11 want to avoid the contractor having to give notice that they are at 75%  
12 and/or needing a new funding PR every two-weeks. You should anticipate  
13 being able to fund the entire estimated total price over the period of  
14 performance. Is it expected the program will have sufficient funds to cover  
15 the work at some point during the period of performance?  
16

17 again and thank everyone for attending. I wanted to  
18 surface a fact that maybe I took for granted in  
19 letting folks know that this a diverse group of  
20 people that represent PPDC, and, you know, thank you  
21 for your time, and just assumed that folks knew that  
22 it was pretty diverse. And that's intentional as  
23 part of the FACA, to have representatives from  
24 various sorts of organizations, from industry, from  
25 NGOs, from grower groups.

26 And I wanted to throw out, before we got  
27 started, just some of the percentage that -- you  
28 know, so folks had a basis for why we are so diverse  
29 and represent a large, you know, spectrum of the,  
30 basically, stakeholders that are out there.

31 So of the PPDC members, 9 percent are

1 federal agencies, 9 percent are also state, local,  
2 tribal governments. The user grower group, those  
3 members represent 28 percent of the PPDC. The  
4 chemical biopesticide industry trade associations



1 represent 19 percent. And then the other three  
2 slices, of which are generally NGO-type  
3 organizations representing public health  
4 representatives, which is about 9 percent, the  
5 farmworker representatives, which are about 10  
6 percent, and the environmental public interest/  
7 animal welfare group, which is about 16 percent.  
8 There is about 35 percent in that slice.

9           So we are a very diverse group  
10 representing industry, academic, user, grower  
11 groups, and NGOs, and it's pretty balanced as well.  
12 So I just -- and that's my intention when we do  
13 submit the paperwork for the Administrator and to  
14 establish the fact that we are required to have a  
15 balanced group. And so we're determined to have a  
16 balanced group and I just wanted folks to -- I took  
17 it for granted that folks realize that, but wanted  
18 to throw out some percentages so folks would  
19 understand that.

20           With that, Jeffrey, I'll turn it over to  
21 you.

22           JEFFREY CHANG: Thanks, Ed. Welcome back  
23 to Day 2 of the June Pesticide Program Dialogue  
24 Committee Meeting. If you are joining us today, we  
25 thank you for being here, and we will go over the

1 administrative and housekeeping items again. If you  
2 participated yesterday, thank you for coming back,  
3 and I will try to be as brief as possible.

4           Again, my name is Jeffrey Chang. I am  
5 joined by Ed Messina, Director of the Office of  
6 Pesticide Programs and Chair of the PPDC.

7           Before we jump in, I want to draw your  
8 attention, to those who have joined virtually, to  
9 the interpretation button on the bottom panel of  
10 your Zoom window to the right of your screen. We  
11 are providing Spanish interpretation for this  
12 meeting, and regardless of your preferred language,  
13 you need to click on that button and select either  
14 English or Spanish to be able to fully participate  
15 in the meeting. This will place you in either the  
16 Spanish or English channel, and as we anticipate a  
17 bilingual meeting today, it is important that you  
18 choose one of these channels.

19           For our Spanish-speaking colleagues, I  
20 will now turn it over to our interpreter, Jackie,  
21 who will provide these instructions in Spanish.

22           (Spanish interpretation.)

23           JEFFREY CHANG: Thanks, Jackie. Closed  
24 captioning and live transcription is available to  
25 those who use the service by clicking the closed

1 captioning button in the bottom panel of your Zoom  
2 screen.

3 We also have an ASL interpreter today and  
4 CART provider. These services can be accessed  
5 through the interpretation button used to select  
6 Spanish translation.

7 If you're a member of the public, unless  
8 you indicated interest in providing oral comments  
9 when you registered for today's public meeting, you  
10 will be in listening mode for the duration of the  
11 event. If you did not preregister for comment, you  
12 may still email me, chang.jeffrey@EPA.gov or use the  
13 "raise hand" function once we come to the public  
14 comment period at the end of the day.

15 PPDC and the workgroup chairs are  
16 designated as panelists in Zoom, meaning that they  
17 can request to be recognized during the discussion  
18 sessions by using the "raise hand" function and can  
19 unmute themselves after they are called upon. It is  
20 very important that you remain muted unless you are  
21 recognized to speak.

22 Today's meeting is being recorded for the  
23 purpose of having meeting transcripts produced. We  
24 ask that all presenters speak slowly and clearly to  
25 ensure everyone can understand and participate fully

1 in the meeting.

2 Conversations should take place orally.

3 The chat function should only be used to contact the  
4 meeting host.

5 Let's take a minute to walk through  
6 today's agenda. Our morning session kicks off with  
7 an update on the Endangered Species Act activities.  
8 Then we will hear about the progress made on the  
9 farmworker workgroup. We break for lunch from 12:35  
10 to 1:15, then reconvene with an update on PRIA 5  
11 implementation, including bilingual labeling and  
12 other worker protections.

13 After that, we will have a session on  
14 communication and pesticide risk reduction programs.  
15 We will break quickly. Then we have an open  
16 discussion on topics moving forward. We have a  
17 period for public comments and then the meeting  
18 adjourns.

19 With that, Ed, would you like to share  
20 anything with the group before we launch into our  
21 first session?

22 ED MESSINA: No, thanks, Jeffrey. I think  
23 we can get into our Endangered Species Act  
24 activities update.

25 JEFFREY CHANG: Great.

1 ED MESSINA: Thank you.

2 ENDANGERED SPECIES ACT ACTIVITIES UPDATE

3 JEFFREY CHANG: We are going to kick  
4 things off with an update on Endangered Species Act  
5 activities for which I am joined by Jake Li, Deputy  
6 Assistant Administrator for Pesticide Programs, and  
7 Brian Anderson, Associate Director of Environmental  
8 Fate and Effects Division. Welcome.

9 JAKE LI: Great. Thanks, Jeffrey. And  
10 good morning, everyone, again. Brian is actually  
11 telling me he's got some audio and video issues. So  
12 I'm going to start talking. We're going to split  
13 this presentation, and we'll just see if Brian can  
14 fix his technical issues.

15 In the meantime I'm going to start sharing  
16 my slides. So give me just a second here.

17 Okay. Jeffrey -- or can you tell me  
18 whether the slides show correctly?

19 JEFFREY CHANG: I'm getting it kind of  
20 broken up into different panels.

21 UNIDENTIFIED MALE: It's in speakermode,  
22 Jake.

23 ED MESSINA: Yeah, so swap -- go to the  
24 top left and go to so the display settings, swap  
25 presenter view.

1 (Pause)

2 JAKE LI: All right. It looks like Brian  
3 is back on. So I'm going to get us started. Again,  
4 good morning, everyone. Ed, yesterday, already  
5 provided us with some background about our office's  
6 work to bring ourselves into full compliance with  
7 the Endangered Species Act. So I'm not going to  
8 repeat that. And I think most of you have already  
9 heard us talk about the ESA for many, many -- across  
10 many, many meetings at this point. Instead, Brian  
11 and I want to give you more information on our  
12 current ESA work and what's happening over the next  
13 year.

14 Today, we will cover what's happening with  
15 our ESA strategies that we teed up in our 2022  
16 workplan. Hold on here.

17 All right. So we'll cover, again, what we  
18 teed up in terms of the ESA strategies in that  
19 workplan and that includes the vulnerable species  
20 pilot, the herbicide strategy, the insecticide  
21 strategy, and a rodenticide strategy. Then we are  
22 also going to talk a bit about how we plan to  
23 implement the mitigation measures in these  
24 strategies. That is something we're spending a lot  
25 of effort on right now because it's a fairly

1 challenging issue of trying to figure out who's  
2 involved in implementing this menu of mitigation  
3 measures, right, for runoff that we've never really  
4 done before as an office. And then, finally, we're  
5 going to cover the timing of our ESA consultations  
6 with the services.

7           Before I start, I actually wanted to make  
8 a note about an important milestone in our ESA work,  
9 which is that, today, we are down to only one ESA  
10 lawsuit that we're actually in the process of trying  
11 to settle. So I think this milestone is a major  
12 testament to how hard everyone who has been involved  
13 in this issue has been working to try to find  
14 practical ways to protect endangered species from  
15 pesticides, while also finding ways for those  
16 mitigation measures to be feasible, right, for  
17 users.

18           I know that we still have a lot of work to  
19 do in this area, but I think we've done a tremendous  
20 amount of work in just the last few years and,  
21 again, the fact that we're down to just one lawsuit  
22 left is fairly remarkable if I think about when I  
23 started this work some 15 years ago.

24           So with that, I'm actually going to turn  
25 it over to Brian first to talk about our ESA

1 strategies.

2 BRIAN ANDERSON: Great. Thank you, Jake.

3 I am leaving my video off, because every time I turn  
4 my video on, my audio shuts off. So I apologize for  
5 not being on video, but I just want to make sure  
6 that you guys can hear me.

7 Okay. So thank you very much, Jake.

8 So I'm going to start by giving a little  
9 bit of just a background on kind of what the  
10 strategies really are and then talk about some  
11 updates to some of the individual strategies that  
12 we're working on.

13 So when we talk about an ESA strategy,  
14 really what we mean is a systematic kind of  
15 predictable way to get through a group or evaluate  
16 either a group of pesticides or a group of species  
17 that are in a particular location. And so it can be  
18 a predictable and systematic kind of process, right,  
19 and that will increase the efficiency of the process  
20 overall.

21 So when we talk about a systematic  
22 process, though, what I mean is something that  
23 covers the rule that's associated with, for example,  
24 a whole group of herbicides, a group of  
25 insecticides, a class of pesticides, for example,



1 and not necessarily the exception. So we're looking  
2 -- so there are always ways or different exceptions  
3 associated with kind of each individual pesticide or  
4 each individual species. But as a strategy, though,  
5 we are trying to tackle the most common kind of  
6 processes. So it doesn't mean that there are  
7 situations and nuances for each pesticide and group  
8 of species that we would still need to consider, but  
9 those are considered on a case-by-case basis, right.

10 So with that kind of background, the  
11 strategies I'll talk about today really have three  
12 basic phases or three different, you know, parts of  
13 the process. The first one is to figure out is  
14 mitigation even needed for a particular group or a  
15 particular species, and if so, what is the extent of  
16 that mitigation, what is the extent of the risks.  
17 And we associate those risks and those potential  
18 impacts then to mitigations.

19 When we talk about mitigations, what we're  
20 targeting for the strategies are really the most  
21 common processes that are associated with pesticide  
22 movement, right, pesticides move through the  
23 environment with other things that move in the  
24 environment. They move with the wind, with the air,  
25 with the water, with the soil.

1           So when we talk about a mitigation  
2 strategy what we mean are those most common types of  
3 pesticide movement pathways. So that doesn't mean  
4 that pesticides can't move using other processes.  
5 Pesticides can certainly move through things, such  
6 as by accumulation, by volatility, they can move  
7 through fog and other kind of ways, but those are  
8 less common, and we only see those for pesticides  
9 that have particular properties. So for a strategy  
10 that covers a large group of pesticides, we're  
11 targeting kind of the most common movement pathways  
12 for a pesticide.

13           And then when we talk about the potential  
14 for an effect or an impact in those mitigations,  
15 what we're talking about are potential species-level  
16 effects. So we're evaluating or developing our  
17 processes to try to evaluate the potential impacts  
18 to a species given that the Endangered Species Act  
19 requires that we -- a federal agency such as us  
20 don't allow actions that allow for -- that  
21 jeopardize the continued existence of listed species  
22 or adversely modified designated critical habitats.

23           So when we're looking at our toxicology  
24 data and our exposure metrics, we're doing so with  
25 that in mind. Is there a potential for a species

1 (inaudible) effect, and then, if so, how do we  
2 mitigate those effects. And we do it in a way that  
3 we're intending to be as flexible as possible.  
4 We're trying to target those mitigations in a way  
5 that kind of spatially -- that's spatially explicit  
6 and spatially granular, and also allows for the  
7 evolution of new processes and new science and new  
8 data to come on board so we're not stuck in 2024 in  
9 10 years from now.

10 So to do that, right, that balance between  
11 spatial granularity and flexibility kind of comes at  
12 the cost of simplicity and complexity. So --

13 (Pause)

14 ED MESSINA: I think we lost Brian.  
15 Jeffrey, can you hear me?

16 JEFFREY CHANG: Yes.

17 ED MESSINA: I think we lost Brian. Am I  
18 the only one not hearing him?

19 JEFFREY CHANG: No, I can't hear him.

20 (Pause)

21 JAKE LI: Okay. He's actually going to  
22 log off and get back on. So in the interest of  
23 time, let me sort of just continue.

24 I think Brian was talking earlier about  
25 implementation, about sort of the spatial extent

1 about allowing for emerging technologies that can  
2 reduce rates and giving credit for those reduced  
3 rates and for trying to develop a programmatic  
4 approach, especially with the federal wildlife  
5 agencies and others to implement these mitigation  
6 measures and to coordinate them with the ESA  
7 consultations, in particular, the biological  
8 opinions that are in the future.

9 Let me move on to this next slide here.

10 So here, Brian was going to talk about -- give an  
11 update on the herbicide strategy, and I think many  
12 of you know that we released the draft herbicide  
13 strategy last year for public comment. We got over  
14 10,000 public comments. We've finish going through  
15 those comments. About two months ago, we released  
16 an update to the herbicide strategy in which we  
17 announced a number of measures that we're  
18 considering in response to public feedback, in  
19 particular, about the feasibility of the mitigation  
20 measures.

21 We had also announced that we are planning  
22 to give a credit in areas with low runoff potential  
23 and that means areas with flat lands or areas with  
24 really minimal precipitation. So one of the bullet  
25 points has a link to that update to the herbicide

1 strategy. It's fairly substantive. So for those  
2 who haven't read it yet, I really encourage you to  
3 take a look at that.

4 I think we're doing a number of fairly  
5 exciting things under this herbicide strategy to --  
6 really I think there are two to three themes. One  
7 is to really focus on where we think the mitigation  
8 measures need to be in order to protect endangered  
9 species. And a big part of that are developing more  
10 refined maps, right, to inform the species' specific  
11 mitigation measures, and the second is really trying  
12 to maximize flexibility and options for growers so  
13 that, for example, people that rent, you know,  
14 farmer-rented land have mitigation options that  
15 aren't available, right, if you don't own the land.

16 So I know that's a work in progress, but I  
17 think we've made a number of important steps and  
18 announced a number of measures we're considering  
19 adding to the mitigation menu in order to increase  
20 that flexibility.

21 We had already announced this previously,  
22 but the final strategy deadline is extended to the  
23 end of August of this year, and we are still on  
24 track to meeting that deadline and finalizing the  
25 herbicide strategy then.

1           It bears repeating. We've said this  
2 multiple times before, but the day the strategy is  
3 finalized is not the day that the measures from the  
4 strategies hits a label or starts becoming sort of  
5 effective, right? We still need to use this  
6 strategy to inform the actual FIFRA decisions in  
7 registration review and for new conventional active  
8 ingredient registrations.

9           So those two types of FIFRA decisions have  
10 their own schedules. I think many of you know we  
11 have a schedule for registration review in which  
12 we're going to pull in the herbicide strategy to  
13 inform the mitigation measures. Same thing for new  
14 AI registrations. So that's herbicides strategy.

15           Let's move on to insecticide strategy.

16           Brian, are you back on?

17           BRIAN ANDERSON: I am.

18           JAKE LI: Okay.

19           BRIAN ANDERSON: I can give it one more  
20 shot. I'm sure it's going to work.

21           JAKE LI: Okay, great.

22           BRIAN ANDERSON: But thank you for taking  
23 that. I apologize here. I'm having some technical  
24 issues. So I'm going to try to keep talking and,  
25 hopefully, I won't cut out again?

1           So yeah, for the insecticide strategy, so  
2   it's very similar in really principle with the  
3   herbicide strategy, where the herbicide strategy,  
4   you know, I was talking about how we're trying to  
5   focus on the most common kind of concerns or the  
6   most common kind of risks associated with a type of  
7   pesticide and herbicide strategy that affects the  
8   plant and the associated potential effects to other  
9   animals, resulting from those effects to plants.

10           For the insecticides, it's really the same  
11   principle, but we're focusing on potential effects  
12   to invertebrates and then resulting potential  
13   effects to other plants and other animals from those  
14   effects on invertebrates, because those are the most  
15   common impacts that we see that are associated with  
16   this type of pesticide. So the only -- the main  
17   differences, though, between the insecticide  
18   strategy and the herbicide strategy also is kind of  
19   the type of habitats that we would consider, the  
20   types of toxicological data that we get for  
21   invertebrates and how we can kind of try to group  
22   those together into the types of habitats that we  
23   evaluate kind of as well. But in principle, it's  
24   really the same idea.

25           But we are moving to issue a draft of the

1 insecticide strategy by the end of July of this year  
2 and we are trying to incorporate, to the extent that  
3 we can, lessons that we learned from the herbicide  
4 strategy and all that we've learned through that  
5 process and through that public process and  
6 incorporate that into the insecticide strategy as  
7 well. So that should be coming out for public  
8 comment by the end of next month, which is coming up  
9 pretty soon.

10           Next slide, please, Jake.

11           And so the rodenticide strategy is also  
12 similar. For rodenticides, we did a little bit  
13 more, though, just because there are so -- there  
14 aren't as many rodenticides to start with and so we  
15 were already planning on conducting biological  
16 evaluations for 11 rodenticides together, and we  
17 decided that, you know what, let's go ahead and  
18 develop a mitigation strategy and kind of put  
19 everything out at the same time, right.

20           So last December, we did issue a  
21 biological evaluation that had predictions of  
22 likelihood of jeopardy and a mitigation strategy as  
23 well, all out for public comments. We applied that  
24 to 11 rodenticides. Rodenticides do offer a little  
25 bit of a unique challenge just because -- just the



1 mode of action that's associated with some of the  
2 rodenticides results in different types of  
3 toxicological effects, meaning we have a concern not  
4 just for maybe animals that eat bait, but also  
5 animals that eat the animals that eat the bait, and  
6 so it can take a few weeks for a treated animal to  
7 actually die, and during that time they can walk  
8 around with enough chemical to affect other animals,  
9 which poses a challenge for the mitigation strategy.  
10 But the mitigation strategy does include both those  
11 different types of exposure pathways and ways to  
12 mitigate those potential effects from those  
13 different exposure pathways.

14 We're going through the public comment  
15 period right now for the rodenticide strategy.  
16 We've got about 2,000 comments total. We have a  
17 team that is looking at those comments and vetting  
18 them and figuring out how those comments influence  
19 us moving forward towards a final strategy in BE.  
20 We're looking to finalize a strategy in November of  
21 this year and we are marching towards that deadline.

22 Next slide, please.

23 I'm not going to talk too much on -- about  
24 the vulnerable species strategy, but just for those  
25 who aren't with it, the vulnerable species strategy

1 is -- we had identified 27 federally threatened and  
2 endangered list of species that we thought were  
3 particularly vulnerable or potentially vulnerable to  
4 pesticides. We proposed a mitigation strategy to  
5 protect them by minimizing and avoiding kind of  
6 pesticide exposures and described an approach to  
7 implement the mitigations and future pesticide  
8 decisions. So we put that out for public comment  
9 last year. We got a number of comments. We got  
10 about 10,000 total, probably about close to 200 that  
11 were individual comments.

12           And so we've evaluated comments and then,  
13 last November, we put out summary of how we kind of  
14 view the public comments and some ways we're  
15 thinking about moving forward as we incorporate into  
16 the strategy and the pilot. So those comments were  
17 particularly around, for example, the maps that we  
18 use to identify spatially where mitigations would be  
19 associated with these species was one comment, and  
20 I'll talk about that in a few minutes; the process  
21 that we're developing right now to try to refine the  
22 maps that we use not just for the vulnerable species  
23 pilot, but if we're moving forward in kind of a  
24 broader context to try to refine the maps to  
25 identify areas that are most relevant for pesticide

1 conservation and for pesticide labeling purposes.

2 We also got a number of comments on the  
3 mitigations, just ensuring that we have enough  
4 options for folks to be able to, you know, get  
5 enough mitigations to mitigate enough to prevent  
6 those species-level effects, making sure there are  
7 enough options available for people and that we  
8 have, basically, the right amount of credit, I'll  
9 call it that, or a view of efficacy of the different  
10 mitigation options as well. So we got some comments  
11 on how much efficacy or kind of credit people should  
12 get for the different types of mitigations,  
13 particularly around the runoff exposure pathway.

14 There were a number of comments just on  
15 clarity really just to connect the dots between  
16 really the pilot species and the criteria that we  
17 use to identify --

18 (Pause)

19 JEFFREY CHANG: Did we lose Brian again?

20 ED MESSINA: Yeah, I think we lost him  
21 again, Jeff.

22 (Pause)

23 JAKE LI: So let me move on with sort of  
24 the next slide, and folks can ask him questions  
25 about the vulnerable species pilot later, if you

1 have questions about it. So we also in our ESA  
2 workplan talked about a Hawaii-specific strategy to  
3 try to identify mitigation measures for as many  
4 Hawaiian species and as many Hawaiian pesticide uses  
5 as possible. So we did start that work.

6 We actually had a workshop in Hawaii  
7 in March of this year. There were two EPA  
8 representatives in person there. I was one of  
9 those people and Jan Matuszko, who is the Director  
10 of EFED, was also there. And so we -- Fish and  
11 Wildlife Service was there; agricultural; ag  
12 chemical NGO stakeholders were there; Hawaii state  
13 representatives were there.

14 I thought it was a really productive  
15 workshop in a sense of helping us at EPA understand  
16 about what are the actual pest pressures in Hawaii,  
17 in what situations do people actually use pesticides  
18 in Hawaii, and what could be measures that people  
19 already start taking in Hawaii or already doing in  
20 Hawaii to minimize impacts to endangered species  
21 from pesticide uses. These are all things that we  
22 really needed to understand through an in-person  
23 dialogue. So it was, I think, a really good  
24 milestone in this Hawaii strategy.

25 At the workshop, we had actually put out a

1 draft Hawaii framework document for the workshop  
2 participants to read and comment on. And that draft  
3 framework document basically identified the  
4 categories of pesticide uses, the categories of  
5 species, basically trying to break down this  
6 somewhat complex situation into some manageable  
7 chunks. And the reason sort of we focused on Hawaii  
8 here is that Hawaii has the most number of federally  
9 listed species of any state. So our view was that,  
10 you know, if we can figure out a solution to Hawaii,  
11 we can make a lot of progress in our ESA compliance  
12 work.

13           And, again, we thought the best way to do  
14 that for Hawaii was to break it down into categories  
15 of, you know, agricultural uses and various  
16 nonagricultural uses, as well as where species are  
17 located, because there are a number of species that  
18 reside only in areas for which there's very, very  
19 little pesticide use. So those should be much  
20 easier to resolve than species that tend to hang out  
21 in areas with a lot of pesticide use.

22           So we are currently sort of focusing on  
23 the insecticide strategy and the herbicide strategy  
24 in terms of what we're going to put out for public  
25 comment and finalize. But we are planning to make

1 more progress on the Hawaii strategy later this  
2 year. The Hawaii team is actually following up on  
3 various aspects of the workshop. But we don't have  
4 anything right now to put out for public comment  
5 just yet. We do expect that later on this year when  
6 we would put out that draft framework for public  
7 comments and then move forward with incorporating  
8 Hawaii into sort of our ESA work and the mitigation  
9 measures.

10 Brian, are you back on?

11 (No response.)

12 JAKE LI: It looks like he is still trying  
13 to restart his computer. Okay. So I'm going to  
14 continue.

15 Here's another thing that really is in the  
16 direction of efficiency and that we talked a little  
17 bit about in our ESA workplan, and it's a  
18 programmatic approach with the National Marines  
19 Fisheries Service. And the idea here is to develop  
20 -- to come to agreement on how we assess, as a  
21 matter of science, effects to species that -- listed  
22 species that NMFS has jurisdiction over and then how  
23 to mitigate the pesticide risk to those species and  
24 to do it programmatically, as in having a  
25 programmatic document that just lays out what are

1 our assumptions for the risk assessment and the risk  
2 management approach for these endangered species  
3 really to start with new conventional active  
4 ingredient registrations.

5 So at least a starting point is not going  
6 to be registration review. We want to, again, bite  
7 off something that we can chew and we started with  
8 the new AIs. And under this programmatic, our idea  
9 here is that we will have completed the  
10 consultations for actions before finalizing the  
11 actual registration of that new AI.

12 So we're still in constant dialogue and  
13 meetings with NMFS about this programmatic  
14 consultation, and our plan is to provide more  
15 updates later this year on where we are on that.

16 Okay. Mapping refinements. Both Brian  
17 and I talked a little earlier about developing more  
18 refined maps of rare species habitat or most likely  
19 to be so that we don't have to apply pesticide  
20 mitigation measures for endangered species in areas  
21 that those species don't actually occur. So we  
22 actually had a really good workshop earlier this  
23 year, maybe just about two months ago, with a small  
24 group of folks who were -- had expertise in this  
25 issue. And basically what we're doing here is we're

1 developing and testing a draft process for refining  
2 these maps. They're called pesticide use limitation  
3 areas, or PULAs, and we actually have about four  
4 pilot species that some of the workshop participants  
5 are helping us test.

6           So they're applying this draft process to  
7 these four pilot species. And we want to see how  
8 easy is this process to actually use, and we'll know  
9 based on the outcome of these four pilot species.  
10 And after that pilot is done, we're going to take a  
11 look back at this draft process, see if it needs to  
12 be finalized -- see if it needs to be amended and  
13 then finalized.

14           And the idea is that when it's finalized,  
15 we can put it out as a public document so that  
16 anyone with the proper expertise can coordinate with  
17 us to help develop these draft maps, because there's  
18 no way that any federal agency is going to develop  
19 hundreds and hundreds and hundreds of draft maps  
20 within any reasonable time period for all of these  
21 endangered species that need these more refined  
22 maps.

23           So we're putting this out there to the  
24 public to say that, you know, if you have the  
25 expertise and you want to help provide these draft



1 maps, here's a process that allows us to work with  
2 you so that you know what we're looking for. So  
3 more on that later this year, but we're currently in  
4 the pilot phase for the species.

5 Brian, are you back on yet?

6 BRIAN ANDERSON: Yes, Jake, I'm back on.

7 Man, I'm sorry --

8 JAKE LI: No worries.

9 BRIAN ANDERSON: -- about my technical  
10 issues here.

11 JAKE LI: Anything you want to add to the  
12 last two slides here?

13 BRIAN ANDERSON: For the map, no, I think  
14 you handled it -- I think you said everything just  
15 right. Thank you very much.

16 Yeah, I would say we are trying to address  
17 a couple of things through the map. I mean, one is  
18 certainly refining the maps to the point where we  
19 can -- where they identify areas that are most  
20 relevant for the species conservation, and two is to  
21 make sure that we're explicitly mapping the areas  
22 that we're intending to be protected, meaning we've  
23 gone out earlier with maps that were larger in  
24 scale, but then we tried to identify just with words  
25 saying -- or text that said these are the habitats

1 within this area that we're trying to protect.

2 So if there's a buffer, there's a buffer  
3 to these types of habitats. But that can be very  
4 difficult to interpret if you're looking at a label  
5 trying to read a description of an ecological kind  
6 of system and trying to look up at the landscape and  
7 trying to say, well, is that what EPA intends, you  
8 know, to be protected or not. That can be very  
9 difficult to interpret.

10 So we're explicitly mapping the areas that  
11 are intended to be within a PULA or within a  
12 protection area so there's no ambiguity if somebody  
13 is in or out of an area that needs some additional  
14 labeling language.

