Transcript of Meeting
of the Committee to Advise on Reassessment and Transition
Background Briefing Session

June 22 & 23, 2000

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A T T E N D E E S

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Name	Organization
Richard Rominger	Deputy Secretary, USDA
Michael McCabe	Acting Deputy Administrator, EPA
Jim Aidala	EPA
Keith Pitts	USDA
Terry Troxell	Director, Office of Plants and Dairy Foods and Beverages, FDA
Steve Balling	Director of Ag Services, Del Monte Foods
Tanya Bobo	Makhteshim-Aghan of North America, Inc.
Paul Helliker	Director, California Department of Pesticide Regulation
Jean-Mari Peltier	President, California Citrus Quality Council
Steve Rutz	Florida Department of Agriculture and Consumer Services

Adam Goldberg	Policy Analyst, Consumers Union

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MEMBERS OF CARAT:

Name	Organization
Dave Whitacre	Groups of New Science, Novartis
Patricia Widder	Acting Director, Poison Control Center
Cindy Baker	Gowan Company
Jay Vroom	President, American Crop Protection Association
Dan Botts	Director, Environmental Pest Management Division, Florida Fruit & Vegetable Association Wally
Ewart	Vice President, Northwest Horticulture Council
Margaret Wittenberg	Vice President of Environmental Affairs, Whole Foods Market
Jose Amador	Director, Texas Agriculture Research and Extension Center, Texas A&M University

Robin Spitko	Plant Pathologist, New England Fruit Consultants

A T T E N D E E S (Cont'd)

MEMBERS OF CARAT:

Name	Organization
Bob Hedberg	Director, Science Policy for the Weed Science Society of America
Eldon Ortman	Director, Ag Research Program, Purdue University
George Wichterman	Entomologist with the Lee County Mosquito Control District in Ft. Meyers, Florida
Lori Berger	California Minor Crops Council
Bob Rosenberg	Director of Government Affairs for the National Pest Management Association
Erik Olson	National Resources Defense Council

OTHERS PRESENT:

Al Jennings	Director of Office of Pest Management Policy, USDA

A T T E N D E E S (Cont'd)

OTHERS PRESENT:

Name	Organization
Marcia Mulkey	Director of the Office of Pesticide Programs, EPA
Steve Johnson	Deputy Assistant Administrator for Prevention of Pesticides and Toxic Substances

DAY ONE

JUNE 22, 2000

P R O C E E D I N G S

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MR. AIDALA: Find your seats. We would like to begin. All right, let's get started. I'm Jim Aidala here from EPA. Let me just -- especially since we've got our two co-chairs here, we might just take some time to obviously introduce them to the committee and hear a few remarks and all of that.

Do you want to go around the room real quick first, or do you just want to take time, Mike and Rich? Do you want to go around the room real quick?

MR. ROMINGER: Why don't we go first and then we'll go around the room.

MR. AIDALA: Go first. Because then we can do that and save you some time, Rich. That will be fine. Anyway we do have -- welcome, first of all, everybody here today. Instead of taking more time listening to me, let's hear from

our co-chairs, Mike McCabe, our Acting Deputy Administrator from EPA, and the Deputy Secretary of USDA, Rich Rominger.

So I'll just turn it over to you, gentlemen.

MR. ROMINGER: Why don't you go first?

MR. MCCABE: You go ahead first.

MR. ROMINGER: I'm first?

MR. MCCABE: You've got the seniority -- the longevity here.

MR. ROMINGER: Okay, thank you. Well, since we are in an EPA facility here, I want to join Mike in welcoming all of you to the first meeting of the Committee to Advise on Reassessment and Transition, CARAT.

We certainly both appreciate your willingness to contribute your time and your guidance to the agency and the department on the important issues in implementing the Food Quality Protection Act.

Many of you are old hands at FQPA implementation. I think we all have a special obligation to help Mike here, because when it comes to working on FQPA, as you know, I've outlasted the two previous EPA Deputy Administrators.

(Laughter.)

But we have fond memories of Fred Hansen and Peter

Robertson. But I like Mike, so let's try to keep him around for a while.

The advisory committees have provided the agency and the department with some excellent input on the implementation of the Food Quality Protection Act. The Food Safety Advisory Committee worked with the agency immediately after the passage of FQPA. And then of course we had the Tolerance Reassessment Advisory Committee or TRAC, and that worked with the agency and the department to help outline the process that would meet the implementation goals given us by the Vice President: sound science, consultation with stakeholders, increased transparency and a reasonable transition for agriculture.

While you share many of the same challenges as the Food Safety Advisory Committee and the TRAC, but what is different for this group is the reality of FQPA implementation. So the challenges are real. Chemical reevaluation is proceeding. Decisions are being implemented. Strategic planning for transition is underway.

So at this point, we're able to see the results of some of the policies and processes that were put in place earlier. So we're asking CARAT now to continue giving us the

feedback and continued direction. We know this committee brings together representatives from many groups or stakeholders in FQPA implementation. So we need contributions from all of you, and perhaps even more important, we need all of you working together.

So thanks for being here today, and we look forward to a lot of productive work.

Mike?

MR. MCCABE: Thank you, Rich. Yes, I am Mike McCabe, the Acting Deputy Administrator. And I'm going to make a bold prediction right now, and that is that I will be the last Deputy Administrator of the Clinton administration at EPA. I know that this face has changed in this position over the last several years. I think it is due to the burnout factor of this position. I was nominated eight months ago and it has been quite an experience.

One thing I share with Marcia Mulkey, who I think many of you know, is that neither of us has moved to Washington to do our job.

(Laughter.)

We both have -- we both maintain our links with reality outside of Washington. We both have apartments in

Washington and return home on the weekend. I think that the perspective that I gain from not only going home on the weekends, but from having worked in a regional office has prepared me well for this position.

And I look forward with working with you. I look forward to the start of CARAT and the work that we're going to do together moving beyond the TRAC process, moving into the kind of advice and response that we can get from this group in helping us implement FQPA.

I want to thank Rich, too, not only for the introduction but for his leadership in this area. I have worked with Rich just a short period of time, but he is extremely well respected, not only within our agency but within Washington. And I have worked on environmental issues with EPA long enough to have seen a time when USDA and EPA did not work well together.

I think that in this administration and in recent years in particular, USDA and EPA have increasingly worked well together. They have tackled difficult issues. They are trying to address some very important issues in the environmental and agricultural arena and are not always in agreement, but have a communications level which is

unparalleled. And I think a lot of it is due to Rich's leadership. So I thank him for his contribution.

Many of you here were involved in the TRAC process, and I want to personally thank you for your hard work there. I want to give you an advance note of appreciation and word of thanks for the hard work that you're going to do in the process now.

I think that we learned a lot from TRAC. We'll learn a lot from CARAT. But I want you to understand, and I think you do, that CARAT is not simply a continuation of TRAC. It is a new committee with a new mission. And tomorrow as a group we'll talk more about what we can accomplish and about some of your perspectives on what you see as what we can accomplish here.

I'm determined to work closely with you to move Vice President Gore's objectives forward through the work of this new committee, and I look forward to it.

Through TRAC we developed a public participation process and created an atmosphere to ensure that our decisions are based on sound science. Those processes -- those policies -- have been in place and thanks to your hard work, they are helping our agencies make better decisions.

I'm pleased to report that EPA and USDA are on schedule to finish the reassessment of the organophosphates by the end of the year. It is an aggressive schedule. It is a schedule that is taxing the resources of both our agencies. And it is a daunting schedule, but one that we are committed to finishing. I am pleased with the cooperation and work that we have put together so far on this, and I see CARAT as enhancing that process.

One of our primary goals of CARAT is to shift our focus to transition and strategic management planning. Over the next two days we'll hear from folks around the country about some interesting transition processes that are currently underway.

And I'm hoping that through CARAT we'll learn from these projects and find new and innovated ways to make safer pest management strategies, including chemical and nonchemical alternatives available to growers, while enhancing the environmental protection for all Americans, especially our children. In doing this, of course, and inherent in this process, is the need to guarantee that farmers have the necessary pest control tools. That is an important objective of both of our agencies.

