

# State FIFRA Issues, Research & Evaluation Group

MINUTES	DECEMBER 8-9, 2014	EPA OFFICES, POTOMAC YARDS ARLINGTON, VA
MEETING CALLED BY	Jim Gray, Chair, SFIREG	
TYPE OF MEETING	Issues, Research, and Evaluation	
NOTE TAKER	Grier Stayton, Exec. Sec., AAPCO	
ATTENDEES	<p>Members of SFIREG: Jeff Comstock, Vermont Agency of Agriculture, Food &amp; Markets , (Region 1 Representative); Anthony Lamanno, New York State Dept. of Environmental Conservation, (Region 2); Grant Bishop, West Virginia Dept. of Agriculture (Region 3); Patrick Jones, NC Dept. of Agriculture &amp; Consumer Services (Region 4); Leo Reed, Indiana State Chemist Office, (Region 5); Susie Nichols, Arkansas State Plant Board, (Region 6); Paul Bailey, Missouri Dept. of Agriculture, (Region 7); Matthew Lopez, Colorado Dept. of Agriculture, (Region 8); Charles Moses, Nevada Dept. of Agriculture (Region 9); and, Robert Blankenburg, Alaska Dept. of Environmental Conservation, (Region 10). Also present: Tim Drake, South Carolina Dept. of Agriculture, and AAPCO President; Bonnie Rabe, New Mexico Dept. of Agriculture, and in-coming Chair of SFIREG Working Committee ("WC"), Pesticides Operation and Management ("POM"); Kirk Cook, Washington State Dept. of Agriculture, and Chair SFIREG WC, Environmental Quality Issues ("EQI"); Fred Corey, Chair, Tribal Pesticide Program Council ("TPPC"); Don Renchie, Texas A&amp;M, representing AAPSE; John Scott, CO Dept. of Agriculture, and President, Association of Structural Pest Control Regulatory Officials (ASPCRO); Dea Zimmerman, OPP; Michelle Bogner, MI Dept. of Ag &amp; Rural Development, representing AAPCO Lab Directors; Kimberly Bingham, Region 4 EPA (representing EPA Regional Offices); Al Havinga, EPA, OECA; Jim Roelofs, EPA, OPP, FEAD; Dan Helfgott, EPA, OPP, FEAD; and Grier Stayton, AAPCO/SFIREG Secretary. Other state representatives, pesticide registrants, trade association representatives and EPA staff were also present.</p>	
	<a href="#">Attachment 1 Agenda</a> ; <a href="#">Attachment 2 Attendees</a>	

## **ORDER OF DISCUSSION TOPICS**

- 1) OECA Update – Al Havinga
- 2) OPP Update – Jim Roelofs (and Spanish Label update from Jose Gayoso)
- 3) SFIREG POM WC update – Bonnie Rabe
- 4) SFIREG EQI WC update – Kirk Cook
- 5) TPPC Update – Fred Corey
- 6) DfE Discussion – Dave Scott, Indiana; Marty Monell, EPA; David DiFiore, EPA
- 7) Drift Reduction Technology update – Jay Ellenberger, EPA
- 8) AAPSE update – Don Renchie
- 9) NRCS Cover Crop Standard revision – Jeff Comstock
- 10) State Managed Pollinator Protection Plans – Jim Gray, Marietta Echeverria, Steve Dwinell
- 11) Open Discussion on State Pollinator Protection Plans
- 12) Regional Reports from SFIREG Region Representatives
- 13) ASCPRO Report – John Scott
- 14) AAPCO Report – Tim Drake
- 15) CTAG Report – Leo Reed
- 16) Process for Obtaining Federal Credentials – Susie Nichols, Al Havinga
- 17) Adjusting Pesticide Inspection Time Allocations – Leo Reed
- 18) Pesticide Inspections in States by EPA Inspectors – Lott, Bingham, Lamanno
- 19) Update on WPS and Certification Rule Changes – Kevin Keaney, OPP
- 20) Update on Enlist Duo Registration and Labeling – Kay Montague, OPP
- 21) Review of Smart Label Progress – Nicole Zinn
- 22) Summary/Closing Statements – Jim Gray

MEETING CONVENED December 8<sup>TH</sup> AT 8:16 a.m.

OECA UPDATE		AL HAVINGA, OECA, EPA	
<b>DISCUSSION</b>			
<p>Havinga reported the National Program Managers guidance is currently being developed. A number of comments from FIFRA State Lead Agencies ("SLAs") have been received. OECA is also working on a FIFRA Compliance Monitoring Strategy. The Strategy will describe expectations and how the program operates (e.g. how many inspections will be done in various categories – nationally). The guidance will be released for state review in 2015.</p> <p>OECA is reviewing Performance Measures collected under the pilot and a memo regarding implementation will be released in 2015. Mandatory reporting of the Measures will begin in 2016. Any SLA issues with the Measures should be reported to the Region office.</p> <p>Havinga reported 443 SLA, 55 EPA and 15 Tribal inspectors are currently credentialed by EPA.</p> <p>PIRT is currently being directed by Amber Davis of Region 4. Davis has formed a PIRT Steering Committee composed of representatives from FL, MI, NY, SC, VT, NJ, NC, OR, the Winnebago Tribe and EPA representatives from Regions 4, 5 and 9. Currently planned are an Urban FIFRA Issues Training Workshop, February 23<sup>rd</sup> in Nevada; an Advanced Inspector Skills Training Workshop, May 18, in Albuquerque, NM; and a Tribal Workshop, location and date to be determined later.</p> <p>Gray asked if the Part Measures for environmental media will include non-target plants. Region 8 states have asked if the intent is to cover non-target plant residue detections from drift complaints.</p>			
<b>CONCLUSIONS</b>			
<b>ACTION ITEMS</b>	<b>PERSON RESPONSIBLE</b>	<b>DEADLINE</b>	