15 JAKE LI: Great. Thanks, Brian.

16 BRIAN ANDERSON: Yeah, no, thank you.

17 JAKE LI: Okay. So next slide here. This  
18 one is really about also the theme of implementing  
19 these mitigation measures. And I think a big part  
20 of what we're trying to do here is increase the  
21 flexibility and the feasibility of these mitigation  
22 measures for endangered species and of the wildlife.  
23 And an important theme is to get input from growers  
24 about which of these measures to add to our  
25 mitigation menu. So this is something that I've

1 said in past PPDC meetings. I've also said that in  
2 other meetings with stakeholders.

3 So we did follow up on that one. On May  
4 9th, we cohosted a workshop with USDA that included  
5 a wide range of stakeholders, mostly agricultural  
6 stakeholders, but we also had environmental groups  
7 there. And we had a number of questions to walk  
8 through at that workshop, particularly questions  
9 around, you know, what are additional mitigation  
10 measures that we should consider adding to menu so  
11 that we can cover a wider range of growers,  
12 especially specialty crop growers.

13 So I think for me a big takeaway from that  
14 workshop was I didn't hear that there were a large  
15 number of new measures that we hadn't already  
16 considered. I think a lot of the questions -- a lot  
17 of the feedback we got was more about how to  
18 implement the mitigation measures in a feasible way  
19 given the complexities of, you know, implementing a  
20 menu for the first time of this nature.

21 We also heard a lot from state programs  
22 that some states actually already have programs,  
23 agricultural stewardship programs, that growers can  
24 voluntarily participate in and that those programs  
25 implement runoff mitigation measures. There may be

1 record-keeping; there may be, sort of, other  
2 features of that program.

3           So we're actively thinking through all of  
4 that right now to figure out, okay, you know, what  
5 are some programs out there that may actually  
6 achieve the same outcome for species protection as  
7 if a grower were to just follow the label without  
8 participating in one of these programs and how can  
9 we incentivize participation in a program like that.  
10 So that, to me, was one of the biggest sort of  
11 takeaways from that workshop.

12           The other thing I wanted to cover in this  
13 slide is that at the last PPDC, and certainly  
14 earlier this year, a number of us at EPA have talked  
15 about this MOU with USDA that was signed in February  
16 of this year to coordinate more on endangered  
17 species and agricultural issues. And as part of  
18 that MOU, I did announce that we're working on a  
19 crosswalk document, which basically identifies which  
20 NRCS practice descriptions would meet the mitigation  
21 menu requirements on EPA's end.

22           So for example, when we say that a grower  
23 can use cover crops, which NRCS definition of cover  
24 crops, you know, can growers actually use, and the  
25 same for other measures. So we're currently working

1 on that crosswalk document. It's currently in  
2 interagency review and we expect to release it for  
3 the public in the next few months. So that document  
4 you can think of as the glue that ties together this  
5 MOU in February where we talked about giving credit  
6 or allowing NRCS conservation measures to meet  
7 pesticide labor requirements.

8 Okay. The other thing -- and Ed talked  
9 yesterday, so I'm not going to say too much about it  
10 -- is that we had just announced our June 18th  
11 webinar that will walk through a new webpage that  
12 will contain in the future our mitigation menu, and  
13 future labels are actually going to point users to  
14 this website to see the menu. In the past, I've  
15 talked about why an online menu is so important,  
16 because it's the only way we're going to be able to  
17 add and amend the measures on the mitigation menu in  
18 any timeframe. The only alternative is to  
19 amend thousands and thousands of labels, and until  
20 that happens, users wouldn't be able to take  
21 advantage of additional mitigation measures.

22 So this online menu is going to be a  
23 really important feature to the use of the  
24 mitigation menu as a whole and keeping this menu  
25 adaptive and flexible over time. So I really

1 encourage folks to at least think about joining or  
2 listening to that webinar.

3           Okay. Offsets, so that's also known as  
4 compensatory mitigation. I've talked about this at  
5 past PPDC meetings. And the whole idea here is that  
6 when it's not possible to avoid impacts altogether  
7 to endangered species and there's only so much that  
8 can be done to minimize those impacts, there is the  
9 opportunity to offset unavoidable impacts. We  
10 talked about that in the workplan and the workplan  
11 update, and we're actively exploring how to try to  
12 incorporate offsets into our FIFRA decision.

13           There was a workshop in February that  
14 CropLife convened, a two-day workshop that I thought  
15 was really productive, that had a number of  
16 stakeholders, including environmental organizations.  
17 And some takeaways from that workshop were that we  
18 talked about what could be a near-term path to try  
19 to consider how offsets could be incorporated into  
20 FIFRA decisions. And that includes something like a  
21 roadmap that can outline how, for example, multiple  
22 species could be part of the offset project, almost  
23 like a pilot to demonstrate how this could work, and  
24 then there would be working groups to focus on some  
25 key issues, like, you know, how do we price the cost

1 of offsets for the suitable species for offsets  
2 because it's probably not the case that every  
3 species is amenable to an offset.

4 So we want to identify those species that  
5 are most likely to actually benefit from an offset  
6 and that will deliver a benefit to a registrant and  
7 a grower if there is an offset for those species.  
8 So we're still actively working on that and hoping  
9 that in the next PPDC meeting we can provide you  
10 with more information on how that's moving along.

11 Brian, back to you.

12 BRIAN ANDERSON: Thank you, Jake. And  
13 it's really just a reminder that our individual  
14 chemical consultations do continue. We are  
15 developing the broad strategies that we are talking  
16 about today, but -- and we also get to continue to  
17 meet kind of our individual obligations as well.

18 So some recent ones for this year include  
19 the last two neonic insecticide biological  
20 evaluations, Acetamiprid and Dinotefuran. We issued  
21 drafts of those last year. It went to a public  
22 comment period. So we're addressing the public  
23 comments right now. We plan to finalize those two  
24 BEs later this year in November.

25 We have two additional ones that we are

1     issuing biological evaluations for, for draft for  
2     public comment later this year. That's  
3     Bicyclopyrone and Benzovindiflupy. Those are hard  
4     to say. Benzo, we call it Benzo. But those are  
5     going out for draft later this year. So you'll see  
6     those for public comment. And we intend to finalize  
7     those two in the fall of next year.

8             And then we have the rodenticide  
9     biological evaluation, which we already kind of  
10    talked about which we plan to finalize in November  
11    of this year as well. Then we also have, in  
12    addition to the biological evaluations, we're making  
13    effects determinations and predicting a likelihood  
14    of jeopardy. We also have biological opinions that  
15    are -- that are coming in, which are kind of the  
16    tail end of those individual chemical consultations.  
17    Earlier this year, we received a final biological  
18    opinion from Fish and Wildlife Service Enlist and  
19    Enlist Duo, and we implemented those bulletins in  
20    January.

21            We also implemented the final biological  
22    opinions from NMFS. Those are NMFS only. But that  
23    one is National Marine Fisheries Service species for  
24    diazinon and malathion. Now, we also are expecting  
25    a methomyl and carbaryl biological opinions from



1 Fish and Wildlife Service later this year. And we  
2 did also receive a final biological opinion from  
3 NMFS on methomyl and carbaryl earlier this year as  
4 well. So we do continue to meet our individual  
5 biological evaluation and BIOP kind of obligations  
6 as well and those keep rolling.

7 Next slide, please.

8 On the next slide, this is really just  
9 everything that we kind of talked about in one  
10 place. I'm not going to go through it. This is  
11 really just for your reference. It just has kind of  
12 the major milestones for some of the different  
13 strategies and the individual consultations that are  
14 going through that process as well. It's just here  
15 for your reference for later. But we'll keep these  
16 timelines kind of updated and communicate any  
17 updates as they happen over time, too.

18 But that's really all we have, I think,  
19 today. Thank you.

20 JAKE LI: Great.

21 ED MESSINA: Feedback and questions from  
22 the PPDC members? We've got some hands raised,  
23 Jeffrey.

24 JEFFREY CHANG: Rosemary, can you hear me?  
25 Rosemary, you can speak. Can anyone hear me?

1 ED MESSINA: Yes, we didn't hear you at  
2 first, but now we can.

3 JEFFREY CHANG: Okay. Okay.

4 ROSEMARY MALFI: Thank you, Jeffrey, and  
5 thank you, Brian and Jake, for that great  
6 presentation. The work that you're doing is so  
7 impressive, and on behalf of Xerces, I'm sure  
8 expressing this for other folks here, just really  
9 grateful for the work that you're doing and how fast  
10 you're doing it. It's a lot.

11 One question I had was about the range  
12 maps. I may have just missed it, but for the PULAs  
13 that were these bigger areas where you were  
14 initially proposing that folks identify habitat, you  
15 know, within those areas and on their own kind of  
16 deciding whether mitigations needed to be applied, I  
17 like that it's no longer like that, that it is  
18 spatially explicit. I think my question is, how  
19 have those been made then spatially explicit, or is  
20 that the kind of information that you're seeking  
21 from the public?

22 Because it strikes me that you could  
23 create a really refined map, though it might be a  
24 bit difficult, you know, based on, like, land use  
25 information and, you know, GIS layers to identify

1 those specific areas.

2 BRIAN ANDERSON: That's exactly right. So  
3 the way we're approaching it right now, right now,  
4 we just have a draft approach, but the way we  
5 envisioned it so far is it depends on the data  
6 that's available for the species. So in some cases  
7 there are already very highly refined ranges that  
8 might be just perfectly appropriate to use. But in  
9 those cases where we do have those big areas, it's  
10 going to depend on what type of data is really  
11 available for the species.

12 So in some cases, Fish and Wildlife  
13 Service or the documentation that's associated with  
14 the species might be very clear about the types of  
15 habitats that are really most important for that  
16 species, and there are GIS layers that are available  
17 that we can use to kind of locate those within the  
18 range, so we can kind of go through that kind of  
19 habitat-based approach. In some cases, there might  
20 be more uncertainty associated with that.

21 There might be more information with  
22 respect to confirmed locations or known locations,  
23 element occurrences, however you want to call them,  
24 but kind of places where -- have already been  
25 identified just kind of where those species are

1 known to be, where the important -- I'll call them  
2 important; that's not the right word -- but kind of  
3 where those kind of main populations are within the  
4 range. We can kind of identify those and then just  
5 based on those -- on that kind of information or  
6 maybe a combination of both.

7 So it's going to be a little bit based or  
8 tailored to the data that's available for that  
9 species. And so it's not always going to be the  
10 same, but we're trying to use whatever data we have  
11 to give us kind of the most appropriate map for  
12 those species.

13 ROSEMARY MALFI: That's great. Thank you  
14 so much for clarifying that. Yeah, that sounds very  
15 reasonable.

16 My other question quickly was the rusty  
17 patch bumblebee got a critical habitat designation,  
18 I think, as a result of the court ruling. Has that  
19 been done? Do we have critical habitat, you know,  
20 outlined for that species yet?

21 BRIAN ANDERSON: I don't know, Jake, if  
22 you know that as well. I'm not totally sure, but  
23 when it does come online, we download it and  
24 incorporate into our processes. So if it's not  
25 available, once it is, we'll utilize it.

1 ROSEMARY MALFI: Sure.

2 BRIAN ANDERSON: I forget if that critical  
3 habitat has actually been delineated or not.

4 ROSEMARY MALFI: Okay. Thank you.

5 BRIAN ANDERSON: Sure.

6 JEFFREY CHANG: Nathan?

7 NATHAN DONLEY: Great. Well, thanks, Jake  
8 and Brian. You know, I really want to thank  
9 everyone at EFED for the work they've done here, all  
10 the scientists there, because it's truly been a  
11 remarkable undertaking so far, and I expect it will  
12 continue to be. You know, the agency is developing  
13 these strategies de novo and there's no playbook on  
14 how to do what the EPA's doing here. And I really  
15 want to commend the agency for the work it's done  
16 and, you know, continues to do on this.

17 And I want to reiterate our support for  
18 the Hawaii strategy moving forward, and also the  
19 NMFS strategy sounds really promising as well. So  
20 that's great.

21 And I think, as many of you know, we've  
22 been very involved in this issue, in helping to  
23 advocate for a robust process here, and we put in a  
24 lot of resources to help develop maps that can more  
25 accurately predict where to target pesticide

1     protections and where they're needed, and we  
2     continue to advocate for things like reducing label  
3     complexity and just make labels more workable for  
4     farmers.

5             So we're really coming at this from an  
6     angle of how do we make this process work better for  
7     everyone because we know there's a lot going on now,  
8     labels are changing a lot, and people are scared, I  
9     think, and I hope the agency and other stakeholders  
10    really see that we're coming here to be  
11    constructive.

12            But something I want to mention is that  
13    we're worried that protections are starting to get  
14    weakened considerably in some cases. So, you  
15    know, we are totally on board with more effective  
16    targeting approaches, label adaptability,  
17    flexibility, you know, let's-figure-this-out type  
18    stuff. But at the end of the day, species need to  
19    be protected and we're worried that's being lost.  
20    You know, we obviously don't know the specifics of  
21    the workplan updates and the herbicide strategy  
22    updates and the vulnerable species pilot updates,  
23    but, you know, some of the language used to describe  
24    those updates has us a little nervous.

25            For instance, no longer including

1 avoidance as a mitigation option for the vulnerable  
2 species pilot is kind of a big red flag for us. And  
3 just to give you a recent example, in the new  
4 glufosinate approval, which we'll be commenting on  
5 here soon, we're noticing ESA mitigations that are  
6 kind of a far cry from what we would expect. I  
7 think there's one runoff credit and a 50-foot aerial  
8 application buffer and only a single bulletin to  
9 prevent jeopardy to 60 species and adverse mod to 38  
10 critical habitats. So that just doesn't add up to  
11 us and especially for a pesticide that could be used  
12 on potentially tens of millions of acres.

13 And I want to reiterate ESA mitigations  
14 don't have to be burdensome. That's not what we're  
15 advocating for here, but they do have to pass the  
16 smell test and we're worried that, you know, things  
17 are starting to turn, so to speak. So we can target  
18 things better, we can make things more workable, but  
19 the mitigations have to be strong, they have to have  
20 teeth. There's just no way around that.

21 So I'll just say this, you know, we're in  
22 kind of a precarious situation here where EPA is  
23 still approving pesticides without full ESA  
24 compliance, and the ultimate success of EPA's, you  
25 know, current strategy here is completely reliant on

1 getting in place sufficient protections on the front  
2 end before consultation has occurred.

3 And if protections start to weaken over  
4 time, you know, due to industry pressure or whatever  
5 the case may be, then this plan fails, and we end up  
6 back where we started. So, you know, trust me when  
7 I say no one wants to end up back in that place, you  
8 know, buried under mountains of litigation. It's  
9 not a comfortable posture for anyone, and it's  
10 certainly not in the best interests of protected  
11 species.

12 So I just want to implore the agency not  
13 to put at risk this process that you've put so much  
14 time and effort into by weakening it to the point  
15 where it no longer accomplishes the original task of  
16 protecting species in accordance with the law and  
17 also say to stakeholders who may be pushing EPA to  
18 violate the Endangered Species Act by scaling things  
19 back considerably, just I urge you to think about  
20 what you're hoping to accomplish with that strategy,  
21 because it may end up making things much harder for  
22 your industry in the long run.

23 So that's all for me. Thank you.

24 JAKE LI: Yeah, Nathan, let me just  
25 respond really briefly. So thanks for that. Truly,



1 I appreciate it, and I really appreciate how much  
2 your organization has been playing a really  
3 constructive role in helping our office get to, I  
4 think, what we all want.

5           You know, in terms of your concerns about  
6 us scaling back some of the mitigation measures and  
7 maybe departing from the purpose of the ESA  
8 workplan, that's also something I'm very cognizant  
9 of. I think you can ask anyone here that I work  
10 with how much I really insist that we are actually  
11 following through on real measures at the end of  
12 day. At the end of day, I don't care about a 3,000-  
13 page biological opinion if it's not actually  
14 implemented. That means absolutely nothing to me.

15           So what we really care about are the  
16 measures on the ground. I think we're trying to  
17 strike this balance here between like how can we  
18 really get those protections in place, but in a way  
19 that people on the ground are actually going to  
20 follow through on and implement and, you know, sort  
21 of the reality of all of this, right, which is that,  
22 like, if we make the measures too difficult, it just  
23 sometimes -- it's just not going to happen on the  
24 ground. So I think we're trying to strike that  
25 balance. That's why I think, for example, the state

1 stewardship programs could be a really good way to  
2 ensure people are actually following through and  
3 that they're under a program that states are  
4 actually going to oversee or the plan participants.

5 I don't know the details about (inaudible)  
6 glufosinate, so we're happy to have a separate  
7 discussion on that. I just -- I don't have enough  
8 information to respond to that one. And I think on  
9 the vulnerable species pilot, I think we might have  
10 provided an update previously on why we're moving  
11 away from avoidance there. I think that's not to  
12 say that we think the measures we're proposing  
13 aren't enough to avoid jeopardy, adverse mod and  
14 minimize take. It was just that it wasn't clear to  
15 us that complete avoidance was needed across the  
16 board for all those species that we had proposed up-  
17 front.

18 I don't know, Brian, if -- you're much  
19 closer to that, so I don't know if there's anything  
20 you want to say.

21 BRIAN ANDERSON: I don't have anything to  
22 add. I think you covered it great. Thank you.

23 NATHAN DONLEY: Thank you both. I  
24 appreciate it.

25 JAKE LI: But, yeah, I hear you loud and

1 clear, Nathan. Our goal is not to jeopardize all  
2 this progress we've been making because we cannot  
3 redo everything we've been doing for the last three  
4 years. Like we are on probably the best path we've  
5 ever been on this. I think no one wants to  
6 jeopardize that.

7 ED MESSINA: Yeah, I'd similarly add my  
8 voice to that as well, and, Nathan, to the extent  
9 that any of the changes were based on refinements,  
10 that's maybe where that's coming from. I'm not  
11 aware of any pressure we received to, you know, drop  
12 mitigations that we wanted as part of that, you  
13 know, approval. But happy to talk offline on, you  
14 know, where you're seeing some gaps in our analysis.

15 NATHAN DONLEY: Absolutely, yeah. Thank  
16 you.

17 ED MESSINA: Mm-hmm.

18 JEFFREY CHANG: Before we move on, we only  
19 have a few more minutes left. So we're going to  
20 take the next couple of people and we're going to  
21 have to move on.

22 So John Wise?

23 JOHN WISE: Good morning, and thank you  
24 for the update on Endangered Species Act work. It  
25 was informative and thorough. Thank you.

1           I want to make two recommendations as  
2 additional mitigation menu options. And whether  
3 they're mitigation options or ways that there can be  
4 exemption, I don't know. I'll just lay them out.  
5 Time is a little bit tight here. One is integrating  
6 pesticide selectivity into the way in which products  
7 either require mitigation or would be exempt. And  
8 I'll just give two real brief examples.

9           Last November, Nathan made a presentation  
10 on the elderberry longhorn beetle and the California  
11 elderberry as a solitary host. And if that were an  
12 example, I would say that if an herbicide was a pre-  
13 emergent herbicide, it would have no threat to a  
14 perennial woody plant and, therefore, all herbicides  
15 that would be -- that, you know, our knowledge and  
16 our science designates them as pre-emergents are no  
17 threat. And that type of pesticide selectivity, I  
18 think, ought to be included one way or another.

19           Another example would be if we're looking  
20 at Karner blue butterfly in Michigan, and if there's  
21 a class of insecticides that are only active on  
22 aphids, for example, well, the Karner blue butterfly  
23 is a lepidoptera and those ought to either be exempt  
24 or ought to be a part of a mitigation menu because  
25 they would have no harm to that endangered species.

1           The last recommendation we have is that a  
2 life-stage element in a mitigation would be useful,  
3 and the reason is that we have many insecticides  
4 that are only active on one particular life stage.  
5 So we could -- an example would be Methoxyfenocide  
6 is highly lethal to lepidoptera larvae, but not at  
7 all to pupae and adults. And so, for example, the  
8 Karner blue butterfly, there's only about a three-  
9 week period of the growing season in which they're  
10 in that larval stage. And so that -- use of that  
11 product in a PULA is relevant during that three-week  
12 period, but not for the rest of the growing season  
13 when these butterflies are in the adult stage.

14           So those two are what I recommend to be  
15 considered, and we could discuss further offline if  
16 that is of any interest. Thank you for your time  
17 today.

18           BRIAN ANDERSON: John, I appreciate that.  
19 Those are considerations we are including in the  
20 strategies if you look at, for example -- and those  
21 are -- so I really appreciate that.

22           If you looked at the herbicide strategy  
23 draft that went out, for example, we kind of split  
24 the species into different groups based on some of  
25 the common kind of differential toxicity that we

1 see. So we looked at like grasses versus broad leaf  
2 plants. We looked at the different environments,  
3 like wetland versus terrestrial, and we see those  
4 kind of common kind of differences both in the  
5 differences of exposure and the difference in  
6 toxicity that we might see.

7           So if we only have, for example, a broad  
8 leaf, you know, an herbicide that's used for broad  
9 leaf control, but it's not toxic to grasses, then we  
10 can target the mitigations in the PULA to just those  
11 areas where the sensitive species is located to the  
12 extent that there is enough data to kind of -- to  
13 show that.

14           And for this insecticide strategy, we're  
15 looking at the same thing. It depends on the type  
16 of data that we have and the type of data that we  
17 get, but we're trying to split out in a way that  
18 kind of makes sense where we can make those  
19 distinctions where we can. So if you see it -- you  
20 know, when the insecticide strategy comes out, if  
21 you see like a different or better way to kind of  
22 break out the species and kind of separate them,  
23 we'd love to have that conversation. So I'd  
24 appreciate that.

25           JOHN WISE: Thank you.

1           JEFFREY CHANG: So we should probably move  
2 on. There is an open discussion at the end of the  
3 day for those who have their hands raised up if you  
4 want to save it or if you would like to email your  
5 comments. So Hardy, Joseph, Rosemary, and Wendy, if  
6 you would like to email your comments to me and I  
7 can compile them and send them to Brian and Jake.

8           So we will move on.

9           ED MESSINA: Thanks, Gus.

10                   FARMWORKER WORKGROUP UPDATE

11           JEFFREY CHANG: So let's now pivot for an  
12 update from our farmworker group. For that, we are  
13 joined by Mily Trevino-Sauceda, Executive Director  
14 and Cofounder of Alianza Nacional de Campesinas, and  
15 Kaitlin Picone, Senior Advisor for Stakeholder  
16 Engagement. Welcome you two.

17           MILY TREVINO-SAUCEDO: Thank you.

18           Kaitlin?

19           KAITLIN PICONE: Yes, thank you. I'm  
20 pulling up the slides. Give me one moment.

21           MILY TREVINO-SAUCEDO: All right. Thank  
22 you.

23           KAITLIN PICONE: All right.

24           (Pause)

25           MILY TREVINO-SAUCEDO: All right. We are

1 a group of people that were able to agree that  
2 several of us are going to be working together to  
3 give this presentation. It's a farmworker group and  
4 we're trying to provide an update of work that we've  
5 done and we -- I think we recently started, not so  
6 long, I think we started like in March, and I think  
7 Joe is going to be one of the people that's going to  
8 help us and -- was it first, Joe, you were going to  
9 give some presentation or Kaitlin before I --

10 KAITLIN PICONE: I think we're going to  
11 start with you, Mily. We'll talk about some of the  
12 discussion from the most recent PPDC meeting that  
13 led to the formation of the group, and then I'll  
14 cover just a little bit on meeting coordination to  
15 date, and then -- I see Joseph Gryzwacz has joined  
16 us -- thank you -- our workgroup colleague and PPDC  
17 member who will be discussing who are farmworkers.  
18 And then, lastly, Mily, we'll turn back to you to  
19 present our draft charge questions for discussion  
20 among the PPDC members today.

21 So I'm going to -- let's see, there we go.  
22 Can folks see my screen? Can I get a thumbs-up or  
23 -- just to make sure you can see?

24 ED MESSINA: Yes, we can. Your volume is  
25 pretty loud, too, Kaitlin, so just FYI.



1           KAITLIN PICONE: Thank you.

2           MILY TREVINO-SAUCEDO: So just to make  
3           sure -- I sound kind of like very unprepared, which  
4           we're -- we did prepare at the same time. I've had  
5           several rough days previously, so bear with me,  
6           please.

7                    What we're doing during all this time, I  
8           think we're having what, a call every week or every  
9           two weeks thanks to Caitlin and Joe that --  
10          especially Joe that was very gracious in terms of  
11          helping out, putting together, you know, notices.  
12          This group, we needed to meet and we needed to find  
13          out who was going to be working with us. And,  
14          finally, it was Kaitlin, and we are very happy.  
15          Kaitlin has been very, very supportive.

16                   There's been -- it's a whole group. And  
17          the formation of this new group was discussed and  
18          approved in November of 2023. And I feel very, very  
19          happy that several people joined the group to  
20          discuss about how could we present, if it was going  
21          to be through charges, present charges in terms of  
22          in what way this group could be working with the  
23          PPDC group at the same time, work with EPA providing  
24          questions and issues, about farmworkers and issues  
25          that farmworkers are experiencing and how important

1 that these experiences represented by at least this  
2 group -- working group and maybe in the near future,  
3 throughout this year, we are able to get farmworkers  
4 to also join and discuss, if necessary.

5 But the potential charge questions from  
6 this discussion included what does EPA know about  
7 the lived experiences of diverse farmworkers with  
8 regards to their interactions with worker protection  
9 standards and the protection in place for them and  
10 how does EPA incorporate information about the  
11 farmworker experiences throughout the whole process  
12 of how we regulate pesticides, ensure implementation  
13 of regulations and policies, and then monitor the  
14 compliance, and ensure that there is good  
15 enforcement.

16 Just before I continue with the third  
17 potential charge, we did have a lot of discussion in  
18 terms of how important it was or has been for groups  
19 that have either been part of -- because like some  
20 of us within the group have had the experience as  
21 farmworkers and know what are the realities that are  
22 happening in our lives and by the use of pesticides  
23 and the misuse of pesticides and how important it  
24 was -- it has been for us to have this kind of group  
25 always represented whenever there is groups that

1 will be providing the necessary advice to EPA to  
2 make sure that there's the voice of the farmworker  
3 community.

4           And for the same reason, this is why the  
5 first two potential charge questions and the third  
6 one is how do we take into account in the field the  
7 implementation farmworkers and growers are doing  
8 when evaluating a pesticide registration. So these  
9 were very well thought out and discussed questions  
10 that we came up with the intent of having more  
11 conversations around this and then -- and not  
12 leaving these questions here, but this work  
13 continuing the conversation, because in November,  
14 when -- specifically me, when I was proposing that  
15 we form this group, it's about the livelihood of our  
16 communities that has had very little visibility,  
17 very little discussion, very little information  
18 provided, very little voice in these kind of  
19 settings.

20           And so we've -- I personally felt and the  
21 people that have joined this group in different ways  
22 have also agreed on the importance of incorporating  
23 these kind of charge questions because it's about  
24 the lack of protections that we have had throughout  
25 history, because we have not been part of -- as I

1 said, the lack of protections is because we're not  
2 part of the Fair Labor Standards Act. So it's much  
3 easier for -- and it's very open for whomever does  
4 not want to be socially responsible can be very  
5 abusive.

6 So if we can go to the next slide and see  
7 what -- the people that have been part of this  
8 group, as you can see here, are Walter Alarcon,  
9 Alana Bares -- if I mispronounce some of you, bear  
10 with me. I'm used to having that in terms of how  
11 they -- people call me Miley, Maley, Millie,  
12 whatever. And just I'm not trying to do that to  
13 people, but it's my own misunderstanding of how  
14 people's names are pronounced.

15 Becca Berkey, Nathan, Alexis Guild, Joe,  
16 Kaitlin, which of course are my co-chairs, and  
17 Michelle, Alexis Temkin, Emma Torres, which is a  
18 companera. Her and I have known each other ever  
19 since the late -- the early '90s, and we both are  
20 connected because we both were widows around that  
21 same time and we know that Emma -- if it's okay with  
22 Emma, because she's publicly shared this -- part of  
23 the reasons why she's so involved in terms of these  
24 kind of issues is because her husband died of a  
25 cancer working in the fields and working with

1 pesticides. And then Emma and other people -- other  
2 family members have had these kind of issues, also.