I'm looking forward to working with you. I believe both Rich and I have pretty full agendas today. In fact, I've got a speech in about 35 minutes. The reason that we wanted to be here this morning really was to kick this off in good spirit and to thank you for your continued contributions to the process. We will both be here all day tomorrow working with you on this.

So good luck today and I look forward to working with you tomorrow.

MR. AIDALA: Well, thanks to, you know, Rich and Mike both for taking time out again with busy schedules. That's why we've done the kind of planning we've done for the next two days. I'll talk about that in a second.

If you've got another minute, I might suggest we just go around the CARAT members to introduce themselves. Obviously we'll do that again tomorrow, but just, you know, a little bit of -- a little more familiarity in the good sense.

So why don't we start with our colleague from EPA?

MR. TROXELL: Terry Troxell, Food and Drug Administration, Center for Food Safety and Applied Nutrition. I'm Director of the Office of Plants and Dairy Foods and Beverages. We're responsible for the pesticide program and

enforcement. We also have done work on the Channels of Trade policy which we'll be talking about later today.

MR. AIDALA: Thank you.

DR. BALLING: Steve Balling, Del Monte Foods, Director of Ag Services.

MS. BOBO: Tanya Bobo, Makhteshim-Aghan of North America, Inc. I'm also a new member of -- (inaudible) -- Distributors Association.

MR. HELLIKER: I'm Paul Helliker, Director of the California Department of Pesticide Regulation.

MS. PELTIER: I'm Jean-Mari Peltier, President of the California Citrus Quality Council.

MR. RUTZ: Steve Rutz with the Florida Department of Agriculture and Consumer Services representing the American Association of Pesticide Control Officials.

MR. GOLDBERG: Adam Goldberg. I'm a policy analyst with Consumers Union.

DR. WHITACRE: Dave Whitacre with Novartis in charge of the Groups of New Science.

MS. WIDDER: Patricia Widder. I'm the Acting Director of the Poison Control Center in Philadelphia. I'm a member of the American -- (inaudible).

MS. BAKER: Cindy Baker with Gowan Company.

MR. VROOM: I'm Jay Vroom, President of the American Crop Protection Association.

MR. BOTTS: Dan Botts, Florida Fruit & Vegetable Association. I'm the Director of the Environmental Pest Management Division. And I apologize in advance. I'm not going to be able to stay tomorrow, because we've got a Board meeting and I've got to back and be accountable to my members of why I spend so much time in Washington.

(Laughter.)

MR. EWART: I'm Wally Ewart, Northwest Horticulture Council. I'm Vice President.

MS. WITTENBERG: I'm Margaret Wittenberg, Whole Foods Market, and I'm Vice President of Environmental and Public Affairs.

DR. AMADOR: I'm Jose Amador from Texas A&M University, Director of the Texas Agriculture Research and Extension Center. It's a -- (inaudible) -- operation for -- (inaudible) -- in the State of Texas.

DR. SPITKO: Robin Spitko, New England Fruit Consultants. I'm an independent plant pathologist in New England, and I'm here representing the National Alliance of

Independent Crop Consultants.

MR. HEDBERG: I'm Rob Hedberg. I'm Director of Science Policy for the Weed Science Society of America.

DR. ORTMAN: Eldon Ortman, Director of the Ag Research Program, Purdue University.

MR. WICHTERMAN: I'm George Wichterman, an entomologist with the Lee County Mosquito Control District in Ft. Meyers, Florida, representing the local government.

DR. BERGER: My name is Lori Berger. I'm Director of Technical -- (inaudible) -- of the California Minor Crops Council. I'm an entomologist by training and a licensed pest control advisor and certified crop advisor.

MR. ROSENBERG: I'm Bob Rosenberg. I'm the Director of Government Affairs for the National Pest Management Association.

MR. OLSON: I'm Erik Olson with the National Resources Defense Council.

MR. AIDALA: Okay. And again, thanks to all the CARAT members. I think we'll move to our agenda in a minute. I don't know if you want to -- is it time for you all to make your exit?

MR. MCCABE: It probably is.

MR. AIDALA: Again, I appreciate very much our co-chairs being here this morning just to even say hello, and obviously we'll be reporting back out what we do today, and then also being in charge and geared up for all day tomorrow.

MR. ROMINGER: We'll see you tomorrow.

MR. AIDALA: Thanks again. Again, we appreciate everybody being here this morning and also members of the public. This is our attempt to do what we call, even on your agenda, the background briefing for the CARAT meetings. Our intention here was to do some of what people reported that the benefit of the TRAC meetings was about when we have a long series of meetings on the TRAC process.

One of the real benefits, especially to people that are outside Washington -- which is something we encourage to have people who are outside Washington be part of the process -- is learning about what we either have done recently, our current thinking, current policies and current status kind of report outs.

And instead of taking a lot of time at our formal FACA session, what we wanted to encourage is to have that opportunity to do that today in a little more informal setting and also one that is just more efficient, because

today will be a day mostly of reporting out on the status of a lot of things. A little background information for those of you, especially the new members to the process -- new members of CARAT that weren't part of TRAC -- as well as just updating those folks who were part of TRAC and anyone else, again, as members of the public.

So we wanted to do that kind of report out information things in one big block today to be able to focus more on sort of issues and dialogue tomorrow among the committee members. So that's the basic thinking of why we split -- how we split the two days up, as well as some scheduling conflicts and all of that. The good news about having our co-chairs is that they are very busy and obviously hard to schedule, so we were able to at least accommodate both of those goals.

The agenda today, again, I think you all have it. If you don't, there are handouts as you come in the room. Basically -- again, we've been through the introductions. We would like to do an update of our science policies, again in a report out sense. You'll notice most of these blocks of time are relatively short ones, talking also about a lot of the activities in terms of USDA Research/Data

Generation/Programs. Obviously our colleagues from USDA will lead that discussion, and that closes out our morning.

Again, mostly that focuses -- most of the morning is only going to be spent with the USDA activities. Then after lunch a lot of the EPA report outs, along with our colleague from FDA on Channels of Trade. But as you can see from the agenda, everything from just a simple budget update, risk assessment overview, Channels of Trade. Again, I know that's an issue to many members and the public.

And also worker protection updates, public health pesticides, human studies. A little bit of update -- a brief update on the Organic Standards Rule, which is of interest to many members here. And then kind of wrapping up.

Again, you can all read the agenda yourself. I'm not going to read it again to you. We'll just try and move through it. As timekeepers, I've got to break -- I think I'm going to go solve the Pacific Islanders' PCB problem sometime in the afternoon. So I'll be breaking away in the middle of this. Keith, I think, is attempting to try to stay all day, too, and obviously we've got lots of other folks here, too.

Why don't we just introduce ourselves up front. We

didn't do that. Obviously we've got some other folks here of some notoriety and importance in the game.

Al, why don't you start?

MR. JENNINGS: I'm Al Jennings. I'm the Director of Office of Pest Management Policy for USDA.

MS. MULKEY: I'm Marcia Mulkey. I'm Director of the Office of Pesticide Programs for EPA.

MR. JOHNSON: Steve Johnson. I'm the Deputy Assistant Administrator for Prevention of Pesticides and Toxic Substances.

MR. AIDALA: And again what I suggest now we do, is Keith will go over the agenda for tomorrow for the CARAT meeting itself. And I want to just get an order of report outs here.

MR. PITTS: I'll definitely be brief. What we are focussing on today is some of the feedback that we got either speaking directly with you as individuals or working with facilitators as far as issues that the group highlighted that we wanted to walk through today just as general background.

What we'll be doing is chewing over some of the discussion that we're having today. The primary target that we want to get out of this meeting on Friday is basically

setting the issues that we are going to tee up for the next several meetings or few meeting, I think, depending on the complexity of the issues that we have to deal with.

But I think we all need to view the next two days as just doing the planning that we need to get done to have a successful two year run of this committee. And I think I'll leave it at that.

