PPDC Incidents Workgroup

Minutes

May 2, 2017

Workgroup Attendees: Steve Bennett (CSPA), Michele Colopy (Pollinator Stewardship Council), Walter Alarcon (CDC), Virginia Ruiz (Farmworker Justice), Cynthia Palmer (American Bird Conservancy), Monty Dixon (Syngenta Crop Products), Gary Wilkinson (Scotts), Will Heeb (Bayer HealthCare), Cheryl Cleveland (BASF Corp.), Amy Hallman (NPIC), Elliot Gordon (ADAMA) and Margaret Jones (EPA Reg.5)

OPP Participants: Jackie Mosby, Melissa Panger, Richard Dumas, Bob Miller and Shanna Recore

EPA Facilitator: Kimberly Green-Goldsborough

Richard Dumas (RD) started the meeting with a thank you to the workgroup members for their feedback on the data elements. Kimberly Green-Goldsborough (KGG) provided an overview of what was to be discussed in the meeting and set guidelines for the discussion (*i.e.*, EPA is looking for feedback and opinions, not an agreement). KGG then asked if there were any questions. There was one request for clarification on whether or not the last communication to the workgroup was a year ago. RD provided the clarification that the workgroup had last met in Oct. 2016 to discuss the questions on the current agenda, however, that meeting turned into more of a process meeting. This is a follow-up to that meeting. KGG then opened the discussion and started going through the questions on the agenda.

- Advice on Data Elements:
    - Any further advice on elements to add or remove?
        - General elements (not unique to type of incident):
            - Workgroup (WG) member said that they struggle with answering this question without understanding the context (e.g., how the data would be collected).
            - RD said that we are looking specifically for feedback on the elements; we will take the concern into consideration.
            - WG member asked if the GPS coordinates had been removed from the list (they have not), because in their experience, people will rarely have that information and if they do they may not be willing to report it.
            - WG member had a similar comment regarding a species scientific name; folks reporting the incident may not know that information.
            - WG member asked why we include the Canadian registration number; Melissa Panger (MP) responded that we regularly share incident data with Canada (PMRA) and RD added that the number can help with identifying duplicate incidents.
        - Human Health:
            - WG member said that although it is important information, checking the pregnancy status of someone involved in an incident may be a privacy issue.
        - Fish and Wildlife:

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        - WG member said that the endangered species status of animals can change over time.
    - Domestic Animal:
        - WG member asked if there would be definitions for acute vs chronic effects.
        - Another WG member added they were glad to see that pre-existing conditions are included in the elements.
        - WG member asked if there would be definitions around the elements related to medical care and asked if these would be things provided by an owner or a professional (veterinarian).
    - Insect Pollinator:
        - WG member suggested that the definition under 'subspecies' be broadened if we are interested in other insect pollinators beyond bees (currently limited to bees).
    - Any other comments?
        - WG member provided an overall comment and suggested that it would be convenient to have dropdowns which would allow someone to determine if a question was asked (e.g., yes/no/unknown); also free text is difficult to deal with in databases.
        - WG member suggested that there be some indication if a particular field was automatically 'backfilled' or entered manually.

- Advice on amount of data to acquire
    1. Should we strive to get all data elements for every incident?
        - Nobody answered 'yes' to this question.
    2. What are the circumstances where we would strive to get all the elements?
        - WG member suggested that if a chemical was going through an action and it would be useful for an EPA decision, that all of the elements should be requested.
        - WG member said that all of the elements should be strived for when an incident is involved in an investigation by a state lead agency; if getting the information from another entity, they may not have all of the information.
        - WG member said that for human incidents, it would be nice to have all of the data elements, but it may depend on the severity; suggested basing the amount of information on a ranking of the severity.
        - Another WG member suggested there may be constraints related to HIPA laws; this may create obstacles for collecting some data.
            - RD said it is something we are aware of and will need to consider.
        - WG member said that their company has a list of 12 standard questions they go through when they receive an incident report; callers often don't want to spend a lot of time of the phone. Trying to get all of the data elements may not be possible – it may slow things down too much.
        - WG member suggested that even if all of the data elements are not filled out, information can still be valuable.
        - WG member suggested that if a human visits a physician after exposure to a pesticide, the physician should be required to provide information on all of the data elements.

        - Another WG member said that they would like to see all of the data elements filled out for all of the human incidents.
        - WG member again reiterated that it was difficult to answer these questions without understanding how the data will be collected.
            - KGG clarified that we were currently seeking feedback on the data elements and not how the data would be collected.
            - MP added that 'strive' to get means that there would be an attempt to get the data, not that we would get in every time.
    3. Does that mean that all the other incidents would involve a lesser set of elements? If no, clarify.
        - No comments.
    4. What would be the bare amount of information that would be useful (provide in general categories of elements vs specific elements)?
        - WG member suggested a bare minimum would be what's currently required under 6(a)(2) – name, contact information, product name, and allegation.
        - Another suggested that a bare minimum would be information on how the exposure occurred and the outcome.
        - Another suggested that a minimum a list of symptoms and pesticide functional class be provided.

- KGG asked if there was any other feedback on the 4 questions or any other issues
    - WG member said they were struggling a bit because we were talking about theoreticals; most wildlife incidents go unreported – any information is better than nothing.
    - WG member asked about the outcome of the project; wanted to know what the final project would be; was concerned about the potential of having to enter data in twice (into an internal system and to EPA's system).

- Advice on Database/System
    - What database/systems might be useful for OPP to know about prior to commencing the IT portion of the effort?
        - WG member said that for animal health, the standard system is PV Works (allows for the transfer of data via XML files – do it currently with FDA databases).
        - NPIC has an internal database they are happy to discuss with OPP.

- KGG asked if there were any other comments (have gone through all of the agenda items)
    - WG member asked what was going to be reported out at the full PPDC meeting (May 3).
    - Jackie Mosby (JM) responded that there would be a brief report-out of the activities of the workgroup.
    - WG member asked if the May 3rd PPDC meeting was open to the public. Reply: Yes.
    - One WG member said that they thought the WG was valuable for looking at voluntary reporting and added that they hope that EPA would next consider FIFRA 6(a)(2) requirements, specifically the current wildlife thresholds.

- JM thanked the workgroup for their valuable feedback; all of the feedback would be taken into consideration as the EPA moves forward; for the current charge, the WG met our desired goals of providing input on the proposed data elements.