3           Myself have had these kind of issues  
4 working in the fields. People that we have known  
5 throughout these 30, 40 years that we have been  
6 engaged working in our communities and seeing how  
7 many people have passed away because of the lack of  
8 protections with farmworkers.

9           And Brian and all these people have been  
10 very, very respectful and very aware about the  
11 importance of making sure that farmworkers have a  
12 voice through this working group.

13           Can we go to the next slide? Thank you.

14           These were the dates that were able to  
15 meet, and as I still have a good memory, we did  
16 start in March. And thank you, Kaitlin, for being  
17 there all the time and trying to push us to make  
18 sure that we had all these kind of meetings. She's  
19 still very good in terms of making sure that we  
20 continue having more meetings. So thank you.

21           Can we go to the next one?

22           Okay. And then Joe asked us if he could  
23 give a presentation about who are farmworkers. I  
24 mean, I can give the presentation, but I think Joe  
25 could be much more quicker. I get very passionate

1 because it's talking about our -- myself, talking  
2 about people we know and people that we represent.  
3 It could get very emotional for me. So in one way  
4 or another, I think, Joe, if you can help us here.

5           JOE GRZYWACZ: Sure. So I'm happy to  
6 chime in. You know, part of what I want to convey  
7 in the next couple of slides, before we turn it back  
8 over to Mily, is, first of all, I've been on the  
9 PPDC for -- I think this is my fourth year now  
10 -- and it's become very clear to me that people tend  
11 to conflate the idea of farmers and farmworkers, and  
12 they are very distinct people groups, very distinct  
13 occupational groups. And so -- but then there's  
14 also substantial amounts of complexity around who  
15 farmworkers are that make enforcement and raising  
16 the voices of farmworkers challenging.

17           And so there's far more words on this page  
18 than I actually want to be able to deliver to you.  
19 But what I want for you to recognize first and  
20 foremost is that farmworkers, by and large, are  
21 individuals who are engaged in agricultural  
22 production. And you can see the various aspects of  
23 agriculture that are there. But the reason why this  
24 is -- why I have this first set of bullet points is,  
25 first of all, there's two main classes of

1 farmworkers, even if we can agree on those, and  
2 those are those individuals who migrate and those  
3 individuals who are seasonal.

4           And the reason why that distinction is  
5 important is that it starts to structure all the  
6 challenges with things like, you know, doing worker  
7 protection standard training, protecting the workers  
8 against pesticide exposure, because, at least among  
9 migrant workers, the vast majority -- excuse me, not  
10 the vast majority, but about 30 percent of those  
11 workers work for two or more employers across the  
12 agricultural season. By contrast, the seasonal  
13 workers, those who only work during the time when  
14 agriculture is being undertaken in certain parts of  
15 the year, they are, you know, mostly work, by and  
16 large, for a single person.

17           So the fluidity of the particular labor  
18 market and the fluidity of which people are perhaps  
19 moving from one location to the next poses a real  
20 challenge for being able to see to it that all  
21 workers are protected.

22           Another important element of this  
23 distinction, though, is that farmworkers, on  
24 average, make somewhere around \$13 an hour, where if  
25 we were to kind of aggregate that up, that would

1 probably be somewhere around \$26-, \$27,000 per year.  
2 By contrast, the average farmer, which is in an  
3 entirely different occupational sector, they make an  
4 average of about \$70,000 per year. So from a  
5 socioeconomic point of view, you know, they're a  
6 very different people group.

7           This image -- and it's just one of many --  
8 demonstrates the typical workplace. Highly  
9 decentralized. There's limited opportunities to see  
10 to it that there's protections in place against  
11 things like sun. This happens to be in the  
12 California Valley. But you get a sense of how does  
13 the work actually get done, especially in an economy  
14 that's increasingly valued, you know, sort of small  
15 handheld fruits that, oftentimes, aren't able to be  
16 picked by machinery, but rather they're more  
17 delicate and need to be picked by hand.

18           So the critical point of this first point  
19 -- of this first element of the slide is just simply  
20 to recognize that, minimally, farmers and farm  
21 workers are different people, and part of the reason  
22 why farmworkers and protecting farmworkers is a  
23 challenge is because there's at least two different  
24 varieties, seasonal and migrant workers, that makes  
25 reaching these workers very challenging.



1           Now, the next challenge that's illustrated  
2           in the remainder of the slides is there's really no  
3           definitive data.

4           Whoops, no. Please go back, please.

5           There's really no definitive data on just  
6           how many farmworkers there are. So, for example,  
7           the census of agriculture that's dated there 2012  
8           estimates that there's about 2.7 million  
9           farmworkers. But for the vast majority of people  
10          who do research in this area, that's considered an  
11          undercount because those data are largely reported  
12          by agricultural establishments that may not have a  
13          good record, shall we say, for who's actually  
14          working on their establishment.

15          If you go just one bullet point on this,  
16          one of the dominant sources of information about  
17          farmworkers is the National Agricultural Workers  
18          survey and notice there that about 42 percent of  
19          those farmworkers are considered unauthorized,  
20          meaning they're undocumented immigrants. And so  
21          that piece alone tells you that there's a motivation  
22          for people who participate in the census of ag to  
23          not report undocumented workers.

24          Why? Because in many states that's  
25          considered a chargeable offense and, for me, who

1       came recently from Florida, that means you could  
2       actually spend time in prison if you actually hired  
3       somebody who is undocumented. So there's a very  
4       strong reason to not report the full size of the  
5       population.

6                It's important to note, though, that about  
7       two-thirds or so of the farmworker population is  
8       foreign-born, with the vast majority of them coming  
9       from Mexico. Most of these folks do work on larger  
10      establishments, but there's also a substantial  
11      proportion, especially in the undocumented ranks,  
12      working on smaller establishments.

13              One of the things that we did when the  
14      NAWS turned 30 years old, about five years or so ago  
15      in the midst of the Trump Administration, is we saw  
16      a substantial shift away from relying on the  
17      seasonal workers to more heavily reliance on the  
18      H-2A worker program. That is an official  
19      designation by the Department of Labor that allows  
20      for temporary workers to come from other countries,  
21      predominantly Mexico, to do temporary work in the  
22      United States under agriculture.

23              Some people have equated that particular  
24      program to modern-day slavery in part because those  
25      visas that are issued by the U.S. Department of

1 Labor are held by the labor organizer. That is the  
2 person who's requesting the H-2A visa, not the  
3 person who's traveling under the visa. So in  
4 essence, those individuals then become the property,  
5 if you will, of the individuals who are securing  
6 those H-2A visas.

7 The point behind all of that detail, apart  
8 from to sort of -- you know, to dizzy you with  
9 detail, is just simply to point out we really don't  
10 know how many farmworkers there are in the United  
11 States at any given time. Of the data sources that  
12 we do have, we do know that the majority of them are  
13 from Central America, primarily Mexico.

14 We do know that the modal education is  
15 somewhere around ninth grade in the Mexican system,  
16 and we do know that a substantial proportion of them  
17 are undocumented. The 42 percent that are there is  
18 actually down from about 60 percent from the middle  
19 of the Trump Administration, when again there was a  
20 heavier reliance on the H-2A worker program.

21 If we could move on to the next slide,  
22 this then gives you a sense of one element of what  
23 makes handling protections of workers challenging.  
24 You know, and the basic point is, the majority of  
25 farmworkers have little or no ability to read or

1 speak English. And, again, if you put it in the  
2 context of a modal education of ninth grade,  
3 Mexican, it's important to recognize within that it  
4 wasn't until 1996 that Mexico had mandatory or  
5 compulsory K through 12 education.

6 So that means the majority of farmworkers  
7 were coming in historically -- and there's still the  
8 case -- where they have not finished high school.  
9 So they're not accustomed to reading labels, taking  
10 tests, sitting in classrooms because that's not part  
11 of the cultural mandate of the educational system in  
12 Mexico.

13 Now, the last slide that I have to share  
14 with you -- actually, I've got one more after this  
15 one -- and there's some redundancies that are here.  
16 But I want to point out that the complexity of the  
17 agricultural enterprise is substantial. So for --  
18 the example here is about the 15,000 organic farms  
19 that are heavily reliant on hand labor largely from  
20 immigrant workers. But that also, you know,  
21 coincides with the fairly large commercial  
22 establishments that are going to be employing large  
23 numbers of workers. And I see here that we've got  
24 some redundant information.

25 So the overall point that I want for

1 people to take away from these last two slides is  
2 really just the complexity of the agricultural  
3 enterprise in terms of how crops are done, produced,  
4 harvested, and brought to market, along with the  
5 relative nature of the farmworker population,  
6 meaning relatively low levels of education,  
7 predominantly Spanish-speaking, highly mobile in  
8 terms of where they're working and how many times  
9 that they work, makes raising the voices of  
10 farmworkers exceedingly difficult.

11           And then the last slide, before I turn it  
12 back over, is to recognize that we focus on  
13 farmworkers not because they're the only people in  
14 the agricultural establishment, but they account for  
15 the vast majority. And when I say "vast majority,"  
16 it is only 51.2 percent that are people who are  
17 working in the fields, who have to follow the  
18 re-entry interval elements, who are only getting  
19 information about the pesticides that are being  
20 applied in the areas in the designated posting areas  
21 that's supposed to be centralized. But when you're  
22 in the middle of 200 to 300 acres of where that land  
23 is and you're moving from workplace to workplace,  
24 what exactly does the centralized posting mean?

25           So all of this comes together to simply be

1 able to say that there's a fundamental shift in,  
2 yes, the label is the law, but at the end of the  
3 day, stop signs and speed limit signs are also the  
4 law, but they oftentimes get overlooked in the  
5 everyday life of how the complexity of this work  
6 gets done. And without recognizing the complexity  
7 of who farmworkers are and the very basis that they  
8 are operating in can make it very easy for people to  
9 misunderstand what are the actual challenges of  
10 moving from the label is the law to being able to  
11 actually enforce and protect these workers that have  
12 largely no voice.

13 And with that, I'll turn it back over to  
14 Mily.

15 MILY TREVINO-SAUCEDO: I would also want  
16 to say that the percentages of annual earnings for  
17 farmworkers varies very much compared to --  
18 California is a state that provides a little bit  
19 more support and wages -- a little bit better wages  
20 than many other states. I'm not saying all states,  
21 but many other states, and it -- because if you go  
22 to Florida or go to Indiana or go to Upstate New  
23 York or other states, though, the wages are much,  
24 much lower.

25 And for here the draft that we have for

1 the charge questions, again, this -- I'm going to be  
2 reading them and I want us to have an opportunity to  
3 -- for the rest of the group members if they want to  
4 add more information to why we're very thoughtful in  
5 terms of why that kind -- how we put together the  
6 charge questions.

7           And the first one is how can EPA better  
8 collaborate with farmworker organizations to seek  
9 input and relevant data from farmworkers to help  
10 ensure the visibility of risk mitigations,  
11 strategies for agricultural pesticides, what are the  
12 best strategies for documenting and evaluating  
13 growth, maturation, and the essential collaboration.

14           And I'm going to read the three charge --  
15 potential charge questions and allow for some of our  
16 members from this group to add a little bit if they  
17 feel like they need to add because it was a group  
18 effort and everybody can -- from the group can have  
19 the opportunity to share why.

20           The second question is how does EPA use  
21 information from farmworker organizations about  
22 real-world scenarios of agricultural pesticide use  
23 in shaping policies and strategies to meet its legal  
24 mandate.

25           And I do want to add here there's an

1 experience some time back that I remember I was  
2 trying -- I was going around as a social worker or  
3 community worker with legal services and I was going  
4 around in the fields looking for a farmworker who  
5 was a client of ours and I ended up in a place that  
6 this worker used to work, but then I found out that  
7 he was working somewhere else.

8           But at the time that I went to that  
9 company, I was very surprised and I asked the  
10 workers if it was okay for me to take pictures and I  
11 did, and the pictures were about the workers  
12 themselves without having any -- because it was  
13 around that time -- it was during the summer, around  
14 that time it was 115 degrees and they were applying  
15 chemicals and the chemicals that were being applied,  
16 they had a machinery where one of the workers would  
17 have to go on top of -- oh, and it was date trees  
18 and they we're trying to provide spray around the  
19 palm tree.

20           And one of the workers would get on the  
21 machinery -- get on top, and when that was  
22 happening, at the same time, one of the workers did  
23 not have a t-shirt on and he had a bandana covering  
24 his head and another bandana that would tie the --  
25 both, you know, to cover his head. But the other



1 worker did have a t-shirt. It was not a long-sleeve  
2 t-shirt. And they both were spraying. And I  
3 remember I was from far away and waited for them to  
4 finish that and I was kind of like about around 100  
5 feet away.

6 And I'm saying this because when the  
7 workers got off, I asked if I could talk with them  
8 for a little bit, and I knew I was exposing myself  
9 in terms of being reprimanded because I was talking  
10 to workers during the time that they were working.  
11 But I saw in terms of a safety situation and  
12 immediately said you need to use long-sleeve -- you  
13 know, I went through a whole thing and in terms of  
14 how workers needed to protect themselves. And they  
15 said, yes, I -- one of them said, yes, I need to put  
16 my t-shirt on. He was all embarrassed.

17 But at the same time, he said that they  
18 had asked the company, but then they were afraid to  
19 ask again to see if they could use some kind of  
20 equipment that would not -- or if they could do this  
21 application of chemicals at an earlier time of the  
22 day because, around that time, it was 10:00 a.m. It  
23 was already that hot. And at least at 6:00 a.m.,  
24 they would be doing 5:00 through 8:00 a.m., the --  
25 you know, the climate wasn't that bad.

1           And when I talked to the workers, they  
2           said that they had asked for that before and they  
3           were -- for whatever reason, the crew leader was not  
4           paying attention. And at the same time, I said, but  
5           you're exposing yourselves and you're exposing  
6           yourselves to the chemicals, and in that way it's  
7           not being helpful. They didn't have any other sort  
8           of protection that they needed to have and they did  
9           not even know that they needed to be protected,  
10          because they were told by the crew leader that what  
11          they were spraying was medicine for the plants. And  
12          I found out that it was another -- at this point,  
13          please forgive me in terms of not having the name of  
14          the chemical that was being sprayed. It was here in  
15          the Coachella Valley.

16                 And I'm describing this just because these  
17                 were pesticide handlers. They knew what to do in  
18                 terms of mixing because they had been taught by the  
19                 crew leader, but they did not know what kind of  
20                 pesticides they were. They only knew that it was  
21                 medicine for the plant and for -- and we keep  
22                 hearing this over and over again.

23                 So let me go ahead -- and this is why  
24                 Joseph was very kind in terms of talking about  
25                 farmworkers. The other question -- I don't

1 remember. Did I say the "how does EPA use" -- yes.  
2 How does EPA use information for farmworker  
3 organizations about real-world scenarios of  
4 agricultural pesticides used in shaping policies and  
5 strategies to meet its legal mandate.

6 We understand that there's not a lot of  
7 resources in many of these district offices and we  
8 need more resources so that there can be more  
9 monitoring, and the state even -- not only -- this  
10 is California, okay, where there's more regulations.  
11 Enforcement is where we need more support, more  
12 resources, et cetera.

13 And the third application -- the third  
14 question is, how is EPA acknowledging and acting  
15 upon the recommendations from previous workgroups,  
16 such as the previous PPDC Farmworkers and Clinicians  
17 Workgroup and the NEJAC Farmworker Workgroup. What  
18 improvements could enhance EPA's responsiveness to  
19 these recommendations, including that transparency  
20 in discussing recommendation that may not be acted  
21 upon.

22 Anybody from our group -- can you go back  
23 to the questions, please?

24 Anybody from our workgroup, can you add a  
25 little bit more? There was a lot of discussion and

1 I think you might have a better discussion -- not  
2 belittling myself, but it's -- there's additional  
3 discussion that you can add here in terms of these  
4 kind of charge questions.

5 For example, Walter -- let me see who  
6 else. In the group, can we go to the group --  
7 Kaitlin, can we go to the group slide?

8 Yeah. Thank you. The group slide. Okay.  
9 I remember, Nathan, you talking about certain -- why  
10 it was so important to have these kind of charge  
11 questions, the way they were developed.

12 I know that the rest of the PPDC will say,  
13 oh, well, we understand, what do you mean? Well,  
14 there was a lot of discussion that we had. And I  
15 know that Alexis was there, Alanna, Walter, you --  
16 can you add a little bit more in terms of the charge  
17 questions?

18 Can we go back to the charge questions,  
19 please? Thank you. To the charge questions. Thank  
20 you.

21 Can we have more people unless -- Kaitlin,  
22 did you want to add a little bit more to this  
23 presentation? Maybe I touched upon some of the  
24 parts that you were supposed to be providing.

25 KAITLIN PICONE: Can folks hear me?

1           JEFFREY CHANG: Yes, Kaitlin.

2           KAITLIN PICONE: Okay. Sorry. I've been  
3 having a hard time getting my mic back while I was  
4 screen-sharing. I know we're a little over on time.  
5 So I want to, you know, be respectful of folks that  
6 might be heading for lunch as well. If we have time  
7 for a comment or two or to open it up for discussion  
8 among the broader group, I think that would be --  
9 you know, Jeffrey, correct me if I'm wrong, but it  
10 might be a good time to do that now.

11           JEFFREY CHANG: Yes, yes. One or two  
12 comments from our members, please.

13           I'm not seeing any hand raised, so no  
14 comments.

15           MILY TREVINO-SAUCEDO: The charge  
16 questions are presented. What's next? Are we going  
17 to have a break or we going to have a motion to pass  
18 the charge questions?

19           JEFFREY CHANG: We could do that. Ed,  
20 does that sound good?

21           ED MESSINA: Yeah, whatever the group  
22 would like.

23           JEFFREY CHANG: Yep. We need someone to  
24 motion for --

25           MILY TREVINO-SAUCEDO: Can I motion for

1       this to --

2               JEFFREY CHANG:  Mm-hmm.

3               MILY TREVINO-SAUCEDO:  -- for the charge

4       questions to be accepted?

5               JEFFREY CHANG:  Yep.

6               ED MESSINA:  Any seconds?

7               JOE GRYZWACZ:  I'll second.

8               ED MESSINA:  All in favor, raise your

9       hand.  Jeffrey will do the count.

10              JEFFREY CHANG:  Yes, please leave them up.

11       Please leave them up.  We'll give a few more people

12       a chance.

13              Let me check the comments, too, if anyone

14       -- okay.

15              MILY TREVINO-SAUCEDO:  So, Joe, did you --

16       did you vote, Joe?

17              JEFFREY CHANG:  Leave them up.

18              ED MESSINA:  I see Joe's hand is up, yep.

19              JEFFREY CHANG:  Okay.  I'm having 30 hands

20       up.  Do you want me to say the names or --

21              ED MESSINA:  I think we're good.  So 30

22       out of 40 --

23              JEFFREY CHANG:  Three, mm-hmm.

24              ED MESSINA:  -- have raised their hands.

25              JEFFREY CHANG:  Thirty-one.

1 ED MESSINA: The yeas have it and the  
2 motion passes.

3 MILY TREVINO-SAUCEDO: Thank you.

4 ED MESSINA: Thanks, Mily. Thanks, team,  
5 for the presentation.

6 JEFFREY CHANG: Thank you. We will go off  
7 to lunch. Please be back at 1:15, a few minutes  
8 before 1:15. Thank you.

9 (Lunch break.)

10 JEFFREY CHANG: I hope everyone had a good  
11 lunch. Can I get a raise of hands to see who's  
12 back?

13 PRIA 5 IMPLEMENTATION UPDATE INCLUDING BILINGUAL  
14 LABELING AND OTHER WORKER PROTECTIONS

15 JEFFREY CHANG: Great. Thank you. We are  
16 now moving forward with our next session, PRIA 5  
17 Implementation Update, including bilingual labeling  
18 and other worker protections.

19 Stephen Schaible, Office of Pesticide  
20 Programs, will be chairing this session. Welcome.

21 STEPHEN SCHAIBLE: Hi, there. Can people  
22 see me? Let me actually -- here we go. And can  
23 people hear me, first of all?

24 JEFFREY CHANG: Yes, we can hear you and  
25 see you now.

1           STEPHEN SCHAIBLE: Okay, great. Jonathan,  
2           can you bring the slides up or -- and while Jonathan  
3           is doing that, hi, everybody. My name is Steve  
4           Schaible. I am the Senior Advisor for PRIA in the  
5           Office of Pesticide Programs, or the PRIA  
6           Coordinator, more commonly.

7           And, today, we're going to go through an  
8           update on where we are with implementation  
9           [connection issue] including -- with focus on  
10          bilingual labeling as well as some -- the farmworker  
11          and healthcare clinician programs that are  
12          in Carolyn's branch.

13          I'll start off speaking and then turn it  
14          over to Sue Bartow and she will, in turn, turn it  
15          over to Carolyn Schroeder.

16          So it looks like we've started the  
17          sharing. While we're waiting for the slides to come  
18          up, for those that are not aware of what PRIA means,  
19          in the interest of being transparent about the many  
20          acronyms we throw around, PRIA is the Pesticide  
21          Registration Improvement Act. This was first  
22          authorized in 2004, and since then has gone through  
23          four reauthorizations, the most recent of those  
24          being in December of 2022, PRIA 5. And that's what  
25          we're in the process of implementing.



1           There were a large number of deadlines  
2           that were associated in calendar year 2023. We're  
3           now into 2024. There's still a bunch of activity  
4           going on and that's what we'd like to share.

5           I am not seeing the slides. Are other  
6           people seeing the slides?

7           JONATHAN: I am sharing them.

8           UNIDENTIFIED FEMALE: I am not.

9           JONATHAN: All right. Let me try again.  
10          I'm sorry.

11          UNIDENTIFIED FEMALE: What I see is it  
12          says that you had started screen-sharing, but I  
13          still am not seeing that either. So it sounds like  
14          it's being slow.

15          JONATHAN: All right.

16          (Pause)

17          STEPHEN SCHAIBLE: You want me to try,  
18          Jonathan?

19          JONATHAN: Let's try -- is it working now?

20          UNIDENTIFIED FEMALE: No, it's still a  
21          dark screen.

22          JEFFREY CHANG: I can try sharing, too.  
23          Give me a second.

24          JONATHAN: Yeah, I'm sorry, guys. I don't  
25          think it's going to work for us -- for me.

1           STEPHEN SCHAIBLE: Not a problem.

2           JEFFREY CHANG: I can do it. Can you see  
3 my screen?

4           UNIDENTIFIED FEMALE: Jeffrey, it says  
5 that you had started to show. So let's give it a  
6 second and see if it loads.

7           JEFFREY CHANG: Okay.

8           UNIDENTIFIED FEMALE: There seems to be  
9 some delay. Yes.

10          STEPHEN SCHAIBLE: There we go.

11          JEFFREY CHANG: Just tell me when to go  
12 over.

13          STEPHEN SCHAIBLE: Okay, great. Yeah, if  
14 you want to go to the next slide.

15          JEFFREY CHANG: Mm-hmm.

16          STEPHEN SCHAIBLE: So we have -- in the  
17 spring 2023 meeting, we presented an overview of  
18 PRIA 5 and all the provision in PRIA 5. And then  
19 last fall, we gave an overview of all of our FY 23  
20 progress. So this is sort of starting from --  
21 largely from what's happened since last fall.

22                 And, again, this is a combination of new  
23 stuff and stuff that we've already done. But in the  
24 bilingual labeling space, we have continued  
25 conducting outreach to a broad array of stakeholders

1 regarding bilingual labeling implementation,  
2 including accessibility of labels to workers, and  
3 the stakeholder group includes farmworkers,  
4 farmworker advocacy groups, industry, our  
5 environmental justice federal advisory committee, as  
6 well as this group, states, and EPA regions. And  
7 Sue is going to be going over that in greater detail  
8 in a little bit.

9 I think you saw in Ed's slides yesterday,  
10 we have put significant resources this year into  
11 our backlog of PRIA actions that are outside of the  
12 fee tables, or non-fee PRIA actions or non-PRIA  
13 actions. And in addition to sort of putting those  
14 resource sources towards completing those actions,  
15 we've also been looking at implementing process  
16 changes so that actions in the backlog, as well as  
17 new actions that are received, are being reviewed  
18 more quickly with the goal of having those actions  
19 reviewed according to any statutory time frames that  
20 apply.

21 EPA issued ESA guidance last year on the  
22 review of conventional and biopesticide new AIs, as  
23 well as pesticides undergoing registration review  
24 that have outdoor uses, and then, finally, guidance  
25 on new uses of registered pesticides. And, finally,

1 on this slide, EPA did migrate all of its work flow  
2 at the end of last fiscal year into the new  
3 Salesforce platform for our IT system, and we are,  
4 this year, going through a lot of work internally  
5 and externally and building out those workflows, as  
6 well as getting customer feedback on how to design  
7 outward-facing functionality.

8 Next slide, please.

9 In December of last year, we published a  
10 PR notice that established the Vector Expedited  
11 Review Voucher Program. This is a program to  
12 incentivize registration of new insecticides to  
13 control the spread of vector-borne diseases that are  
14 transmitted by mosquitoes. EPA also developed a  
15 process for sharing EPA data evaluation records with  
16 the applicant at the time of the regulatory  
17 decision. And so this is something that has been  
18 implemented as of January across all three of the  
19 divisions.

20 EPA published a centralized webpage that  
21 provides ESA guidance documents related to pesticide  
22 regulation, as well as non-EPA resources for  
23 pesticide-related activities, and these would be  
24 such things as 25B, IPM, other resources. And we're  
25 continuing to receive feedback from stakeholders on

1     how to -- additional guidances or related resources  
2     that we should be considering for this webpage.

3             EPA has been supporting farmworker  
4     training and education through both the continuation  
5     of existing cooperative agreements as well as the  
6     awarding of new cooperative agreements for the  
7     Pesticide Safety Education Program and the  
8     Partnership Grant Cooperative Agreements.

9             And, finally, EPA has requested  
10    stakeholder input on program designs for the  
11    Healthcare Provider Training and Farmworker Training  
12    Cooperative Agreement Programs. So these are RFIs,  
13    requests for information.

14            Next slide, please.

15            And I will say, again, Carolyn's branch  
16    and Carolyn will be doing a deeper dive on that  
17    topic as well.

18            Additionally, EPA continues to provide  
19    funding to the Center of Disease Control NIOSH,  
20    through an interagency agreement to support  
21    pesticide incidence reporting through the Sentinel  
22    Event Notification System for Occupational Risk, or  
23    SENSOR, and this funding has allowed SENSOR to  
24    expand into four additional states, Washington,  
25    Texas, North Carolina, and Georgia.

1           There are requirements in PRIA 5 for  
2 training, a set-aside of 500 -- up to 500,000 a  
3 year, and this is for training of EPA employees. So  
4 there's -- a task order has been completed for that  
5 training to utilize an existing contract in the  
6 Office of Water. So we're waiting for the Contracts  
7 Office to complete that and that training will  
8 begin.

9           And in addition to that, there is a notice  
10 of funding opportunity being developed for a grant  
11 for external internal training, and this needs to  
12 go, as specified by PRIA 5, to certain entities,  
13 land grant universities, non-ag universities. So  
14 this second aspect to that training is to meet the  
15 requirements of PRIA 5, to have that training  
16 developed and implemented by those specific  
17 entities.

18           In addition, there's also requirements for  
19 third-party audits to give EPA recommendations for  
20 process assessment and workforce assessment. Those  
21 task orders are also in development. A contracting  
22 vehicle has been identified within EPA and we're  
23 putting together those task orders to get those  
24 online with funding expected in FY 25.