So today a couple of issues out on the table. Some briefing on those. Tonight we all need to go back and think about those and any other issues that may be of concern to us. And tomorrow will generally be the agenda setting meeting for the course of the TRAC, realizing that somewhere midstream something may pop up that we have to deal with in this process.

But that's what we intend to do for Friday.

MR. AIDALA: Okay. Instead of listening to us in general, let's talk about some of the specifics from the agenda. I think our first item is science policy update from Bill Jordan.

MR. JORDAN: Good morning, everybody. I'm Bill Jordan and I work in the Office of Pesticide Programs. Along other things, I get to work on the science policies. And

today's update will be using a paper, paper number 2 that Margie Fehrenbach has in the back.

It was not among the materials that were mailed out to you. It became available this morning. So if you did not pick up a copy, signal by raising your hand or something like that and people will make sure you get a copy.

MR. AIDALA: Let me break in. It's hard to hear in the back of the room, so speak up and into the mikes and all, just in general.

MR. JORDAN: Okay. I can do that. For those of you who participated in TRAC, you understand what the science policy exercise is attempting to do. For those of you did not sit through all the TRAC discussions on that, I want to take a minute or two and try to provide a little context about what this particular update addresses.

In the spring and fall of 1998 as EPA was working to implement the Food Quality Protection Act, and particularly the provisions that asked us to do more things and new things in risk assessment, the public raised a lot of questions about, well, how exactly is it that EPA is going to approach the difficult science questions that FQPA raises.

The TRAC discussions led to identifying about nine

different broad science policy areas that were particularly critical to the implementation of FQPA and were cutting edge and were controversial. And what TRAC recommended and what EPA agreed to do was to develop science policy papers that described our approach with regard to these different areas and to issue them to take public comment on them. In October of '98 we identified 19 specific papers that we were going to issue that dealt with the science policy areas.

It set out a very ambitious schedule, a schedule which has changed over the following months, and what you have in front of you is the latest schedule for those 19 papers. You'll notice that the last paper is Number 26. And that's because in the course of our doing the work on the first 19, we received a lot of very valuable comments. We found that the process helped us in a variety of ways.

It helped us to be more specific and clear about our science policies. We found that it was a good way to communicate to people and let them know and understanding what our positions were. We found also that the comments that we got back from the public helped us to improve our science policies to have a stronger foundation and a clearer approach.

All of those things are important and beneficial, and so we decided that in a number of additional cases we wanted to use the process to cover further science policies. So the list has been expanded to 26 papers that we will put through the notice and comment process.

We have made a lot of progress, I think, on this and I'll talk a little bit about it. But I want to first of all give some acknowledgements to the people who have been doing the work. Just so you understand, this effort has involved sciences in the health effects division and in the ecological effects division. It has involved people from the field and external affairs division. It has brought in biologists and economists from the biological and economic analysis division. We've had very useful comments from practically every other division in OPP.

Particularly Jeff Kempner, who has worked with me on overseeing this. He has done a fabulous job. Jeff has now taken a new position in OPP, and his successor is Jean Frain (phonetic). And Jean and I will continue to manage this. But it is an effort that I think has really underscored the notion of teamwork in OPP, and it has I think produced some good results which I'll tell you about.

The paper that is available shows that we have issued for public comment 16 of the 19 original science policy papers. The only three that remain to be issued are papers number 17, 18 and 19. The Cumulative Risk Assessment paper is number 17, and you'll see there it says expected in June of this year. There are by my count eight days left in June, and I think we're going to meet that schedule. The paper is with the Assistant Administrator's office and going through the final magic waving of hands that they do over there that is important and valuable.

MR. AIDALA: I'm glad you added that.

MALE SPEAKER: I thought it was the laying on of hands, not the waving of hands.

(Laughter.)

MR. JORDAN: Well, okay. Laying on of hands, yes, and blessing and raising it up to the sky. That paper is one which builds on two papers that were taken in the Scientific Advisory Panel last year and have been integrated and are now going to be put out in the Federal Register notice that could be issued probably the first week of July. But it should be signed later this week or next.

The other two papers that have not yet -- of the

original 19 that have not yet been issued are both related to the drinking water assessment. They are scheduled for next month, and I think that's pretty likely to happen.

Of the seven papers, we have proposed four and three of them are going to be issued very shortly. They have been signed. They are expected to be published in a notice of their availability expected next week to appear in the Federal Register.

And the paper on use related information and how we use it in our risk assessments is expected also to be revised and issued next month. So we're making progress on that front.

In terms of getting out these papers after they go through the public comment, the public comment process in some cases has produced an enormous volume of comments. I think probably the 10X paper set records. We had over 800 comments. The paper when piled up is about two and a half feet tall. And we have done a huge amount of work in summarizing, reading through every comment and basically trying to boil it down and trying to organize that huge amount of public response.

And similar kinds of work have been done on all of

the other papers that we have revised. We have issued six in revised form, and you will see them in dark shading. There are -- this is one other paper that has been signed and will be published tomorrow. That is called -- that is paper number seven, a user's guide to information on assessing risk through food.

This paper is, I think, not particularly ground breaking in terms of setting science policies, but for those of you who are new to CARAT and are unfamiliar with our risk assessment approaches, it will be a very useful background paper, because it explains in fairly straightforward language how we do it. And more importantly, it provides links to all of the more detailed science policy papers that underlie the specific pieces of it.

For example, links to our paper on acute risk assessment, Monte Carlo techniques, evaluating nondetects, the pesticide data program at USDA and the monitoring program at FDA. A valuable source of information. So look for that one to be announced in the Federal Register. It is our aim to put those papers up on the web site the same day that the Federal Register notice appears.

That paper will bring to a total of seven of the 19

papers. We're expecting July also to be a fairly busy month. There are four more scheduled to come out in July, two of which relate to 10X and one of which relates to Cholinesterase, and another of which relates to Monte Carlo assessment techniques.

The Cholinesterase paper is on track. The schedules for 10X and Monte Carlo are still possible but ambitious, I would say. So we're working literally every day to do drafting, circulate and get comments on those papers, and sometimes it's difficult to predict exactly where the controversies will arise. But we're doing our best to try to get them out in July.

On the extra credit papers, as I like to call them, I mentioned that we are getting out the use related paper next month. Another one that is scheduled to be issued for public comment is paper number 26 relating to drinking water treatment.

Papers 25 and 26 I think are important in that they represent the next generation of our refinement of our thinking about doing drinking water exposure assessments. We have been to the Scientific Advisory Panel to discuss the work that the Geological Survey is doing on modeling, the run

off of pesticides from land application into rivers, streams, lakes and reservoirs. And they have made some really very remarkable progress in developing regression based models that allow us to predict concentrations in surface water over time. With those more sophisticated models, which actually are being validated against monitoring data, and derived from monitoring data that USGS has collected, we think that we'll reach a much more sophisticated and reliable way of estimating pesticide concentrations in water. And those estimates can then be used in our risk assessments to combine with the estimates of residues in food and exposures that may occur from use of pesticides in and around the home.

And so papers number 25 and number 26 will together describe the progress that we're making on those areas. The paper dealing with treatment summarizes the information that we have been collecting from the public literature and working together with our colleagues in the Office of Water to describe the impact that various drinking water treatment processes have on residue levels and identity of particular pesticides.

I think that pretty much summarizes where we have

been and some of the things that you can look for. And I'll stop here and let you ask questions.

MR. AIDALA: A couple of things. First of all, we welcome questions from everybody in the room, number one. Number two, we especially welcome questions, and actually encourage questions, from CARAT members, especially those of you that are new. That's something I should have said earlier. There is no such thing as sort of a dumb question in the land of pesticides.

First of all, to all of you that are new to FIFRA, welcome to FIFRA. It's an enjoyable and entertaining arena to work in. But in particular it is also quite complex and difficult, everything from the acronyms to sort of the history and the sometimes Alice in Wonderland nature of some of what you're about to hear about in the next couple of days.