OPP UPDATE		JIM ROELOFS, OPP; AND JOSE GAYOSO, PRD, OPP, EPA	
<b>DISCUSSION</b>	<a href="#">Attachment 3 – Methomyl Agreement draft</a>		
<p>Gayoso discussed recent activities of the pilot program for translating portions of labels into Spanish (e.g. health statements). An EPA Spanish Labeling workgroup is charged with evaluating the effectiveness and efficiency of label changes and they have received helpful feedback from SLAs over the past year. Gayoso asked SFIREG assistance in getting the "word" out. There is no firm date for the pilot kickoff, but it will be in 2015. Gray agreed to enlist a few volunteers from SFIREG to assist with the pilot implementation.</p> <p>Roelofs referenced the December 26<sup>th</sup> effective date of a revised OMB Omni Circular. The Circular covers grant guidance and requirements. He was unsure of the effect on SLAs but stated that Fred Corey, Jim Gray, and Tim Drake would be contacted and briefed.</p> <p>Roelofs also reported the Methomyl Agreement with methomyl fly bait registrants was sent last Thursday evening for signature. The Agreement includes limitations on distribution, the phase out of 1 &amp; 5 lbs. containers, a registrant</p>			

developed information pamphlet, and the monitoring of incident data collected from 12-15 state agencies – to include OH, MI, and WI. Registrants will also agree to specify on the label "Do not use to kill <non-target species names>, effective January 1. Brian Rowe, MI, via conference call, commented that he is assigned as the SFIREG contact for pulling together the 12-15 state agency participants and their efforts to collect annual incident data. He suggested inclusion of the Michigan State University Animal Health Diagnostic Lab due to the national scope of their animal necropsy analyses. Roelofs commented that Tom Myers, EPA Product Manager, will provide Rowe with further guidance. Roelofs noted EPA will consider Restricted Use Classification if the Agreement is not effective. Rowe will use the AAPCO email distribution list to poll states and request the reporting of incidents. Rowe suggested internet monitoring of claims as part of the data collection. Dan Helfgott asked if the surveillance was to begin now or after the agreement is signed. Roelofs noted the start date was not specified in the agreement and Myers will be contacted for further clarification. Moses asked if the registrant pamphlet would refer the public to more information on the web. Roelofs stated a draft pamphlet has not been reviewed but EPA can supply information they can use (e.g. – leads to SLA contacts).

Roelofs reported 50 comments from SFIREG on the Label Review Manual, along with hundreds from registrants and the public. It took 1 ½ years to review 734 comments. Dozens of changes were made based upon the comments. Since this review there have been other changes – for example, revisions to respirator terminology, typographical errors, etc. The changes have been announced through an internal list and through the OPP Update. Changes are quickly made to the on-line Label Review Manual. Recent changes were summarized:

1. Chapter 3- General Requirements, Section 2d, "MSDS" changed to "SDS." Section 2g, web-distributed labeling option availability referenced.
2. Chapter 16, Section 2, #6, "the drowning pictogram" has been seen as a conflict with the EPA signal word. The change allows embossed use on the bucket – not on the label.
3. Chapter 16, Section 4, #3 – registrants can apply for a label amendment to allow "bio-certification" supported by a USDA letter, disclaimers, and other requirements. No one has submitted a request to Roelofs' knowledge.

Moses asked what options are available for SLAs to report labeling issues found in the field. Roelofs replied: 1) Contact the PM Manager, through SLITS if the product labeling issue is unique, and 2) Contact the Label Consistency Committee via the website – if a generic labeling problem.

Roelofs announced he will be retiring January 3, 2015, after 36 years of service with EPA and 17 years as SFIREG liaison. Gray thanked Roelofs for his outstanding efforts with implementing SLITS, training for EPA label reviewers, revisions to the LRM, and the establishment of the Label Consistency Committee.

<b>CONCLUSIONS</b>	
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<b>ACTION ITEMS</b>	<b>PERSON RESPONSIBLE</b>	<b>DEADLINE</b>
SFIREG volunteers needed to assist EPA Spanish Labeling Workgroup (Liza Fleeson, VA, and Antonio Escobar, MI, volunteered to date)	Gray	

<b>SFIREG POM WC UPDATE</b>	BONNIE RABE, NM AND IN-COMING CHAIR, SFIREG POM WC
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<b>DISCUSSION</b>	
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Rabe is the in-coming Chair of the SFIREG Pesticides Operations & Management Working Committee. Her update included a summary of the topics discussed at the September joint POM and EQI Working Committee meeting. SLA data mining; state pollinator protection plans, DfE labeling; EPA Project Officer training; 25(b) products; NRCS cover crop guidance; and inspection time estimates were noted.

<b>CONCLUSIONS</b>	
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ACTION ITEMS	PERSON RESPONSIBLE	DEADLINE

<b>SFIREG EQI WC UPDATE</b>		KIRK COOK, WA, AND CHAIR, SFIREG EQI WC	
<b>DISCUSSION</b>			
<p>Cook also reported on topics covered at the joint POM and EQI September meeting. Off-line discussions included pesticide use issues related to cannabis production. Other topics focused on the USGS, NAQWA, urban pesticide use study; joint studies with NMFS and buffers relating to biological opinions; the consideration of state POINTS data for use in EPA benchmarks and registration decisions. A conference call is scheduled to discuss POINTS data use and a draft set of recommendations will be sent for EQI review in January 2015. Cook will then share the document with EPA and incorporate their comments for a final draft to be presented at the April 2015, joint POM and EQI meeting.</p>			
<b>CONCLUSIONS</b>			
ACTION ITEMS	PERSON RESPONSIBLE	DEADLINE	

<b>TRIBAL PESTICIDE PROGRAM COUNCIL REPORT</b>		FRED COREY, TPPC CHAIR	
<b>DISCUSSION</b>			
<p>Corey provided a summary of TPPC activities and state – tribal interactions. He reported a National Certification Plan Workgroup was formed to monitor implementation of the Plan. The Workgroup, guided by Nichole Zinn, has met monthly with issues such as jurisdictional definitions and clarifying guidance on the website addressed. TPPC has asked that the Workgroup continue their calls on a quarterly basis – to keep dialogue and cooperation going. Corey asked for a state designee on the Workgroup and Gray replied that Joe Spitzmueller, MN, has volunteered. Corey noted some success resulting from the NPM guidance encouraging state and tribe cooperation. A compilation of joint state and tribal activities is to be published. Corey felt tribal acceptance of joint activities has strengthened over the years. Helfgott stated the grant guidance also identifies state support and cooperation with tribes as a priority.</p>			
<p>Corey noted a training Issue Paper is under development (re: training availability, timing, needs, etc.) TPPC has also placed emphasis on IPM in tribal housing projects. Corey asked for SFIREG to share any ideas regarding urban IPM.</p>			
<p>Gray applauded Corey's effort to promote state and tribal partnerships.</p>			
<b>CONCLUSIONS</b>			

ACTION ITEMS	PERSON RESPONSIBLE	DEADLINE

## DfE, OGC/AD Position Paper Discussion

Dave Scott, IN; Jeff Rogers, VA; Marty Monell, OPP; David DiFiore, OPP

### DISCUSSION

[Attachment 4- DiFiore presentation](#); [Attachment 5 – DfE Legal Position](#); [Attachment 6 – OPP DfE Background Statement](#); [Attachment 7 – Scott DfE Workgroup report](#)

Dave Scott, IN, provided a summary of state issues related to the implementation of Design for the Environment (“DfE”) labeling. SLAs have a fear of de facto public interpretation of the DfE logos as “safer” products. Also included in the meeting packet was the DfE legal opinion provided April 22, 2010, by Erin Koch, Pesticide & Toxic Substance Office, EPA. David DiFiore, DfE Program, EPA, summarized this opinion by stating DfE labeling is:

1. Not an endorsement by EPA
2. Not an inherent safety statement, and
3. Not a comparative safety statement.

Scott reported the POM workgroup formed to investigate the issue (composed of Scott; Charlie Clark, FL; and Jeff Rogers, VA) focused on how to share their experience and assist EPA in the implementation of a credible program. A credible program was defined by Scott as “consumer understanding and buy-in.” Three areas of concern were identified:

1. Timely access by SLAs to a list of reviewed and EPA approved products (EPA is to post products to a website, but “timely” posting is needed).
2. Concern with distributor registrations. If a master label is approved then all supplemental / distributor labels will be eligible. Scott noted that EPA does not review distributor labels and there is a poor track record of distributor label compliance. There has been a push to link distributor labels to the master label but EPA does not have a system currently in place.
3. Concern by SLAs that 25(b) products have not been through review, and if they are violative, will EPA enforce?

