

February 2017 EPA SME Liaison Report to Science Policy Committee

On January 12th I had a full day discussion with various EPA staff at the Office of Pesticide Programs headquarters in Crystal City, VA. This meeting was also an opportunity to interact with the SME's from the American Phytopathological Society (APS; Wayne Wilcox) and the Weed Science Society of America (WSSA; Michael Barrett). These meetings were more than just a "meet and greet". I established a personal working relationship with one of the EPA scientists, Arnet Jones, who is serving as the Acting Deputy Director of the Biological and Economic Analysis Division (BEAD). BEAD activities and policies will likely have the most impact on or at least most often interface with the interests of members of the ESA.

Establishing a collegial and working relationship with BEAD staff has already had some benefits. For example, Alec Gerry from UC Davis emailed me about a concern from ESA MUVE that they did not have enough time before the deadline to comment about the pyrethroid insecticide registration review. After providing some insights into what EPA might be looking for and how to couch an argument in favor of protecting uses of pyrethroids for livestock agriculture, I called Arnet Jones to clarify some confusion about the comment deadline and how to submit comments. Arnet returned my call promptly and told me good news, indicating the comment period was being extended by 60 days and a new URL with directions would be issued to clarify confusion. Based on this experience, I think my EPA liaison duties will necessarily evolve to more proactive attention to comment period deadlines and perhaps providing insights for framing comments that would be helpful to the EPA in making sounder decisions about important products.

During my visit to EPA, I met with a number of EPA scientists from BEAD, EFED (Ecological Fate & Effects Division), and Registration Review (RD). I had the opportunity to ask questions about why certain decisions were made. For example, I asked specifically about the rationale for gutting the registration of flubendiamide, an essentially innocuous insecticide important for orchard crops. The problem from EPA's perspective was prolonged water persistence, which was an unusual reason for removing an insecticide that was ostensibly safer than older organophosphate insecticides for both workers and insect natural enemies. Nevertheless, my opportunity to ask questions also showed me that the EPA scientists were earnestly skeptical, studied registration issues quite intently, and tried to make reasonable decisions about registrations.

Regarding other issues of interest to ESA members are the microbial insecticides policy and the pending neonicotinoid risk assessments for bees. On the former front, I did not receive from EPA any useful information about microbial insecticides, but I did meet one of the scientists working on biopesticides. I can follow up by forwarding more specific questions as EPA policies further develop or change. With respect to more neonicotinoid risk assessments being released, I was told that the next set, which would include clothianidin, thiamethoxam, and dinotefuran, would not likely be released until sometime during Fall 2017.

EPA staff did ask us SME Liaisons to help with bridging pest resistance terminology. The issue was different definitions being used by different crop protection disciplines (e.g., Weed Science vs Entomology vs Plant Pathology). I was handed a spreadsheet compiled by one EPA scientist that listed definitions for various aspects of resistance. I foresee an opportunity to work with the APS and WSSA on common definitions and trying to publish suggestions for bridging definitions across disciplines in a target journal.

In closing, I am open to carrying forward any questions from ESA members directly to my contact at EPA. Much of the information that EPA needs to make reasonable registration decisions is related to product use and measurable benefits. Any person can individually submit comments about pending EPA registration decisions, but when comments are represented by a specific group interest, they may have greater weight.

Allan Felsot
02-08-17