So, again, don't be bashful whatsoever in terms of raising questions or why -- you know, this seems to have been very important. And since we had seven TRAC meetings or whatever number it was -- it only seems like 12 --

(Laughter.)

MR. AIDALA: You know, why was this such a big deal

and is there something I'm missing here. Just so you can bend better and be able to figure out your context as you go into CARAT. And, again, we really do encourage those kinds of questions and things.

With that, as Bill just said, any questions?

(No response.)

MR. JORDAN: There is no way that all of our 26 science policy papers are straightforward and so understandable that no one has questions.

MR. AIDALA: Dave?

MR. WHITACRE: Bill, it was a good review. Well done.

MR. AIDALA: Do you want to use a microphone? We've got a microphone.

MR. JORDAN: I'll repeat the question, if you want me to.

MR. AIDALA: Yeah, or just repeat it. Either way. Go ahead.

MR. WHITACRE: Bill, it was a good review. Thank you. Well done. The question I've got is formally or even casually, how are you looking at the science policies? Is this regarded to be a work in progress? What are the

prospects that other issues are going to come up that then need to be appropriately addressed through other policies?

I mean, how are you thinking of that and what do you think is going to happen as the months wear on?

MR. JORDAN: I think that's a great question, and let me just talk about a couple of things. The first I want to talk about is the notion that these are policy -- that these are guidance documents. They are not rules.

For example, one of the papers that we issued is paper number 11 called Choosing a Percentile of Acute Dietary Exposure as a Threshold of Regulatory Concern. That's a mouth full of a title. The shorthand term that we use around here is the 99.9 paper.

What that paper describes in about 50 or 60 pages is the thinking that goes into our decision making about making a regulatory decision. It suggests that our starting point is a particular number, but then goes into a discussion of factors that lead us -- that we will look at in deciding whether we want to move away from the choice of that number.

It also says in the paper that these factors are guided very much, and influenced very much, by the individual circumstances of a particular chemical risk assessment.

So these papers are frankly guidance. They represent a sort of more specific description of how we're going to implement critical science challenges. How we're going to respond to critical science challenges that are before us because of FQPA.

But they do not -- do not -- lock us into any particular outcome on any particular chemical. Those will still be made on a chemical by chemical basis. Now what that means, frankly, is that our understanding will be shaped by and our sense of the policy will evolve as we continue to work through individual chemicals.

And because these documents are guidance documents, we have repeatedly stated in the documents themselves and in public meetings such as this, that if people disagree with positions we take, they are welcome to raise those points. They are encouraged to raise those points in the context of individual chemical decisions. And to the extent that we depart from our approaches in individual chemical decisions, we will explain our reasons for departing from them.

In terms of where we go in the future, it's my expectation and my experience from working in the Office of Pesticide Programs over the years that science marches on,

that science changes, and that our understandings and insights into situations over the years move as we gain more information. And so the process of looking at individual chemicals will give us more experience in making these policies. In particular, the conduct of new studies and the development of new research will also give us some better sense.

And I think over the course of the years we're likely to evolve on these science policies. As we do that, we will undertake to revise the policies. I anticipate using the same kind of notice and comment process.

The drinking water papers that I discussed at the end of my remarks -- opening remarks -- are an example of that. We have paper number eight which we put out for public comment. We took comment on it, and we have revised and reissued it, that described our approach in 1999. Even before that paper was final, we had begun to get work from USGS that indicated that we could go to the next level. And after that matured to a point where it looked like it was promising, then we announced that would undertake to issue papers number 25 and 26 that represent a further progress in that area.

So that's just a couple of examples of how we have continued to move in our science policy area. We may add more papers. We may do another iteration of papers that have already been issued and basically keep the same title.

MR. AIDALA: Marcia, why don't you add a little bit about it. Not just -- again, there is other -- you know, outside of quote, science policies, where as we go forward with -- whether you want to call it FQPA or just a day to day. You know, as our job changes in light of different, you know, challenges and different, you know, findings of science or other things and how we sort of evolve policies and determine how to sort of make out -- you know, get outreach to the public as well as get feedback from the public.

MS. MULKEY: Well, it is true that this process, which is now well maturing, is a key piece of the way we have both stakeholder involvement and openness in what's going on with science policies. But it's not the only piece.

The Scientific Advisory Panel has always been a public process. I think -- it appeals to me, at least, that we're getting a lot better about -- and that the public is getting better about -- participating in that process and getting notice of that process. That our papers for that

process are getting fuller and broader airings and that public participation in that process is enriching.

And so while that's not instead of or always in addition to, it is combined with this process. And, of course, the openness and public participation in decision making for individual chemicals and so forth is also an opportunity to engage and shape science policies.

And then finally we continue -- we do have rule makings. We do expect to promulgate revisions of our data requirements, our Part 158. That will be a formal rule making. That is certainly a critical arena for these kinds of things. And we have guideline revisions that will continue to go on. And we use PR notices and other processes that we don't track as quote, science policies, but that we are consistently following the same kind of notice and comment, addressing the comments and developing dockets. The same kind of sort of openness and participatory processes.

I don't know if you had anything else in mind that you wanted me to refer to.

MR. AIDALA: No. I think Dave thought it was a simpler question.

(Laughter.)

(END OF TAPE ONE, SIDE ONE.)

MR. WILSON: Given that there is an admitted dynamic and evolutionary element to this, how do you see this process tying in in a science sense to the OECD process, or in fact the NAFTA process? Where do you see the harmony between, say, Mexico, Canada and the U.S. into the OECD process?

MS. MULKEY: Well, we have --

MR. AIDALA: Jeff, just out of -- sort of just so we all get to be a little more friendly to you, if you could identify yourself when you ask a question.

MS. MULKEY: Right.

MR. WILSON: Jeff Wilson, Canadian Horticulture Council and a farmer northeast of the -- (inaudible).

MR. AIDALA: Cool. Thanks. Thanks for being here. A long way coming.

MS. MULKEY: Yes. It's good to see you, again. I was in a meeting with Jeff last week.

We integrate our work on these policies with all dealings within NAFTA and OECD very directly and very consciously. And I'm certain that a Canadian government official will be here tomorrow. Is Janet here? Oh, here she

is. From PMRA. And they have regularly attended the meetings of this group. They've regularly participated in the science policy development. And we have brought to OECD, and have responded to OECD's interest in all of our work that overlaps with their work.

And in a lot of cases -- not so much on these 20 some odd policies. But on guidance we've actually adopted OECD guidance, or worked through OECD in a way that we do it all at the same time, so our guidance and OECD guidance are one and the same.

We are working continuously to try to be more internationally consistent and transparent. And because of FQPA and because of the many challenges it has given us, we have the effect of having more from our direction out in terms of keeping the world informed than there is, you know, new cutting edge activity elsewhere. But we try to pick it up both directions.

I feel we're getting better and better at that with every passing day. There is a lot of interest around the world, and certainly in Canada and Mexico, in the way we're implementing FQPA. And I think they are following us very, very closely.

MR. AIDALA: Any other questions? Cindy?

MS. BAKER: Bill, I just had a clarifying question. The interim early assessment policy, is that what we were calling in TRAC the early winners? Is that what that is?

MR. JORDAN: Yes.

MS. BAKER: Okay. And what are you thinking about that policy? Because as the OPs are mostly through, I would say at least the initial part of assessment, where does this come into play in what you're looking at doing?

MR. JORDAN: My thinking about this one continues to change. And that's the only paper on here for which there is isn't a schedule.

MS. BAKER: Right.

MR. JORDAN: Partly because as we've worked on this issue and come to understand more about the organophosphates, and as we've gone deeper into our thinking about the cumulative risk assessment, perceptions of how to deal with this one have shifted.

What I'm anticipating at this point is that we'll probably include in -- not the cumulative risk assessment guidance that is going out later this month. But in the iteration that comes from that, some more explicit thinking

about how well we can separate the pesticide uses which are trivial contributors to the overall cumulative exposure from those which are more significant in the overall risk assessment.