It was reported there are currently nine (9) products approved with the DfE logo. Monell noted very few active ingredients make it through the DfE screen (only 5 a.i.’s at this time).

Tony Cofer asked if SLAs had been surveyed on their willingness to register these products in their states. Scott replied no. Gray recommended re-sending the EPA legal opinion out to the states along with a short AAPCO survey. Jennifer McLain, AD Director, suggested also sending the OPP, AD, DfE Pilot summary as an attachment (see Attachment 6). DiFiore provided a short presentation explaining the DfE concept; the format of the pilot project; the DfE web pages; the future of the DfE program, and the proposed re-design of the logo. Don Lott, EPA, stated the Office of Compliance will work with OPP and SLAs to ensure compliance.

### CONCLUSIONS

### ACTION ITEMS

DfE Legal Opinion and Survey of States to be sent via email to AAPCO SLA contacts

### PERSON RESPONSIBLE

Scott, Rogers

### DEADLINE

January 2015

## UPDATE ON DRIFT REDUCTION TECHNOLOGY (DRT)

JAY ELLENBERGER, OPP, FEAD; JIM  
GRAY, SFIREG CHAIR

**DISCUSSION** [Attachment 8 – DRT Ellenberger Presentation](#)

Ellenberger provided background information on the DRT program and its key components:

1. Standardized test protocols and testing of technologies.
2. OPP review of test results and assignment of DRT star rating.
3. OPP posting of DRT ratings on website.
4. Registrant applications to OPP to use DRT rating on product label.
5. OPP assessment of risks with labels making DRT claim (credits applied in risk assessments).
6. Applicators referring to labels and DRT website for information.

Ellenberger addressed label enforcement – how will SLAs confirm the applicator used the DRT label? Two means would be: 1) check the equipment nozzles and 2) review the applicator records. Applicators will still be accountable for use in accordance with labeling.

Ellenberger summarized the benefits and incentives of the DRT program – it sets a standard, provides more applicator flexibility, less pesticide loss, etc. Gray asked when SLAs could expect to see DRT labels in the field. Ellenberger replied, most likely the end of 2015 or early 2016. Nichols asked who was doing the wind tunnel studies for EPA. Ellenberger replied the primary testing facility will be at the University of Nebraska. Gray offered the input of the POM Working Committee as labeling becomes available.

**CONCLUSIONS**

**ACTION ITEMS**

**PERSON RESPONSIBLE**

**DEADLINE**

**AAPSE UPDATE**

DON RENCHIE, TAMU,  
AAPSE PRESIDENT-  
ELECT

**DISCUSSION** [Attachment 9 – AAPSE Presentation](#)

Renchie provided a brief update of AAPSE activities:

1. AAPSE provided comments on the WPS rule.
2. The AAPSE National Workshop was held in September 2014, in Harrisburg, PA (large number of participants and topics included membership and strategic plans for the organization)
3. AAPSE participated in the National Stakeholders Team
4. Support and appreciation of PSEP funding efforts
5. AAPSE's 25(b) workgroup completed a White Paper on the issue
6. Collaboration with other organizations
7. Provision of various services to members (communications, list-serve, journals, etc.)

**CONCLUSIONS**

**ACTION ITEMS**

**PERSON  
RESPONSIBLE**

**DEADLINE**

**NRCS COVER CROP STANDARDS**

JEFF COMSTOCK, VT

**DISCUSSION** [Attachment 10 – Comstock Presentation](#); [Attachment 11 – NRCS – AAPCO Comments](#); [Attachment 12 – NRCS Final](#)

Comstock explained the issue relates to feeding and grazing of cover crops which are subject to re-plant restrictions from a preceding crop's pesticide use. A chronology of the issue was presented. SFIREG comments were filed with NRCS in September 2014. Late September, NRCS issued their revised cover crop standard. A copy of the final NRCS cover crop standard was provided by Comstock (Attachment 12), along with the SFIREG/AAPCO suggested wording. NRCS chose not to adopt the SFIREG targeted language but the final standard does state ("Ensure herbicides used with crops are compatible with cover crop selections and purposes.") Comstock noted NRCS state offices have narrative sections in their project plans that do address label restriction and added that SLAs may work with their state NRCS technical committee to have the SFIREG language inserted.

**CONCLUSIONS**

**ACTION ITEMS**

**PERSON RESPONSIBLE**

**DEADLINE**

**STATE MANAGED POLLINATOR PROTECTION PLANS**

JIM GRAY, CHAIR;  
MARIETTA ECHEVERRIA,  
OPP

**DISCUSSION** [Attachment 13 – Echeverria Presentation](#); [Attachment 14 – Gray Presentation](#); [Attachment 15 – Draft Pollinator Protection Plan Guidance](#)

Echeverria provided the background and EPA perspective on the importance of pollinator protection; their recent activities relating to pollinator protection; the Presidential Memorandum of June 2014; and mitigation options being considered at EPA. She noted the national decline in colonies, the strong demand for pollinator services, and the introduction of the Bee Advisory Box on neonicotinoid labels.

Echeverria further outlined the Presidential Memo directives to assess the effects of pesticides on pollinator health and to engage states and tribes in developing managed pollinator protection plans. Echeverria acknowledged several states have already developed pollinator protection plans and some are engaged in their development. An August 2014, OPP letter was sent to AAPCO, TPPC, and SFIREG which expressed EPA's desire to collaborate with the states and tribes in the development of Managed Pollinator Protection Plans ("MP<sup>3</sup>"). Echeverria provided a list of OPP mitigation options under various scenarios (label restrictions, state MP<sup>3</sup>s, etc.) An EPA review and acceptance process of state MP<sup>3</sup>s is also being developed. EPA will seek public comment on a proposed mitigation plan with a goal to see at least some MP<sup>3</sup>s come into existence in 2015. EPA will also continue to mitigate pollinator risk through their chemical-specific risk assessments.

