



APS & EPA Cooperation

March 2008

The American Phytopathological Society A Resource for EPA

▶ **Concern:** The American Phytopathological Society (APS) has begun to explore ways in which we can more closely cooperate with EPA's Office of Pesticide Programs (OPP) on providing information to assist OPP on information for risk assessments on crop protection chemicals and biotechnology products to maintain their availability to combat crop diseases.

▶ **Situation:** We understand that there are numerous regulatory challenges that OPP will be facing in the near future with crop protection products undergoing Registration Review now required to include new types of data on water quality, possible endocrine disrupting compounds, and the impact of pesticides on endangered species. During this process and beyond, APS would like to be used as a resource for EPA in contributing data on real life pesticide use (including biotechnology and biocontrol products) and usage information for consideration as these risk assessments go forward. This information is especially important for assessment of products critical in production of minor crops. APS could be as well a source for information on the benefits of fungicides (and other pesticides) needed for risk-benefits analyses.

The PPB supports and encourages the use of sound science and high quality data in the EPA decision making processes. Regulatory decisions about fungicides, other pesticides, and biotechnology products must be based on facts derived from sound scientific studies and not on public perceptions or speculation. It is only through the use of scientifically valid information that judgments can be made on the relative risks and benefits of pesticide and biotechnology use in maintaining our currently abundant, high quality, and relatively inexpensive food supply.

Education is the most important factor in the safe and environmentally responsible use of fungicides and other agricultural chemicals. The continued training and licensing of pesticide applicators and education of farm workers is necessary to minimize exposure. The public needs accurate information on important issues facing modern agricultural production such as food safety, safety of biotechnology, risk/benefit assessment, pest management alternatives, environmental impacts, and the responsible use of pesticides.

▶ **Proposal:** To facilitate enhanced discussion among members of our society knowledgeable about crop protection products and the broad range of individuals at OPP and in the regional EPA offices, APS proposes a roundtable with EPA to discuss EPA activities regarding crop protection as it relates to plant pathology. By starting with a roundtable, we should be able to determine how APS members can best assist the Agency in meeting its need for science based data, outreach, and education. It may be appropriate to identify a fungicide designated for Registration Review that could serve as a test case to guide our cooperative efforts.

▶ **Result:** The Public Policy Board met with the Biological and Economics Analysis Division of OPP in 2007 and outlined our proposal as well as listened to their needs. That information exchange has given APS a better awareness of the requirements for registering (re-registering) crop protection products, and EPA a better understanding of the information APS can provide to assist the Agency in making valid decisions on crop protection products. APS can provide the science based information that EPA needs to ensure that crop protection tools are maintained for US growers to continue to produce the safest, most reliable food supply in the world.

▶ **Contacts:** APS PPB members Beth Carroll (beth.carroll@syngenta.com) and Bill Dolezal (william.dolezal@pioneer.com) as well as APS PPB Chair Jacque Fletcher (jacqueline.fletcher@okstate.edu) and Kellye Eversole (eversole@eversoleassociates.com) are available to answer any additional questions.