25           All activities and -- well, all

1 accomplishments to date under PRIA 5, as well as  
2 upcoming activities, are more fully described in a  
3 PRIA 5 implementation webpage that can be reached at  
4 this link.

5 Next slide.

6 Finally, EPA, in May, did issue this PRIA  
7 annual report. This is the first annual report to  
8 have been issued since 2019 for the '18 report. So  
9 PRIA 5 amended the reporting requirements to  
10 continue some reporting requirements, but to add a  
11 bunch of additional reporting requirements. So  
12 these requirements hit on EPA performance for PRIA  
13 fee-for-service actions, the implementation of  
14 certain process changes that are specified in PRIA  
15 5.

16 It talks about EPA's progress on its non-  
17 fee PRIA actions or the non-PRIAs. These include  
18 metrics for registration review, as well as  
19 activities carried out under a set-aside. Well, in  
20 addition to the non-PRIA set-aside and then, also  
21 additionally, for activities carried out under  
22 grants related to farmworker and healthcare  
23 clinician training partnership grants and the  
24 Pesticide Safety Education Program. So all of  
25 that's included in the annual report.

1           It talks about data on EPA's utilization  
2 of the initial content and preliminary text screens  
3 and then, finally, hits on EPA reporting out on  
4 funds received and how those funds are utilized with  
5 regard to staffing and FTEs.

6           So that's it. I will turn it over now to  
7 Sue.

8           SUE BARTOW: Thank you, Steve. Good  
9 afternoon, everyone. My name is Sue Bartow. I'm a  
10 chemical review manager in the Pesticide  
11 Reevaluation Division, and I'm a member of OPP's  
12 Spanish Labeling Workgroup.

13           Today, I'm going to give an overview on  
14 OPP's activities related to the bilingual labeling  
15 requirements in PRIA 5, and as Steve mentioned, I'm  
16 primarily going to focus on work since the last  
17 update we gave at the PPDC meeting in November.

18           Next slide, please. Thank you.

19           So just a quick refresher on the PRIA 5  
20 requirements. PRIA 5 provides deadlines for  
21 bilingual labeling to appear on pesticide products.  
22 These deadlines are established on a rolling  
23 schedule from December of 2025 to 2030, with the  
24 translations for the most hazardous and toxic  
25 pesticide products required first.



1           There are also implementation requirements  
2    in PRIA 5, specifically label changes to add the  
3    bilingual labeling are to be implemented through  
4    non-notification, and the non-notification process  
5    means that a product label may be updated with  
6    Spanish translations without notifying EPA or EPA  
7    reviewing that label as long as that is the only  
8    change that's being made to the label.

9           PRIA also outlines additional requirements  
10   and includes some specific timelines for their  
11   completion. Some of those are EPA will cooperate  
12   and consult with state lead agencies for pesticide  
13   regulations to implement the bilingual labeling; EPA  
14   will seek stakeholder input on ways to make  
15   bilingual labeling accessible to farmworkers. That  
16   was required to be started within 180 days from the  
17   enactment of PRIA 5 or by last June. So we've had a  
18   number of different activities related to that.

19           EPA is required to develop and implement  
20   and make publicly available a plan for tracking the  
21   adoption of the bilingual labeling, and that's due  
22   by December of 2024. And also EPA must implement a  
23   plan to ensure that farmworkers have access to the  
24   bilingual labeling, and that's due by December of  
25   2025.

1           Next slide, please.

2           This slide shows the specific deadlines  
3           for the labeling in PRIA 5 for restricted use  
4           pesticides. The label must bear the translations  
5           within three years of enactment of PRIA 5 or by  
6           December of 2025. Similarly, agricultural, non-RUPs  
7           that are Acute Tox Category 1, are also due in  
8           December of 2025, and those products with an Acute  
9           Tox Category of 2 will be due within five years or  
10          by December of 2027.

11          For antimicrobial and nonagricultural  
12          products that have an Acute Tox Category 1, the  
13          translations are due on products by December of '26,  
14          an Acute Tox Category 2 products, the translations  
15          are due by December of 2028. All other products  
16          have a deadline of December 2030.

17          PRIA 5 also provides timing provisions for  
18          if or when the Spanish Translation Guide is updated.  
19          In that situation, the agency must notify  
20          registrants within ten days of the update. And for  
21          agricultural use pesticides labels, the companies  
22          must update their label with the new information and  
23          an updated guide within one year of the date of  
24          publication or the latest approved label change,  
25          whichever is earlier.

1           And for the antimicrobial non-ag use  
2 products, the companies have two years from the  
3 update or the latest stamped label, whichever is  
4 earlier, for their updates.

5           Next slide.

6           So the agency has taken various steps to  
7 address the PRIA 5 requirements for seeking  
8 stakeholder input on ways to make bilingual labeling  
9 accessible to farmworkers. We held a national  
10 webinar last June and there were more than 380  
11 participants and 31 speakers that participated in  
12 the national webinar.

13           The agency also opened a public docket for  
14 public input last summer and we received 36 comment  
15 submissions in the docket.

16           During the comment period, we also  
17 received recommendations on topics other than how to  
18 increase farmworkers' access to bilingual labels,  
19 including some feedback on the translations that are  
20 included in our Spanish Translation Guide. So those  
21 recommendations are also being considered by the  
22 agency.

23           EPA presented charge questions to the  
24 National Environmental Justice Advisory Committee,  
25 or NEJAC, and were soliciting feedback on several

1 topics, including communication approaches and  
2 strategies that we could consider, available  
3 technologies and connection issues on the ground,  
4 logistics, potential partners to work with, and  
5 implementation recommendations. So we received  
6 draft recommendations from the NEJAC at the end of  
7 April on those charge questions.

8           And then we also -- our colleagues in EPA  
9 Region IX, working through a grant, conducted four  
10 focus groups with farmworkers. Two were held in  
11 California, one was held in Nevada, and one was held  
12 in Arizona, and these all took place between  
13 December of 2023 and February of 2024.

14           So at the last PPDC meeting, I provided  
15 details on the recommendations that we received  
16 during the national webinar and also the  
17 recommendations that came in the public docket. So  
18 today, I'm going to highlight some of the  
19 recommendations that we received in the draft NEJAC  
20 recommendations, as well as some of the input we  
21 received in the focus groups with the farmworkers.

22           Next slide.

23           For the four focus groups that were held  
24 with farmworkers in Region IX, there were between 9  
25 and 15 participants in each group, and the

1 participants included both pesticide handlers and  
2 farmworkers. The participants had a wide range of  
3 experience. The experience ranged from less than 1  
4 year to more than 50 years. And some of the  
5 recommendations that we've received included  
6 using colors and visuals for risk and signal words  
7 on the label; making the label information easier  
8 to understand. There were recommendations to  
9 provide information in a central location, both on  
10 the farm and off of the farm, for the agricultural  
11 community.

12 We received recommendations to provide  
13 more training, as well as enhanced trainings. There  
14 were recommendations for using an app or website  
15 that had links to reliable, up-to-date information.  
16 There were recommendations to use videos to explain  
17 the label, and we also had recommendation to provide  
18 pesticide safety education information to children  
19 in agricultural communities.

20 In addition, the participants also  
21 discussed some of the concerns that they had. They  
22 mentioned that farmworkers don't have access to the  
23 label but rely on information that's provided by  
24 their crew leader, and that information is typically  
25 shared in person orally. They discussed the need

1 for their crew leaders or supervisors to be well-  
2 trained, as well as the importance for them to  
3 convey accurate, consistent, and very relevant  
4 pesticide safety information to the farmworkers.  
5 And there were also discussions about fear of  
6 retaliation for the farmworkers.

7 Next slide.

8 Some of the recommendations that we  
9 received in the draft NEJAC report include  
10 conducting additional outreach through focus groups  
11 in multiple regions in order to capture input from  
12 various commodity sectors, as well as from different  
13 farm jobs. There were also recommendations for  
14 piloting outreach practices with farmworkers before  
15 finalizing and implementing our plan for  
16 accessibility.

17 There were recommendations that discussed  
18 making the language on the pesticide materials  
19 accessible, and they noted that accessibility should  
20 include not just the physical location, but also  
21 making sure that the content is understandable by  
22 those workers that speak different languages and  
23 that have varying degrees of literacy.

24 They mentioned using materials that  
25 include pictures, infographics, diagrams, or other

1       visuals, and they also mentioned the idea of having  
2       a QR code that was accessible in hard copy that  
3       could be taken home for the farmworkers to access in  
4       private to avoid being shamed or any issues with  
5       retaliation for accessing the information in the  
6       workplace.

7                 There was a recommendation to share  
8       Spanish language information in different locations,  
9       especially areas that farmworkers commonly visit.  
10       Some of the locations they mentioned were parking  
11       areas near a field, near time clocks where people  
12       would clock in or out for work, at hand-washing,  
13       near portable toilets or bathrooms. They also  
14       discussed areas to provide general pesticide  
15       information that are off of farm, such as healthcare  
16       clinics, community centers, legal service centers,  
17       and laundromats.

18                They recommended sharing any updated  
19       information immediately through posting and central  
20       posting areas. They also recommended that EPA  
21       collaborate with other organizations, such as USDA,  
22       to expand broadband internet connectivity. And,  
23       lastly, they provided recommendations for improving  
24       the WPS trainings for farmworkers.

25                And we expect the final recommendations

1 from the NEJAC this summer. And then there are a  
2 couple of follow-up steps that are expected. One,  
3 EPA will provide an update to the NEJAC on how we're  
4 implementing the recommendations that they included  
5 in their report, and that is due within six months,  
6 and then in a year, a full report is due to the  
7 NEJAC on our implementation.

8 Next slide.

9 So since the passing of PRIA 5, OPP has  
10 actively been engaging stakeholders to explain the  
11 PRIA 5 requirements, to get feedback on  
12 accomplishing them, as well as sharing updates on  
13 our activities. We conducted extensive outreach  
14 during the last fiscal year, fiscal year '23, and  
15 we've been continuing our outreach efforts this  
16 year.

17 So some of the outreach has included  
18 coordinating with the NEJAC, as I just mentioned,  
19 participating in quarterly farmworker advocacy  
20 stakeholder calls. We've participated in meetings  
21 with industry representatives, such as CLA & RISE  
22 and also with quarterly calls with the PRIA  
23 coalition. We've participated in meetings with  
24 SPIREG (phonetic), AAPCO, and now PPDC. We've  
25 participated in calls internally with regional staff



1 both in OCSPP and also with OECA.

2 We participated in a meeting with the  
3 U.S., Mexico, and Canada Technical Working Group on  
4 pesticides and then the four focus groups that I  
5 just mentioned.

6 Next slide.

7 So I'm a member of the Spanish Labeling  
8 Workgroup, and there are more than 20 members of the  
9 workgroup from the various divisions in OPP, as well  
10 as we have a few members from the Office of General  
11 Counsel and we have a couple of members from our  
12 region, Region IV and Region V have members on the  
13 workgroup.

14 And we're heavily involved in the work to  
15 comply with the various PRIA 5 labeling  
16 requirements. And to tackle all of the different  
17 aspects, we have divided ourselves into subgroups to  
18 work on the different pieces. So we have an  
19 accessibility subgroup that's working through the  
20 public feedback that we got at the webinar, the  
21 public docket, and the focus groups, and now through  
22 the NEJAC recommendations. We have a communications  
23 subgroup that has developed text for a website and  
24 this website will include a section of frequently  
25 asked questions that we've received that are

1 different outreach efforts.

2 We have a tracking subgroup that's  
3 currently investigating our internal systems and  
4 processes to develop a plan for tracking. And we  
5 also have a Spanish Translation Guide subgroup  
6 that's working through the comments that we received  
7 on the Translation Guide.

8 So a lot of information is getting pulled  
9 together and we definitely intend to continue our  
10 outreach with stakeholders as we proceed through the  
11 work on the PRIA 5 requirements.

12 Next slide.

13 So our plans for fiscal year '24 include  
14 the four focus groups that I outlined, and our  
15 accessibility group has been reviewing the  
16 information that we received during those sessions  
17 and they're incorporating the comments into a list  
18 of recommendations that we've been compiling as  
19 we've been having the different outreach  
20 engagements. The NEJAC recommendations will also be  
21 added to that list.

22 Our communications subgroup has developed  
23 text for the website and the frequently asked  
24 questions. The website's going to provide  
25 information about the bilingual labeling

1 requirements in PRIA 5. And our website text is  
2 currently in final management review and we're  
3 looking to have it go live later this month.

4           Following the launch of the website, we're  
5 planning to hold a webinar with CropLife America to  
6 address questions that registrants have on the  
7 bilingual labeling requirements. And then we also  
8 plan to conduct outreach with stakeholders as we  
9 start firming up the tracking plan and as we work on  
10 the accessibility plan. That tracking, again, is  
11 due in December of '24, and the accessibility plan  
12 it's due in December of 2025.

13           So that's all I had today. I'll  
14 pass things over to Carolyn Schroeder.

15           CAROLYN SCHROEDER: Hello, everyone. I'm  
16 Carolyn Schroeder, and I'm in the Office of  
17 Pesticide Programs Pesticide Reevaluation Division,  
18 the same division as Sue Bartow, who just presented,  
19 in the Certification and Worker Protection Branch,  
20 the Branch Chief of the branch, and we work on --  
21 what I'll be presenting on is the updates for PRIA  
22 5's cooperative agreement set-asides. So not all of  
23 them, but a subset that relate to -- specifically to  
24 some of the set-asides that -- for the farmworker  
25 program as well as for the healthcare provider

1 program.

2 So next slide.

3 So these are the ones I'm going to cover  
4 today. The PRIA 5 cooperative agreement set-asides,  
5 the mandate extends the set-asides for the Pesticide  
6 Safety Education Program, the PSEPs, as well as the  
7 partnership grants. It also created some new set-  
8 asides created for the healthcare provider training,  
9 a new Farmworker Training and Education Program, and  
10 a new grant technical assistance to those applicants  
11 and the grantees for the healthcare provider  
12 training or the farmworker training and education  
13 grants.

14 Next slide.

15 So you're going to see this slide a few  
16 times. These are all the different set-asides that  
17 we're discussing today and I'm highlighting which  
18 one I'm covering in the next couple slides.

19 So we'll start with the Pesticide Safety  
20 Education Program.

21 Next slide.

22 The Pesticide Safety Education Funds  
23 Management Program is the set-aside that is funding  
24 a new program that -- a new cooperative agreement,  
25 and the recipient is the Extension Foundation. It

1 just began at the end of the last fiscal year back  
2 in -- the beginning of this fiscal year, excuse me,  
3 October of this -- of last fall and this provides  
4 funds to the Pesticide Safety Education Programs at  
5 the land grant universities. The emphasis is on the  
6 certification programs to support the certification  
7 for restricted use pesticides and pesticide safety  
8 education more generally.

9           And something new to note in the new  
10 program is that there is some new environmental  
11 justice focus. Some of the new group -- the new  
12 agreement encourages collaboration with minority-  
13 serving institution. It's also encouraging some  
14 projects that relate to supporting the  
15 collaborations with the minority-serving  
16 institutions, tribes, translation of materials, and  
17 other focus groups to help provide culturally-  
18 appropriate and language-appropriate resources for  
19 those that are going through pesticide safety  
20 education and specifically the certification  
21 programs.

22           So there's some translation of materials  
23 that is happening in Spanish and Mandarin. Some  
24 other current projects or some Spanish translation  
25 of some standard operating procedures and glossaries

1 and there's some links on these slides that will  
2 lead you to more about that program.

3 Okay. The next slide.

4 And we're next going to cover the  
5 partnership grants set-aside. This \$500,000 that  
6 goes to partnership grants and the recipient of  
7 this is for the National Pesticide Information  
8 Center. There's a new five-year cooperative agreement  
9 that began in March of this year with Oregon State  
10 University. They were also the recipient of the  
11 previous cycle for this set-aside and this provides  
12 objective science-based information about pesticide  
13 and pesticide-related topics. Its for information  
14 for the public. One of their main services is a  
15 phone line service and they also have infographics  
16 and informational web resources available for  
17 download and fact sheets and other information on  
18 their websites.

19 There are quite a few languages, over  
20 2,000 -- excuse me, over 270 languages, including  
21 the top 25 languages spoken in the United States,  
22 free of charge for someone to call and receive  
23 pesticide safety information for the public.

24 In 2023, NPIC received over almost 7,000  
25 inquiries and provided some incident reports. They

1 also have many hits on their website for the public  
2 receiving information regarding pesticide  
3 information.

4 The next one.

5 The next two that we're going to cover,  
6 we're going to spend a lot more time on these two  
7 cooperative agreements and programs. There's a  
8 Healthcare Provider Training Program and the  
9 Farmworker Training and Education Program. These  
10 are new set-asides in PRIA 5.

11 I do want to highlight that these  
12 formerly were considered the worker safety  
13 activities under PRIA 4, and actually under PRIA 1,  
14 2, and 3 and 4.

15 So go to the next slide.

16 I want to highlight that under PRIA 4  
17 there were existing agreements that supported those  
18 worker protection activities, and the three listed  
19 here is AFOP, and that's the National Farmworker  
20 Training Program. The recipient of that is the  
21 Association of Farmworker Opportunity Program, PERC,  
22 which is the Pesticide Education Resource  
23 Collaboration. That UC Davis in collaboration with  
24 Oregon -- Oregon State. And then also UC Davis, in  
25 collaboration with Oregon State, also had PERC

1 Medical, which is more the healthcare provider side.  
2 That one did since close at the end of the last --  
3 last summer, in August of 2023.

4 We'll cover a little bit of this more  
5 later in the presentation, but just wanted to  
6 highlight that there is a continuum of some worker  
7 protection activities that are covered under some  
8 current grantees.

9 Next slide.

10 JEFFREY CHANG: If you wouldn't mind just  
11 slowing it down a little for the translators.

12 CAROLYN SCHROEDER: Sure. Absolutely.

13 Next slide.

14 So this slide might look a little  
15 familiar. So the new set-asides were created for  
16 the healthcare provider training. That's up to \$2.5  
17 million over a five-year cycle. Then we have the  
18 farmworker training and education. That's up to 7.5  
19 million over five years. And then a Grant Technical  
20 Assistance Program to those applicants for those  
21 programs and the successful grantees, and that's up  
22 to \$1.75 million over five years. These set-asides,  
23 as I mentioned, will replace the worker protection  
24 activities that was previously provided under PRIA  
25 4.



1           The previous amount of money was \$1  
2 million per year and that covered the healthcare  
3 provider training and the farmworker training and  
4 education. What I want to highlight is that, under  
5 PRIA 5, there's actually now \$10 million over five  
6 years available for those programs instead of \$5  
7 million. That's doubling the amount of money  
8 available for those programs through PRIA.

9           In addition, there's some -- the new Grant  
10 Technical Assistance Program to support those  
11 applicants and then there's new requirements also  
12 that relate to the scope and the applicant's  
13 eligibility related to those programs. I will  
14 highlight that the scope is more focused on the  
15 farmworker and rural communities, as well as  
16 community-based organizations as being the  
17 recipients of some of these funds.

18           Also, it requires us to engage more, to  
19 dial up our engagement with the stakeholders and  
20 those that will be involved in those programs, so  
21 for example, you know, our stakeholder outreach on  
22 the design of those programs.

23           The next slide.

24           I also want to highlight that we had some  
25 stakeholder engagement that you're likely familiar

1 with from the PPDC. It was a farmworker and  
2 clinician training workgroup. This group met  
3 monthly for most of the year in 2021, and provided  
4 recommendations at the end of that regarding  
5 farmworker training and clinician training. The  
6 workgroup gave the recommendations specific to the  
7 cooperative agreements that were provided under  
8 previous PRIA 4 safety activities, and I want to  
9 highlight that these recommendations have been  
10 really informative for us as we start designing our  
11 initial drafts of the funding opportunities for the  
12 new PRIA 5.

13 So we have a continuum of our  
14 recommendations -- excuse me, of the engagement from  
15 our stakeholders as we develop these programs.

16 Next slide.

17 I'll give you a little bit more  
18 information about that as we talk about the  
19 healthcare provider training. So the new Healthcare  
20 Provider Training Program will fund the training of  
21 healthcare providers on the prevention, recognition,  
22 treatment, management, and reporting of pesticide-  
23 related illness. We did, as I mentioned, that the  
24 PPDC workgroup that met in 2021 provided some really  
25 helpful recommendations to help shape our initial

1 drafts of this.

2 We then issued a request for information  
3 of -- that laid out what that design of that new  
4 program may look like and solicited public and  
5 stakeholder feedback on that design. We posed  
6 specific questions to stakeholders related to that  
7 program design, and there is a link here for where  
8 you can find those comments.

9 Next slide.

10 To let you know kind of how the initial  
11 design was laid out, we did hear about -- from the  
12 clinician training recommendation provided by the  
13 PPDC workgroup was to improve reporting systems for  
14 pesticide incidents, promote awareness of pesticide  
15 illness and reporting among the clinicians and by  
16 partnering with the professional organizations,  
17 trying to target a wide range of healthcare  
18 providers, not just strictly clinicians, and having  
19 to involve those healthcare providers in the  
20 development and evaluation of materials, investing  
21 in a needs assessment of what do they need to help  
22 them with all of those -- the recognition,  
23 management, and treatment and so forth, of pesticide  
24 poisonings and to increase partnerships with those  
25 are -- with the funding of organizations that have

1 front-line relationships.

2 Next slide.

3 So we designed this program and we laid it  
4 out into this request for information, the RFI, and  
5 collected -- you know, we laid out a potential for a  
6 program that has increased emphasis on reporting,  
7 broadening the definition of a healthcare provider,  
8 promoting collaboration in professional  
9 organizations, and also making sure that we are, you  
10 know, getting more of that -- front-line  
11 opportunities out there in rural communities.

12 Next slide.

13 We received 16 comments and the comments  
14 echoed and built on what we heard from the PPDC  
15 recommendations, which was really helpful to hear,  
16 and then we also have received some suggestions from  
17 those recommendations to leverage existing  
18 relationships that are out there. That's including  
19 the different healthcare organizations and  
20 associations out there, state lead agencies,  
21 pesticide safety education programs, different  
22 grassroots organizations that would help bridge  
23 those communications between the vulnerable  
24 communities and the healthcare providers, making  
25 sure that we have expertise in developing the

1 bilingual and culturally contextual educational  
2 materials to help the healthcare providers offer  
3 information to farmworkers, you know, their patients  
4 and the farmworker family members numbers.

5           We also need to ensure that we address  
6 beliefs around pesticide hazards and how to  
7 communicate those risks. And then also it was  
8 recommended that we should also train and do  
9 outreach for children and educational providers  
10 since they interact directly with farmworker  
11 families on a regular basis.

12           Next slide.

13           The comments also expressed support for  
14 other aspects of the proposed design, including  
15 adding some occupational screenings, housing  
16 screenings, including those for pediatric patients,  
17 a focus on cultural competence and humility,  
18 importance of reporting and applying the lessons  
19 learned from our previous agreements, those that  
20 were previously funded under other PRIAs.

21           Other suggested feedback is recognizing  
22 that community healthcare centers use a team  
23 approach to care as they provide a basic training  
24 for all staff and then role-specific training as  
25 well. So again, being very inclusive and having a

1 broad definition of what a healthcare provider --  
2 who is a healthcare provider. And also consider  
3 providing help for populations, making sure that we  
4 are emphasizing the populations at high or unique  
5 risk of pesticide exposure.

6 Next slide.

7 So where are we now? EPA is currently  
8 developing a notice of funding opportunity,  
9 incorporating all those recommendations -- as many  
10 of the recommendations as we can from the PPDC  
11 workgroup, as well as what we received during a  
12 request for information. And then the next steps  
13 would be to issue that NOFO in -- this year, in  
14 2024, and making sure that we can get the funding  
15 out the door in fiscal year 2025, next year.

16 Okay. Now, we'll move on to the  
17 Farmworker Training and Education Program. This  
18 program will fund innovative training, education,  
19 materials development, and outreach to farmworker  
20 communities on the worker protection standard,  
21 pesticide safety, and information related to worker  
22 pesticide safety.

23 Similar to the healthcare provider, we  
24 received some recommendations from -- we had  
25 stakeholder engagement through the PPDC workgroup

1 and also we published a request for information  
2 earlier this year in January of 2024. It also laid  
3 out a proposed design for the program and we posted  
4 specific questions to stakeholders related to the  
5 program design.

6 Next slide.

7 So what we received during the workgroup,  
8 the PPDC workgroup back in 2021, was to specify in  
9 future notice of funding opportunities that more  
10 farmworkers and the farmworker organizations and the  
11 worker protection standard trainers are involved in  
12 the development and evaluation of those materials  
13 that train on basic pesticide safety training.

14 We also were recommended that we improve  
15 the process for the evaluation, that feedback loop,  
16 and require farmworker trainings to work within the  
17 cultural context of their audience. It also was  
18 recommended that they ensure the better compliance  
19 enforcement of those training requirements and also  
20 to increase the rigor, thoroughness, and  
21 effectiveness of training.

22 There is a link here, as well as the other  
23 recommendations here. There's a much longer list to  
24 take a look at, but this is a good summary.

25 Next slide.

1           So this farmworker -- this National  
2 Farmworker Training and Education Program, you can  
3 see the acronym on the slide, for the -- the request  
4 for information laid out in the proposed design, and  
5 it emphasized that the community involvement and  
6 cultural context are needed, understanding the  
7 language and training needs and also understanding  
8 how to have successful outreach and delivery  
9 strategies of that training and information and then  
10 making sure there's an evaluation component.

11           Next slide.

12           We received 27 comments from a variety of  
13 stakeholders, including nongovernmental  
14 organizations, the public, different state  
15 associations, as well as state agencies and one  
16 federal agency.

17           Next slide.

18           The comments included a need for direct  
19 involvement of farmworker communities and  
20 organizations in all phases of the agreement and  
21 obstacles and trying to address the obstacles of  
22 their involvement.

23           The comments included information  
24 regarding the barrier and perspectives for  
25 organizations to apply and manage these agreements,



1 including the resource constraints, how complex it  
2 is, and the length of the process, language  
3 barriers, and administrative requirements.

4           There was also a need expressed for  
5 trainings and materials that are linguistically and  
6 culturally appropriate for the farmworkers' reading  
7 level, and then also making sure that the language  
8 needs for trainings and material development are  
9 taken into consideration. And then a list of  
10 languages was provided for some of the top languages  
11 to consider, and I have some of those on the slide,  
12 like Haitian, Creole, Spanish, some indigenous  
13 language and so forth.

14           Next slide.

15           Additional comments included expanding the  
16 scope to make sure it includes people who live near  
17 farms, students and staff near those farms, and the  
18 definition of what it is to be a farmworker  
19 community and also to consider trainings beyond the  
20 worker protection standard that might have  
21 supplemental training to consider topics, such as  
22 personal protective equipment, pesticide drift, how  
23 to address take-home exposure, and other resources  
24 available for workers for those types of topics.

25           There was also areas of focus provided for

1 handler training and those are the individuals who  
2 mix, load, apply, or otherwise handle pesticides  
3 involved in the actual application of pesticides.  
4 And then the outreach -- it also was recommended  
5 that the outreach include trusted messengers to  
6 increase the effectiveness and making sure that  
7 those projects consider how to empower the community  
8 itself.

9           It was also expressed that geographical  
10 considerations for the awards be taken into account  
11 as there are differences in the crops and who and  
12 where these products are being applied.

13           Next slide.

14           Similarly, we are -- with this program, we  
15 are now developing the NOFO based on using those --  
16 that information received through the request for  
17 information and the PPDC workgroup. We plan to  
18 issue the NOFO into 2024 and to fund the new program  
19 in fiscal year 2025.

20           Next slide.

21           Lastly, we're going to cover the Grant  
22 Technical Assistance Program. The set-aside allows  
23 up to \$1.75 million for the technical assistance  
24 that supports the grant process itself. The three  
25 bullets on this slide address what activities are to

1 be supported, and that's the grant application  
2 process, the drafting of grant applications, and  
3 compliance with grant management and report  
4 requirements.