Gray described the activities of a SFIREG workgroup (workgroup members are listed in Attachment 15). The workgroup is charged with identifying core elements of a state MP<sup>3</sup>. Early on, the workgroup defined "managed pollinators" as any species of pollinators managed by humans. A key component of an MP<sup>3</sup> would be the fostering of communications between beekeepers, growers, applicators and others. Other critical elements identified in the draft SFIREG MP<sup>3</sup> Guidance (Attachment 14) include:

1. Public stakeholder participation.
2. A method for growers and applicators to recognize if managed pollinators are near their treatment sites (apiary registration/locations, bee flags, etc.).
3. A method for growers or applicators to contact beekeepers in advance of pesticide applications.
4. Recommendations on how to reduce pollinator risks from pesticides (BMPs, etc.)
5. A clearly defined plan for public outreach (meetings with stakeholders, posting MP<sup>3</sup> on website, social media, etc.)
6. A mechanism to measure the effectiveness of the MP<sup>3</sup> and periodic review and update of the plan.

Gray also outlined optional or recommended elements of an MP<sup>3</sup>:

1. A strategy to deal with hives without identified owners.
2. Communication with crop advisors and ag extension service.
3. Clear information on the applicability of the MP<sup>3</sup> (perhaps separate or modified MP<sup>3</sup> for specific cropping systems).
4. Addressing urban beekeeping and non-agricultural pesticide use.

5. More formalized agreements between bee keepers, farmers, and property owners – especially involving financial agreements between the parties.

Gray asked the SFIREG representatives to disseminate the MP<sup>3</sup> guidance to the states in their region, collect their comments and forward them to Gray. Gray will then compile the comments on the draft Guidance by February 1<sup>st</sup> with the goal of providing EPA a copy of the Guidance by March 1<sup>st</sup>. Jones asked if the Extension Service in the states should also be solicited for comments on the draft. Gray left this to the discretion of each SFIREG reps – but at least each state's SLA should be contacted for comments. Lamanno suggested a webinar be provided for the states so they could understand the subject.

Echeverria reiterated that EPA has a draft policy document describing the scope of their mitigation measures, the scientific basis for proposing the policy, the active ingredients included, specific label language, and additional discussion on uncertainties. This policy will be released for public comment sometime early 2015. Comstock asked, as other active ingredients are considered or there are expanded use patterns, will EPA apply the same structure to the other use patterns? Echeverria replied it would depend on the exposure scenario – if the bees were brought in for use by the grower or if they were "visiting" pollinators.

## CONCLUSIONS

## ACTION ITEMS

PERSON  
RESPONSIBLE

DEADLINE

### **REPORT FROM AAPCO POLLINATOR WORKGROUP – AND ADDITIONAL DISCUSSION**

STEVE DWINELL, FL

## DISCUSSION [Attachment 16 – Dwinell Presentation](#)

Dwinell thanked the AAPCO Managed Pollinator Protection Plan (MP<sup>3</sup>) Committee for their efforts. The Committee was comprised of about 17 organizations (public and private). The Mission Statement for the Committee was:

"To assemble information on existing and developing managed pollinator protection plans;  
Disseminate this information to stakeholders in order to assist states in the concept development and adoption and to assist USEPA in their efforts;  
Build a broad stakeholder consensus on effective strategies for protecting pollinators that are the least disruptive to production agriculture and other affected stakeholders."

Dwinell felt the core of an MP<sup>3</sup> is – "beekeeping needs agriculture and agriculture needs beekeepers." Specific tasks were identified for the Committee. Currently there are 5 states with MP<sup>3</sup> plans in place and 15 states have plans in development. Six states have started down the road of an MP<sup>3</sup> with the adoption of voluntary colony registration through the DriftWatch program. Seventeen states are waiting for the MP<sup>3</sup> process to be concluded. Dwinell highlighted the common elements of existing plans and listed barriers to implementation of a plan:

1. Identifying and engaging stakeholders,
2. Lack of apiary staff to engage beekeepers,
3. Limited staff resources to develop and implement plans, and
4. Time needed for rule/legislation.

The Committee's conclusions and recommendations are: States can be assisted in development of plans by national organizations that have participated in the development of plans; resources for developing and implementing managed pollinator protection plans are limited, and these limits will slow development and implementation of managed pollinator protection plans; updating plans should be a continuous process; impacts on managed pollinators from pest management practices are not confined to one class of pesticides or type of active ingredient; managed pollinator protection plans need to re-emphasize that bee production is an important part of agriculture; managed pollinator health is improved when diverse forage plants are available, and provisions for diverse forage and pollinator habitat can be part of managed pollinator protection plans; pest management practices in areas other than crop production can be incorporated into managed pollinator protection plans; wide area pest control for episodic pest outbreaks should be included; there is large diversity in crop production systems, and utilization of the crop resource by managed pollinators across the states surveyed; and, given the diversity in pest management activities, crop production systems, and pollinator management

systems, a phase in period is recommended. Dwinell stressed the need for a phase-in period – deadlines would be hard to meet.

Dwinell stated the Committee will finalize their report for the AAPCO Board and once approved a copy will be provided to SLAs, EPA, and other stakeholders. Given the imminent release of the EPA policy, the Committee agreed to stay together to review the policy.

Lamanno noted the extensive resources needed to develop a plan and asked what Plan EPA would accept. Echeverria replied EPA will have input into the SFIREG guidance and the key elements are aligned with EPA. The EPA policy will outline acceptance criteria. Lamanno felt it would make sense to wait until EPA has their policy in place – since an MP<sup>3</sup> is voluntary. Gray stressed the need to keep the SFIREG and EPA criteria aligned. Dwinell added there is no down side to starting the stakeholder process in advance. Bishop commented the plans and communications are desirable but expressed concern with bee label enforcement. Gray responded there may be a desire for SLA flexibility in creating regulatory requirements or they may wish to develop only a voluntary BMP approach. Echeverria, added that EPA will still want the Plans to have a measure of success or improvement. Dwinell stated the Florida plan is voluntary and has been very successful this year.

Jones described the NC plan process and how the communications among stakeholders are often difficult. He also raised the issue of neonicotinoid use being almost impossible in cotton – the cotton blooms and the temperatures exceed 55°F throughout the summer. Reed commented that Region 5 states are willing to develop MP<sup>3</sup>s, but FIFRA work plans need to be re-negotiated. Drake asked if the MP<sup>3</sup> measures reduce risk for a pesticide, will EPA provide for label restrictions to be alleviated. Echeverria responded that EPA's approach will not change – any proposed label changes will go through a robust public comment process. Moses felt the MP<sup>3</sup> is not a voluntary process – without an MP<sup>3</sup>, mandatory label language will impose additional restrictions on use. Echeverria responded, the policy, once published, will provide a better explanation. Dwinell commented that Florida established a definition of "bloom" as a % of flowering – which allows continued pesticide applications in certain situations.

