OPP General Notes – February 19, 2019

1. **PRIA** – PRIA3 expired on February 15th, and Rick confirmed that a statement was sent to the Press Office and also posted on OPP's PRIA webpage. Alex asked for a comparison of PRIA3 and PRIA4, with high level improvements that are beneficial to EPA and stakeholders as well as impacts on growers if PRIA4 is not passed. Alex and Tate would like to use this information to engage with Congress on PRIA 4 passage. Following the General, Steve Schaible sent the requested information to the OCSPP-IO.

2. **Follow-up to Chestnut Briefing** – The American Chestnut Foundation (ACF) reached out to BPPD last year to describe the OxO Chestnut and request a determination on whether it contains a PIP, and thus is considered a pesticide. OPP subsequently determined that OxO Chestnut contains a PIP, and now ACF would like OPP to reconsider its determination. Alex indicated that she was close to being ready to make a decision. Erik wanted to first reach out to OGC's senior management for counsel. Nancy would like a timeline and background on the level of effort to develop and finalize a rule to exempt the OxO Chestnut from the FIFRA registration requirements. Subsequent to the briefing, BPPD provided a draft timeline to the OCSPP-IO.

3. **Schedules for Biotech Rules (PIPs and Genome Editing)** – Rick said he has the high-level milestones for the two biotech rules but has asked the team to develop the milestones for inclusion in the ADP Tracker. Nancy would like steps for internal milestones for both rules. Subsequent to the briefing, BPPD provided a draft timeline to the OCSPP-IO (see #2 above).

4. **Devices Follow-up** – There was discussion on the need for the Program to make a decision on whether the Synexis-like products are a device or a pesticide. Options discussed included issuing a FRN to seek comment on a proposed decision tree for helping to determine whether a product is a pesticide or a device. The OCSPP IO seemed to indicate that this is a possible step.

5. **EWG Petition on Glyphosate** – Rick informed the OCSPP-IO that the Environmental Working Group (EWG) submitted a petition requesting modification of tolerances for residues of glyphosate in or on oats. For petitions that meet the Agency's requirements, EPA must publish a Notice of Filing within 30 days of making that determination. OPP has been consulting with OGC to determine if it meets Agency requirements for a petition seeking to modify tolerances. The DAAs requested additional information and gave the clearance to start the process to seek public comment on the petition through an FRN. Following the General, Rick sent to the OCSPP-IO a briefing paper and email from OGC on the issue.

6. **Comments on LRM Respirator Changes** – Nancy recently asked to see the comments that OPP received on the respirator descriptions in the Label Review Manual. Nancy reviewed the comments and thought they were technical, but good. OPP will develop a timeline for finalizing the new respirator language for inclusion in the Label Review Manual.

7. **Chlorpyrifos** – After reviewing the requested timetable on milestones, the DAAs would like to schedule a meeting to better understand the comments received on the proposed rule and the data. Subsequent to the OPP General, the OCSPP-IO scheduled a discussion for February 27th.

Waiting for OCSPP IO Feedback:

- Pollinator Presentation for Administrator – sent revised slides 2/21 based on feedback from Alex
- Follow-up to Atrazine Eco Risk Assessment Briefing
- Feedback on Response to Nanocopper petition (sent 12/21)
- Paraquat Follow-up Questions (Sent 2/10); Follow-up discussion scheduled for Feb. 28th.
- CDA Copper Clinical Studies (Sent 2/11)
- Comments on PREP RFA (Sent 2/3)
- Feedback on OPP changes to the NPM Guidance (Sent 2/8; revised sent 2/22)
- Trilateral Meeting Travel Justification (Sent 2/11)
- Decision on Chestnut Status (Follow-up to 2/12 briefing)
- Device Determination (Follow-up to 2/12 briefing)
- Chlorpyriphos Timeline – (sent 2/19)
- Slide decks for OPP Overview, Pesticide 101, Registration Review 101, Registration 101(sent 2/14)

- Animal Alternatives Briefing – (resent 2/22) Addressing comments received from OCSPP-IO
- Wolbachia Experimental Use Permit - draft rejection letter (sent 2/22)
- Response to the OIG on the WPS evaluation
- Text for inclusion in the updated IRIS handbook

OPP to send to IO

- List of what OPP has put out for public comment in the last 5 years and what is the priority and schedule for responding and finalizing
- Chlorpyrifos: Comments on Meeting Summaries
- Periodic Nootkatone Updates
- Strategy for Kaolin Clay Products
- Timetable for finalizing PR 98-10
- Nanosilver registration timeline

Upcoming Briefings/Separate Meetings for the OCSPP-IO

Priority briefings:

- Animal Alternatives (schedule request sent to IO 2/22)
- Pollinator Briefing for Administrator (schedule request sent to IO 2/6)
- PPDC Overview and Policy Issues (scheduled for 3/1)
- Chlorpyrifos (scheduled for 2/27)

Other Briefings:

- CDA Copper Clinical Studies (ready to be scheduled)
- Notice of Intent (NOI) (scheduled for 2/27)
- Organism-to-Disease Efficacy (schedule request sent to IO 2/7)
- Structural Fumigants (schedule request sent to IO 2/6))
- Grants Overview Meeting (schedule request sent to IO 2/11)
- Relativity Training (FOIA)
- Synergy
- New FY-19 PRIA Measures follow-up (Charlotte asked for 30 min)
- Petitions Briefing
- Spray Drift Policy Update
- Determination of Uncertainty and Extrapolation Factors when using Irritation as a Point of Departure for Irritant and Corrosive Antimicrobial Pesticide Chemicals

- All Hands Meeting for Alex Dunn (OPP sent the IO potential dates 2/19)
- Farm Bill – Hemp
- Inert Ingredient Disclosure
- Overall Guidance Documents and Rules Briefing Schedule
- Animal Alternatives for Acting Administrator\
- FIFRA Fees Briefing