**ESA SME Liaison to EPA OPP Report for April/May 2021**

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**Meeting with EPA OPP**

On April 16, 2021, Erin Cadwalader and I met with EPA OPP staff members Kelly Tindall, Monisha Kaul, and Murphey Coy. Murphey Coy is the new OPP liaison to the ESA SME liaison who is taking over from Kelly Tindall. We discussed more detail about the kind of webinar subject matter regarding pet flea control products that OPP is interested in learning about and their target audience. EPA was seeking expertise to present in a webinar for purposes of training their in-house staff. They seem to want to develop a closer working relationship with the presenter for training needs and information exchange. I had reached out to Maureen Hinkle at the Univ of GA in early April before I knew specifically what the objectives of the webinar were. Maureen was not interested at first, but then I reached out to her again with more accurate objectives of the webinar and she decided to agree to work with OPP to develop the webinar. I also informed OPP prior to Maureen accepting the webinar invitation that another possible entomologist, Michael Rust at the Univ of CA Riverside, had several recent publications about cat flea management. Following discussions about the "pet pest management" webinar, further discussion ensued regarding a webinar series for the benefit of ESA members to hear from OPP staff about how they do their risk assessments.

**EPA Announcements (April/May 2021) of Possible Interest to ESA Members**

- **EPA Launches New Electronic Confidential Statement of Formula Application**

EPA is launching an electronic Confidential Statement of Formula application (eCSF builder) to support pesticide registration applications. To register a new pesticide product with EPA, companies must submit a Confidential Statement of Formula (CSF) application. The form lists all the product's components and their percent by weight along with various additional information. Currently, CSF applications must be submitted to EPA in hard copy. The new eCSF builder will automatically validate certain data in a CSF application prior to submission to EPA. This functionality, along with real-time validation of chemical ingredients through EPA's Substance Registry Service, will make the pesticide registration process more efficient, saving EPA and registrants time and resources. Users can access the eCSF builder and provide feedback through the Central Data Exchange.

Relevance to ESA members: Many institutions are developing biopesticide active ingredients. However, commercialization of these products and use in the field depends on integration with formulation chemistry for both delivery of product to sites of application as well as improved handling and dispensing properties. This new electronic supporting system of putative "inert ingredients" (or EPA's preference term, "other ingredients") might speed approval of the ingredients that go into formulations.
https://www.epa.gov/pesticides/epa-launches-new-electronic-confidential-statement-formula-application

- **EPA Extends Respiratory Protection Flexibilities for Agricultural Pesticide Handlers During COVID-19**

In June 2020, EPA issued temporary guidance regarding respiratory protection requirements for agricultural pesticide handlers that offers flexibility during the COVID-19 public health emergency. Due to the continued concerns regarding personal protective equipment shortages in the agricultural sector, EPA is extending the "annual fit test delay" to September 30, 2021 as part of the previously issued guidance on respiratory protection requirements for agricultural pesticide handlers. This revision is in alignment with Occupational Safety and Health Administration memos on respirators and addresses Agricultural Worker

Protection Standard (WPS) requirements under the Federal Insecticide, Fungicide, and Rodenticide Act.

The remainder of the June 2020 guidance remains in effect. The following link is to EPA's amended statement and includes provisions of the "fit test delay" option. Basically, it allows fit testing done in 2019 or 2020 to suffice for meeting the Worker Protection Standard if certain conditions are met.
URL: https://www.epa.gov/enforcement/amended-statement-regarding-respiratory-protection-shortages-and-reduced-availability

- **EPA Webinar about the Experimental Use Permit for the Oxitec Genetically Engineered *Aedes aegypti* mosquitoes**

EPA released information on April 30th about a May 5th webinar for the public about the approval of an experimental use permit to allow Oxitec Ltd to field test genetically engeineerd Aedes aegyptic mosquitoes for population management.
EPA's documents (EUP, risk assessment) related to the Oxitec mosquito release can be accessed at URL https://www.regulations.gov/search?filter=EPA-HQ-OPP-2019-0274

- **Meeting of the EPA PPDC (Pesticide Program Dialogue Committee)**

The Pesticide Program Dialogue Committee, a broadly representative federal advisory committee, meets with EPA on a regular basis to discuss pesticide regulatory, policy, and program implementation issues. The present biannual meeting was scheduled for May 12/13. The Committee represents a broad spectrum of stakeholders including state regulators, industry, professional science organizations, universities, and USDA scientists. The purpose of the Committee is to provide feedback to EPA on various pesticide regulatory, policy, and program implementation issues. Presently there are four working groups who are reporting about their activities at today's meeting. The working groups include Emerging Agriculture Technologies; Emerging Pathogens Workgroup; Farmworker and Clinicians; and Resistance Management. The Emerging Ag Technologies workgroup seems focused on drone or automatic vehicles spraying and questions of whether changes in risk assessments is possible with more precise applications, reduced rates, spot treatments. No documentation of activies of the Resistance Management workgroup are available.
URL for the PPDC: https://www.epa.gov/pesticide-advisory-committees-and-regulatory-partners/pesticide-program-dialogue-committee-ppdc

- **EPA Opens Comment Period on Draft Biological Opinion on Malathion**

In January 2017, EPA released the biological evaluation for malathion, which found potential effects on threatened and endangered species and their designated critical habitats. Because the biological evaluation for malathion made "likely to adversely affect" determinations to some threatened and endangered species and their designated critical habitats, EPA has been consulting with FWS to ensure the registration of malathion is not likely to jeopardize the continued existence of these species or adversely modify their critical habitats.

The U.S. Environmental Protection Agency (EPA) is seeking public comment on the U.S. Fish and Wildlife Service's (FWS) draft biological opinion for the registration of malathion. EPA encourages input on the RPAs and potential RPMs from pesticide users, registrants, public interest organizations, other interested parties, and state, tribal, and local governments. EPA will provide the comments to FWS for their consideration before they finalize the biological opinion. The public comment period will be open for 60 days and will close on June 19, 2021. The draft biological opinion is included in docket EPA-HQ-OPP-2021-0231 at www.regulations.gov.
Link to the BiOP (Biological Opinion) re malathion: https://www.epa.gov/endangered-species/biological-opinions-available-public-comment

Link to the docket memorandum with instructions for submitting comments: https://www.regulations.gov/search?filter=EPA-HQ-OPP-2021-0231