5 This technical assistant is specific to  
6 the grants for the programs that we just covered,  
7 and that's the Healthcare Provider Training Program,  
8 as well as the Farmworker Training and Education  
9 Program. This technical assistance would be in the  
10 form of a grant to an organization and they need to  
11 have specific experiences with farmworker and  
12 healthcare providers and providing that kind of  
13 technical assistance to them.

14 Next slide.

15 The approach for our office is to issue  
16 technical assistance grants in two phases. Step one  
17 is to issue one or two noncompetitive grants of  
18 \$40,000 for technical assistance to support the  
19 candidates through the grant application process and  
20 the drafting of the grant applications. That's the  
21 period of when the applications for those programs  
22 -- when we're soliciting applications for the new  
23 programs is actively open and they need to apply,  
24 having immediate support for that process.

25 The second step would be to issue a

1 competitive notice of funding opportunity to support  
2 grantees -- those successful grantees with the grant  
3 management and reporting requirements. This will be  
4 a five-year cooperative agreement that aligns with  
5 the other cooperative agreements that are funded  
6 successfully under those programs and that technical  
7 assistance will provide ongoing support creating  
8 resources to support the applicants, as well as for  
9 future applications and it will align with the  
10 farmworker program overall and helping in that  
11 maintenance of that grant management and reporting  
12 requirements.

13 Next slide.

14 So why are we doing a two-phase approach?

15 Well, the overarching reason is that we want to make  
16 sure we are getting funding out expeditiously, as  
17 soon as we can, to the communities to make sure the  
18 funding can be provided in 2025. We are working  
19 hard to get those NOFOs out in 2024, and we want to  
20 make sure that the technical assistance support is  
21 there and ready to help at that time.

22 There also is a current government-wide  
23 effort to simplify and shorten the NOFOs, which is  
24 great news. Those new OMB regulations take effect  
25 early next fiscal year. So that would be in

1     October.  And this means that all of EPA's NOFOs  
2     will look different beginning in FY 25.  That part,  
3     in itself, is good news.  However, internally, if  
4     we're going to wait until that period comes to issue  
5     the new NOFOs.  It will significantly delay us  
6     getting them out the door, because it means taking  
7     what we have already and kind of starting again.  So  
8     we want to get everything out as soon as possible  
9     and align everything to happen at the -- here in  
10    2024 instead.

11             So as a result, we would have significant  
12    delays and we want to get -- as expeditiously as  
13    possible to initiate the new awards next year.

14             As you were probably aware, it is a  
15    lengthy process to issue the competitions  
16    themselves, solicit applications, then, you know,  
17    allow that to be open long enough to give everyone  
18    time to apply.  And then when that closes, there is  
19    a period of time of reviewing all the applications  
20    and then working with the new grantees to get their  
21    new workplans and budgets in place, and then  
22    providing the funding.  That is a lengthy process.  
23    And if we start now, we can do it within FY 25.  If  
24    there are any delays, it could bump it into a future  
25    fiscal year.

1           So what we'll do is two noncompetitive  
2 awards to allow that technical assistance to proceed  
3 quickly and provide the targeted support for those  
4 new NOFOs, followed by the technical assistance NOFO  
5 that will allow for a longer term responsive support  
6 and a creation of all the technical assistance  
7 resources for the community-based organizations.

8           Next slide.

9           I'm returning to the farmworker training  
10 and education one just to highlight some of our  
11 current activities. So the National Farm Worker  
12 Training Program, as I mentioned previously, is --  
13 the recipient of that cooperative agreement is the  
14 Association of Farmworker Opportunities Program.  
15 And these are items that are happening right now,  
16 which I wanted to highlight given that we don't have  
17 the NOFOs out yet and we still have some really  
18 great activities happening with our current  
19 grantees.

20           AFOP is providing multiple occupational  
21 health and safety training topics to the farmworker  
22 community. They have a list of several different  
23 projects underway. They have pesticide safety  
24 training for children. They have a project that  
25 works with pesticide exposures around families, so

1 trying to prevent take-home exposure, pesticide  
2 exposure in pregnancy, children in the fields  
3 campaign, and a national farmworker women's health  
4 social media campaign. This is in addition to  
5 providing the worker protection standard required  
6 basic pesticide safety training. That is on an  
7 annual basis in a multitude of states that have high  
8 agricultural production.

9 Next slide.

10 We also want to highlight the Pesticide  
11 Education Resource Collaborative. This is the  
12 agreement with the UC Davis in collaboration with  
13 Oregon State. They have issued an agricultural  
14 community-based project on the last few years and  
15 soliciting small projects that are community-based  
16 organizations to provide like a sub-award program to  
17 different organizations and the technical assistance  
18 to help them with their grant management along with  
19 it. It's funding nonprofits that serve the  
20 farmworkers, agricultural pesticide handlers, their  
21 families, communities, and contributing to the safe  
22 use of pesticides in areas where pesticides are  
23 used. Currently, there's six of them and they have  
24 been awarding to the amount of nearly \$550,000 in  
25 funds.

1           Next slide.

2           Here's a list of some of those  
3 organizations and their projects. We have  
4 Campesinos sin Fronteras. We have Toxic Free North  
5 Carolina and the Farmworker Association of Florida.  
6 The slide gives a little bit more information of  
7 each, but these are really interesting, exciting  
8 projects. The Campesinos sin Fronteras is reaching  
9 and educating Spanish-speaking farmworkers,  
10 pesticide applicators and their families in the  
11 areas surrounding Yuma county in Arizona, and it's  
12 directly related to pesticide safety.

13           Toxic Free North Carolina is a two-year  
14 project, and they're increasing the awareness of the  
15 worker protection standard and pesticide safety  
16 among farmworkers and their communities in North  
17 Carolina. And then, lastly, the Farmworker  
18 Association of Florida has a project to inspire and  
19 enable the farmworker community to reduce their  
20 chronic exposure to agricultural pesticides.

21           Next slide.

22           We also have the Ag Health and Safety  
23 Alliance for an award of \$100,000 for two years.  
24 This project is focusing on the safe pesticide  
25 handling and PPE. That's personal protective



1 equipment usage with an emphasis on respiratory  
2 safety.

3 The National Center for Farmworker Health  
4 has an award of \$100,000 for two years to increase  
5 the worker protection standard awareness and also  
6 pesticide safety in farmworker communities that  
7 speak Mesoamerican indigenous languages.

8 And then, lastly, we have the Surry  
9 Medical Ministries, and that's a two-year project to  
10 increase the awareness of pesticide exposure and  
11 health risk for the migrant and seasonal farmworkers  
12 in Western North Carolina.

13 Next.

14 There will be a third request -- excuse  
15 me, there was a third request for applications that  
16 closed earlier this year in February. And we  
17 anticipate that the funding will be released in  
18 August. And there is a link here for you to read a  
19 little bit more about it.

20 And that covers all of the worker safety  
21 and healthcare provider training programs. Thanks.

22 ED MESSINA: Thanks, Carolyn.

23 JEFFREY CHANG: We can now open it up for  
24 discussion with PPDC members. Please raise your  
25 hands.

1           Joseph, Joe?

2           JOE GRYZWACZ: Hey, thanks, Carolyn and  
3 the rest, for that. I really appreciate, you know,  
4 the work that you guys have been doing and the  
5 follow-up of the previous farmworker recommendations  
6 and that sort of thing. I guess one of the  
7 challenges that I'm kind of having a difficult time  
8 reconciling is you're getting consistent messages,  
9 and some of them, you know, come from me, right? So  
10 I'm kind of throwing things, you know, recognizing  
11 that they're bouncing back.

12           But one of the elements that I tried to  
13 convey in my presentation just a few minutes ago was  
14 just simply that the farmworker population is hugely  
15 complex, right. So the notion of the recommendation  
16 that you receive that people should have it at the  
17 centralized posting, well, there's a lot of  
18 farmworkers that don't have access to a centralized  
19 posting. So that's a good answer, but, yet, at the  
20 same time, it's a nonactionable answer, even though  
21 yes, it is required by law to have one, but it's not  
22 uncommon to find the centralized posting in the back  
23 of somebody's truck that's moving around someplace.

24           So this is one of those places where the  
25 letter of the law, as opposed to how it actually

1 gets implemented out in the field, it really varies.  
2 And so there's a part of me that says you're getting  
3 all the answers that people say are good answers,  
4 but how you implement them is an entirely different  
5 kettle of fish.

6           And so I'm just --I'm kind of concerned,  
7 quite honestly, that maybe we're not finding good,  
8 actionable recommendations, but, rather, we're  
9 mouthing all the usual recommendations that people  
10 give. And I don't know what the workaround is, but  
11 I do think that that's a problem, you know, based  
12 on, at least, you know, some of the materials that I  
13 heard presented here.

14           CAROLYN SCHROEDER: Thanks, Joseph. I do  
15 appreciate that comment. I know your example is a  
16 very good one. You're right. It is nuanced. And  
17 even the word "central posting" -- I know we still  
18 use that term sometimes, but it was something we  
19 tried to address in 2015 to not even call it central  
20 posting anymore because, as you were mentioning,  
21 there's not necessarily a place that people go, but  
22 it has -- there is more to it for an employer to  
23 understand to make sure that it is in a place where  
24 employees will pass, and we added additional  
25 locations of where that posting needs to be,

1 including where the -- to follow -- I'd have to go  
2 back and check the direct text to quote myself, but  
3 there's additional locations and additional to a  
4 place where it will be displayed.

5 I think we even called it like a display  
6 that had to be in certain locations, including where  
7 they'll be likely to congregate and then along where  
8 like the decontamination supplies and such were put.  
9 So there was attempts, through regulation, to  
10 improve that particular example.

11 In addition, the training itself, it  
12 should be explaining there is a requirement for that  
13 information to provide it to the farmworker. So  
14 it's not they know where it is located, it's that  
15 they are able to access it and make it accessible.  
16 So I think you're right that the components are all  
17 there in the regulation, but whether or not it's  
18 being followed or understood and awareness, there's  
19 room for improvement.

20 And my hope -- this might be my own  
21 personal hope -- is that through making sure that  
22 there is an expansion of these projects in the  
23 community-based level that there can be more  
24 awareness brought to both the employer, as well as  
25 the farmworker themselves and the pesticide

1 [connection issue] of what those requirements are  
2 and the understanding of it, so it can translate  
3 into more actionable understanding and awareness of  
4 that information.

5 We're open to suggestions on how to make  
6 that happen through these kind of -- through these  
7 NOFOs and through other forums, of course. It's not  
8 all going to be resolved in some grants, but I do  
9 think that is a good start.

10 JOE GRYZWACZ: I agree. I'll just simply  
11 press back on that, though, I mean, because, you  
12 know, in trying to find a modal thing that works for  
13 everybody, it really works for nobody. And so I've  
14 been looking in my email box trying to find it, but  
15 I received, for example, this really great  
16 photograph of one entrepreneurial response to this  
17 whole notion of where do you post information  
18 regardless of whatever it gets called by. And it's  
19 basically something that gets stuck to the side of a  
20 bus and it contains every strip of possible  
21 information that every federal organization requires  
22 from wage an hour to workers' compensation to -- you  
23 know, to everything. And by containing everything  
24 in that emblem, it contains nothing, because trying  
25 to find what you're looking for is essentially

1 impossible.

2           And so again, I appreciate the task is  
3 really very hard, but I'm just going to reinforce  
4 the point of I think we're hearing the same messages  
5 and trying to cram them into a universal box when a  
6 universal box really isn't the solution. And, you  
7 know, so I just throw that out as a recognition that  
8 it is a challenging and vexing problem, but, yet, at  
9 the same time, you know, until we recognize the  
10 diversity of the ways that this needs to be  
11 implemented and hold people accountable to how  
12 they're actually doing it, it's just going to be an  
13 uphill battle.

14           A simple side note would be, I noticed  
15 from a recent white paper that Bill Jordan, perhaps  
16 he's on this call, had created that the actual  
17 number of complaints and things that are filed  
18 against the ECHO database are just really indicative  
19 of there's relatively few follow-ups to any complaint  
20 that takes place. And even if it is, it's a good  
21 stern finger-shaking at individuals.

22           And so part of this is also recognizing,  
23 hey, there's an enforcement side of whether or not  
24 people are actually doing it. And, frankly, you  
25 guys are so underfunded, you can't really do any

1 enforcement. So there's a lot of this work that's  
2 just simply not getting done.

3 STEVE SCHAIBLE: Joe, I have a quick  
4 question. Do you feel like this concern you're  
5 raising or this point, is this something you feel is  
6 in the scope of the newly formed farmworker  
7 workgroup or do you feel that's out of that scope?  
8 I'm just thinking about different mechanisms that  
9 exist to provide feedback to the agency on this.

10 JOE GRYZWACZ: I do think it has the  
11 potential to fit there, especially -- I can't  
12 remember what those -- what the charge -- the final  
13 version of the charge questions that we voted on  
14 were. You know, but one of them was essentially how  
15 can we, you know, help the agency be more responsive  
16 to, you know, and/or deal with the complexities. I  
17 don't remember the exact language, but I do think  
18 there's the possibility for that.

19 MILY TREVINO-SAUCEDA: I think, if I may  
20 -- sorry. I think that, Carolyn, I really liked  
21 your presentation, and thank you very much and the  
22 people that talked about PRIA 5 and all the work  
23 that's been done. At the same time, like Joe was  
24 saying, it's very hard to say this, but it is part  
25 of the reality. Our organizations -- and I'm

1 talking about at least 15 -- we've all had to learn  
2 how to work within the cultural context of our  
3 communities.

4           And when I say this -- and I've used this  
5 term very much because we learned how important it  
6 was that farmworkers or populations that we work  
7 with, we can't -- I mean, even if we create a  
8 curriculum, we have to readapt or adapt whatever is  
9 going to work with that community if we do the same  
10 -- if it's a training curriculum we have to redo and  
11 we have to invest there.

12           And just so that answering the question,  
13 what Steven was talking about or asking if the  
14 farmworker group could fit right here in terms of  
15 giving some feedback, I think it would. It would be  
16 a good opportunity for us to see in what way we can  
17 work with you. And I know I've worked with how many  
18 -- how many years now, you and Steven, and you're  
19 always trying to do the best. At the same time,  
20 it's about finding ways how we can work together and  
21 give some feedback and -- separately, you know, in  
22 the working group and -- you know, because we're all  
23 trying to make sure that EPA is doing the right  
24 thing, and we -- all of us that are here. And some  
25 of us are exposing many things that might not -- you



1 know, other people might not be aware of.

2 And so just to end on my comment is it's  
3 -- a lot of you from EPA I know have done -- that  
4 are right now have done and are still doing many  
5 things that will help our communities. And what we  
6 want to do is help out and see how, you know, we can  
7 work together and, collaboratively, we can give some  
8 feedback that will be, you know, a little bit more  
9 useful and it will -- I mean, the groups that you're  
10 already funding, some groups are -- hopefully, they  
11 could also be, you know, helpful in terms of what  
12 you are -- you are already working on the PRIA  
13 information.

14 But this group -- and I'm glad that Emma,  
15 who is one of your members can also be very,  
16 very helpful. I mean, she's great. Just that she's  
17 not here right now. She had to do some other  
18 things, but I'll end there. Thank you.

19 CAROLYN SCHROEDER: Thanks, Mily, and the  
20 current grantees -- the PERC and the AFOP, we have  
21 been able to begin implementing some of the PPDC  
22 workgroup recommendations through that -- like the  
23 highlighted projects that we mentioned that --  
24 regarding especially the community-based  
25 organizations.

1           And I also want to emphasize that the new  
2 programs that we're going to be putting out, there  
3 is a strong emphasis on the cultural  
4 appropriateness, working within the cultural context  
5 of that community, and although it won't -- to  
6 Joseph -- to, Joe, your point, I understand that it  
7 won't hit every single scenario, but there is a  
8 strong -- the goal is to try to reach more of those  
9 target audiences in a way that things can be  
10 understood and puts it into a perspective that takes  
11 that cultural -- in that environment, the  
12 geographical, the language, the community background  
13 into account to make sure that that information --  
14 and it does take something that is a boiler -- like  
15 an overarching rule that is meant to hit all  
16 scenarios and make it more tailored for that  
17 individual experience to make sure those important  
18 pesticide safety message and information is  
19 understood.

20           JEFFREY CHANG: Kim Brown?

21           KIM BROWN: Hey, Carolyn, and thank you  
22 for the great presentation. I just wanted to say,  
23 I've worked with Carolyn for a few years on  
24 pesticide safety education type stuff. And I just  
25 wanted to educate PPDC. I don't know how much you

1 all get talked to about pesticides safety educators.  
2 I know that there's -- I guess I want to say that we  
3 are a resource in a lot of states. There's  
4 pesticide safety educators in every state that work  
5 with extension, that in a lot of states still have  
6 county-level experiences that, you know, we work  
7 within our counties, understand our cultures within  
8 our counties.

9           And I'd just like to encourage some of  
10 that relationship with not only farmworkers, but  
11 extension as well, because we are such a great  
12 -- we've been doing this for a long time. And I'd  
13 like to make sure that we continue to build those  
14 relationships. I think sometimes we get forgotten  
15 when a relationship -- or when something's been  
16 happening for a long time.

17           I know Marc Lame is going to talk later on  
18 about IPM. IPM has been something that's been  
19 talked about for a long time. Pesticide safety  
20 educators have been around since the beginning of  
21 EPA, as well, because I, in a former life, was at  
22 LSU and had replaced somebody who was employed  
23 before EPA was started, talking about certification  
24 and training and pesticide safety.

25           So I just wanted to make sure that we just

1 talk about that as PPDC, that we understand that  
2 there are pesticide safety educators and our goal as  
3 pesticides safety educators is to make sure that we  
4 work with these groups. When I was in Louisiana, I  
5 worked with a lot of H-2A, H-2B employees making  
6 sure that they were trained because that is  
7 something I'm very passionate about myself, that we  
8 are using these pesticides safely and correctly and  
9 that we are protecting human health and the  
10 environment.

11 So that really is my piece, Carolyn. I  
12 greatly appreciate the work that we get to do  
13 together and that we make sure that we remember  
14 pesticide safety educators as an ally and a resource  
15 there as well. So thank you for that.

16 CAROLYN SCHROEDER: Thank you, Kim, for  
17 those comments. I know we quickly went over the  
18 Pesticide Safety Education Program slide that  
19 highlighted very quickly the cooperative agreement  
20 that supports some of that work. It goes well  
21 beyond that, and I know that. And we didn't -- like  
22 we could do a whole presentation just on that  
23 program for sure. Thank you for those comments.

24 KIM BROWN: Yeah, thank you, Carolyn, very  
25 much. Yeah, we could. But I just wanted to remind

1 some of the PPDC about the value that pesticide  
2 safety educators have. And, Carolyn, we greatly  
3 appreciate y'all's support.

4 CAROLYN SCHROEDER: Sure. Very relevant.  
5 Thank you.

6 JEFFREY CHANG: Anyone else? There's five  
7 more minutes in this session.

8 Brian?

9 BRIAN ANDERSON: Hey, thank you, Jeffrey,  
10 and thanks, Carolyn, for a great update and also  
11 Susan's update as well.

12 I just want to make a quick comment. When  
13 Susan went through her bilingual labeling update and  
14 she talked about some of the feedback that the team  
15 got from the listening sessions with farmer workers  
16 -- with farmworkers, and I don't remember all the  
17 bullet points she had there, but there was a couple  
18 -- one about color-coding the labels based on signal  
19 words and then there was another one about basically  
20 make labels easier to understand. And I just --  
21 I think those are just two examples that could be  
22 applied to all labels in all situations.

23 So I guess what I'm trying to say is, I  
24 think that's some good feedback that could be  
25 applied not just in Spanish language, or anything

1 like that, but just in general. Labels are where  
2 the end user learns how to use a pesticide, and I  
3 maintain that they should be as easy as possible to  
4 understand, and that will help us all accomplish our  
5 mission of protecting human health and the  
6 environment. So I just wanted to say that. Thank  
7 you. Great presentations. Appreciate it.

8 CAROLYN SCHROEDER: Thanks, Brian.

9 JEFFREY CHANG: Joe?

10 JOE GRYZWACZ: Yeah, I just wanted to pick  
11 up on the last comment. I think that was really  
12 well made, and I think it's important to recognize  
13 that herein lies one of those vexing challenges,  
14 right? And that is the language of biochemistry and  
15 the scientific meaning of toxicity and all of those  
16 kinds of elements doesn't translate well when the  
17 vast majority of the farmworker population -- well,  
18 the vast majority, about 56 percent, has a ninth  
19 grade education or less.

20 So, you know, the spirit of the law is we  
21 must educate -- or the letter of the law is, we must  
22 educate it, but the spirit of the law is, we want to  
23 make sure people understand and can interpret that  
24 information that's available. And so it comes back  
25 a little bit to some of the comments that I made

1 yesterday with regard to the Label Reform Group  
2 where we're doing some real solid digital labels and  
3 doing some proof runs with them, and having some end  
4 users that have those kinds of characteristics  
5 looking at those labels, perhaps using some of the  
6 color-coding and that kind of stuff.

7           That's where it becomes really important  
8 to see to it that those two operations are working  
9 hand in hand. Because, again, at the end of the  
10 day, the modal education for farmworkers is just so  
11 low that the ability to convey that complex  
12 biochemistry, or whatever else, you know, is  
13 contained in the label is just a vexing challenge.

14           And for a bunch of academics and people in  
15 the industry who get it, it's one thing, but for  
16 people it's literally Greek too is yet another one.  
17 And so I just think that requires punctuation.

18           JEFFREY CHANG: Claudia or Ed, whoever was  
19 first. Sorry.

20           ED MESSINA: Let's go with Claudia,  
21 please.

22           CLAUDIA ARRIETA: Okay. I'm just trying  
23 to figure out here -- so thank you for the good,  
24 good presentations. I actually want to echo what  
25 Kim was saying about the state lead agencies. So

1 we're part of CSU training farmers and workers, and  
2 I have been training applicators for Colorado for  
3 a long time. So I feel like it is also the  
4 responsibility as an applicator to give that  
5 information to the handler and the workers. And  
6 that is where the state agency -- pesticide safety  
7 education is huge for us, as an applicator, to get  
8 that information and deliver that information to the  
9 people behind us because we are responsible. I feel  
10 like I am responsible for the other people.

11 So if we have to stop an application, we  
12 stop an application. If we have to train more  
13 handlers and workers, that is part of our  
14 responsibility, too. Just to say that, yeah. Thank  
15 you.

16 CAROLYN SCHROEDER: Thanks, Claudia.

17 ED MESSINA: Yeah, I was going to make a  
18 similar point and start with a question, and maybe  
19 this is something for the workgroup to consider,  
20 which is what are differences between the  
21 applicators and farmworkers, right? So there may be  
22 different levels of education, but there's also  
23 different needs for what information they need.

24 So my question is, do we see handlers, do  
25 we see applicators and farmworkers differently, or



1 are they the same? So in EPA, we sort of treat them  
2 differently, right? So really the big thing for the  
3 farmworker community is knowing when not to go into  
4 the field, right, for an example, right, restricted  
5 entry interval.

6 So how do we deliver the right information  
7 to those farmworkers and what information do  
8 farmworkers need is always a question that's on my  
9 mind? And how is that different from really the  
10 real information, or not real, but the additional  
11 information or more intense information that an  
12 applicator needs in order to avoid contact with  
13 farmworkers? I'm just wondering how others see  
14 that?

15 JEFFREY CHANG: Emma, and final comment.

16 EMMA TORRES: Yes. Ed, most of the time,  
17 the farmworkers are the applicators as well. Most  
18 of the time they do both work, you know, depending  
19 on the type of a season. But the majority of times  
20 that I know, they -- so we train both applicators  
21 and farmworkers, you know, on the WPS, worker  
22 protection standard, and that's where we find out  
23 that they play both roles, you know. Some of them  
24 dedicate themselves to just be applicators, but the  
25 majority have both roles.

1 ED MESSINA: We'll let Joe go.

2 JOE GRYZWACZ: Yeah, I was just going to  
3 say, I mean, we just field-tested some materials  
4 that the Farmworker Association of Florida is  
5 developing, and the most common feedback that we  
6 received on things like the reentry interval and the  
7 centralized posting is usually it's not up-to-date.  
8 Usually the reentry interval is posted, but there's  
9 no information that's actually written on it.

10 So again, it's one of those -- it's a  
11 small N. It's one focus group in one particular,  
12 you know, designated area. But it just highlights  
13 sort of the messiness of between, you know, what  
14 does the law require -- and in 2019, there was a  
15 total of 1,903 violations reported to the ECHO  
16 database and about 60 percent of those violations  
17 were -- well, 30 percent were that worker safety  
18 training was violated and central posting  
19 violations. So those are the most common violations  
20 that take place. But, yet, there's no teeth in any  
21 enforcement of any of that.

22 JEFFREY CHANG: Thank you. I think that's  
23 everyone.

24 ED MESSINA: Emma had her hand up, but  
25 maybe that's legacy.

1           JEFFREY CHANG: Emma, was that a legacy  
2 hand?

3           EMMA TORRES: Yes. I wanted to add that,  
4 you know, what farmworkers report to us is not --  
5 oftentimes not knowing what the reentry interval is,  
6 but actually being allowed to do that, you know. So  
7 they're just -- even if the post is there, you know,  
8 they're told to go in, and so that's one of the  
9 issues that we find the lack of really enforcement  
10 and that's one of the things that they tell us  
11 sometimes when we tell them this is what the law  
12 says, this is what WPS says. And they say, and what  
13 is my opinion, if I refuse, I don't have a job. So  
14 that's a reality, unfortunately, that we have seen  
15 for many years, that, yeah, the law is there, but  
16 the reality of the, you know, farmworker conditions  
17 is not the same.

18           ED MESSINA: Yeah. And so when I -- thank  
19 you for that comment. And so when I think about how  
20 we prioritize how we're going to protect  
21 farmworkers, to me that seems like one of the  
22 biggest issues is making sure that those reentry  
23 intervals are respected. There is central posting  
24 or posting, and so, you know, really focusing our  
25 efforts where impact could be felt from those

1 farmworker communities is really important.

2 CAROLYN SCHROEDER: And, Ed, I can just  
3 add related specifically to the new programs for the  
4 farmworker and the farmworker training education, as  
5 well as the healthcare providers, that when we're  
6 thinking about the rural communities and the  
7 farmworkers as communities, we are keeping it very  
8 broad.

9 And that is based on, you know, the  
10 feedback and items that we've just been discussing  
11 now as well as what we've been receiving through  
12 other -- you know, different forums for stakeholder  
13 engagement, to allow a less strict interpretation of  
14 what it means to wear the handler hats, you know,  
15 applicator hat versus to a worker or hand laborer,  
16 that there would be a lot of opportunity to develop  
17 materials and messaging and thinking of who is that  
18 target audience and what information they need for  
19 these projects so the farmworkers can be inclusive  
20 of that spectrum of activities they would be doing  
21 on a farm or near the community, near the farm --

22 ED MESSINA: That's great. Thanks.

23 CAROLYN SCHROEDER: -- working with or in  
24 or around areas treated with pesticides, yes. I  
25 just wanted to clarify that.

1 ED MESSINA: Yeah, that's helpful. That  
2 was sort of my framework question, so I'll make sure  
3 I also maintain that framework. Thank you.

4 CAROLYN SCHROEDER: Thanks.

5 ED MESSINA: All right, Jeffrey, I think  
6 we're closing this one out.

7 JEFFREY CHANG: Thanks. Do we want to  
8 take a break or move on with the next session?

9 ED MESSINA: Should we raise hands if you  
10 want to break or -- yeah, raise hands if you want to  
11 break.

12 Okay. I think we should take a break,  
13 Jeffrey.

14 JEFFREY CHANG: Sure.

15 ED MESSINA: When do you want us back?

16 JEFFREY CHANG: We can come back at, you  
17 know, 2:40, 2:42. Just take a quick break, please.

18 ED MESSINA: Thank you.

19 (Brief break.)