Rabe noted NM has no reported bee kills and asked if the measures of improvement could be anecdotal (e.g., establishment of communications). A "number" may be difficult for some states to use as a measure of improvement. Dwinell suggested the "numbers" of beekeepers involved, growers participating, etc. Lopez noted the Presidential Memo discussed all pollinators – not just "managed" pollinators. He asked for a discussion or explanation in the draft guidance or EPA policy about how the plans would also protect "unmanaged" pollinators. Echeverria stated the policy would address this. Lopez also asked if there was an EPA expectation for consistency of Plans for beekeepers moving between states. Echeverria felt a regional approach – with Regional Offices participation – would be helpful. Julie Spagnoli asked for linkage/interaction across the SFIREG, AAPCO, and EPA policy documents. Dwinell replied the AAPCO report is for SLA review and consideration and the same is true for the SFIREG document. Gray added he was hopeful all three documents would be consistent with each other. David Flakne suggested the encouragement and incorporation of bee keeping into young farmer programs. Ray McAllister noted the SLAs need to include in their plans verified pesticide bee kill numbers to establish their base line. Gray commented there was an actual increase in ND of beekeepers reporting bee kills as a result of "trust building" through their MP<sup>3</sup> stakeholder meetings. Lopez noted that state Beekeeper Associations often follow their leadership and the number of reported cases can fluctuate on this basis.

## CONCLUSIONS

## ACTION ITEMS

	PERSON RESPONSIBLE	DEADLINE
Comments from SLAs will be collected by SFIREG reps and forwarded to Jim Gray	SFIREG Reps	Feb 1, 2015
Powerpoint presentations to be posted to AAPCO web page (under "Documents")	Stayton	ASAP
Webinars will be held January 2015 on the subject of the SFIREG Guidance document.	Gray, Stayton	Jan 6 and Jan 8
Echeverria will provide Gray with a firmer date on the release of the EPA Policy document	Echeverria	Early January
States were asked to work with their Tribal partners.		

## STATE REGIONAL SFIREG REPORTS

REGIONAL SFIREG REPS

**DISCUSSION** [Attachment 17 – Region 1](#); [Attachment 18 – Region 2](#); [Attachment 19 – Region 3](#); [Attachment 20 – Region 4](#); [Attachment 21 – Region 5](#); [Attachment 22 – Region 6](#); [Attachment 23 – Region 7](#); [Attachment 24 – Region 8](#); [Attachment 25 – Region 9](#); [Attachment 26 – Region 10](#)

See attached reports for details.

Region 1, Jeff Comstock reporting: Relative to the FSMA, Maine inquired whether states in Region 1 considered bleach used to wash leafy produce in markets was a compliance issue – whether this fit any applicator category. No SFIREG action requested at this time. Gray asked for ME to forward any findings to Comstock.

Region 2, Anthony Lamanno reporting there were concerns in NY with the May 2015 implementation of the revised WPS rule, and if states would have sufficient time to provide outreach prior to enforcement.

Region 3, Grant Bishop reporting: Concern with slow response time from the Region for general clarifications/information.

Region 4, Patrick Jones reporting: Nichols provided update on 2,4-D regulations. Concern with Enlist Duo release. Verbiage change on neonics related to wide area spray exemptions (change from “government-sponsored” to “state-sponsored.” Discussion with Meredith Laws – and wording reverted. Problems with Inspector WIKI. Drone use was also discussed.

Region 5, Leo Reed reporting: discussed methomyl initiative and the states’ desire for a web-based Regulator’s Forum.

Region 6, Susie Nichols reporting: discussed issues with obtaining Federal credentials and drift language on labels. Asked for Off-target Movement of Pesticides Committee to be re-instated. Helfgott noted the Drift PRN being tabled and the EPA approach to address drift through individual registrations.

Region 7, Paul Bailey reporting the training requirements for field staff are becoming burdensome. Would be better to have a 3 year CEU time frame vs. 1 year. WIKI site described as horrible. 6 Missouri inspectors could not access site without EPA HQ help. Region 7 states are very concerned with the EPA legal interpretation for DfE logos. 4 states may not register DfE labels.

Region 8, Matt Lopez reporting their discussions regarding MP<sup>3</sup>s, Federal Credentials (can a credentialed Tribal member conduct monitoring for credentialing of state inspectors?); pesticides and marijuana concerns (abamectin LD<sub>50</sub> is the same as strychnine). Lopez asked how many SLAs have done marijuana grow facility inspections. Gray suggested sending a Survey Monkey inquiry to SLAs.

Region 9, Chuck Moses reporting discussions relating to Federal Credentials, Pollinator Protection Plans, inspection time allocations, data mining of state data by EPA, Performance Measures and School IPM.

Region 10, Bob Blankenburg reporting their discussions on incorrect respirator language on current labels; Oregon’s request for EPA assistance interpreting Oregon data on neonicotinoids in Linden trees; State Managed Pollinator Protection Plans; inspection time allocations, and Federal credentialing. Relative to respirators, Roelofs responded that EPA followed the lead of NIOSH. Gray agreed to discuss this matter further with the POM Chair.

There were no Issue Papers brought forth.

### CONCLUSIONS

### ACTION ITEMS

PERSON  
RESPONSIBLE

DEADLINE

## ASPCRO REPORT

JOHN SCOTT, PRESIDENT, ASPCRO

**DISCUSSION** [Attachment 27 – ASPCRO Report](#)

Scott provided an in-depth report of ASPCRO Committee Activities.

The Label Review Committee primarily focused on Pollinator Protection Language in 2014. The Label Review Committee continues to work with AAPCO and SFIREG on the pollinator protection plan development being discussed with EPA currently.

Structural Fumigation Committee:

This committee was newly formed in 2014 and is currently chaired by John Scott (CO). The purpose of the committee is to work with EPA on future reregistration decisions in relation to structural fumigants. Current activities are focused on the development of structural fumigation training course that is intended for EPA personnel to help provide hands-on training of structural fumigations for reference in future reregistration decisions.

Termiticide Standards Committee:

The TSC met several times in 2014 to discuss the proposal to review current pretreatment standards of full horizontal pretreatments vs. moving to a spot/access point pretreatment approach. The thought behind the concept was that it could reduce the environmental load, applying significantly less product under the slab of a structure and possibly help ensure that applicators are making applications at the full labeled rate to access points. EPA confirmed they had an interest in allowing this option on the label, but efficacy data would be needed for any future consideration of changing the treatment standard and future labeling.