In the early winners, the idea is that a particular use is such a small contributor, and also that it has some very important qualities to meet -- pest control needs and therefore what one might call benefits -- that we ought to say early on this chemical for this use is one which we believe ought to be retained while we go through and think about the other uses.

Our insights into the organophosphates and cumulative risk assessment really are such that I don't think we are yet clear how we want to handle that. But that's where I see it getting dealt with.

MS. BAKER: Similarly when you get to cumulative that's going to play into it?

MR. JORDAN: Uh-huh.

MS. BAKER: Okay. My second clarifying question is, worker exposure and ecological risks are clearly two of the big areas now in the risk assessment phase. At least as we're going through this where issues are being raised there

really aren't any science policies directly related to those two, other than end point being probably a critical one in that.

Do you see any papers -- I mean any extra credit papers coming out that deal with the worker exposure issue and how that's going, or ecological risks?

MR. JORDAN: It's an idea that some folks have talked about and we haven't made a decision on. And I think that depending on reactions from the public, that may help us come to a choice.

We've done some things such as workshops.

MS. BAKER: Right.

MR. JORDAN: That have been productive and constructive. We've had briefings in the Advisory Committee arena that have dealt with both ecological risk and worker risk. And my sense is that that has addressed the needs to some extent. And what I'm unclear about, and I think what others are unclear about, is how well does it address those needs.

So the short answer is I don't know yet.

MS. MULKEY: Well, those topics have also been involved in SAP interactions.

MS. BAKER: Right.

MS. MULKEY: They are of course addressed by the guidelines and by the data requirements. So they will, at a minimum, continue to be part of our public stakeholder involved interactive process. Whether they get listed as a FQPA -- I mean, by definition they're not FQPA. They are FIFRA issues. So whether they get listed as part of this process or whether they're addressed in some other, the idea is that they would also have open participatory iterative process.

MS. BAKER: Well, the only reason I'm raising it is that a lot of the questions that we get from stakeholders center around those two areas. And there's not a lot of clarity in their minds about how you come up with the worker risk assessment that you do, what kind of information do they need to provide in to make sure that you've got, you know, the accurate information about what they're doing when they're pruning or thinning or harvesting or why they have to -- I mean, you know, all those kinds of issues.

MS. MULKEY: Uh-huh.

MS. BAKER: It's an area that I think it's probably not as well out there in terms of understanding how that

comes together.

MR. AIDALA: Okay. Jay?

MR. VROOM: I'm Jay Vroom, President of American Crop Protection Association. Bill, I wondered if you could shine a little more light on this question of going from these guidance papers to the practical application. How do we keep track, or better track, or better understanding in the public sector of when things that get done in a specific review then institutionalize the policy or further refine the policy?

And one that I think Cindy may have just referred to is, for instance, the question on toxic endpoints around the Chlorpyrifos decision a couple of weeks ago. How do we sort of take that back and understand, you know, does part of that decision on that specific chemical institutionalize something like the toxic endpoint selection for Cholinesterase Inhibition, as an example? Or not?

MR. JORDAN: Yeah. While, I think -- I think the best way to answer that is to say that the policies are out there in the public domain through the web site that is available. There is fax on demand. And people can look at them, and they can look at the risk assessments which we've

issued, which are also publicly available, and see to what extent they match up or don't match up.

Our commitment in the policy documents is to explain where we have departed from the policy. And if people think that we have departed and not explained it, then that would seem to me to be an appropriate comment to make in the course of the opportunities that are afforded through our public participation process to comment on our risk assessments.

To the extent that something is an elaboration and is chemical specific, it seems to me it's confined just to that -- that particular chemical.

Is there some particular thing in that example or something that you're --

MR. VROOM: Well, honestly I haven't read the specific provision in the Chlorpyrifos decision that relates to that, so I don't know what it says. But I suspect that it provides an awful lot more context and texture to endpoint selection for that chemical so that chemical is done.

But it certainly will have a profound effect on the common mechanism and cumulative effects regulatory process when we get to that across that family of chemistry.

MS. MULKEY: Well, I'm not sure it will, Jay, if I understood that last piece. The endpoint selection for an individual chemical does not -- based on the material that we've already put in the public domain about hazard -- the hazard side of cumulative risk assessment, it does not automatically follow that the same endpoint for that individual chemical will be the appropriate relevant endpoint in the cumulative.

And so I -- now maybe I didn't understand the question. But I think that whatever the issues are about the endpoint selection for the appropriate regulatory choices for Chlorpyrifos that would -- you might very well have a different study and a different endpoint that would be used for Chlorpyrifos' part of the sort of common -- made common -- normalized or whatever the right word is, hazard across the class.

MR. VROOM: At least for my benefit, I don't think I understood that before. So I think that is a helpful refinement of wherever that's headed at this point.

MR. AIDALA: Well, two things. For example, specifically about cumulative. Since we've said many times we're going to get it out by the end of June, well, we've got

eight days left. So, you know, hold on shortly and you'll see the actual, you know, paper on cumulative, number one.

Number two, in general, you know, as Bill articulated, and it's like many other things the agency does. You're trying to explain your general thinking or thinking policy, at least in my more civilian sense, and then as they apply to specific cases everything ultimately is case specific, because ultimately you're making a decision on a business license and all that.

And, again, there is a push and pull about this one provides a new and provocative issue. Have we thought about that. How do we communicate that. Part of what Dave, I think at least fundamentally, was asking about -- I mean, for example, a new cutting edge is used. You take it to the SAP, among the other ways that we might communicate to the public, again, with some notice and then affording some opportunity not just for sort of outside peer review per se, but also, you know, SAP meetings allow for outsiders to come in and do presentations and things.

And it's that whole soup of ways that we sort of present our thinking about either a particular case or a particular issue or even a set of issues and move forward,

since, you know, many of these are usually scientifically steep decisions and obviously that's a many changing and splendid thing.

Other questions on science policies?

(No response.)

MR. AIDALA: Okay. Thank you. Do you want to -- Al, do you guys want to start a little bit on USDA stuff for a few minutes and then take a break?

AL: Well, I was --

MR. AIDALA: I'm not sure that people are asleep enough to take a break yet. I don't want you to perk them up quite let.

MR. JENNINGS: Well, unfortunately I told my team to be here at 10:30.

MR. AIDALA: Well, then we'll take a break.

MR. JENNINGS: A couple of them have arrived, but I don't think it's quite a quorum. So I would rather wait and get the entire team here.

MR. AIDALA: Okay, that would be fine.

MS. MULKEY: Do you want to take some questions from the new members about what they would like to see?

MR. AIDALA: Yeah, that's a good -- I think that's

a good suggestion. Marcia just suggested that we allow the opportunity for especially the new members of CARAT to sort of either ask questions or sort of articulate any expectations they have, because maybe that can help tailor what we do for today as well as tomorrow.

So I don't know if any of the new members of CARAT want to volunteer to say what they think or don't think or anything else. We'll also take those kind of comments from old members, too, but we've heard of you all before many times.

MS. MULKEY: Especially identify what you think your informational needs are. Not that we necessarily could rush to add a totally new topic today, but perhaps even off line we can try to meet some of those informational needs if people want to identify them.

Patricia, do you want to go first?

MR. AIDALA: Yeah, why don't you go ahead. Dan, do you have a mike for Patricia? No, the other Dan. Sorry. You may go, Dan.

MS. WIDDER: I didn't know exactly what to expect and appreciated the invitation to be on the Committee. But in the Poison Control Center we get numerous questions from

the public, as well as health care professionals, about, you know, the rationale for, you know, the safety and regulatory issues on all of the pesticides.

So I guess quite a bit of information has already become clear to me in terms of what information would be available. And I'm looking forward to, you know, preparing myself and the Poison Control Center to understand exactly what you guys do.

Because I don't really think we've worked closely enough with you in the past to really have a clear idea of, you know, what these papers mean and how we should be responding on our hot lines and, you know, when our toxicologists are consulted whether or not they truly have enough information from you to respond. More as individuals probably are how they are responding, not, you know, based on the true materials that are out there.

We've been getting numerous questions on our hot lines already about Dursban (phonetic) and whether it's going to be available and, you know, the whole history beyond that.