20 COMMUNICATION AND PESTICIDE RISK REDUCTION PROGRAMS

21 JEFFREY CHANG: We are now moving forward  
22 with our next session, Communication and Pesticide  
23 Risk Reduction Programs. We are joined by Kaitlin  
24 Picone, Senior Advisor for Stakeholder Engagement;  
25 Tom Cook, Environmental Protection Specialist in the

1 Biopesticides and Pollution Prevention Division, and  
2 Marc Lame, Emeritus Professor with Indiana  
3 University.

4 You can go, Kaitlin.

5 KAITLIN PICONE: So before we get into the  
6 presentations -- as Jeffrey said, we have two  
7 presentations during this session -- I just wanted  
8 to briefly set the stage with some information  
9 on OPP's communications more broadly. Yesterday, Ed  
10 had shared a couple of slides on this, including a  
11 QR code to get on our Pesticide Updates listserv,  
12 which reaches over 25,000 recipients. So if you  
13 aren't yet one of those people, I would encourage  
14 you to join the listserv.

15 He also shared a graph that illustrates  
16 that, over time, the number of OPP updates has been  
17 increasing, and it's not necessarily every year over  
18 year, but it is generally trending up. And for  
19 context, we have just over four months left in this  
20 fiscal year and we are already level with, you know,  
21 the total number of OPP updates that went out in  
22 2017. So they are trending up and we're increasing  
23 transparency by providing more updates on what we're  
24 doing. And we're utilizing risk communication  
25 techniques to relay that information in a way to the

1 public that is digestible.

2 We're also utilizing social media to reach  
3 different audiences, as well as public webinars to  
4 take a deeper dive on complex topics, such as the  
5 ESA mitigation menu webinar that Jake and Ed  
6 mentioned earlier that we'll be hosting on June 18  
7 and, of course, integrated pest management.

8 So with that, I'll turn things over to Tom  
9 Cook from our Biopesticides and Pollution Prevention  
10 Division for our first presentation on IMP outreach.

11 Are you ready to go, Tom?

12 TOM COOK: Yes, hi, Kaitlin. Yes, I am.

13 KAITLIN PICONE: Great.

14 TOM COOK: Jeffrey, if you don't mind, if  
15 you're able to pull those slides.

16 JEFFREY CHANG: I'll pull them up. Just  
17 remember to speak slowly for our interpreter.

18 TOM COOK: All right.

19 (Pause)

20 TOM COOK: Good afternoon. My name is  
21 Thomas Cook. I'm the Lead for the Center for  
22 Integrated Pest Management. We are actually housed  
23 in the Biopesticides and Pollution Prevention  
24 Division within the Office of Pesticides Program.

25 Next slide.

1           What I'd like to do is kind of give you  
2           guys an overview of what I'm planning to discuss on  
3           the slides going forward. We're going to discuss  
4           briefly about the webinars that was just mentioned  
5           by Kaitlin, as far as our participation rate, as  
6           well as the increasing of our value proposition for  
7           those that are participating with us.

8           I'm going to touch a little bit about  
9           expanding our outreach efforts through participation  
10          in teleclasses, as well as, you know, the Center  
11          folks fielding questions within our public-facing  
12          email box, as well as our distribution of our mass  
13          email through our gov delivery platform.

14          I'm also going to touch on a little bit  
15          about our supporting efforts with our sister  
16          programs within the OPP, as well as our partnerships  
17          and close relationships with our regional  
18          coordinators across all ten regions throughout the  
19          country. And, of course, I'll finish off a little  
20          bit and touch a little bit about our additional IPM  
21          efforts.

22          Next slide.

23          In this slide, you'll see that, you know,  
24          what I wanted to mention is that we've had a steady  
25          growth of our webinar program since our inception



1 when we started in 2014. On average, we usually  
2 average about -- roughly about 1,000-plus  
3 participants that are signing up and tuning into our  
4 webinar topics. We also, through our gov delivery,  
5 have announcements that are reaching well over close  
6 to 42,000 individuals of these IPM subscribers. So  
7 we're very proud of the fact that we're expanding  
8 the footprint of those that are receiving IPM  
9 information.

10 Most of the states and several  
11 professional organizations we're partnering with  
12 offer continuing education credits to the licensees  
13 for their attendance to our webinars. We also hold  
14 an online repository for all our previous webinars.  
15 To the right, you'll see a QR code where you can  
16 just scan and be able to link directly to all our  
17 webinar series.

18 Next slide.

19 Here, we wanted to provide just a few  
20 graphs and charts just to show you as far as our  
21 success that we're having within our program. As  
22 you see to the left, our attendance, we've had a  
23 continual growth year over year from the inception  
24 to our current date of 2024. To the right, you'll  
25 see a registration and attendance. Again, we have a

1 consistent amount of those that are registering, as  
2 well as those that are actually participating during  
3 the live event.

4 And on the bottom, you'll see what we're  
5 really proud of is we have a conversion rate of 60  
6 percent, those that actually come in, sustain and  
7 maintain, and visit us again after the fact. So  
8 we're really proud of that fact.

9 Next slide.

10 So what are we doing? We've been  
11 extending our outreach through our partnerships. We  
12 made the decision years ago to offer up and partner  
13 up with our state counterparts through offering  
14 these continuing education credits. To our  
15 surprise, this has been a huge success, and it's  
16 actually taken on a -- it's a behemoth task that  
17 we've actually taken on with our state counterparts,  
18 but the partnerships are mostly with the states and  
19 many of the professional organizations that support  
20 IPM. We've seen a significantly increased value  
21 proposition for all the IPM webinar participation.

22 Again, I mentioned as far as the state  
23 partnerships, we initiated this effort in 2020, and  
24 this was actually during the height of the pandemic.  
25 With that, we really, really worked hard to partner

1 with all the lead agencies for pesticides, as well  
2 as the state health departments and sanitarians.

3 Our very own Marcia Anderson has really  
4 worked hard in building out a lot of the  
5 partnerships with the professional organizations,  
6 for example, the International Society of  
7 Arboriculture, the Society of American Foresters, as  
8 well as one particular state, the New Jersey  
9 Licensed Tree Care Experts.

10 So we're working hard to diversify our  
11 portfolio to really reach the masses on pulling  
12 folks in to view these educational opportunities for  
13 all the stakeholders.

14 Next slide.

15 Again, through extending our outreach  
16 through our partnerships, one effort that we really  
17 take on is working through some of the teleclasses,  
18 and some of the teleclasses are sponsored through  
19 WHO, the World Health Organization. And, in  
20 particular, in 2024, we just recently had a  
21 broadcast title, Encountering Bed Bugs While  
22 Traveling. As you can see, these are pretty  
23 impressive numbers where we had actually close to  
24 8,600 participants during the live events and then,  
25 after the fact, we've had close to 30,000 views come

1 in and actually review the recording. So we're  
2 proud of that fact as well.

3 Bed bugs is obviously a very, very hot  
4 topic, and any time we run any type of broadcast or  
5 training or whatever it may be, we usually get a  
6 large swath of individuals that sign up and want to  
7 hear and participate in that.

8 Next slide.

9 Here, we wanted to provide just a few  
10 graphs just to show you as far as some of the  
11 efforts and the level of effort that we perform in  
12 the Center. As you can see, a good portion of what  
13 we do on a day-to-day basis is responding to  
14 webinar-related questions. These are obviously  
15 either follow-up questions or just inquiries for  
16 technical assistance, as well as field questions  
17 related to specific pests and/or pesticide questions  
18 and, of course, just general questions.

19 To the right, you'll see where this kind  
20 of -- you know, the ebb and flow of throughout the  
21 year, usually around January is our peak season, the  
22 top of the year. So we're pretty busy within the  
23 Center.

24 Next slide.

25 Our IPM gov delivery, this platform is

1 working miracles for us. We've got Jennifer Lemon,  
2 who's on our team, she's done a phenomenal job of  
3 pulling together a lot of engaging descriptions to  
4 be able to pull the folks in and, you know, show the  
5 interest of -- or the interesting aspect of the  
6 different webinars. And, as you can see, year over  
7 year, from 2018, the numbers have jumped  
8 exponentially over to our current date, to where we  
9 are well over 40,000 individuals, and that number is  
10 climbing by the day. So we're excited about that.

11 Next slide.

12 So what else are we doing within our mass  
13 communication and outreach efforts within the  
14 Center. We're working across the program within our  
15 sister programs. We support other webinar  
16 activities or outreach activities. For example, we  
17 had a BulletinsLive webinar that we supported PRD  
18 and EFED, well attended. So what we would like to  
19 do is be able to provide the platform and technical  
20 support for those -- our counterparts and our  
21 colleagues to be able to push out additional  
22 information that's critical to the masses.

23 We also partnered with our regional  
24 partners, you know. Of most recent, we partnered  
25 with EPA Region 6, and this was pretty much

1 targeting and geared towards our tribal communities  
2 and tribal partners. It was very successful. We  
3 also worked with EPA Region 3 on other issues as  
4 well.

5 Next slide.

6 So here I wanted to kind of touch a little  
7 bit on some of the additional IPM efforts that we  
8 perform. I mentioned, of course, that we respond to  
9 program support and respond to pest-specific  
10 inquiries through our general public email box that  
11 we field every day. We also, of course, I  
12 mentioned, as far as support our EPA regional  
13 coordinators on technical questions and/or just  
14 material support.

15 Another component that the Center is  
16 partaking in is that we manage IPM grants.  
17 Currently, there are six agricultural IPM grants,  
18 roughly about 750k, and, actually, that's going to  
19 be concluding by early 2025, next year.

20 One of the fun things that we get to do  
21 within our program is we actually get the  
22 opportunity to actually have boots on the ground and  
23 see exactly what's going on on the ground, and I'm  
24 pretty sure a friend of our program, Marc Lame, is,  
25 going to mention the importance of that as well.

1           But, here, you see on the picture to the  
2 bottom left, we got an opportunity to bring out our  
3 Senior OCSPP Assistant Administrator, Michal  
4 Freedhoff, as well as the striking gentleman in the  
5 middle, Mr. Ed Messina, who's standing next to the  
6 Honorable Mayor of New Orleans, LaToya Cantrell.  
7 This was a recent trip that we were able to go out  
8 and see some of the challenges and opportunities  
9 that the actual city is facing when it comes to  
10 rodent control and/or mosquito management.

11           In addition to some of these other field  
12 experiences, we get to visit several local school  
13 districts to kind of see and hear and feel what  
14 they're faced with and see how the agency can help  
15 support some of their efforts.

16           With that, that's all I had. Let me stop  
17 right there, Jeffrey, and see if there's any  
18 questions I can answer.

19           ED MESSINA: Thanks, Tom. And Claudia --  
20 Claudia, who runs the New Orleans program, correct,  
21 and she was recently up in D.C. see giving a rodent  
22 tour for the -- for our locally, she came to help  
23 with an NPMA tour. So she gave a rodent control  
24 tour for Washington, D.C.

25           And I'm just taking issue with your

1 striking comment. Thanks, Tom, for all your work.

2 TOM COOK: No problem.

3 JEFFREY CHANG: Marc Lame is up next and  
4 we'll take comments at the end of this session.

5 Marc, are you all set?

6 UNIDENTIFIED FEMALE: And we can see your  
7 screen, Marc. I think you might just need to start  
8 your slideshow.

9 ED MESSINA: And we're not hearing you  
10 yet, Marc.

11 MARC LAME: Can you hear me now?

12 JEFFREY CHANG: Yes.

13 ED MESSINA: Yes.

14 (Pause)

15 MARC LAME: So anyways, where am I coming  
16 from? I am a former Integrated Pest Management  
17 Specialist, a cooperative extension guy from U of A,  
18 where I worked in the cotton fields, and the reason  
19 I got into communication was is that I thought that  
20 farmers and PCOs would just accept integrated pest  
21 management because I was a university professor, and  
22 I found that was not the case. And so I figured  
23 that there had to be some attitudinal or behavior  
24 change stuff going on. And that's why I found the  
25 study of diffusion and, in fact, I studied it for a



1 number of years.

2 I'm also a former environmental regulator.

3 So I understand, you know, that we have -- as I  
4 heard this morning with the D-Day ceremonies, we  
5 have rules, rights, and responsibilities, and that  
6 helps me understand that. I am and have been an  
7 appointed advisor to the EPA and the CDC for  
8 probably 15 years. And I, of course, promote IPM  
9 and I'm a current -- or a professor that --  
10 actually, even though I'm retired, I still teach  
11 environmental management.

12 And I should be able to go down to the  
13 next one here.

14 Next slide. Boy, oh, boy.

15 ED MESSINA: If you get your cursor on  
16 that screen -- there you go. It changed.

17 MARC LAME: Okay. So when we talk about  
18 stuff we've been talking about for the last two days  
19 and the idea that, you know, we want our EPA people  
20 to be able to communicate basically as leaders, as  
21 scientific leaders, and that's to be understandable,  
22 relevant, accessible, and credible. There are five  
23 basic steps for risk communication, credibility,  
24 awareness, understanding, solutions, and enactment  
25 or implementation, which, of course, sounds very

1 much like that idea of what it's like to be a  
2 scientific leader and communicator.

3           So we have to establish those things.  
4 There's ways that we can do it right and there's  
5 ways that we can make it go the other way. And, of  
6 course, we really want it to go the correct way.

7           When it comes to actually communicating  
8 for behavioral change, we need to remember there's a  
9 scientific continuum and this -- you know, we have  
10 lots of great scientists at the university, but  
11 certainly at the agency. And so, you know, they  
12 figure out -- they get an idea what the problem is  
13 and they sometimes are doing the bench science and  
14 applied science to come up with the solution. And  
15 then that solution has to be demonstrated and then  
16 it needs to be incorporated into the community.

17           So, I mean, it's real nice to come up with  
18 a scientific solution, but if you don't get people  
19 to use it, it's not going to do you much good. So  
20 that's why it's really important to have this.

21           Now, actually, EPA was into this stuff a  
22 long time ago and it's -- I think culturally with  
23 the Office of Pesticide Programs, there's things  
24 that I like and there's things I don't like. But  
25 one of the things I do like is, you know, pesticides

1 were originally regulated by the USDA. And part of  
2 USDA was actually going out and getting, in the old  
3 times, farmers to adopt new technologies. And so  
4 that extension model using diffusion of innovation  
5 was really important.

6 So actually, as far back as 1992, which,  
7 of course, is 30 years ago, ancient history, more  
8 than 30 years ago, a couple of EPA guys came up with  
9 what was called the "Rat Book," because they saw  
10 that there was a problem when it came to children  
11 being exposed to pesticides and we developed a  
12 relationship -- at that time, Bill Currie and Ralph  
13 Wright, both these guys have passed away now, but  
14 they -- this is not new to the agency is my point.  
15 It's a certain type of communication.

16 And just as an example of what we did by  
17 using -- by diffusing integrated pest management in  
18 schools. We didn't -- this wasn't a recycling  
19 program for kids or anything like that. This was  
20 actually using the school facility and the managers  
21 to reduce pests and, of course, by reducing pests,  
22 we reduce pesticides.

23 So we -- over a period of just, you know,  
24 20 years or so, we were able to get -- diffuse  
25 integrated pest management in schools in 41 states

1 and reduce the risk of pests and pesticides to kids  
2 and to the other inhabitants of the school at that  
3 time. That is still going on. Tom Cook's group is  
4 still working with the school IPM. There's -- it's  
5 kind of slowed down a lot. There's some things  
6 which I will show you that need to be done in order  
7 for it to be jump-started again, or transferred to  
8 any other type of community.

9           So we know that what we want to do with  
10 integrated pest management is have a shift in pest  
11 management from the days of scheduled treatments of  
12 pesticides to using integrated systems based on  
13 education to manage pests. And by doing so, as I  
14 said yesterday, integrated pest management and  
15 resistance management were twins born of the same  
16 problem, which was what were doing back in the '50s  
17 and early '60s wasn't working when it came to pests.  
18 And, you know, I came in at a time where literally  
19 we were -- you could take a tobacco budworm and  
20 drown it -- and or not drown it, just dip it into  
21 DDT and it wouldn't do anything. So it just wasn't  
22 working for the farmers or for the environment, or  
23 for citizens, for that matter.

24           So looking into diffusion theory, I  
25 thought that we could probably come up with a good

1 model for going into a community, whether it be a  
2 farming community or a school community, or in this  
3 case with resistance management into a pesticide  
4 user community and use diffusion to better implement  
5 a program, and I'll explain better in just a minute.  
6 But diffusion theory is that process by which new  
7 ideas or practices, called innovations, are  
8 communicated through certain channels over time and  
9 either adopted or rejected by members of a social  
10 system over time.

11 I'll explain that further as we go along  
12 based --

13 JEFFREY CHANG: Marc, sorry to interrupt.

14 MARC LAME: Yes.

15 JEFFREY CHANG: What slide are you  
16 supposed to be on? Because we're only seeing the  
17 second slide right now.

18 MARC LAME: You're only seeing the second  
19 slide?

20 JEFFREY CHANG: Yes.

21 MARC LAME: Can you see the other slides  
22 now?

23 JEFFREY CHANG: Yes, we are seeing them.

24 MARC LAME: Okay. Well, they were great  
25 pictures. There's Ralph and Bill. All right. And

1     there's little kids in the school and this is what  
2     we're trying to do is change behavior as I mentioned  
3     from the old scheduled treatments, which, you know,  
4     we've really moved away from, to real integrated  
5     pest management, which we really haven't moved all  
6     the way towards.

7             This is diffusion theory. And then  
8     catching up, we're at the elements of diffusion. So  
9     you have the innovation. The innovation are best  
10    management practices, like integrated pest  
11    management, resistant management practices, those  
12    are -- that's the innovation and we want to use  
13    certain communication channels and it takes time and  
14    we have to know what social system we're working in.  
15    So clearly working with school administrators and  
16    custodians to get them to adopt integrated pest  
17    management is different than working with a cotton-  
18    growing community. So it's just something that's  
19    perceived as an adopting unit as new over time.

20            Attributes, they are really important.  
21    And this is something that we have to consider when  
22    we -- when we come up with our BMPs, our resistance  
23    management program and plans. Same with IPM. Does  
24    it have -- is it better than what was being used  
25    before? So does it have a relative advantage? Is

1 it compatible with the social system? IPM is very  
2 compatible with the built environment social system,  
3 particularly schools, for instance.

4 Can you try it or do you have to swallow  
5 it all at once? Can you observe it and how complex  
6 is it? And, of course, integrated pest management  
7 has always seemed very complex, depending on how you  
8 communicate it.

9 Okay. So how do we communicate that so we  
10 can get this done right? And, yes, that is a little  
11 town in Indiana.

12 So there is a process that oftentimes  
13 implementers -- maybe at some point the agency was  
14 really good at this and then, you know,  
15 institutional memory goes away and we kind of  
16 forget, because we have new things that we want to  
17 try and use. For changing behavior in a social  
18 system, you need to go through what's called the  
19 innovation/decision process. So you have to make  
20 the community aware that there, in fact, is  
21 something better. So right now, we could have a lot  
22 of resistant problems or resistance problems when it  
23 comes to pesticides. But we actually have ways that  
24 we can mitigate that. And so there is a better way.

25 Then you persuade that group to try it out

1 and they make a decision to implement it or not, you  
2 implement it, and then you confirm that they, in  
3 fact, made the right decision to adopt resistance  
4 management, or in the older case, integrated pest  
5 management. The problem with most bureaucracies is  
6 that they stop right around the decision process,  
7 the, yes, we like this, and they don't do the  
8 necessary things in the implementation process and  
9 they don't do the confirmation process.

10 So for instance, you know, one thing I'm  
11 critical about when it comes to school integrated  
12 pest management with the agency is there needs to be  
13 a confirmation program. For instance, one type  
14 would be an awards program and, you know, that needs  
15 to happen in order for this process to right itself.

16 So variables that affect the rate because  
17 the faster we can implement a program, the faster --  
18 well, the cheaper it is in terms of time and money  
19 and we can go on to the next thing because you guys  
20 have a lot of stuff to work on and wouldn't it be  
21 nice if we can get this process into effect earlier  
22 in what we call critical mass, where we don't have  
23 to really put much into it anymore.

24 And, by the way, you know, I know that  
25 some years ago, the agency talked about, oh, well,



1 we're going to use a wholesale model to implement  
2 integrated pest management and humans need to be  
3 talked to. You know, we might have social media and  
4 all these other kinds of stuff, but the fact is is  
5 that we are retail animals and it might work  
6 wholesale for an agency to do something, but it  
7 doesn't work for a social system. So that's why  
8 it's so important to do this. And, of course, by  
9 understanding the social system, and then you have  
10 to have change agents and they have to be able to  
11 promote and, of course, compete, because there are  
12 people who don't want integrated pest management or  
13 resistance management.

14 Change agent sequence is very simple.  
15 It's develop a need for a change, establish the  
16 information exchange, diagnose problems, create the  
17 intent to change in the client, translate the intent  
18 into action, and that's something that, for  
19 instance, we were probably lacking when it comes to  
20 worker protection standards, stabilize adoption and  
21 prevent discontinuance, and then achieve a terminal  
22 relationship.

23 So we should -- all change agents should  
24 basically try to be working themselves out of a job.  
25 Change agents, there's Bill Currie again, Mary

1 Grisier from Region 9, and then the IPM team, some  
2 of you guys that know rodents know Bobby Corrigan.  
3 We also worked with the folks on the Navajo  
4 Reservation and the tribal change folks and -- oops,  
5 I didn't want to go ahead that far.

6 So I don't know if I can go backwards or  
7 not. Yeah, I can.

8 And then there's some people in this  
9 bottom picture here, there's Sherry Glick, Mary  
10 Grisier, there's Don Baumgartner from Region 5, and  
11 so basically our innovation was put together with  
12 the proper group of stakeholders when we did this.

13 So I'll go past this real quick. This is  
14 where we have this problem with the wholesale versus  
15 retail. Something that I hear all the time is,  
16 well, we have this new information. We have a new  
17 webinar, which, you know, I've done webinars with  
18 Tom and they're a good thing to do, but they're just  
19 the beginning.

20 And what that is is what we call the  
21 hypodermic needle model where you take information  
22 and you inject it into a system, and it's typically  
23 substandard to test that flow model.

24 (Sound interference)

25 MARC LAME: Did someone say something?

1           Anyways, so for a more proven behavioral  
2 change you want to --

3           (Sound interference)

4           MARC LAME: Yes?

5           You want to go to transfer information  
6 from the media to opinion leaders and then from  
7 opinion leaders to people in the system. So  
8 basically, you want to use peers to change a social  
9 system. And that's why wholesale really does not  
10 work as well as retail.

11           So I like a two-step flow model and that's  
12 what the IPM work that I've done is based on. So  
13 IPM, we have as an innovation and mine is much  
14 simpler. It's basically designed to allow humans to  
15 compete with other species. So, you know, I know  
16 all the language that is used for IPM. This is what  
17 I use.

18           So the other thing I use is saying that  
19 IPM is a pollution prevention innovation, and I say  
20 this because it's simpler because the Pollution  
21 Provision Act has certain protocols. So for  
22 instance, reduction at the source for pesticides is  
23 not having pests. And going through that protocol  
24 or that act actually works. And, of course, my  
25 argument is that's where the office should be

1 tapping for more money, particularly in the  
2 nonregulatory scheme of trying to change behavior  
3 regarding pesticides.

4 So kind of finishing up here, we know that  
5 IPM is effective because it's proactive, it's based  
6 on ecological underpinnings. It's precautionous  
7 regarding risk to environmental health, and it's  
8 less expensive because it leverages existing  
9 operations.

10 And, again, existing operations, you know,  
11 looking at schools -- schools ever since Columbine  
12 have been doing security, which is the same as  
13 monitoring, the backbone of integrated pest  
14 management and resistance management, I might add.  
15 Schools do energy conservation, which is exclusion.  
16 They do sanitation, which is basically not providing  
17 food, shelter, and water for pests. So this is  
18 something they understand and that's why it works so  
19 well.

20 I would say to you we can do the same  
21 thing in almost any venue. And, of course, this is  
22 sharing credit, giving awards. You guys, of course,  
23 know Jim Jones, Steve Owens, and we would always use  
24 plaques with schools. One thing I always tell  
25 people that I work with is a \$100 plaque is worth

1       \$10,000 worth of implementation.

2               Public participation is what I'm going to  
3 finish with, and I'm not going to go over all of  
4 this. But it's any process that works to understand  
5 people's values and uses their input to make better  
6 decisions.

7               So EPA -- this is part of EPA policy.  
8 But, again, part of -- this is something when it  
9 comes to communicate that I'm not sure how well this  
10 policy is being implemented. I see it much better  
11 now than I ever have. But this is something that's  
12 really important.

13              So these are the basics with public  
14 participation, is to provide a clear defined  
15 opportunity for the public, to influence the  
16 decision, manage the commitment to fully consider  
17 public input, engagement of the full range of  
18 stakeholders from the community, including  
19 vulnerable population and marginalized communities,  
20 focus on building relationships between stakeholders  
21 and creating and sharing truthful, comprehensive,  
22 and clear information.

23              This, I would say, is also a good argument  
24 for having longer face-to-face PPDC meetings because  
25 this allows our committee to, in fact, reach these

1 goals as stakeholders to provide useful advice to  
2 the agency.

3           Just for the heck of it, factors that  
4 inspire trust and credibility, caring and empathy,  
5 are number one. So it's not the competence and  
6 expertise, which I personally wish it was, or  
7 honesty and forthrightness or dedication and  
8 commitment, which certainly I would say our  
9 communicators in the agency have all of that stuff,  
10 but caring and empathy is what really inspires trust  
11 and credibility.

12           So actions speak louder than words. I  
13 would say, you know, actions speak louder than  
14 words. So that's communication, through your  
15 actions. And so lead from in front and be  
16 suspicious of anyone who won't do the same.

17           And this is why I was a little distressed,  
18 you know, with the idea that the field trips and  
19 those things are going away. I think those are the  
20 perfect opportunity to lead from in front.

21           So that's the end of my share. And I'll  
22 leave it up to Jeffrey to take it from here.

23           JEFFREY CHANG: Thank you, Marc.

24           MARC LAME: Did I do it fast enough,  
25 Jeffrey?

1           JEFFREY CHANG: You were perfect. Thank  
2 you.

3           MARC LAME: That's a matter of opinion.

4           JEFFREY CHANG: Does anyone have any  
5 comments? We have a few hands up, but I don't know  
6 if they're legacy hands, but Daren?

7           (No response.)

8           JEFFREY CHANG: Patrick? Patrick Johnson?

9           (No response.)

10          JEFFREY CHANG: Okay. Joe, Joe Gryzwacz?

11          JOE GRYZWACZ: Thanks, Marc. I mean, that  
12 was really great. I especially appreciate some of  
13 the really pointed comments, and I echo, you know,  
14 the need for direct in-person communication  
15 surrounding these -- you know, surrounding nuanced  
16 issues like this. My only comment is really one of,  
17 you know, like many things in the realm of  
18 communication, you know, good targeting to specific  
19 populations is an important part of being able to be  
20 effective with these kinds of messages.

21           I know, as an example, in an entirely  
22 different space where the National Children's Center  
23 for Agricultural Safety and Injury, they have a hard  
24 time reaching essentially farm owners and operators  
25 with messages about how to keep kids safe on farms

1 or farming establishments. And I just simply use  
2 that as an example of -- your diffusion of  
3 innovation strategy, I think, is well framed, but  
4 trying to identify who are the appropriate targets  
5 and the best way to reach those targets, that's a  
6 place where I would encourage a little bit more  
7 thinking on that, only because I think it's the  
8 critical point.