Rodenticide Committee:

Several states brought comments forward to the ASPCRO Rodenticide Committee (RC) regarding the current rodenticide label restrictions, allowing use only for commensal rodent control. Many states have non-commensal rodent control pest issues and there currently are few products on the market to address this pest issue. States are currently having to address the lack of available products to control non-commensal rodents through the issuance of 24(c) registrations. The RC submitted a letter to EPA in September 2014 requesting that EPA accept laboratory data from registrants to show efficacy of these products on non-commensal rodents, rather than requiring field testing (since for years the regulated industry used these products under 2(ee) and efficacy has been confirmed on these species), and to ensure the use patterns remained restricted to commensal and specific non-commensal rodents the committee recommended and provided a list of non-commensal rodents states felt needed to be added on the label.

59th Annual ASPCRO Conference:

The 59th Annual ASPCRO Conference will be held August 23-26, 2014, at the Marriott Harbor Beach Hotel in Fort Lauderdale, FL. An exciting agenda is being developed and a few agenda items already planned will address risk based communications with an ever increasing environmentally conscious public, climate change and its effects on pest pressure, pollinator discussions and our pest tour will include a site visit to where the Conehead termite has taken-up residence, a new invasive pest in Florida.

**CONCLUSIONS****ACTION ITEMS****PERSON RESPONSIBLE****DEADLINE****AAPCO REPORT**

TIM DRAKE, PRESIDENT AAPCO

**DISCUSSION****[Attachment 28 – AAPCO Report](#)**

AAPCO President, Tim Drake, congratulated Jim Roelofs on his pending retirement and thanked him for his years of service. Drake announced that Amy Bamber, former MT Dept. of Agriculture official, was selected as the new AAPCO/SFIREG Executive Secretary, replacing Grier Stayton in March 2015. Drake also discussed the need to find a site and host for a new Pesticide Regulators Forum, to be shared by AAPCO and ASPCRO members. The exact cost was estimated to be \$4,000 but this is not yet confirmed. Drake also announced the annual AAPCO Spring Meeting is scheduled for March 8-11, 2015, at the Hilton Alexandria Old Town, Alexandria, VA.

**CONCLUSIONS**

ACTION ITEMS			PERSON RESPONSIBLE	DEADLINE
<b>CTAG REPORT</b>			LEO REED, IN	
<b>DISCUSSION</b>	<a href="#">Attachment 29 – CTAG Report</a>			
<p>Leo Reed briefed SFIREG on CTAG activities. CTAG has completed a paper titled "Limited Use Pesticide Certification." The purpose of this paper is to recommend that EPA provide a mechanism for States to add a "commercial limited use" applicator certification category and to provide information for States interested in offering certification for "limited use" pesticides. CTAG is working on a paper to provide guidance to certification managers and educators on using new technology, such as webinars, SKYPE, FaceTime, GoToMeeting, and Google Hangout, etc., for recertification classes and seminars, whether proctored or non-proctored. CTAG is soliciting one new SLA member and one new Pesticide Safety Educator. Reed expressed CTAG's sincere appreciation to NASDARF for their national projects such as manuals and test question banks for Core, Right of Way and Aerial categories.</p>				
<b>CONCLUSIONS</b>				
ACTION ITEMS			PERSON RESPONSIBLE	DEADLINE
<b>Project Officer Training Update</b>			Cindy Wire	
<b>DISCUSSION</b>				
<p>Wire briefed SFIREG on efforts to finalize a 3 day EPA Regional Project Officer training course. There is a commitment to provide the same training to states but in a shorter time frame. Wire asked states for their opinion on SLA participation in P.O. training at pre-SFIREG meetings and the results were mixed. Wire suggested the following options:</p> <ol style="list-style-type: none"> <li>1. Add one day to a future AAPCO meeting</li> <li>2. Hold a 6 hour webinar for all states</li> <li>3. Offer 2 hour presentations in Regions with an interest – at their pre-SFIREG meetings</li> <li>4. Host geographical time zone webinars.</li> </ol> <p>Gray asked for over-night consideration of these options by SFIREG reps.</p>				
<b>MEETING ADJOURNED December 8<sup>TH</sup> AT 4:55 P.M.</b>				
<b>MEETING CONVENED December 9<sup>th</sup>, AT 8:31 A.M.</b>				
<b>PROCESS FOR OBTAINING FEDERAL CREDENTIALS</b>			SUSIE NICHOLS, AR; AL HAVINGA, OECA	
<b>DISCUSSION</b>	<a href="#">Attachment 30 – Nichols Presentation</a> ; <a href="#">Attachment 31 – Steps to Completing Fed Credentials</a>			
<p>Havinga reported FIFRA inspector training requirements were published in 2002. In 2004, process guidance for obtaining Federal credentials was published. Havinga noted that before 2013, there were 2,000 credentialed EPA inspectors (across all media), and now there are about 1,400. The decrease is primarily from credentials being dropped by those not needing</p>				

them. There are about 600 state and 200 contractors with EPA credentials. Based on an earlier Inspector General report that noted refresher training was not being done, new training requirements were published in 2014. Under these requirements everyone must have basic, health and safety, and program specific training. The specific training requirement is broken into "initial" and "continuing education" training done annually. Eight hours of health and safety is required annually for FIFRA specific training. The re-credentialing process for EPA inspectors has recently been changed from a term of three (3) to five (5) years. States are still on 3 year, but Havinga foresees a change to 5 years. EPA will begin background checks on contractors (partly based on the Navy Yard shootings in D.C. by a contractor). States and Tribes may have to grapple with this issue. One major problem will be the cost of background checks. Havinga referenced the use of on-line training availability but admitted difficulties with access. Inspector WIKI took 1 ½ years to get approval to develop.

Havinga reported the State/Tribal training guidance will be revised but he felt there is flexibility built in to the current guidance with references to ride-along and on-the-job training options. The big issue is in reference to EPA procedures and SLAs will need to work through these with their Region Offices. He suggested discussing the use of existing state provided health and safety training with the Region. In the next few years EPA will have a new Talent Management System ("TMS") platform for training. Initially it will be a records management system but should eventually be a training delivery system. EPA inspectors will soon use the system for their records.

Nichols went through the WIKI Inspector credentialing process with a new inspector beginning October 1<sup>st</sup>. As they progressed through the on-line process, Nichols recorded simple instructions along with a screen shot. Nichols offered to create a package and share with SFIREG at a later date. Access (obtaining a password) took about 48 hours. Nichols walked through the on-line process. AR does not have written guidelines for taking the refresher training.

Moses took the refresher training – it took 13 steps to get the process started. He has only completed 2 modules to date. The process is very complicated and both NETI and WIKI sites have to be accessed. He hopes the TMS will simplify the process. Moses felt that state safety training should be accepted by the Regions.

Gray felt the time commitment was one problem and asked if the on-line training was any quicker than face-to-face training. Havinga stated the training time is the same – 3 days – for either. Gray referenced the ride-along option – would credit be given for inspections already completed? Lopez stated Region 8 has not given any clear answer. Havinga stated "experienced" inspectors are defined in the FIFRA training guidance as having 2-5 years' experience in FIFRA or 25 documented inspections. He suggested having a conversation with the Region if the inspector meets this criteria. Gray asked for consistency among the Regions. Havinga acknowledged the state/tribal guidance needs to be more explicit.