So I'm just looking forward to, you know, just being able to get more information on how your processes work so we can understand, you know, how you determine, you know,

cumulative effects. And I'm just excited to see that you really are working very hard in this area, and maybe we just haven't been able to work closely enough to know.

MR. AIDALA: I appreciate those comments. Two points. One is obviously as you go through the next two days you'll hear a lot and learn a lot and hopefully raise at least a lot of issues that you can pursue.

I would suggest, for example, even while you're here for the two days -- Margie Fehrenbach, by the way for everybody, is our designated federal official. Margie, do you want to -- I think everybody knows you in one way or the other.

But the point is, you may want to talk to our communications people, for example, and just sort of the way to get access to all of our whole menu and the deluge of information that we do have available. Otherwise we'll say, just go to our web site, epa.gov, and all questions about any subject will be solved. You might want to be a little more -- you know, dig a little deeper on that.

As well as some of our people that deal especially with things that I think in your world, incidents for example, you know, somebody is calling up about a chemical of

the day that they've read, you know, in the newspaper about, and how do we communicate to people on this. You have some access immediately, in fact, on information that we have available.

So you might want to do that for any of us. But, you know, Margie's former life was in the communications world of our shop. So you can take advantage of that, too.

Any other newcomers have any --

MS. MULKEY: You might want to recognize Jamie because she just came in. Jamie Clover-Adams.

MR. AIDALA: Okay. We have a new arrival behind Margaret, I think.

MS. CLOVER-ADAMS: I thought I could just sneak in.

MULKEY: Sorry. But everybody needs to get to know you, Jamie.

MS. CLOVER-ADAMS: Good to be here. I just got here.

MR. AIDALA: Do you want to introduce yourself just real quick?

MS. CLOVER-ADAMS: Oh, I'm sorry. I'm Jamie Clover-Adams. I'm the Secretary of Agriculture from the State of Kansas.

MR. AIDALA: Okay. Welcome. Another pleasing heard from, so to speak. Mark, who are you pointing to?

FEMALE SPEAKER: Jack. Mr. Jack Laurie.

MR. AIDALA: Oh, Jack. Okay. All right, do you want to introduce yourself?

MR. LAURIE: Jack Laurie. I'm the President of the Michigan Farm Bureau and a farmer from east central side of Michigan. And I'm real pleased to be a part of this.

MR. AIDALA: All right, welcome.

MS. MULKEY: Welcome, Jack.

MR. AIDALA: Welcome. We're especially encouraging any of the folks that are newer to the process, for example not having been members of TRAC. Paul and Adam can count as sort of people who were only at the tail end of TRAC or something. So I don't know if any -- again, any comments about sort of either expectations or issues that they would like to especially see through the next couple of days or something.

Adam and Steve, do you want to go? Well, you guys decide and then let us know.

MR. RUTZ: Yeah. Steve Rutz with the Florida Department of Agriculture. One of the things that I think

that AAPCO, which is the organization representing the state pesticide control officials, is particularly interested in is sort of the practical elements when we go into the transitioning process in dealing with actual mitigation strategies for particular compounds. Because the state folks tend to be the ones that are sort of on the front lines along with the poison control and others that have to deal with the calls and the what ifs and that sort of thing.

So I think that's the particular angle that we're -- you know, we would like to have some at least depth and detail on.

MR. AIDALA: And, again, for all members -- I mean obviously what you'll hear both -- you know, two days is not a long time in effect and given all the other things that these kind of convenings do. But please very much -- we would encourage follow up. You'll hear enough to kind of peak your interest, at a minimum I hope, and just please absolutely feel, you know, unabashed about following up with any of us.

Adam?

MR. GOLDBERG: I'm Adam Goldberg from Consumers Union. I'm not sure I know what information I need yet.

That's what I'm looking for from the next couple of days. But my expectation is to come in here and to work to try and come to some fair agreements to curtail risk and plan transition of the safer alternatives.

And some of the things that I've heard this morning were very positive in the sense that we believe that the riskiest uses are already known and so are their alternatives. So it's not a question of what, but just about the details of how to get there. And that's what I'm looking forward to trying to hammer out.

MR. AIDALA: Great. Anybody else? I mean, you don't have to. It's not compulsive. Rob?

MR. HEDBERG: Working with the Weed Science Society, herbicides of course represent the major use of pesticides. Probably three quarters of the pesticide use in this country. Working with the Science Society, we're interested in understanding how the decisions are made. How we can improve the decisions about particular products to make sure that we don't lose products that are very valuable unnecessarily. But also if we do have to make changes in the use of products, is to mobilize our people so that we can help with the transitions that are needed.

But basically our objective is to understand the process and help improve the process of making decisions.

MR. AIDALA: All right. Rob, thanks.

MS. BERGER: I'm Lori Berger with the California Minor Crops Council. I just really would like to learn more about the process and how the minor crops groups can provide input to your staff and scientists as we go through these processes.

MR. AIDALA: Okay, thanks. Yeah, you're old.

MALE SPEAKER: Yeah, I feel bad about that.

MR. AIDALA: Wait for the mike.

MALE SPEAKER: And it's not just being an old member. It's saying the same things about what we said before and being so predictable. But what I hope we can also bring out of this is -- I understand this is somewhat sequential more or less. This is a successor to and not a continuation of the TRAC process.

I think those of us in the residential or non-ag use community probably are of the view that issues related to non-ag exposure, non-ag risk, probably were somewhat on the periphery of the TRAC process. I mean, it was included, but it's kind of one of those cusp issues like worker exposure.

It's not really at the core of FQPA.

And I think we would like to see a more robust discussion of things like the science policies underlying residential exposure, the acquisition of data for more robust decisions, more communication and transparency in terms of how those decisions are arrived at, and I think just in general a little bit more light being shown on that arena.

MR. AIDALA: Be careful what you wish for, but sure. But the point is well taken. Okay. Again, I'm not trying to, you know, force testimonials out of anybody. So I guess we'll just take a break and start again at 10:30. Is that when your troops were arriving?

MR. JENNINGS: Yeah.

MR. AIDALA: The cavalry arrives at 10:30, so be in place then.

(Whereupon, a brief break was taken.)

MR. JENNINGS: Okay. Let me -- my role here will be to introduce the people who know what they're talking about and do the real work in some of the programs. I guess I should point out that we are doing a selection of some of the research programs and the data programs that are more

directly related to FQPA implementation. There is obviously a lot of USDA research. We are not going to stray into areas that are less directly related.

So with that, our first presenter is Dennis Kopp (phonetic) with CSREES, which generally stands for the Cooperative States Research, Education and Extension Service. And Dennis will cover the research programs, some of which are new, that are focussed on FQPA implementation.

Dennis?

MR. AIDALA: Why don't you take the wireless, if you want to. It's easier. Whichever -- whatever is easier for you guys.

MR. KOPP: Well, welcome. I really appreciate the opportunity to visit with you this morning. I am going to sit down. I thought I would stand up, but I gave blood a little earlier this morning and I feel a little weak. So I would like to sit down.

STEVE: (Inaudible).

FEMALE SPEAKER: Yeah.

(Laughter.)

MR. KOPP: I heard that, Steve. I heard that. I would like to spend a couple minutes at the beginning of this

activity and talk a little bit about the federal engagement in the agricultural research and information delivery system that relate to the pest management issues that I think are on the table for this group for the next couple of days.

The reality of this is I could title this talk something a little different. And I thought on the metro coming over, probably the best title for it would be the alphabet soup of agriculture. Because in this town acronyms are wonderful things. We use them as much as we can. But I would like to go ahead and talk a little bit about how some of those acronyms and the programs that are underneath those acronyms fit together.

And as an instructor one learns very early in their career that what you try to do is to boil your talk down to a number of succinct points, tell the audience what those points are, cover the points, and then when you're all done, summarize them very quickly. And I would like to do that.

The three points that I want to get across this morning are number one the big pieces. And that would be the major program areas in the USDA that contribute to the issues that are on the table for the next couple of days.

