

Process Improvements in the Pesticide Program

Pesticide Reevaluation Programs

Product Reregistration

The EPA continued to place a significant emphasis on improving the timeliness and overall productivity of the [product reregistration program](#). As a result of these efforts, the agency is making good progress toward meeting its long term goal of completing product reregistration in FY 2014. It is important that the EPA complete product reregistration within the next few years so that mitigation measures required by pesticide Reregistration Eligibility Decision (RED) documents will be included on pesticide product labels, and so that the agency can divert vital resources to the registration review program and ensure that we complete the first 15-year cycle of registration review by October 1, 2022.

The agency's Office of Pesticide Programs (OPP) continued to successfully implement a Memorandum of Understanding for Work-sharing on Product Reregistration, developed by two OPP divisions to increase their productivity. The MOU, signed in October 2009 by the Antimicrobials Division and Pesticide Re-Evaluation Division, established the parameters of a mutually beneficial work sharing agreement for product reregistration. Through this agreement, OPP's Pesticide Re-evaluation Division has been able to address a previous backlog of needed science reviews, while OPP's Antimicrobial Division has obtained additional knowledgeable and experienced staff to help conduct product reregistration. By sharing existing resources and expertise and redistributing the workload, these divisions are continuing to achieve a mutually beneficial outcome at no greater expense to the agency. Product reregistration decisions are being completed more quickly, speeding the delivery of risk mitigation measures and achieving important human health and environmental protection goals. Meanwhile, the work share arrangement has improved the consistency of science and label reviews across OPP. The agreement continues to serve as an excellent example of applying innovative thinking in a resource-constrained environment.

The agency achieved an important step toward completing product reregistration this year by using refined numbers and status information for products in the product reregistration universe. By identifying and including products that were canceled between the time when Reregistration Eligibility Documents (REDs) were signed and product-specific Data Call-Ins (DCIs) were issued, the agency has more precisely defined the universe of products that are subject to product reregistration. The agency is now able to more accurately track the status of all products undergoing product reregistration, describe the EPA's progress in meeting program goals, and solidify plans to complete the remaining product reregistration decisions during the next few years.

Registration Review

As part of the Agency's ongoing efforts to implement our responsibilities under the Endangered Species Act (ESA), the EPA with the U.S. Departments of Commerce and Interior (the Services) and the Department of Agriculture has been exploring a variety of process and scientific issues that, once resolved, will enhance our ability to meet our obligations in a sound and timely manner while providing increased transparency and opportunities for collaboration.

The EPA and the Services have worked for years to develop best methods and processes for conducting FIFRA consultations under Section 7 of ESA. In spite of these efforts, there remain scientific and technical issues for which resolution has not been reached. Resolving these issues is critical to the success of the endangered species program. In March 2011, EPA Administrator Jackson, on behalf of the EPA, the Services, and USDA, asked the National Research Council (NRC) of the National Academy of Sciences to convene a committee of scientific experts to review the key scientific and technical issues that have arisen in carrying out our joint responsibilities under ESA and FIFRA and provide independent advice. The topics on which we seek advice include identifying best available scientific data and information; considering sub-lethal, indirect and cumulative effects; assessing the effects of mixtures and inert ingredients; the use of models to assist in analyzing the effects of pesticide use; incorporating uncertainties into the evaluations effectively; and the use of geospatial information and datasets in these assessments. The [committee of independent experts](#) selected by the NRC began its review in November 2011 and is expected to complete its report in early 2013 as described in this report's section on [science review improvements](#).

In an effort to provide a transparent and collaborative endangered species consultation process, the EPA is working with the Services and USDA on activities to increase opportunities for stakeholder and public involvement. In response to growing public interest in attaining a greater role in ESA Section 7 consultations, the EPA, the Services and USDA are engaged in discussions with stakeholders through a variety of public meetings that focus on broadening opportunities to provide information relevant to the Agency's risk assessments and consultations for listed species. For example, EPA, the Services and USDA helped organize and participated in the Minor Crop Farmer Alliance Workshop in Denver, Colorado in May 2011, which focused on opportunities for growers to become more involved in the Agency's ESA-related registration review work. The EPA has also been working this year with the [Pesticide Program Dialogue Committee \(PPDC\)](#) to provide background information on the status of ESA/FIFRA consultations and opportunities for members to discuss concerns related to the consultation process. Further, the EPA has been working with the [PRIA Process Improvement Workgroup](#), a PPDC workgroup, to discuss opportunities for public participation in ESA-related work during registration review. Through these and other meetings and discussions, the Agency is making progress toward attaining a more transparent and collaborative process.

As we implement the registration review program, the EPA is also initiating internal program changes and process improvements to facilitate work on ESA-related FIFRA actions. The EPA now plans to provide an endangered species assessment for each pesticide undergoing registration review. To accomplish this, the agency is adapting the registration review program process to accommodate ESA-related work. The EPA is working to improve coordination across staff working on endangered species assessments. Further, in response to input received during public meetings, the EPA is considering ways to include relevant stakeholder data and information early in the registration review process, and perhaps broaden the process to receive stakeholder information months prior to opening a registration review docket.

As a result of a discussion at the [October 2011 Pesticide Program Dialogue Committee \(PPDC\) meeting](#), the full PPDC recommended that the Agency identify opportunities for early stakeholder engagement in the registration review process and supported the concept of publically accessible "SMART" meetings. (In the reregistration program, SMART meetings

enabled EPA and stakeholders to begin communicating early in the process to ensure the accuracy of information about pesticide use, which was vital to the Agency in developing accurate pesticide risk assessments.) The EPA will work with the PRIA Process Improvement Workgroup to explore how and where ESA-related work and consultations fit into the registration review program. These ideas and developing process improvements will be pursued further during 2012.