Jones asked if there was any way to get a document confirming completion of the training module. NC is doing screen shots of the last page. Havinga stated he will check into this – it's a technology issue. Adobe Connect is being used for training. Skill Board is the platform for the Health & Safety.

Lopez asked, what is the "business need" for states to have a Federal credential? He added, the process is becoming more and more expensive. Havinga replied, the business need is for states conducting Federal inspections (PEIs, market, imports).

#### CONCLUSIONS

SLAs and Tribes should pay attention to the training guidance revisions as the process unfolds over the next year or so.

#### ACTION ITEMS

#### PERSON RESPONSIBLE

#### DEADLINE

Issue of Regional Consistency on Federal Credentialing/ Training Guidance – Drake and Gray to raise issue at NPM meeting

Gray, Drake

Revision to State/Tribal FIFRA training guidance to clarify flexibility

Havinga

### ADJUSTING PESTICIDE INSPECTION TIME ALLOCATIONS

JIM GRAY, CHAIR; DAVE SCOTT, IN; AL HAVINGA, OECA

#### DISCUSSION

Scott raised this issue at the September joint meeting of POM/EQI. Due to the increased complexity of inspections, Scott submitted comments on the draft Grant Guidance, recommending an increase the time allotments for inspections. Gray

noted the inspection time allotments were meant to be negotiable. He asked for feedback from pre-SFIREG meetings. Nichols felt a percentage completed in x days would be more accurate. Bishop reported that Region 3 states (with one exception) felt the current hours assigned were too low. Bailey stated Region 7 states were never given the opportunity to negotiate. Gray noted the hour allotments are locked in the grant template. Reed stated he was in favor of a change and felt there should be agreement on Regional or National numbers. Comstock stated Region 1 states were not aware of their ability to negotiate. Moses stated Region 9 states have negotiated with the Region. Jones commented that NC is doing "total program" reporting on the 5700 form (state and Federal outputs). The problem with this approach – the 5700 report does not account for all of the state activities (e.g., state regulatory requirements above and beyond FIFRA). Bogner noted that not all Regions are including lab analysis times. Havinga asked if travel times, case preparation should be separated out. Zimmerman noted the grant template numbers can be deleted out.

Scott emphasized the need for more accurate time allotments on the basis that state resources and priorities will be better served during any negotiations with the Regions.

#### CONCLUSIONS

A new SLA survey is needed.

#### ACTION ITEMS

#### PERSON RESPONSIBLE

#### DEADLINE

Survey Monkey survey of states to get a better compilation of inspection hours estimates from states. Labs will also need to be contacted.

Comstock, Jones, Havinga

OECA to work through the numbers with states and Regions

Havinga

### PESTICIDE INSPECTION IN STATES BY EPA INSPECTORS

DON LOTT, OECA; KIMBERLY BINGHAM, REGION 4; ANTHONY LAMANNO, NY DEC

#### DISCUSSION

[Attachment 32 – EPA Inspections](#)

At the June SFIREG, Lamanno raised the issue of EPA inspectors conducting inspections in NY without being accompanied by NY inspectors. The issue was never resolved with Region 2. They are currently reviewing their options. Lamanno was looking for further insight on why the Region did not want NY inspectors to accompany them on use inspections – in contradiction of state primacy.

Lott noted there was a push from OPP for more WPS inspections. He felt that over time the concept of primacy has changed in the Regions and the Project Officer training will include a strong component on its meaning. Bingham discussed the EPA – State partnership objectives and the need for good communications. In general, EPA Regions should provide 24-48 hour advanced notice to the SLA of planned FIFRA inspections (import inspections are the exception). Lott explained that the FIFRA section on primacy is only for pesticide use or misuse inspections. He elaborated on how primacy is accorded to the state and the criteria necessary (adequate state laws and regulations).

John Gorman, Region 2, felt there was a big misunderstanding between his office and NY. The Regional Administrator wanted to do more WPS inspection, NY replied they could do no more, so a letter was sent asking for NY approval for EPA inspectors to conduct the inspections. He felt this was a sharing of work. NY responded they did not want EPA doing the inspections and they did not proceed any further.

#### CONCLUSIONS

#### ACTION ITEMS

#### PERSON RESPONSIBLE

#### DEADLINE

<b>UPDATE ON WPS AND CERTIFICATION RULE CHANGES</b>		MATT LOPEZ, CO; ANTHONY LAMMANO, NY DEC; KEVIN KEANEY, OPP	
<b>DISCUSSION</b>	<a href="#">Attachment 33 – WPS presentation</a>		
<p>Lopez commented that Richard Pont, EPA, had provided Region 7 states with an update on the WPS rule. He asked Keaney to provide a timeline for when implementation would occur – for planning purposes. Lamanno also expressed concern with having adequate outreach time. Keaney discussed the WPS rule process. Thousands of comments were received. These were divided into 50 major categories. Some comments resulted in modifications to the proposed rule. Keaney provided SFIREG with an “Implementation Plan and Schedule” (see Attachment 33), which included time for outreach to states, Regions, trainers, ag producers, etc. He felt by the time of full implementation, all stakeholders would have the tools and information necessary. The Rule is expected to be published as final in the summer 2015.</p> <p>The Applicator Certification &amp; Training Rule is awaiting final comments from USDA and Congress. OMB will also review and Keaney expects the proposed Rule to be published in the summer 2015. The Administration is committed to moving both Rules forward.</p> <p>Lopez asked if any compliance assistance funding would be available. Keaney replied there would be \$1.5 million set aside to help support SLAs. Gray commented SLAs need outreach and other compliance assistance tools available as soon as possible. Once published as a final Rule, Keaney replied the tools would be made available.</p> <p>Gray asked Drake to advise how AAPCO and SFIREG will work together to comment upon the C &amp; T Rule.</p>			
<b>CONCLUSIONS</b>			
<b>ACTION ITEMS</b>	<b>PERSON RESPONSIBLE</b>	<b>DEADLINE</b>	
<b>UPDATE ON ENLIST DUO REGISTRATION AND LABELING</b>		JIM GRAY, CHAIR; DAN KENNY, AND KAY MONTAGUE, RD, EPA	
<b>DISCUSSION</b>	<a href="#">Attachment 34 – Enlist – Duo ppt</a>		
<p>Montague provided background information on the 2,4-D choline/glyphosate herbicide for use on “Enlist” corn and soybeans. Enlist Duo was registered by EPA on October 15, 2014. EPA provided a Technical Briefing for the public in conjunction with their registration decision. The briefing and supporting documents are available at: <a href="http://www2.epa.gov/ingredients-used-pesticide-products/registration-enlist-duo">http://www2.epa.gov/ingredients-used-pesticide-products/registration-enlist-duo</a>. The risk assessments are available in docket EPA-HQ-OPP-2014-0195 at <a href="http://www.regulations.gov">www.regulations.gov</a>. The registration is approved in 6 states (IA, IL, IN, OH, SD and WI). EFED continues to work on ESA for additional states and ten states are currently proposed for addition (AR, KS, LA, MN, MO, MS, NE, OK, TN, and ND). ESA determination for the majority of remaining states is expected by Summer, 2015. Montague provided a list of enforceable label restrictions and label specified resistance management practices. The registration is a time-limited registration. There are stop-points to ensure evaluation and re-working of registration, if necessary. Kenny was confident the product could be managed properly with the label restrictions and fail-safes in place. Comstock asked if a DRT star rating would be applied to this product. Kenny replied the labeling included the DRT. Bailey asked if the laboratory method for analysis of 2,4-D choline salt was provided. The answer was, no – the method is the same as for amine or any other form of 2,4-D. Reed asked if DOW will survey growers annually on their resistance management practices. Kenny replied DOW will call or visit growers and survey them on a number of areas. DOW will report to EPA annually. Gray stated he has discussed with DOW if there could be any means to verify the choline salt was used vs. other formulations. A DOW spokesperson stated they are developing markers - an assay for the choline salt formulation is easy, but a marker for field residues is still being worked on. Dave Scott thanked DOW for addressing some of his concerns with label statements, but questioned how to define the term “low relative humidity.” Kenny noted this registration required a lot of resources and involved some new approaches. He asked SLAs to stay engaged.</p>			