9 But the messaging about trying to, you  
10 know, use the diffusion of innovation model with,  
11 you know, major stakeholder groups or decision-  
12 makers to get early adopters to then start, you  
13 know, setting the example for others, I think that's  
14 entirely the correct strategy for being able to  
15 permeate the ultimate population with the kinds of  
16 messages that you're advocating.

17 So just a long-winded way of saying I  
18 think you're absolutely right, but I think thinking  
19 about who are those target groups that can be the  
20 diffusion -- the early adopters, so that you can  
21 actually do some of the things that you're talking  
22 about would be, you know, a good next step.

23 MARC LAME: It is. And let me say that,  
24 you know, I teach communication. That's a weird  
25 thing for an entomologist to do. But an axiom that



1 we always use is whether -- just like the three most  
2 important things in real estate is location,  
3 location, and location, the three most important  
4 things in communication is audience, audience, and  
5 audience. And we need to do a much better job with  
6 that, particularly, as you stated, with opinion  
7 leaders.

8 JEFFREY CHANG: Rosemary?

9 ROSEMARY MALFI: Marc, thank you so much  
10 for that presentation. I really enjoyed listening  
11 to your framework and it helps me think about it in  
12 a new way, and I really like that idea of sort of  
13 like teach the teacher, right. Same sort of  
14 principle. So thank you for that.

15 I think I also wanted to swing back to a  
16 comment that you made yesterday about funding. So,  
17 you know, we've all gathered here and like listened  
18 to proposals and, you know, we know the need for  
19 education and we know that, you know, we want  
20 resistance management programs to be prioritized,  
21 but we also know that OPP is looking at a huge  
22 funding cut, right, for this -- or budget cut for  
23 this coming year.

24 So, Marc, I think it was you who had  
25 suggested that the PPDC send a letter to Congress to

1 advocate for funding. Was that you, Marc, who said  
2 that? No? It was somebody else.

3 MARC LAME: No, but I would sign it.

4 Yeah, you're absolutely right. You know, and the  
5 strange thing is is that there's tons of research  
6 for decades that shows that it's more efficient and  
7 effective -- cost-effective to educate for changing  
8 behavior bigger than it is to regulate.

9 Now, I'm all for regulation. Believe me,  
10 I am all for regulation. But that's where -- you  
11 know, OPP has, you know, most of its money in that  
12 regulation and, you know, I think that, if done  
13 correctly, they would have some added effectiveness  
14 and efficiency by better funding of the  
15 nonregulatory groups.

16 I mean, I still want the answer. Is PESP  
17 still -- is that still a viable program in BPPD? I  
18 don't know if it is. They haven't had a new member  
19 in three years.

20 ROSEMARY MALFI: Can you -- what's that  
21 acronym?

22 MARC LAME: The Pesticide Environmental  
23 Stewardship Program. In our Resistance Management  
24 Group, we talked about, you know, the parts of the  
25 agency that could facilitate resistance management.

1 And that's really important because you need to have  
2 that nonregulatory function of education and  
3 technical assistance, and it needs to be supported.  
4 But I can tell you that the agency, in general, and  
5 OPP specifically -- I've been involved with them for  
6 well over 30 years and it's -- and that's just the  
7 case, you know. They're the red-headed stepchild.  
8 I hope I don't get in trouble for that.

9 ROSEMARY MALFI: So, I mean, I don't know  
10 how we would organize this. I don't know if we're  
11 -- like I don't know the rules under, you know,  
12 FACA, what our communications are allowed to be like  
13 outside of a meeting because there must be members  
14 who are not actually here. But if folks were  
15 interested in putting -- you know, I'd be happy to  
16 lead an effort to put a simple letter together that  
17 we all might be willing to sign.

18 I don't know if that's a motion or just  
19 like an email suggestion or how we initiate that  
20 kind of effort. So any guidance on that is  
21 appreciated for this newcomer.

22 ED MESSINA: We can take that back and see  
23 if there are any ethical considerations that -- you  
24 know, given that you're appointed to the committee  
25 and representing the Government, you know, and then

1 whether you could do that in your individual  
2 capacities, not citing PPDC.

3 ROSEMARY MALFI: Right.

4 ED MESSINA: So Jeffrey and I will take  
5 that back. We'll talk to Michelle.

6 MARC LAME: And this might surprise  
7 certain people, but, I think, again, as part of  
8 communication and -- one, it's a good thing to use  
9 the chain of command and see what their response is  
10 and, you know, you can always copy people, but I  
11 think we have a good chain of command, you know. So  
12 that's my opinion.

13 ED MESSINA: Thanks, Marc.

14 JEFFREY CHANG: Ed?

15 ED MESSINA: Ed?

16 JEFFREY CHANG: Hardy?

17 HARDY KERN: Thank you. Yeah, I want to  
18 second, again, fantastic presentation. That was  
19 really helpful for me in reframing a lot of this.  
20 And I just want to comment two things. One,  
21 definitely on the funding issue, I think that's  
22 something just about everybody here can get behind  
23 it. We want to support OPP in that way as  
24 appropriate and ethically considered and also in --  
25 a lot of what you were talking about, I think it can

1 be really a great way for different groups with  
2 "differing interests" that are all together on this  
3 call to come together around the communication parts  
4 of it.

5           And, you know, the way that registrants  
6 are impacted by communication on risk reduction is  
7 different in some ways than us in wildlife, but also  
8 very much the same. And I think it could be another  
9 really great opportunity for a lot of shared goals,  
10 a lot of common agenda setting. And I really  
11 appreciate the way that you framed everything today.  
12 It's given me a lot to think about and to kind  
13 of take back and -- yeah, looking forward to  
14 applying this in PPDCs now and in the future. Thank  
15 you, Marc.

16           MARC LAME: And I might say, as a PPDC  
17 member and one who has been a member for a long  
18 time, that I really appreciate the opportunity to be  
19 responsible for our freedom. And so when Ed opened  
20 up the meeting yesterday and said thank you for your  
21 service, you know, we have an opportunity to serve  
22 and that's -- we don't get that too often. And  
23 then, of course, I want to appreciate you guys for  
24 your service.

25           JEFFREY CHANG: Thank you. Anyone else

1 before we move on?

2 (No response.)

3 JEFFREY CHANG: Great. We are nearing the  
4 end of the PPDC agenda. Ed Messina, the Director of  
5 Office of Pesticide Programs, will do some  
6 synthesizing for us as we look towards the next six  
7 months of OPP activities and how the work of the  
8 PPDC discussed today will impact those.

9 This will be a whiteboarding session and  
10 Kaitlin Picone will be our lovely notetaker. So we  
11 can get started there.

12 MOVING FORWARD AND MEETING CLOSING

13 ED MESSINA: Thanks, Jeffrey. So we  
14 certainly had, in my opinion, some great topics for  
15 this PPDC and as suggested by PPDC members. So we  
16 really just wanted to carve this time out to see if  
17 there were any additional discussions we wanted to  
18 have about any of the topics that were presented.  
19 And then, also, as we look towards the fall PPDC,  
20 were there any topics that you felt weren't covered  
21 that you'd like to see be covered in the future PPDC  
22 meeting and any other thing that has occurred to  
23 you, or any other topic or issue you'd like to raise  
24 as a member of this organization.

25 So with that, I will wait for hands to be

1 raised. And thank you for lasting this long, two  
2 days of remote meetings and giving it your all, and  
3 I'll echo my thank you for your service for this  
4 committee and for the expertise that you bring.

5 I know there was some ESA stuff, too, that  
6 maybe we didn't get to finish in that session, but I  
7 see Grant's got his hand up. Thanks, Grant.

8 GRANT MORRIS: Just real brief. Would it  
9 be possible for the next one -- maybe it's more  
10 important for the new members, but is there like an  
11 abbreviation list that you guys could put out as  
12 part of the pre-read that would -- of all the  
13 abbreviations you guys are using. It takes a while  
14 for me, anyways, to catch up and know what you're  
15 talking about on some of the stuff.

16 ED MESSINA: Thanks. Yeah, we have an  
17 acronym list. We can definitely share that. And it  
18 looks like you're getting some thumbs up.

19 And we did have an orientation with new  
20 members. I don't know if you were able to attend  
21 that. I'm sure that didn't answer all your  
22 questions. Just maybe if, you know, they're making  
23 some of that available offline. I don't know if you  
24 felt that was helpful a little bit.

25 GRANT: Yeah, it definitely was. I just

1 -- like you said, there's just -- there's a lot of  
2 terms getting thrown out there.

3 ED MESSINA: Got it. Will do. Thanks.

4 Who's next, Jeffrey?

5 JEFFREY CHANG: Gary Prescher.

6 GARY PRESCHER: Yeah. Can you hear me,  
7 Jeffrey?

8 JEFFREY CHANG: Yes.

9 GARY PRESCHER: I can't seem to get my  
10 camera working. But my question/comment would be  
11 focused on the timeline that you use when you're  
12 bringing out a strategy and a draft portion of it  
13 versus the final end game. And I'm just wondering,  
14 number one, if there's a schedule release time that  
15 needs to leave a certain amount of time between when  
16 you release the draft for public comments and then  
17 working with different stakeholders back and forth,  
18 which we really appreciate the way that the agency's  
19 been working, you know, on some of the ESA issues  
20 that were discussed.

21 But I guess the question kind of centers  
22 around, number one, sometimes it seems like there's  
23 just not enough time to maybe crunch all the tweaks  
24 and input suggestions, you know, that maybe you're  
25 offered up by different stakeholders on these



1 strategies that you're developing. So is there a  
2 set time between when you release a draft, like six  
3 months to do this, or is it just we'll put the draft  
4 out, we know we have a deadline coming, so we got to  
5 get the draft out, and that tends to get delayed, so  
6 we don't have as much time to discuss things?

7 ED MESSINA: Generally, when we put things  
8 out for public comment, it's 30 days. We can give  
9 an extension to 60 and 90, and we have given  
10 extensions on many of the strategies.

11 GARY PRESCHER: So the public comment  
12 part, yeah, I understand that. But in terms of  
13 seeking other input, for example, you know, on  
14 mitigations or offsets, whatever it is you're  
15 working on, is there -- I guess the point I want to  
16 make is the longer we have time to take a look at  
17 what's proposed and then offer up suggestions or  
18 tweaks or whatever, the better it seems to be for  
19 everybody engaged in terms of buying in. And  
20 education, some of the things that were mentioned in  
21 Marc's presentation there.

22 ED MESSINA: Yeah, thanks. I got cut off  
23 from on the meeting for a minute, so apologies. So  
24 what I think I heard you say was you understood the  
25 public comment part. It was the question about the

1 time in between the draft and the final and the time  
2 allotted. And so for many of the strategies, we did  
3 do a draft, we received comments. Then we put out  
4 another draft and then we haven't yet put out the  
5 final for many of the ESA strategies. That's  
6 coming. That process has taken about six months to a  
7 year to kind of round out all of that sort of  
8 outreach, multiple drafts, and then finalization.

9 So but is there some suggested time frames  
10 or different approaches you'd like us to take? And  
11 sorry, again, my audio cut out for a little bit, so  
12 I didn't get to hear your comment.

13 GARY PRESCHER: Well, that might be  
14 something to think about in terms of working through  
15 the different issues here or different strategies  
16 that the EPA is working on. It would just be -- I  
17 guess I would encourage -- we would encourage some  
18 consideration on trying to lengthen that timeline  
19 out a little bit longer between the -- so we can get  
20 a view of the draft and then have more feedback  
21 interaction in terms of what we've discussed at  
22 NCGA.

23 Thank you.

24 ED MESSINA: Thanks.

25 JEFFREY CHANG: Marc Lame?

1           MARC LAME: Yes, and this an observation,  
2           and I'm not quite sure what to do about it. When we  
3           were in our resistance management group, what we  
4           tried to do -- what I tried to do was to find the  
5           strategic plan in activities for the different  
6           entities in the agency that could work together  
7           to do resistance management, which was one of our  
8           recommendations. But there's -- what I found was is  
9           that there were a number of, I'll say, divisions,  
10          branches, whatever you want to divide them up in,  
11          that did not have strategic plans that addressed  
12          certain things which I knew were going on.

13                 And so I'm seeing, you know, there's a  
14          problem of if you don't have a plan, you've got some  
15          problems. I go all the way back to the strategic ag  
16          initiative and, you know, you have to have a uniform  
17          plan and then you have to have it coordinated. And  
18          what makes it even harder -- and I have so much  
19          sympathy for you on this -- you have to do it with  
20          all the reasons.

21                 So there's a problem there. I don't know  
22          what the solution is other than to just state that,  
23          as an observation, I think things would run better  
24          from a policy advice viewpoint if there were, you  
25          know, better strategic plans. So that's all I'm --

1 it's just an observation.

2 ED MESSINA: Marc, were you able to see  
3 the agency's strategic plan and the -- sort of Goal  
4 7, which is what we operate under?

5 MARC LAME: Yes. Yeah. That's good  
6 stuff, you know, but way up there. You know, the  
7 40,000-foot level, you know, plan and directions and  
8 that kind of stuff. But when you get down into the  
9 weeds, you know, it's -- I didn't see stuff that I  
10 needed to be able to say, well, this branch is  
11 already doing this and they can work with so-and-so  
12 branch, that kind of thing.

13 ED MESSINA: Yeah, because that's -- yeah,  
14 so all the take-back for me and Kaitlin is are there  
15 lower-level strategic plans that can be shared,  
16 because there are -- we do a strategic plan that  
17 lines up with the agency's plan. So maybe being  
18 able to comment on that would be helpful. So we'll  
19 check into that. Thanks.

20 MARC LAME: Okay. Yeah, and I've seen the  
21 office's plan and that looks pretty good, too. I  
22 don't know about sharing. That's a tough thing.  
23 I'm an old Bill Ruckelshaus fan, you know, and he  
24 talked about transparency. So...

25 ED MESSINA: Yeah, so and I'm -- I know

1 that our plan is put out there, but maybe it's not  
2 in the most accessible places. So we could check on  
3 that.

4 MARC LAME: Right.

5 ED MESSINA: Thanks.

6 JEFFREY CHANG: Hardy?

7 HARDY KERN: Sorry for the delay there.

8 Just a comment on the strategies that are being  
9 proposed and developed. I think it's fantastic that  
10 so many groups engage so deeply on it. We're one of  
11 them, certainly. And there was a lot of support  
12 expressed today for these being, you know, sort of  
13 de novo or new and, you know, everyone's figuring it  
14 out as they go, and what these strategies -- as  
15 they've been developed and released and commented on  
16 and as we're getting new ones, I think the EPA truly  
17 has done a great job of transparency along this  
18 process, as well as underlining that it is an  
19 ongoing new process and it's going to take some  
20 different steps to implement and figure out.

21 And so I would just want to throw out  
22 there that this is one of the cases of not letting  
23 the perfect get in the way of the good, especially  
24 since it is a strategy and guidance as opposed to  
25 hard and fast, you know, things changing overnight.

1 And from doing a lot of outreach and talking with  
2 groups on all parts of this issue, especially with  
3 the herbicide strategy, I do feel like that's become  
4 the assumption, is that things are going to change  
5 overnight and you're not going to be able to grow  
6 this coming season with the tools that you need to.  
7 And I just want to throw it out there that it's  
8 ongoing and we recognize that and it's collaborative  
9 and the agency has done a good job of making sure  
10 that that's clear.

11 JEFFREY CHANG: Joe?

12 JOE GRYZWACZ: Great, thank you. The  
13 point that I want to raise is one that doesn't  
14 really have a solution, and I'm a little reluctant  
15 to raise it, but I'm going to raise it anyway. And  
16 that is, you know, when opportunities for face-to-  
17 face communication are challenged, like, you know,  
18 not having an in-person meeting because of budgets  
19 -- I completely understand budgets, but that cut  
20 ends up affecting some groups more than other  
21 groups, you know. So the NGOs and the worker  
22 advocacy groups and those kinds of things are far  
23 more harmed from the inability to have face-to-face  
24 conversations with EPA and other individuals than  
25 are business and industry, because they've got

1 people in the D.C. area, they can fly people into  
2 the D.C. area to talk and to try to work around  
3 things.

4 But organizations like farmworker advocacy  
5 groups and the NGOs, like, you know, the ESA groups  
6 and that kind of stuff, they're not as well  
7 positioned to be able to make up for lost facetime.  
8 So I don't know how to say it any other way then,  
9 you know, it's always hard to absorb budget cuts,  
10 but the idea of not meeting in person does affect  
11 some groups more so than others.

12 And so I would just lobby strongly for,  
13 you know, recognizing that presumably even-handed  
14 decision does still affect some groups more so than  
15 others in terms of their voice for the Pesticide  
16 Program Group. And I don't have a solution other  
17 than trying to lobby Congress for more money and  
18 that kind of thing, but the optics could come across  
19 as though, well, we're trying to affect everybody  
20 equally, but, in reality, certain groups are more  
21 affected than others.

22 ED MESSINA: Thanks, Joe. Not as a way of  
23 defense, but maybe to allay some of your fears, we  
24 have quarterly meetings with NGOs, farmworker  
25 communities, and industry that are set with the AA

1 and multiple engagements that I'm personally  
2 involved in with farmworker groups and, in  
3 particular, are on issues that they care about, like  
4 organophosphates. I think there's a meeting next  
5 week with farmworker groups and the AA. So we do  
6 have those meetings. We take our outreach and  
7 stakeholder engagement seriously across multiple  
8 stakeholders.

9 But I don't want to detract from your  
10 point, Joe, but maybe add to the frame that there is  
11 other meetings that are happening that we also feel  
12 is important. Thanks, Joe.

13 JEFFREY CHANG: Kim Nesci?

14 KIMBERLY NESCI: Yeah, hi, is Kimberly  
15 Nesci. I have I guess more of a question/  
16 observation for Ed and the group. I mean, first, I  
17 wanted to say thanks for including me in as a member  
18 of the committee and all the thoughtful  
19 presentations and good work that was presented over  
20 the past two days. I think it was really great to  
21 hear from everybody. I was really struck by what  
22 Bill Jordan said in his public comments, compounded  
23 by your presentation at the start of this meeting,  
24 Ed, yesterday about resources, where a lot of this  
25 meeting was talking about more things that people



1 need from you or want from you or from OPP.

2 And, also, I know that, in a lot of cases,  
3 efficiency measures or efficiency efforts can take  
4 some time or take additional resources at first to  
5 find the efficiencies and to get those implemented  
6 and to change -- you know, to effect change in an  
7 organization.

8 So what I'm curious about is what your  
9 strategy is for balancing the process improvements  
10 with the need for growers to have additional tools.  
11 You know, being USDA, I need to think about growers'  
12 needs. And, of course, all of that compounded by  
13 the lack of resources and whether there's anything  
14 that PPDC could do as a group to help in that  
15 strategy or those strategies.

16 ED MESSINA: My initial reaction is, you  
17 know, it is those process improvement activities  
18 that we're undertaking that are designed to get  
19 registration decisions out the door sooner and  
20 reregistration out the door sooner so that the tools  
21 in the toolbox can be added for growers. So that's  
22 an important aspect of why we're doing the process  
23 improvements.

24 And the good news is there's -- in PRIA 5,  
25 we'll have a third party take a look at our

1 processes and look for places we can be more  
2 efficient to achieve that goal. So, you know, as  
3 we're thinking about our goals in OPP, you know,  
4 protecting human health and the environment being  
5 key, while we're also examining the registration  
6 decisions for pesticides and reevaluating those  
7 pesticides in the marketplace to ensure that they  
8 are protective, where there's efficiencies in any of  
9 those aspects, while all also maintaining the  
10 credibility and the science and taking the time to  
11 look at things where we need to. That's the balance  
12 we're striving for.

13           And there's a list of examples of things  
14 that, you know, can be improved that we've been  
15 working with various folks on and, you know, how we  
16 do review is automating some of the things through  
17 the IT, as examples, building an index for the  
18 label. Many of the discussions that we had here  
19 today were aligned with our goals of being more  
20 efficient. So I think they're aligned. I mean, we  
21 do want to support the growers in those efficiencies  
22 and make sure we're satisfying our obligations under  
23 the various statutes.

24           Hopefully, that answered your question.  
25 But in terms of more, yeah, I think we should talk

1 about it more and I'm -- I think the way you do  
2 process improvement is you listen to the voice of  
3 your customers, which are many of the members on  
4 this group, right, you are customers of EPA's  
5 information, farmworker all the way to industry. So  
6 how -- if you're looking at our processes and we're  
7 being transparent about it, how can we do a better  
8 job in taking that feedback and incorporating that  
9 into our changed processes?

10 KIMBERLY NESCI: Third party review, Ed,  
11 is that -- you may have said this in the PRIA  
12 slides, but I don't remember -- is that going to be  
13 released to the public?

14 ED MESSINA: I believe the report will be  
15 -- yeah, I'm not sure. I'd have to check with  
16 Steve. But, certainly, we'll get the report and  
17 then we have to articulate outside the agency how we  
18 implemented changes in the report, and showing that  
19 we did implement changes and respond to the audit  
20 report is what allows us to have the other 5 percent  
21 fee increase. The first 5 percent fee increase was  
22 triggered with the other divisions being put into  
23 the IT system, which we completed as Steve mentioned  
24 today.

25 KIMBERLY NESCI: Will that -- the work

1 that you're doing to implement the report is that --  
2 will that be a proposal for comment or is that just  
3 a report on your -- for public input or is that --  
4 do you all get to decide wholesale?

5 ED MESSINA: I'm not sure. Yeah, I'd have  
6 to talk to Steve about the process around that. But  
7 I think your comment around transparency around the  
8 audit process is something we can take back and make  
9 sure we're, you know, being transparent about that,  
10 whether it's a summary, whether it's -- you know, I  
11 mean, maybe there's some privacy issues that we  
12 would need to work through. But I think it's  
13 important for the public to understand what were the  
14 recommendations and then how did EPA address those  
15 recommendations. I think that's an important aspect  
16 of this process.

17 KIMBERLY NESCI: Thank you.

18 JEFFREY CHANG: Hardy, is that a legacy  
19 hand?

20 (No response.)

21 JEFFREY CHANG: I think so. We still have  
22 like a half-hour, so please give some more info or  
23 any suggestions, please.

24 ED MESSINA: Anything you want to talk  
25 about, any topics that you want to talk about that

1 were covered or any topics you would suggest for the  
2 next meeting or anything else you'd like to talk  
3 about?

4 JEFFREY CHANG: Rosemary?

5 ROSEMARY MALFI: Yeah. I think Bob Mann,  
6 who's also in Massachusetts like me, I think  
7 suggested that we have a much longer discussion  
8 about the ESA -- about the ESA work at the next  
9 meeting. I think -- so that's November. That  
10 should be just post like the draft -- like people  
11 having submitted public comments on the draft  
12 insecticide strategy. It just seems like a -- maybe  
13 just a good time to -- I don't know -- dedicate just  
14 some more discussion space, especially if we're  
15 going to be in-person, you know, it would be a lot  
16 -- just easier to have an actual like large group  
17 discussion when we're all in a room together.

18 So, yeah, that's something that I would  
19 definitely like to see and it sounds like maybe some  
20 others also feel that way. I guess we can't see a  
21 show of hands --

22 ED MESSINA: Yeah, I agree.

23 ROSEMARY MALFI: -- but --

24 ED MESSINA: Yeah, I agree. I heard that  
25 as well. And I would add, you know, please take

1 advantage of the extra webinars that we do, you  
2 know, if you're interested in this topic. We have  
3 done lots of webinars and other engagements for ESA.  
4 So I would say we can add more space to the PPDC  
5 meeting, but also implore folks who are interested  
6 to seek out those other webinars, because we've been  
7 providing a lot of outreach on the various  
8 strategies. But great suggestion, thanks, Bob and  
9 Rosemary.

10 ROSEMARY MALFI: Which I appreciate, by  
11 the way.

12 ED MESSINA: Thanks, yes.

13 JEFFREY CHANG: Walter?

14 WALTER ALARCON: Hello, this is Walter  
15 Alarcon. I'd like to make a comment on the anything  
16 else category. First of all, I thank you for the  
17 opportunity to serve in this group. It is amazing  
18 to see the efforts that are being placed to protect  
19 workers, farmworkers. And the comment is it's  
20 important to remember again what Marc Lame was  
21 saying, right. What are the three most important  
22 things when we do communication, audience, audience,  
23 audience. I think when we work in our workgroups,  
24 that's what we're focusing on, we're focusing on our  
25 target audience.

1           And then my last comment is to acknowledge  
2 the support of the EPA to the state programs that  
3 conduct (inaudible). Thank you for that. And we,  
4 at NIOSH, are going to help continue supporting the  
5 state programs and also (inaudible) that data  
6 recently obtained through the funding even to CDC to  
7 states has been shared with the EPA Health Effects  
8 Division.

9           Thank you for the opportunity to comment.

10          ED MESSINA: Thank you, Walter.

11          JEFFREY CHANG: Kimberly?

12          KIMBERLY NESCI: Yes, hi, thanks. I have  
13 another question. And this is related to, I think,  
14 what Rosemary proposed. What I'm wondering is  
15 whether the upcoming -- so on the first day, you all  
16 talked about some upcoming herbicide cases,  
17 including Atrazine, Paraquat, and Glyphosate. And  
18 on the Glyphosate slide, you talked about completing  
19 consultation for Glyphosate under ESA.

20                 What I'm wondering is if the herbicide  
21 strategy framework will be applied to Atrazine and  
22 the documents going out on Paraquat since those, I  
23 think, are going out -- if I'm remembering the  
24 deadlines correctly, are going out after the  
25 strategy will be finalized. So I'm curious about

1     how those individual cases and those case decisions  
2     sort of intersect with the herbicide strategy?

3             ED MESSINA:  Yeah, they do.  And so the  
4     teams are aware of the things we're proposing in the  
5     strategies.  So you will see some alignment and, in  
6     fact, I think, you know, for a couple of them, we've  
7     sort of been waiting and holding off and waiting for  
8     the strategies to be finalized, but not in all  
9     cases.  So I think it's a mix, Kimberly.

10            But, yes, we are considering the  
11     strategies from the herbicide strategy for our  
12     individual chemical herbicide cases.

13            KIMBERLY NESCI:  Okay.  [Connection  
14     issue].

15            ED MESSINA:  You're breaking up for me,  
16     Kimberly.  Sorry.

17            KIMBERLY NESCI:  I just think that those  
18     will be good case studies.  It will be interesting  
19     to see how this is actually applied like to any  
20     given chemical.

21            ED MESSINA:  Agreed.

22            KIMBERLY NESCI:  Thank you.

23            JEFFREY CHANG:  Jill?

24            JILL SCHROEDER:  Thank you.  I would be  
25     interested -- and I think that my organization would



1 be interested in understanding more about where the  
2 agency is with risk assessments from drone  
3 applicators, as well as targeted or spot treatments.  
4 We have a lot of changes in our technology that are  
5 going forward, and it would be good to know how your  
6 -- where you are with risk assessments with those  
7 different types of technologies.

8 ED MESSINA: Sure. Thanks. Jill. Yeah,  
9 as a former member of the emerging technologies  
10 subworkgroup and chair, definitely a topic that  
11 interests me directly, and so Amy Blankenship has  
12 been working with an industry task force for  
13 updating the ag drift models and then preparing more  
14 information for the agency to consider. But I think  
15 we'll definitely take back -- when we send out the  
16 draft agenda for PPDC members, probably put a UAV  
17 update on there, because we haven't had one in a  
18 while but we have had many.

19 And if you're interested and want to  
20 invest the time, there's multiple materials on the  
21 PPDC website for the prior meetings that have this  
22 discussion and you can kind of read the transcripts  
23 around all of the input and the emerging  
24 technologies report that was submitted and those  
25 recommendations. So there's plenty of data to mine.

