Compliance and Enforcement Update

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What Influences EPA Pesticide Priorities?
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- **Statute** (FIFRA, FFDCA, ESA, CWA...)
- **Science/Risk**
  - Try to address the greatest risk concerns
- **EPA Strategic Plan**
- **Court Directives** (e.g., ESA, NPDES Pesticide Permits)
- **Political**
  - Administrator or Assistant Administrator Priorities
  - Presidential & Congressional interest
- **Budget** (e.g., earmarks, resource availability)
- **Incident and compliance history data**
- **States and Tribes** (NASDA, AAPCO, SFIREG, ASPCRO, TPPC, NTOC...)
- **OPP and OECA Management**
- **EPA Regions**
- **Other Stakeholders**
  - PPDC, fed agencies, NGOs, CLA, growers
Using Data and Information.....

- New data and information management technologies present challenges and give opportunities

- Key questions:
  - What are the future program challenges?
  - How do we manage/improve program?
  - Can we tell our story?
  - What are the opportunities?
Potential Automation of Form 5700 Collection

Current Approach

- Fillable Form
  - Manual Submission
  - Manual Load

Excel Spreadsheet

- Automated Submission
- Automated Load

Database or Data Mart

Potential Automation Approach

- FIFRA Dashboard
Performance Measures

- In 2015 finalize Compliance & Enforcement Performance Measures
  - Measures represent improvement over the PART
  - Measure link to FIFRA goals to answer:
    - How well we protect the health of people?
    - How well we protect natural resources?
    - What we are doing to ensure availability of effective pesticides?
  - Future: use measures data to tell a story -- dashboard
FIFRA Dashboard (Concept Phase)
Presents FIFRA Producer Establishment, Inspection, Violation and Penalty Information On ECHO
Objective: Identify production and reporting anomalies that pose the greatest health risk.

Data Sources:
SSTS — Section Seven Tracking System
PPLS — Pesticide Product Label System
PPIS — Pesticide Product Information System
TRI — Toxic Release Inventory
ICIS — Integrated Compliance Information System
FRS — Facility Registry System

Problem: Limited number of inspections require a method to determine high-risk establishments for inspection.

Outcome: Target and prioritize high risk facilities producing pesticides that have been cancelled but report production, and to support cross-media inspections, target producers with highest toxicity that report production but lack permits.
Advancing Field and IT Technology

- **Label Matching Technology (E-Enterprise)**
  - Use label matching technology to conduct field label reviews
  - More effective and efficient label reviews

- **Mobile Business Solutions for Field Inspectors**
  - Field tablets to link targeting, inspections, & enforcement activities
2015 …..

- Completed ...
  - Project Officer Training
    - March 3 – 5
    - Focused on co-regulator relationships
    - Roles of Project Officer and Technical Contacts
    - Evaluating performance and primacy
    - Using the Cooperative Agreement Guidance
  - 25b Advisory Letter Template
    - Compliance assistance letter issued January 29
    - Assistance for alleged noncompliance with the 25b minimum risk exemption
Later in 2015 ......

- EPA 16 - 17 National Program Managers Guidance
  - EPA will issue new national guidance in April, 2015
  - State & tribe and grant oversight will be a key issue
  - Agency compliance and enforcement focus areas:
    - ✓ Product integrity
    - ✓ Border compliance
    - ✓ Worker protection
Later in 2015 ......

- Compliance Monitoring Strategy
  - Provides a multi year framework and guidance with goals for FIFRA monitoring
  - Promotes national consistency
  - Provides a strategic approach to focus on the greatest risks to human health and the environment
  - Actual annual commitments negotiated as part of the cooperative agreement process
  - EPA currently reviewing and addressing state/tribal comments
  - Finalize in spring of 2015
Questions or Comments?