<b>CONCLUSIONS</b>		
<b>ACTION ITEMS</b>	<b>PERSON RESPONSIBLE</b>	<b>DEADLINE</b>
<b>REVIEW OF SMART LABEL PROGRESS AND NEXT STEPS</b>		JIM GRAY, CHAIR; NICOLE ZINN, FEAD, OPP, EPA
<b>DISCUSSION</b>	<a href="#">Attachment 35 – Smart Label Presentation</a>	
<p>Zinn provided background information on the EPA Smart Label initiative. Smart Labels are defined as an electronic system for submission and approval of pesticide labels. The process would include conventional, anti-microbial and biological pesticide label reviews and approvals. The advantages are a streamlined process, more accuracy, consistency, and efficiency. The benefits to SLAs include:</p> <ol style="list-style-type: none"> <li>1. Improved access to master labels and associated data</li> <li>2. Potential to streamline the registration process (benefits to all parties if the same data is used)</li> <li>3. Enforcement (searchable labels and standardized sections so finding label content is easier)</li> </ol> <p>An internal pilot project was completed in 2014 and the EPA found the initial model incorporated too many variables to support a specific application rate. They also found the level of detail needed to be reduced and concluded a user guide would need to be developed prior to the release of an external pilot. Currently EPA is developing an xml standard for submission of electronic labels. An external pilot meeting was held December 4<sup>th</sup>. Nine companies have volunteered to participate. All materials throughout the process will be available on an EPA webpage. EPA will collect feedback on the data elements and labeling sections and will measure the ease of working with the model. The data model, style sheet view, and user guide being used in the pilot are posted at <a href="http://www2.epa.gov/pesticide-registration/pesticide-smartlabel-pilot">http://www2.epa.gov/pesticide-registration/pesticide-smartlabel-pilot</a>.</p> <p>Zinn illustrated examples of data elements and described the forms of input that can be used. State input was solicited, and she asked for initial comments by January 23<sup>rd</sup>. Examples of desired SLA feedback would be:</p> <ol style="list-style-type: none"> <li>1. How can states use the Smart Label data?</li> <li>2. How can EPA best determine and meet state needs?</li> <li>3. Any sections or data elements still needed?</li> <li>4. Which sections are most important to states?</li> <li>5. How can EPA remain engaged with states throughout the process to develop the Smart Label?</li> </ol> <p>Comstock asked if any Regulator-in-Residence participants were involved in the initiative. Liza Fleeson stated she had sat in on the Smart Label meeting last week. Comstock felt SFIREG comments could be funneled through Fleeson or the other R-in-R participants. Zinn noted that comments could be sent directly to the Smart Label email: <a href="mailto:Smartlabel@epa.gov">Smartlabel@epa.gov</a></p> <p>Gray suggested the best way to get SLA feedback would be send the website link with a message directed to the AAPCO email distribution list. Scott suggested formation of a workgroup of SLA registration specialists to review and comment. Gray agreed to discuss this with POM Chair, Giguere and Bonnie Rabe.</p>		
<b>CONCLUSIONS</b>		
<b>ACTION ITEMS</b>	<b>PERSON RESPONSIBLE</b>	<b>DEADLINE</b>

Discuss formation of a POM workgroup of SLA registration specialists to review and provide input on the Smart Label initiative	Gray, Rabe, Giguere	

<b>WRAP-UP AND ACTION ITEMS</b>		JIM GRAY, CHAIR
<b>DISCUSSION</b>	<b><u>NEXT MEETING OF FULL SFIREG – JUNE 8-9, 2015</u></b>	
	<ol style="list-style-type: none"> <li>1. SFIREG volunteers needed to assist EPA Spanish Labeling Workgroup (Liza Fleeson, VA, and Antonio Escobar, MI, volunteered to date).</li> <li>2. DfE Legal Opinion and Survey of States to be sent via email to AAPCO SLA contacts – Dave Scott, Jeff Rogers</li> <li>3. MP<sup>3</sup> comments from SLAs will be collected by SFIREG reps and forwarded to Jim Gray</li> <li>4. MP<sup>3</sup> Powerpoint presentations to be posted to AAPCO web page (under "Documents") - Stayton</li> <li>5. MP<sup>3</sup> Webinars will be held January 2015 on the subject of the SFIREG Guidance document. Gray, Stayton</li> <li>6. Echeverria will provide Gray with a firmer date on the release of the EPA Policy document - Echeverria</li> <li>7. States asked to work with their Tribal partners regarding MP<sup>3</sup>.</li> <li>8. Issue of Regional Consistency on Federal Credentialing/ Training Guidance – Drake and Gray to raise issue at NPM meeting</li> <li>9. Revision to State/Tribal FIFRA training guidance to clarify flexibility – Al Havinga</li> <li>10. Survey Monkey survey of states to get a better compilation of inspection hour estimates from states. Labs will also need to be contacted - Comstock, Jones, Havinga/ OECA to work through the numbers with states and Regions – Havinga</li> <li>11. Discuss formation of a POM workgroup of SLA registration specialists to review and provide input on the SmartLabel initiative- Gray, Rabe, Giguere</li> <li>12. Gray to schedule conference call with Regional reps 2 months before June SFIREG.</li> </ol>	

**Meeting adjourned 12/9/2014, at 11:30 A.M.**