The next thing I would like to talk about is an

unusual relationship. And there is one of those in the big pieces, and I would like to talk about that. And that happens to be the agency that I work with, the Cooperative States Research, Education and Extension Service.

And then the third thing I would like to just mention and talk about is a dissection of that unusual piece to let you see how the programs that we have in the area of pest management actually fit together.

So I'm going to jump right into it. First of all, there are three major big pieces in the Department of Agriculture that address the areas of production, agriculture and pest management. The first of these big pieces is the Animal and Plant Health Inspection Service. And the major focus of the work that APHIS -- which is the Animal and Plant Health Inspection Service. The main focus of that is in the area of biological control, it's implementation and the regulation of biological control and other activities.

Another major player or big piece in this puzzle is the Agricultural Research Service, ARS. And the major focus of the work that ARS does in production of agriculture relates to the basic and long term questions that need to be answered. And that's where ARS makes its major

contributions.

The third big piece of the puzzle is the Cooperative States Research, Education and Extension Service. Now it's interesting that the first two programs, APHIS and ARS, are both direct line agencies. They have a boss in Washington, D.C., an administrator, who calls the shots, who is very influential in determining the agenda of the agency and directing the activities and resources of that agency to make that happen. And this is a very good thing if you want to get focussed activities done quickly.

The third piece in the puzzle, CSREES, does not operate like that, and that's what makes it the unusual relationship. CSREES has only 200 and some people in its whole agency. And it gets its work done by doing contract type activities through MOUs, contracts and relationships with anywhere from 50 each year to maybe 150 different institutions that have agricultural scientists working in them across the United States.

So we have direct line agencies that can be very responsive to need, and then we have a partnership relationship with CSREES. The other thing is, ARS and CSREES now seem to be doing the same thing. They both have

researchers that are working on agricultural production issues, but they do it in a very different way.

The ARS is really the extra mural research -- excuse me -- the intermural research. It is the research that the Department of Agriculture can take pride in, because it owns the people. It owns the buildings. It owns the equipment in the buildings. And when the light switches are turned on, it's ARS money that pays for the electricity that is used. They pay for every bit of that research. That gives them a total direct line and capability of regulating and directing that research.

CSREES now is the extramural research agency and working in this partnership it doesn't work quite as well. When you're working with partners, you don't tell your partner what you want done. What you do is, you convince your partner that they would be dump as a box of rocks if they didn't do what you wanted done. And that is the relationship that that agency has then with these land grant institutions, and the land grant institution is the major player in this.

Al, we have some handouts. Would you mind handing them out while I continue babbling on here?

MR. JENNINGS: I will start handing them out.

MR. KOPP: Those are the big pieces. Now I would like to talk about this unusual relationship. CSREES. It sounds like a mouth full of words. Cooperative States is really the focus of this. This is the federal agency that cooperatives with the states and scientists in the states through various types of programs. The REES is very easy. Research, Education and Extension Service. Three things that Agriculture needs to function and to deliver programs.

Now this partnership with the states is primarily done with the land grant universities, but it extends into many institutions that are beyond the land grant. How does it go about doing its business? Well, it does it in a number of ways. This partnership now involves working with the states, the land grant partners, and asking those partners to do something for it.

CSREES asks the states to provide resources in the form of people and dollars to make agricultural research and pest management research work in their state. And how good does the state cooperate? Well, on an average, if you look at all of the money going into agricultural research that is influenced by the Cooperative States Research, Education and

Extension Service, you would find that the states themselves are paying for approximately 80 percent of that research.

And CSREES now, what does it provide in this? Okay. It provides a funding resource for a small portion, about 20 percent of that activity. It also provides national leadership and a national vision for where the research needs are and the extension delivery should be.

So this unusual relationship actually works very, very well. The states now provide people and dollars. They also provide local leadership and an engagement with the issues within their individual boundaries in regards to pest management issues. That is the playing field of this unusual relationship.

Now I would like to dissect one part of it. And I have provided you with two handouts. I will not read these handouts, but I would like to point out some things to show you how CSREES, which is a whole group of different programs, fits these programs together into a coordinated pest management portfolio.

And I would like to start with the yellow sheet that I handed out. This is the President's budget. This is what the President wished would happen last March when he

sent that out. And as we know, some of it will happen and some of it probably will be changed. If you would open it up, you would find that it's a threefold and the very last fold has a whole bunch of numbers on it. And I'm not worried about the numbers now. But I would like to talk about the programs that are part of the pest management portfolio.

And this document right here, the yellow document you have in your hands, relates directly to the second handout that I gave you, in which I have a number of numbered programs on there that will match the programs on your yellow sheet. Now the numbers on there -- if you just ignore all of those multiple pages of good words that I've provided for you, and some of them are underlined, because the underlining will tell you how the programs differ from each other.

If you turn to the last page, you get a table like this. Turn to that table, because this table now has a list of the programs that are in the CSREES budget. This is the whole budget. It's not all pest management, folks, but all the pest management programs are in there. So what I've done on the white sheet is pull out the programs from the yellow sheet that are the pest management programs. And I have them numbered, and that number relates to the number

on the white sheet. And it's just for easy reference, so the first number in parenthesis is such.

I would like to go back to the yellow sheet -- or go back to the alphabet soup situation and go through the programs. If you want to check off the programs in the CSREES budget that relate directly to pest management issues, directly to the issues you're talking about here, if you start on the very first sheet and you see Water Quality and Food Safety, ignore those two programs. And the first thing you come to is Pesticide Impact Assessment.

Now that is the wrong name this year. What you want to do is take your pencil and write it behind it, area centers. Because that is where the funding for the area centers is coming from. The Pesticide Impact Assessment dollars will evolve to what the Secretary of Agriculture asked for, pest management centers. And this is done in conjunction with the Office of Pest Management Policy, and we are looking forward to that as an exciting activity this year.

The first -- let's see. Okay. I guess I gave you a bad steer here, folks. We're on the second page. We're under the integrated category here. Let's continue down.

The next item on the integrated category is the Crops at Risk from FQPA Implementation. The alphabet designation of that is CAR, C A R. So write that in behind, because people will be talking about CAR all the time. It's a new program. This is new money that came into Agriculture this year to address crops at risk from FQPA implementation. And those funds will be used specifically for that.

The next item down is the FQPA Risk Mitigation Program for Major Food Crop Systems. Now that acronym boils down to RAMP, R A M P. If you have a CAR, you need a RAMP. You've got it.

The next program below that is Methyl Bromide Transition, addressing a major issue associated with pest management in the next few years to come. The Methyl Bromide Transition Program. The alphabet soup relationship there is MBT. Some people put a P on it, but I leave it off. MBT.

Going down further, we have Invasive Species listed, third from the bottom. If you notice looking across, that program is not funded in the President's budget, or it's not recommended for funding. And we don't have an acronym for it, but we'll get one if it gets money.

Organic Transition is another program that is not

funded that is listed in here. It is funded?

FEMALE SPEAKER: Well, there is requisite money there for 2001.

MR. KOPP: It's 2001. We're only working with money in the bank, and the money in the bank is 2000. Two thousand and one is our wish list.

FEMALE SPEAKER: All right.

MR. KOPP: Okay. We're still working on that. That's what Keith is doing. Okay. The Organic Transition Program is not funded, but we hope that in 2001 we can funding into that.

If we move into the Extension Activities, the first program relating to pest management issues is called Pest Management. Great. What is that ten million dollars used for? That is the extension based funding. This is the funding that goes to the land grant universities so that they can put on an IPM program -- an Integrated Pest Management Program -- within their boundaries.

That's the source that provides the base funding for our state partner to make that happen. Without that money IPM will not happen in this country. It's just a given fact. There are people out there that are getting their

paycheck off of that.

All right. If we move down through there, the second from the bottom in that Smith Lever category is the Pesticide Applicator Training. Now PAT is the acronym for that. And that is a program that has been a shining star as far as functioning, and it's a shining star in cooperation.