1 And I think it's probably, to agree with you, worth  
2 an update at the next meeting.

3 JILL SCHROEDER: Thank you.

4 JEFFREY CHANG: David?

5 DAVID: Hello, I'm new to the group as  
6 well. So I hope I haven't missed something. I was  
7 going to ask kind of a tangential question about bio  
8 control and whether this group or EPA talks to other  
9 federal agencies because I'm thinking about some of  
10 the bio controls that have been released in Canada  
11 and have made their way across the border. And if  
12 they come across the border, I'm thinking of one  
13 especially -- that's houndstongue root weevil -- and  
14 it can't legally be moved. And so again, if you're  
15 talking about IPM's strategies and a way to reduce  
16 herbicides, maybe that's an area that could be  
17 looked at, a suggestion.

18 And then another comment -- and this one I  
19 got from our bio control person here in Washington  
20 -- is I understand that EPA is going to take charge  
21 of pathogens and consider them a bioherbicide. So I  
22 hope I'm not getting this wrong. And this person's  
23 concern is that it's going to make using pathogens  
24 as bio control agents essentially impossible because  
25 no one will fund all the work that it takes for a

1 herbicide label.

2 So does that make sense? Did I get that  
3 point across?

4 ED MESSINA: Sure, where that's coming  
5 from. But I think we can do an update on our  
6 agency's efforts on bio control, and maybe if  
7 there's a jurisdictional question, happy to take it  
8 offline as well and talk to our folks in BPPD.

9 JEFFREY CHANG: Emma?

10 EMMA TORRES: Thank you. Okay, thank you,  
11 Ed and Jeffrey. I'm also new to the group. So I've  
12 been listening and absorbing as much as I can. And  
13 I'm also honored to be among the group that, you  
14 know, is so knowledgeable in so many areas. So I  
15 just want to make sure that I contribute as our  
16 farmworker advocate to ensuring that, you know,  
17 everything that had been said, that, you know, we  
18 have discussed about ensuring that the farmworker is  
19 also placed in the center of the conversation.  
20 Because I see that, you know, in many areas it  
21 really affects them.

22 And, particularly, I think that, you know,  
23 I'm curious about how are we going to be continuing  
24 to assess the actionable recommendations, because I  
25 think it was mentioned that it's really good

1 information, what we're getting, but some of these  
2 are just, you know, like regulations or laws that  
3 are not actionable. They are not -- we are not able  
4 to implement them at the ground.

5 So I'm wondering how are they going to be  
6 followed through and to see that we actually are  
7 accomplishing, you know, the protection that we're  
8 talking about, that is not impacted by the  
9 industries or, you know -- but rather continues to  
10 see that human, you know, subject in the middle that  
11 is EPA's main focus of protecting the human and the  
12 environment.

13 So I just wanted to add that. Thank you.

14 ED MESSINA: What I might suggest there is  
15 maybe at the next PPDC, we invite our enforcement  
16 folks to talk about how they go about enforcing the  
17 rules for worker protection standards, application  
18 exclusion zones if folks -- I'm getting some thumbs  
19 up. It sounds like maybe that's responsive to your  
20 request, Emma. Hopefully, that is.

21 EMMA TORRES: Thank you.

22 JEFFREY CHANG: Hardy?

23 HARDY KERN: Hey, it's me again,  
24 everybody. A couple things, one possibly for fall,  
25 I'm wondering -- and I may be jumping the shark here

1 -- but if an update on plant biostimulants and what  
2 the agency is doing there and where regulation might  
3 go, only because I know it's coming up a lot in  
4 federal regulation.

5           And then, while we're all here, and also  
6 kind of a procedural question, but what does it take  
7 to officially start a working group? I know this  
8 was in our briefing documents. But then I also  
9 wanted to ask for the folks that are on here today  
10 who have participated in or start or sunsetted, or  
11 all the above. What did you find helpful in terms  
12 of scheduling and, you know, makeup of your working  
13 groups if you started a new one or participated in  
14 one, as someone who's new to it and would love to  
15 help out on one or start one at some point? What  
16 worked, what didn't? Did you share recipes with one  
17 another? You know what was good about it? What  
18 worked?

19           ED MESSINA: Yeah, thanks. To quickly  
20 answer your question, it's really suggesting it to  
21 the group, the need, and then getting it seconded  
22 and then having a motion and then having it pass.  
23 And then the other thing is we generally have an EPA  
24 chair and then we have somebody from the outside who  
25 would be the chair. The EPA chair is really there

1 to facilitate. We can provide, you know, a team  
2 site. We can help with scheduling meetings, but  
3 it's really, you know, the workgroup, subworkgroup  
4 seeking charge questions from the main PPDC. What  
5 questions are you trying to answer? What advice do  
6 you think you're trying to give to the agency? So  
7 all those things.

8           Maybe at the next -- in the fall meeting,  
9 we can schedule some time to talk about workers. We  
10 had one at the last one and that's where the  
11 farmworker group was stood up. The other thing to  
12 consider is how many workgroups, subworkgroups the  
13 PPDC can handle and then how many --

14           HARDY KERN: Yeah.

15           ED MESSINA: -- subworkgroups can EPA  
16 handle. But it really just --

17           HARDY KERN: And sorry, Ed. Does that  
18 have to happen at the actual PPDC like this or in  
19 the fall where you propose one to get a vote on or  
20 can that happen through email? I'm just -- point of  
21 curiosity.

22           ED MESSINA: Generally, it's happened  
23 through the full PPDC where you have a quorum --

24           HARDY KERN: Cool.

25           ED MESSINA: -- to establish it, yeah.

1           HARDY KERN: Thank you.

2           ED MESSINA: Mm-hmm. Thanks.

3           JEFFREY CHANG: Gary?

4           GARY PRESCHER: Yeah, I think I got my  
5 video going here. Remind me or maybe I missed it --  
6 if I did, I apologize -- I know I'm focusing on the  
7 applicator side of the business here, not so much  
8 the farmworkers. I know that's been discussed. But  
9 I recently had an opportunity to review one of the  
10 labels for an herbicide that's going through  
11 reregistration. So this gets kind of at the  
12 question one of our panel members asked. And it  
13 looked like, yeah, you were using kind of this new  
14 methodology that you've been talking about here.

15                   And my comment and point is, you know,  
16 I've been around chemicals from many different  
17 perspectives, using them on a farm and consulting  
18 and working with customers, but what's the plan for  
19 educating applicators on how to interpret everything  
20 that's going to be on this new label? Because it  
21 was more than a fifth grade read, I'll put it that  
22 way, and there's language on there that I just  
23 couldn't quite understand, you know, that works  
24 around the ESA part of it, mitigations and other  
25 things.

1           So is there a plan? You know, when you  
2 roll out reregistration or a label with all this new  
3 stuff on it, what's the plan? Are you just going to  
4 roll it out and let people try to absorb it on their  
5 own or are you going to -- does the EPA have a plan  
6 to educate folks on how to interpret all this stuff,  
7 where to go, what to do when they have questions?

8           ED MESSINA: Yeah, I think you raise an  
9 important issue, which is with the change to these  
10 labels to incorporate ESA, there's going to need to  
11 be training and education, and to borrow Marc's  
12 term, you know, diffusion of that. So there will be  
13 webinars. There will be discussions on  
14 implementation and how to use the maps. And your  
15 first opportunity, I think, is -- I don't want to  
16 get the date wrong -- I think it's June 18th.  
17 There's an OPP update that we sent out.

18           So you could sign up for the mitigations  
19 menu workshop for ESA. And that's where we're  
20 hoping we'll be walking folks through, you know, the  
21 process for how we do this is important and I would  
22 say unique and probably, you know, containing some  
23 difficulties, this big change management project,  
24 which is ESA implementation.

25           We're going to need help. We're going to



1 need folks to help educate folks on the new tool.  
2 So yep, we've thought about it. We're open to  
3 feedback, too. If you want to put it on as an  
4 agenda for PPDC to make some recommendations, we're  
5 all ears. But there definitely is some thought and  
6 some planning around that.

7 GARY PRESCHER. Thanks.

8 ED MESSINA: Mm-hmm.

9 JEFFREY CHANG: Joe?

10 JOE GRYZWACZ: I just wanted to follow up  
11 to Gary's comment because, you know, frankly, it's  
12 it's one that I've tried saying in a couple of  
13 different ways, but he frankly said it best, and  
14 that is -- you know, it's this whole idea of  
15 there's, you know, the plan as it exists on the  
16 books and then how we actually get it done. And  
17 whether it's the label reform and whether or not the  
18 prototype is working the way that we would expect,  
19 how that gets translated and taken up by diverse  
20 farmworker groups or the applicators themselves, you  
21 know, at the end of the day, you know, real-life  
22 people are trying to put these things to work in  
23 real-life situations.

24 And it seems as though the flow of  
25 communication tends to be more unidirectional than

1 bidirectional. And I realize as a national  
2 organization you have no choices, you know, kind of  
3 surrounding that. It just strikes me that Gary's  
4 comment was right on the mark regarding, but how do  
5 we actually do all this when it's intended to convey  
6 really complicated information.

7 So I just wanted to echo that and tie it  
8 back to some other comments that have already been  
9 made.

10 ED MESSINA: Thanks, Joe. I just put the  
11 mitigations menu websites webinar information in the  
12 chat for those who are interested.

13 JEFFREY CHANG: Anyone else?

14 (No response.)

15 JEFFREY CHANG: So we do have 15 minutes  
16 before our next session.

17 ED MESSINA: I think we can take a break  
18 if everyone's done with the commenting and  
19 discussion for this session. Yep, thank you for  
20 your thoughtful comments.

21 Jeffrey, you want us to return at 4:30?

22 JEFFREY CHANG: Wait, Jill has one.

23 ED MESSINA: Oh, Jill?

24 JILL SCHROEDER: Yeah, just a quick  
25 request. Will you be summarizing the action items

1 that came out of this meeting that will be handled  
2 going forward before the next fall meeting? Thank  
3 you.

4 ED MESSINA: So there's a transcript that  
5 will be published and put on the PPDC website.  
6 Jeffrey will take the topics that we've gleaned from  
7 this discussion, put together a proposed agenda for  
8 PPDC members to -- much like we did for this session  
9 -- to stamp and approve and add or delete, and we'll  
10 build the agenda with PPDC members over email. And  
11 if we need to meet informally, we can develop the  
12 future agenda and those topics. And then each of  
13 the workgroups have their takeaways.

14 And then also as part of my OPP update,  
15 which included topics that were of interest to the  
16 group from the last meeting, any of the items that  
17 were mentioned here that we need to flush out, I  
18 will provide that in the OPP update.

19 Did that answer your question, Jill?

20 JILL SCHROEDER: Yes, I think so.

21 ED MESSINA: Thanks. Anything to add on  
22 that, Jeffrey?

23 JEFFREY CHANG: Nope. That's great, Ed.  
24 Thank you.

25 ED MESSINA: Mm-hmm.

1           JEFFREY CHANG: Okay. We can return at  
2           4:30 for our last session, the public comments.  
3           Thank you.

4           ED MESSINA: Thanks, everyone. See you at  
5           4:30.

6           (Brief break.)

7                           PUBLIC COMMENTS

8           JEFFREY CHANG: It's the end of the day,  
9           which means it's time for members of the public who  
10          have been listening to provide public comment.  
11          Please use the "raise hand" function as a signal  
12          that you are ready to make comments. Our technical  
13          support team behind the scenes will promote each  
14          registered commenter with their hand raised to  
15          panelist, which will allow you to unmute your line  
16          and activate your webcam.

17          Please wait until I call on you in the  
18          order of those listed on the screen first to turn on  
19          your mic, to deliver your remarks slowly and  
20          clearly. Like, yesterday, when you are making your  
21          comment, please state your name and affiliation if  
22          you have one.

23          We ask that you please limit your remarks  
24          to three minutes. Again, please keep your remarks  
25          within the maximum time allowed. When the timer

1 makes it to zero, I will allow you to finish  
2 whatever statement you are making and then I will  
3 cut you off so we can ensure that everyone who has  
4 signed up to share comments has the opportunity to  
5 do so.

6 If there is additional time, we will open  
7 the floor to commenters who have not registered to  
8 speak. If you would like to provide your comment  
9 via email, please email me at chang.jeffrey@EPA.gov.

10 Great. We'll get started with our first  
11 commenter, Annie Kruger.

12 Annie? No?

13 (No response.)

14 JEFFREY CHANG: We'll move on to Doug  
15 Johnson.

16 DOUG JOHNSON: Hi, thank you, Jeffrey.  
17 Doug Johnson, I'm executive director of the  
18 nonprofit California Invasive Plant Council, serving  
19 wildland weed managers here in California. And I  
20 have a comment about the ESA process. I'm not super  
21 familiar with it, the Section 7 consultation, but  
22 have familiarized myself because there is  
23 significant anti-herbicide pressure in California in  
24 some communities, and one of the things they've  
25 picked up on as a talking point is that the EPA says

1 that glyphosate kills 93 percent of endangered  
2 species. And they present that talking point  
3 basically as if glyphosate is out there doing this  
4 currently.

5 And from our read of the process, the  
6 EPA's role is to run a very coarse screen over what  
7 glyphosate could harm either directly or indirectly.  
8 It's a very coarse screen of one or more  
9 individuals. That is simply in order to pass the  
10 species on to the wildlife agencies so they can  
11 complete their evaluation.

12 The reason this is coming out is because  
13 the label that is used -- and I'm not sure if this  
14 is EPA's choice or if it's the Fish and Wildlife  
15 Service template, but the "likely to adversely  
16 affect" is a really misleading label for that  
17 category. What that category says is there is a  
18 slight possibility that this could have an impact;  
19 therefore, we're going to pass that along onto the  
20 wildlife agencies to look at in more detail and see  
21 if there really is a real-world problem.

22 By saying "likely to adversely affect,"  
23 those members in the public who are predisposed to  
24 think that a pesticide use is going to be harmful  
25 can use that and have used that as a talking point

1 to public decision-makers who -- you know, that's  
2 one more point that can lead them to say, okay,  
3 well, we shouldn't use any glyphosate ever for  
4 anything because it's obviously bad for the  
5 environment.

6 And so even though, for instance, in a  
7 city in California, the Fish and Wildlife Service  
8 submitted a letter, saying, look, we really are  
9 concerned about these invasive plants and their  
10 effect on wildlife, we think you should follow an  
11 IPM practice that does keep herbicides in the  
12 toolbox, that didn't end up swaying the public  
13 office holders who are under a lot of pressure.

14 So anyway, just a point. If there is any  
15 flexibility in naming that category something  
16 different than "likely to adversely affect" so that  
17 it communicates to the general public who doesn't  
18 understand the -- all the nuances of the process, a  
19 little bit more clearly what that category is, that  
20 would be helpful. Thanks.

21 JEFFREY CHANG: Thank you. I see Annie  
22 Kruger on.

23 ANNIE KRUGER: I'm here. Sorry. I'm  
24 happy to be here. I am with Compliance Services  
25 International, but I'm here on behalf of the FIFRA

1 Endangered Species Task Force and the co-organizers  
2 of a workshop series we've been leading in  
3 Washington and Oregon, Gary Bahr, Dani Lightle, Ryan  
4 Dewitt, and Kathryn Rifenburg.

5           So I just wanted to to highlight some of  
6 the activities that we've been doing with this  
7 workshop series in Oregon and Washington that are  
8 really relevant for a lot of the conversations that  
9 have been brought up here today as far as ESA  
10 implementation challenges, interpreting labels and  
11 bulletins, communication, and diffusion of  
12 knowledge. So really, really pertinent stuff that  
13 we've been trying to work through the past few  
14 months in a workshop series across Oregon and  
15 Washington.

16           We've done four one-day workshops to work  
17 with both agricultural communities and conservation  
18 communities on the ground to work through the  
19 interpretation challenges that they have with the  
20 mitigation language, find out what they need to  
21 really move forward with successful implementation.  
22 And we gathered all of those results and worked with  
23 a diverse group across Oregon and Washington from  
24 the state lead agency leadership extension and all  
25 of the other supporting groups and commodity



1 agencies to work through what success would look  
2 like and how we can get closer to really  
3 understanding, based on the implementation  
4 challenges that we've heard, how we could work to  
5 address some of those that are going to help  
6 increase protections to the species where we need  
7 it, but really increase the interpretation and ease  
8 of access to the bulletin language.

9           So we've also done a survey of pesticide  
10 applicators in Oregon and Washington to understand  
11 ESA awareness, current conservation activities, and  
12 resource needs for implementation.

13           So I just wanted to help kind of highlight  
14 and position some of the work we're doing in this  
15 space to help inform some of the things that are  
16 occurring across the country and how the results  
17 here could be kind of used to inform other regions  
18 and other spaces across the country on how they can  
19 really cater maybe this bottom-up grassroots effort  
20 approach to working towards successful  
21 implementation.

22           So just thank you for your time.

23           JEFFREY CHANG: Thank you. John Bottorff?

24           (No response.)

25           JEFFREY CHANG: I don't see him on, so

1 Laura Campbell?

2 LAURA CAMPBELL: Are you able to hear me  
3 all right?

4 JEFFREY CHANG: Yes.

5 LAURA CAMPBELL: Thank you. Good  
6 afternoon, everyone. My name is Laura Campbell.  
7 I'm with Michigan Farm Bureau, and I wanted to make  
8 a comment about the ESA herbicide and insecticide  
9 strategy that's going to be coming up, as well as  
10 future efforts for EPA to be able to comply with  
11 Endangered Species Act actions.

12 I was very grateful for the opportunity to  
13 be able to participate in the May 9th workshop that  
14 EPA and USDA hosted to be able to talk about some of  
15 the particular concerns that states with a lot of  
16 specialty crops have when it comes to being able to  
17 comply with and implement the Endangered Species Act  
18 strategies.

19 And in his presentation earlier today,  
20 Jake Li mentioned that when we had that  
21 conversation, there weren't a whole lot of brand new  
22 mitigation practices or activities that needed to be  
23 included necessarily that they were hearing from  
24 participants, and that's true.

25 One thing I would like to suggest -- and

1 this a great opportunity for this committee, the  
2 Pesticide Program Dialogue Committee -- is to kind  
3 of take a look at the cultural differences in not  
4 only how the mitigation practices are implemented,  
5 but also things that come up, such as differences in  
6 how they're named, differences in species that might  
7 be planted, you know. So if you're doing cover  
8 crops, what species are going to work best for your  
9 cover crops? If you're doing, you know, a different  
10 kind of tillage, what's going to be your most  
11 effective tillage? How can you incorporate  
12 protection against erosion on hillsides in different  
13 climates and conditions?

14 And rather than trying to go through an  
15 exhaustive process of naming every single possible  
16 practice and every permutation of that practice,  
17 this committee might have a really good opportunity  
18 to instead focus on helping EPA identify and create  
19 sort of a framework of here's what we're looking for  
20 for the effectiveness of a practice, show us what  
21 you're doing in a very outcomes-based way so that,  
22 regardless of what you call it, regardless of, you  
23 know, the specifics behind it, you know, is it  
24 effectively reducing runoff, is it effectively  
25 reducing spray drift, in order for farmers to be

1 able to use the practices that make the most sense  
2 for their farm to comply with these new strategies,  
3 with the new requirements that are going to be  
4 coming up as herbicides and pesticides undergo this  
5 process.

6 One additional thing that this committee  
7 has a really good opportunity to do is to assist EPA  
8 with the outreach and education. You've got  
9 workgroups that are already working on farmworker  
10 issues, on outreach, on integrated pest management.  
11 Those workgroups and the people who are focused on  
12 that really have an opportunity to help EPA with  
13 that outreach and with getting folks trained on how  
14 to implement and how to comply with this new  
15 strategy.

16 So I appreciate the chance to talk today  
17 and appreciate all of the work that you do. Thank  
18 you.

19 JEFFREY CHANG: Thank you. Lewis Brown?

20 (No response.)

21 JEFFREY CHANG: Regina King?

22 (No response.)

23 JEFFREY CHANG: Virna Stillwaugh?

24 (No response.)

25 JEFFREY CHANG: And William Jordan?

1           BILL JORDAN: Thank you. I'm Bill Jordan.  
2 I'm the Pesticide Team Lead with the Environmental  
3 Protection Network.

4           First, I want to say thank you to the EPA  
5 folks for all the work you're doing. It's really  
6 impressive, especially given the constraints and the  
7 resources available to OPP. Ed Messina's opening  
8 presentation showed the diversity and the sheer  
9 volume of the work, and I am extraordinarily  
10 impressed and grateful.

11           I want to say a word about budgets. In  
12 the last 20 years or so, EPA's workload has  
13 increased in terms of the number of applications and  
14 the complexity of the work that they need to do in  
15 registration review and registration decisions and,  
16 yet, the staffing levels have fallen by almost 30  
17 percent. While I am pleased that EPA is making  
18 changes to improve its efficiency, those changes are  
19 not going to be enough to keep up with the work, and  
20 I think it would be incumbent on PPDC to look hard  
21 at the budget for the agency and think carefully  
22 about what's needed to actually cover all of the  
23 work that is required under the various statutes,  
24 and that key stakeholders -- the range of  
25 stakeholders represented on PPDC would like the

1 agency to do.

2 I also want to comment on the charge  
3 questions for the farmworker workgroup. I think  
4 they are smart in trying to dig into what I see as a  
5 very important question, namely, are pesticides  
6 being used in the way that EPA thinks they are in  
7 terms of the label instruction that accompany each  
8 product?

9 I believe that EPA's risk assessments are  
10 appropriately conservative in assuming that people  
11 will follow the label directions when it comes to  
12 number of applications, application rates, shortest  
13 PHIs, and restricted entry intervals, but there are  
14 a number of requirements on labels that I fear  
15 people are not following, requirements relating to  
16 protective equipment, requirements relating to the  
17 worker protection standards. And there is ample  
18 evidence that misuse is a serious issue, not only  
19 looking at the worker protection data on the ECHO  
20 database, but also looking at the experiences with  
21 Dicamba, with regard to bacillus thuringiensis  
22 refuges, ant baits, rodenticide uses, and also  
23 antimicrobial products.

24 EPA ought to be looking at this issue more  
25 broadly and trying to figure out better ways to

1 understand what's happening in the real world by  
2 doing such things as giving more input and support  
3 to the SENSOR Program, to collecting better feedback  
4 from the field through the enforcement work that  
5 states do, looking more systematically at incident  
6 data, collecting data through the 3C2B data call-in  
7 program. And I hope that the Farmworker Justice --  
8 the farmworker group will look at that and provide,  
9 not only a scope of the problem, but also some  
10 constructive ways to try to improve the situation.

11 Thank you.

12 JEFFREY CHANG: Thank you.

13 Virna Stillwell?

14 VIRNA STILLWELL: Good afternoon. I'm  
15 Virna Stillwell. I am the VP for Scientific Affairs  
16 at the Northwest Horticultural Council. We  
17 represent growers, packers, and shippers of apples,  
18 pears, and cherries in the Pacific Northwest.

19 The first part of my comment is with  
20 regard to the Endangered Species Act. Tree fruit  
21 growers in the Pacific Northwest employ currently  
22 various conservation practices, including vegetative  
23 filter strips in the field, using (inaudible) or  
24 sprinkler irrigation system, mulches, and practicing  
25 reduced (inaudible) in an effort to prevent runoff

1 or any erosion of pesticides.

2 As you can see from the large menu of  
3 mitigations in the herbicide strategy or in the  
4 newly proposed mitigations, there are only a few  
5 mitigations that are applicable to tree fruit. Most  
6 mitigations are applicable to row crops and other  
7 specialty crops. So it is important that  
8 mitigations are flexible and tailored to the region  
9 and to the specific commodity, in this case, tree  
10 fruit.

11 Also, implementation of mitigations is not  
12 going to come without a cost. So funding for our  
13 training and mitigations implementation is going to  
14 be critical. If there isn't funding and growers  
15 have to sacrifice farmable land, then implementation  
16 of mitigations will not be feasible and many growers  
17 may have to abandon production altogether.

18 The second part of my comment is with  
19 regards to the farmworker protection. Tree fruit  
20 growers make sure that farmworkers are well trained  
21 in pesticide safety. The Washington State Tree  
22 Fruit Association and the Washington State  
23 Department of Agriculture train applicators in both  
24 English and Spanish. I had the opportunity to  
25 attend two of those trainings, and they are very



1 informative, very interactive with high applicator  
2 participation.

3           Additionally, all pesticide information is  
4 posted in the orchards (inaudible) stores and all  
5 the field workers can see this information.

6           Washington State is (inaudible) just  
7 training farmworkers and applicators. They are now  
8 also training farm managers to make them better  
9 managers and make sure that they can train all their  
10 field workers and provide the necessary training and  
11 support for their safety and success.

12           Thank you very much.

13           JEFFREY CHANG: Thank you. We can open it  
14 up to the floor now, if any one has -- any of our  
15 public attendees have any comments.

16           (No response.)

17           JEFFREY CHANG: No. Okay.

18           David, I see your question. Did you want  
19 to share the documents now or were you hoping to  
20 email those to the PPDC?

21           DAVID: Yeah, I was thinking about  
22 emailing them to the PPDC.

23           JEFFREY CHANG: Yeah. Okay. Yep, you can  
24 contact me later about that.

25           DAVID: Okay, thank you.

1           JEFFREY CHANG: We have made it through  
2 the full slate of public comments. A sincere  
3 thank you to those who presented today and  
4 yesterday, to our PPDC members, members of the  
5 public who listened in and shared their views, and  
6 to all of the support staff that made this two-day  
7 session possible.

8           To all members of the PPDC, thank you for  
9 all the critical work you do both to protect human  
10 health and the environment and ensure a safe and  
11 sustainable food supply.

12           It has been a pleasure being your  
13 moderator for the last two days. With that, I bid  
14 you farewell and I will turn it over to Ed to close  
15 us out. Thank you.

16           ED MESSINA: Well, a round of applause for  
17 Jeffrey for making this all happen, all the pre-work  
18 that goes in and his excellent job being a  
19 facilitator and our designated federal official. So  
20 great job, Jeffrey, and thank you for all you do.

21           To all of our presenters, an amazing job,  
22 all of the pre-work -- and I met with many of the  
23 folks that are on those subcommittees and, you know,  
24 answered questions, looked at slides to make sure  
25 that the full PPDC group was getting the best

1 information that they could get. I thought every  
2 single presentation was just top-notch. So thank  
3 you.

4 PPDC members, thanks for your input, for  
5 your service, for your grace. I hear you on the  
6 desire to meet in person. I am very much an in-  
7 person person as well.

8 That being said, I'd just remind this  
9 group that Congress will be heading into an election  
10 season -- a presidential election season. The odds  
11 of us having a full budget by November, I would --  
12 I'm not a betting man, but I might put low odds on  
13 that. So chances are we'll probably be on a  
14 continuing resolution, which means we only get a  
15 portion of our budget really to spend, because we  
16 don't know what the year is going to look like. And  
17 depending on, you know, what the conversations are  
18 around the budget for EPA, we could be preparing  
19 ourselves for an even further reduction in the  
20 budget or maybe an increase. Who knows?

21 So I just want to put that out there and  
22 ask for your grace as we consider really trying to  
23 have the next meeting in-person, but also know that  
24 there could be external forces that are working  
25 against us in order for us to pull that off.

1           So with that, this concludes the  
2           summer/spring meeting of the PPDC workgroup. Thank  
3           you to all the new members, amazing job. Thanks to  
4           our returning members. Thank you to the folks that  
5           have exceeded their term and are rolling off, and  
6           thank you to members of the public who listened for  
7           the last couple of days to really hear about the  
8           important topics that we work on every day in EPA,  
9           along with the great Office of Pesticide Programs  
10          staff that are committed to being true public  
11          servants to the American people as we evaluate  
12          pesticides for their impact on human health and the  
13          environment.

14                 So thanks, everyone. Have a great evening  
15          and a great weekend.

16                         (Day 2 adjourned.)

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