

SUMMARY OF EARLY ENGAGEMENT ON THE OCSPP FY 2018-2019 NPM GUIDANCE

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Revised March 22, 2017

The Office of Chemical Safety and Pollution Prevention (OCSPP) and the regional offices communicate regularly with states and tribes to better understand local, regional and national issues and priorities and to plan as co-regulators, where appropriate. For this early engagement opportunity, we gave the FY 2016 guidance with the FY 2017 addendum to states and tribes for comment, as well as attachments of the FY 2016 President's Budget narratives related to our toxics programs. We asked them to identify the most important areas of work to inform the development of the two-year FY2018-2019 National Program Managers (NPM) Guidance. We discussed which priorities should be maintained as national priorities. For the pesticides program, we also asked which priorities should be on the Pesticide "pick-list" for regions to select. These discussions took place during a series of tribal and state meetings at the national and regional levels and via written correspondence.

For OPPT, the early engagement comments centered on the programmatic work of the office: Lead Risk Reduction, Pollution Prevention, TRI and Chemical Safety, which will continue to be implemented in FY18-19. In response to these comments, OPPT will add text to the FY18-19 Guidance to include language that affirms and ensures: 1) continued Regional efforts to work with States and Tribes on OPPT issues; 2) OPPT's continued efforts to look for ways to incorporate the Lautenberg Chemical Safety for the 21st Century Act (LCSA) and TRI work seamlessly into the work that Regions, States and Tribes do; and 3) all activities listed for states are equally identified for tribes in all of OPPT's programs, and do so by including the word "tribes" or adding a bullet specific to tribes for the OPPT activities, per the National Toxics Tribal Council (NTTC) request.

For the Office of Pesticide Programs (OPP), comments generally centered on the upcoming pesticide worker safety and certification and training rule revisions which will need to be implemented in FY18-19. Regional comments noted the amount of work involved with implementing these two rules, and the need for support from OPP. Regions also commented on the region-specific project requirement which directed each region to complete one region-specific IPM project. Regions stated they would like to get rid of this ACS measure in the future, and do not want IPM as the only region-specific project topic. As a result, OPP included a list of six topics for region-specific projects in the final draft. Finally, the Tribal Pesticide Program Council (TPPC) requested bed bugs be listed as a priority. While OPP did not specifically name bed bugs as a priority, this work can be addressed as a region-specific project using the IPM category which is one of the six topic areas.

Below are specific communications and meetings held to engage states and tribes during this early engagement opportunity for the Office of Pollution Prevention and Toxics (OPPT). Comments centered on the programs: Lead Risk Reduction, Pollution Prevention, TRI and Chemical Safety. The comments received can be seen in the chart below. For the Office of Pesticide Programs (OPP), comments generally centered on the upcoming pesticide worker safety and certification and training rule revisions which will need to be implemented in FY 2018-2019.

Date	Engagement	Status
May 4	OPP - Send e-mail to AAPCO/SFIREG and Tribal Pesticide Program Council (TPPC) leadership requesting their attendance at the June 14 OPP/OECA National Pesticide Meeting to discuss the FY18-19 NPM guidance with OPP, OECA and the regional pesticide program managers.	Completed
June 14	OPP - Listen to state and tribal representatives discuss their priorities at the OPP/OECA National Pesticides Meeting in Crystal City, VA, and consider their focus areas during discussion with the regions on potential FY 18-19 pesticide NPM priorities.	Completed
June 21	OPP - Listen to tribal members discuss their priorities at the National TPPC Meeting in Flagstaff, AZ, and discuss potential FY 18-19 national pesticide priorities with tribal representatives.	Completed
June 22	OPPT - Discuss the opportunity for discussing priorities for FY18-19 NPM guidance with NTTC leadership.	Completed
June/July	OPPT- Send e-mail to state call participants to request their input on the FY18-19 NPM guidance during the July 27 th quarterly call.	Completed
July 19	OPPT- Discuss with tribal representatives FY18-19 NPMG and priorities on the monthly call with the NTTC leadership.	Completed
July 27	OPPT- Discuss draft FY 18-19 NPM guidance during the Chemicals Safety & State-based Groups Quarterly Coordination Call.	Completed
Aug 9	OPPT/OPP/OECA – Early Engagement Call for Indian country. Discussion on OCSPP NPM Guidance and related OECA NPM Guidance (FIFRA and TSCA).	Completed
Aug 16	OPPT- Continue discussion with tribal representatives FY18-19 NPMG and priorities on the monthly call with the NTTC leadership.	Completed
Sept 8-9	P2 State Dialogue Meeting. Discussed NPM guidance and priorities with participants.	Completed
Sept. 9	OPPT/TRI State, Tribal and Regional Conference call. Discuss NPM guidance and office priorities with call participants.	Completed
Oct 4-5	OPP - Discuss draft FY 18-19 national pesticide priorities at National TPPC Meeting in Pauma Valley, CA.	Completed
Oct 25-27	NTTC /OPPT in person meeting. Tribal council members discuss the NPM guidance.	Completed
Oct/Nov	OPP - Discuss draft FY 18-19 national pesticide priorities at regional pre-SFIREG meetings with states and tribes. Regions will gather state and tribal feedback and provide this information to OPP.	Completed
Nov 28	OPP - Share draft FY 18-19 NPM guidance language with states and tribes.	Completed
Dec 8-9	OPP - Discuss draft FY 18-19 NPM guidance language at National SFIREG Meeting in Crystal City, VA. States will provide final feedback on the draft language.	Completed
Dec 9-11	OPP - Discuss NPM guidance language at the OPP/OECA National Pesticide Managers Video Conference. Resolve issues with the regions related to the final draft of the FY 18-19 NPM Guidance. SFIREG and TPPC representatives will also participate in these discussions and provide final input on draft priorities.	Completed
Jan 2017	Finalize draft for public review process. There is an opportunity for additional state and tribal input when the draft is posted for public comment in Feb/ March 2017.	Planned