

APS Public Policy Board Holds EPA OPP Roundtable

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On November 12–13, 2008, several members of the APS Public Policy Board (PPB), along with representatives from several other APS committees, met with staff from the U.S. Environmental Protection Agency (EPA) Office of Pesticide Programs (OPP) and from the USDA's Office of Pest Management and the National Agricultural Statistics Service. The purpose of the roundtable was to follow up from PPB's March 2008 visit with EPA officials in Washington, DC, exploring ways in which APS can work more closely with EPA and other federal agencies. The roundtable was a key 2008 initiative for the PPB. More information on this initiative can be found at www.apsnet.org/members/ppb/industry.asp.

APS members have expertise in a broad range of science disciplines, so they are in a position to assist regulatory agencies in making informed decisions and understanding their implications. The roundtable identified several subject areas and emerging issues that would benefit from an active role by APS members and committees.

EPA participants commented that APS is the first professional society to seek this level of interaction and that it may serve as a precedent for other organizations.

APS members attending were impressed with the high level of preparation and participation from several divisions and offices within EPA and USDA. Especially appreciated was the leadership of **Arnet Jones** and **Linda Murray** (EPA OPP, Biological Effects Assessment Division), because they were instrumental in making this event a success.

APS President-Elect **Barbara Christ** gave EPA and USDA staff a clear understanding of APS as an organization, of what the APS PPB is and does, and of the value of increased interaction between APS and EPA. A series of presentations by EPA staff provided APS members the framework in which EPA scientists operate. This included an introduction to the laws governing pesticides and transgenic products as well as overviews of the benefits assessment process, the ecological and human health risk assessment processes, reregistration review, and strategic planning.

Specific topics of mutual interest were discussed in detail, including the following.

Regulation of Biotechnology Products

The biotechnology discussion identified several areas in which the advice of APS members would be productive. These include regulating transgenic crops that have viral coat protein-mediated disease resistance, finding a workable regulatory definition for what constitutes a transgenic plant growth regulator, defining ways to measure and understand the effects of genetically modified, plant-produced protectants on soil microorganisms, and assessing the potential for gene flow from genetically modified organisms.

Fungicides to Promote General Plant Health

EPA staff was able to get an APS perspective on the recent trend toward increased use of fungicides in corn and soybean for promotion of general plant health. This complex topic extends to agricultural economics and plant physiology and has implications for fungicide resistance management.

Soil Fumigants

These critical plant disease management tools have been under intense regulatory scrutiny for years. Many APS members have been involved in risk/benefit assessments and in finding alternatives. The reregistration process for four soil fumigants is nearing its conclusion. The new regulations will have far-reaching effects on the ability to manage soilborne pathogens and nematodes. Long-term economic consequences will be significant. Already, the lack of available alternatives is impacting user communities in the United States, especially in California.

Agricultural Chemical Usage Surveys

As **Beth Carroll** outlined in the March 2008 issue of *Phytopathology News*, the USDA plans to discontinue the Agricultural Chemicals Usage Survey that is conducted by the National Agricultural Statistics Survey (NASS). NASS needs \$8.4 million to fund the survey program—a very small portion of the total NASS budget. Among several other uses, the survey data are critical in the EPA's risk assessments for all pesticides, including fungicides and soil fumigants. Without these public domain data, EPA will be compelled to use worst case assumptions in their risk assessments and this could lead to unnecessarily conservative regulation of key plant disease management tools. APS members can influence this by telling their congressional representatives about the importance of this program. Background information on this issue can be found on APSnet at www.apsnet.org/members/ppb/PDFs/USDAChemicalUsageSurveys308.pdf.

Endocrine Disruptor Screening

The Endocrine Disruptor Screening Program is a congressional mandate driven by the Food Quality Protection Act amendments to the Federal Food, Drug, and Cosmetic Act. It “directs EPA to develop a chemical screening program using appropriate validated test systems and other scientifically relevant information to determine whether certain substances may have hormonal effects.” This will continue to be a significant regulatory effort with long-term consequences for U.S. agriculture and has important implications for chemical control of plant diseases because it has the potential to restrict plant disease management options in the United States and elsewhere. For example, the draft tier 1 screening list includes eight of the most widely used fungicides. Chemical options for plant pathogen control already are very limited. Finding and registering new products is expensive and difficult in today's regulatory and business environment.

APS members should have an interest in ensuring that these regulatory decisions are based on valid science by assisting in the documentation of actual fungicide use patterns, to avoid the use of worst case risk assessment scenarios. They can help critique the scientific validity of proposed endocrine assays and can participate in the cost/benefit analyses needed to assess the true cost to U.S. agricultural productivity.

Endangered Species Act

The most immediate effects of endangered species legislation relate to insecticides and herbicides. Later regulatory action could affect the availability of fungicides and fumigants. This is an area in which APS members can provide an understanding of actual product use patterns (to allow realistic rather than worst case risk assessments) and can improve estimates of the economic impact of regulation.

Fungicide Resistance Management

This discussion revolved around ways to protect existing fungicide modes of action and ways to accelerate broad access to new modes of action. It led to a discussion of the key role of IR-4 in testing and registering new fungicide modes of action, especially for vulnerable, high-value crops. Universities, IR-4, and manufacturers can work toward simultaneous development and registration of two or more fungicide modes of action. User groups can submit public interest documents to trigger accelerated regulatory review for new fungicides. Manufacturers can provide more regulatory leverage for resistance management compliance by ensuring that label language is mandatory rather than permissive.

The roundtable was one example of how EPA scientists actively seek input for their regulatory decisions. EPA staff reminded us to use the EPA website to keep tabs on upcoming regulatory reviews for fungicides, fumigants, and biotechnology products. When the regulatory review dockets open, public comment is invited. This is when APS members and committees should be involved. Full access to all of the PowerPoint presentations from this workshop are available for member review at www.apsnet.org/members/ppb/OPPRoundtable.asp.

There will continue to be opportunities for partnership and information sharing between APS, EPA, and USDA. The roundtable was a pivotal step in developing this working relationship. The PPB will meet with EPA officials in March 2009. Any APS member with issues that they wish to bring to the attention of EPA should contact any member of the PPB before March 2, 2009. A listing of PPB members can be found at www.apsnet.org/members/com/boards_detail.cfm?Code=PPB. ■