

Summary of Input from State, Territory, and Tribal Partners for Office of Chemical Safety and Pollution Prevention FY 2025-2026 National Program Guidance

Process for Soliciting Early Input

Name of Organization	Venue	Date
EPA Regional Pesticide Managers	National Pesticide Manager Meeting	June 7, 2023
Tribal Pesticide Program Council (TPPC)	TPPC Fall Meeting	October 3-5, 2023
State Lead Agencies (SLAs)	Teams call with SLAs	October 24, 2023
National Tribal Toxics Council (NTTC)	NTTC November meeting	November 13, 2023

Highlights of Early Input from States, Tribes, and Associations

- **Comments from EPA Regional Representatives:** Regarding pollinator protection priority area -
 - As identified by the State FIFRA Issues Research and Evaluation Group (SFIREG), if growers know about illegal pesticide use by beekeepers, it disincentivizes them to sincerely engage in Managed Pollinator Protection Plans (MP3) activities. SLAs don't feel like they have the backing by EPA to pursue beekeepers misusing products leading to bee kills. This should be addressed by EPA under the pollinator priority area.
 - States are reporting to their Regions issues with the enforceability of label language.
 - SLAs generally operate separately from their apiary programs so directing Regions to work with SLAs to develop and track the effectiveness of MP3s is not a realistic/effective approach.
 - SLAs typically do not have the resources or expertise to develop pollinator protection plans and the Regions' hands are tied because this is not required and may be a low priority when compared to other pesticides issues.

- Regional pollinator staff perform these tasks as a collateral duty assignment which falls outside normal Project Officer (PO) duties. As such, there is highly variable ability across the Regions to devote time to this. A coordinated effort to evaluate effectiveness should occur between HQ staff who monitor the Association of American Pest Control Officials (AAPCO) survey and the Regions. It may be worthwhile to modify this statement to emphasize building partnerships between HQ and the Regions.
- Suggest the strategy place greater emphasis on communication and outreach.
- Suggest adding under “Activities” “encouraging growing practices near treated cropland and non-cropland”.
- Suggest HQ engage Regions regarding results of AAPCO/SFIREG Pollinator Protection Plans (P3s) surveys; ensure that these surveys capture work being conducted beyond P3s to make sure all state efforts towards pollinator protection are captured.
- Regarding outreach and education, suggest that Regional staff can work with the information developed and HQ staff/collaborators to convert this information into outreach materials that may be more readily distributed and relevant to Regional stakeholders.
- Regions distribute information as it's available, but per the OCSPP sub-lead handbook, any communication materials developed by HQ must be reviewed by the Region. As far as regional pollinator staff are aware, no such communication or development of materials has occurred. It would be great for the NPG to recognize this and include language that encourages continued collaborative activities between the Regions and HQ on pollinator protection activities.
- Suggest updating all pollinator protection materials linked in the NPG as many if not all are out of date.
- Suggested metrics: “Number of pollinator-focused events, pollinator presentations in the Regions, dissemination of materials/number of products distributed to the public, number of downloads for links on the EPA website (via google analytics), etc.” This is how OCSPP can establish reach, and these can better be used to evaluate subsequent outreach strategies.
- **General comments from Regional pesticide staff:**
 - Request that Headquarters to emphasize technical support and resources for FIFRA Grants Database (FGD), especially if it’s going to be the primary method most grantees use to upload documents.
 - Tribal pesticide programs could use more funding.

- Pesticides of highest priorities are going to get more important as the EPA reviews pesticides, especially with the neonicotinoid reviews that are coming up in the next year or so.
- Request that EPA emphasize outreach on alternatives to conventional pesticides, especially since I've seen a growing anxiety in the ag sector here and abroad about pesticides getting prohibited.
- **Comments from the Tribal Pesticide Program Council:**
 - Would like to see increased emphasis and funding given to pesticides in water, water quality monitoring and testing.
- **Comments from the State Lead Agencies:**
 - **Washington State Department of Ag -**
 - Consider adding Endangered Species Act (ESA) as a priority area in the future and provide guidance to SLAs and Regions should proposed ESA strategies be adopted.
 - If Regional offices were to be part of ESA activities, I would imagine it being around developing Region specific mitigation measures, working with other federal and state agency partners in the Region, on solutions that fit the states and Region they work in. What we've seen in the current strategies so far is that those writing them, don't have a good perspective on the incredible variability in local agriculture practices, diversity of topography, climates and cropping practices. I would reiterate my comment though that the "pile" of OPP ESA Projects/initiatives – strategies have added an inordinate amount of work for SLAs (albeit at management level). I don't know the impact of these for the Regional EPA offices. I would expect that if OPP adopts any of these proposed strategies and a new body of work results from them for SLA's and the Regions that they might be added to a future guidance document.
 - I do not see a need to add ESA to the current guidance. However, if the current ESA strategies get adopted and SLAs and Regions end up doing lots of "boots on the ground" work, then maybe ESA would be added in the future. I do expect that with Climate change and the number of species being lost, ESA may rise to the level of its own activity within OPP guidance eventually. Currently, it's all a "side project" writing comments and talking about what might work vs. carrying out a specific work task or activity.
 - **Office of Indiana State Chemist:**
 - EPA needs to desperately call an emergency audible and put ESA implementation activities at the top of the list. SLAs, our cooperators, and our regulated clients are all being overwhelmed by this mega-issue that is already in some level of

implementation for all of us. The Agency must recognize the urgency, regardless of the desire for a multi-year planning process.

- Certification and Training (C&T) rules implementation: Timing-wise compliance dates are upon us.
- Grants management improvements: It is time for EPA to get to work on updating and overhauling the reporting template to eliminate all of the duplicate reporting for SLAs that is built into CDX.
- Pollinator protection: This is a natural set of activities to pair with the ESA mitigation measures that are upon us. We should think about them as a comprehensive package.
- Regional priorities: Each Region should be prepared to provide justification, with data, if possible, to support the Regional priority selected. A Regional EJ priority project could be supported if a practical and meaningful pesticide project could be identified.
- WPS: While we support the need to protect workers and handlers, focusing some largely unenforceable concepts, such as the AEZ, lowers the sense of priority of this issue.

Actions taken to address comments:

- EPA staff had a follow up call with the regional pollinator sub lead to better understand the regional pollinator staff workgroup's concerns and suggestions.
- EPA staff met with HQ pollinator subject matter experts to explain regional pollinator staffs' concerns and solicit feedback on their requests.

Next Steps

EPA will consider the early input received from state, territory, and tribal partners in developing the FY 2025-2026 National Program Guidance.