It involves no dollars being put in by the USDA. But the leadership component for that program -- the national leadership is provided by CSREES, and the funding that comes to it comes to us through EPA. And they provide about 1.8 million dollars a year to allow pesticide applicator training to incur in all of the states and all the land grant institutions.

Now if we flip back to the other side, there are some other alphabet soup pest management -- or it's the other side of this budget page. The budget page rips off, if you want to carry something light and you don't want to read the words.

Okay. Under Research and Education Activities, if you move down to the Special Research Grants, the second item under there is Expert IPM Decision Support. That has another name. That has an acronym. The acronym is a wonderful

acronym. It's even more -- it's even worse than CSREES. That's what makes it wonderful. It's PMIDSS. PMIDSS. P-MIDSS.

That is a very interesting program in that it is an attempt for -- it's an attempt in the USDA to develop an information handling system for all of the pest management data in the United States. And it has been going on for a while and it is making real good progress over the last few years.

The next program is the Integrated Pest Management and Biological Control. You can write behind that a word and an acronym. You can write behind it regional IPM. And these are the dollars that go into the four CSREES regions that the regions utilize for pest management -- IPM pest management activities within their individual regions. It goes out in a competitive process within the region directed at the specific problems of that particular region.

The next program down is one of our better loved programs. It's called Minor Crop Pest Management, and then the acronym is given for you in the President's Budget, IR-4. The IR-4 program. That is very well loved, because it is addressing some of the specific needs that Agriculture is

finding they have in their minor crops. It addresses two very important issues: the loss of registrations and minor crop issues. Very strong following and very strong support for that program.

Sliding down two additional slots, you come into Pest Management Alternatives. That program has an alphabetical soup acronym. It's called PMAP, P M A P. Pest Management Alternatives program. Now that program is looking at short term solutions to problems that come about in pest management systems related to any sort of regulatory activity.

(END OF TAPE ONE, SIDE TWO.)

MR. KOPP: -- was not funded in this year's budget and it doesn't have an acronym yet. But it would, we believe, work in conjunction with the pest management centers which are being developed out of the PMAP program. And it would probably be the saving grace to allow those centers to move from a dream to a reality. So it's going to be a very important line that we get put in place.

If we move down into the next center, there is another area called the National Research Initiative Competitive Grounds Area. There are two lines that you want

to check there. The first line, National Resources and Environment, and then go down to the third line and put a check by Plants. Those don't have acronyms other than NRI -- National Research Initiative.

And this is the agency CSREES' attempt to address the basic problems through competitive grants process. It does very, very basic research related to pest management issues. Much of the stuff being done there won't have application next season or the season thereafter. But 10 years down the road if this hasn't been done, we might have a big missing link in what we hope to be a new pest management technology. And you can write behind there -- there is about 14 and a half million dollars in FY 2000 that will go into this NRI competitive grants related to base research on pest management issues.

Now I'm not going to insult you by reading things on there, but I would ask you if you find -- if you want to know more about the individual programs, they all fit together. And I underlined how they are unique in this white handout so you only have to read one line in each of the numbers. I won't burden you with reading the whole thing. But if you want to read more, you're sure welcome to it.

Because we attempted to describe how these different programs -- and we refer to this as our pest management portfolio. These are many different programs where we have to as an agency think of innovative ways of putting together those activities so they compliment each other and not duplicate each other. And we're doing as good a job as we can at that.

And that's all I have to say. Al?

MR. JENNINGS: Any questions for Dennis before we move on?

MR. KOPP: Yes?

MS. PELTIER: Dennis, I'm Jean-Mari Peltier with the California Citrus Quality Council.

MR. KOPP: Yes, Jean-Mari.

MS. PELTIER: I appreciate this a lot. This is very helpful as to how all of these fit together in a matrix, because it does become alphabet soup. And for those of us who aren't familiar with it, this is very helpful.

Two questions, though. These regional crop information policy centers, where are they physically housed?

MR. KOPP: They -- okay. Let's go to the pest management centers, which would be the PM dollars. Those are

real dollars. We have them in 2000. That will be the dollars that will implement the centers. They're not in place yet. But there is a competitive process that has been in place since the last week in March.

And we have, sitting on my desk, a stack of proposals of scientists from across the country that are saying, my institution could do everything you want done in this request for proposals. And we will panel those proposals and decisions will be made on where those institutions -- or what institution will be the lead institution to make those centers function the third week in June. And we probably will have the information that will go back to the successful PI's in early August.

MS. PELTIER: So those will be educational institutions that will serve as the focus of it?

MR. KOPP: They will be educational institutions where the centers are housed. They will be -- and the centers are not -- we're not buying bricks and mortar with this. What we're doing is we're putting people together.

There are really two goals of those centers. One is to reestablish an information network that has been disassembled by the PM dollars no longer being available.

That's one goal. The other is, if we're going to have truly regional centers, we don't want Washington to define the regions. We want the crop production regions to say hey, we have enough in common. We're going to be the regions.

So the second goal of these centers is over the next three years to evolve from these traditional four regions of CSREES into regional centers based on crop production areas. How many will there be? We don't know. But we're suspecting there probably will be anywhere from maybe eight to 10 or so regional centers that are reflective of crop production areas.

MS. PELTIER: Will these have bodies that are actually doing the research, or will they have access to funds for producer groups to petition for your grants?

MR. KOPP: I don't envision them as having the bodies that go out and put in the field plots, but I envision them in having the bodies that facilitate that happening. I can use an example that will be familiar to you. A person like -- a previous -- well, Rick Melnacode (phonetic) does that. He doesn't put in the field plots, but he knows how to put people together to make that happen.

The second half of your question, will they

distribute money to make that happen, we don't know what the lines or funding will be. But I cannot believe these will not be in existence, and as they pull together these CSREES programs in a regional manner, I very much believe that some of the funding that is going into the other programs will be managed by those centers.

So, yes, there will be dollars.

MS. PELTIER: Will there be oversight or input from producer groups to feed input in about the kinds of projects they think need to be undertaken?

MR. KOPP: We wouldn't even consider a center if it didn't have that. That's the truth. It's written right in the RFP.

MS. PELTIER: Okay, good. A final other question. I'm sorry I've asked a bunch here in a row. The natural resources and the environment, the NRI basic research, just ballpark for that area and the area in plants, how much of that ends up going to answer questions on specialty crop agriculture as opposed to the basic corn, wheat and soybeans?

MR. KOPP: Probably very little of it goes to either. It would be looking at probably some of the basic research issues. I'm thinking of some of the biotech

activities or the underlying foundations of some of the new technologies that will evolve into pest management technology. This is really basic research. So I suspect very little will be specifically directed at any particular commodity.

And that really isn't the purpose of the NRI. The NRI isn't to grow better corn or address issues of minor crops. It is to develop that base foundation of information that is going to be the keystone to our next level of pest management.

MS. PELTIER: Thank you.

MR. JENNINGS: Yes?

MR. LAURIE: I'm still a little confused on the same subject, the regional crop information and policy centers. How does this compliment or support or work with already existing pesticide research centers that some of us have at our land grant universities?

And the second part of the question is, I'm not sure I understand the difference between a regional crop information -- that component -- and the policy component. How is the center involved in the policy process?

MR. KOPP: Okay. We're talking about a program

here that has never been funded. And I don't know how that's going to fit in yet, either. When we get funding it should compliment what we're doing with area centers. If it doesn't compliment that, it's going to be very troublesome, because I don't know how it would work. Because here you've got two programs run by the same agency that have to compliment each other.

So I see that as if funding becomes available as being a part of the activities, or allow the area centers to begin to expand into centers that are reflective of crop production regions. That's how I would hope that would happen.

But since it's an unfunded program, I really don't have a good answer for your question.

MR. PITTS: Let me take it.

MR. KOPP: Sure. Sure.

MR. PITTS: Jack, what's happened is the transition that occurred with -- this money is basically the old NAPIAP money. It's the money that went out through formula funds to land grants which were basically the positions that were funded by the federal government, where Al could pick up the phone and say, I need some data on such and such, either for

research decisions we're making in the department or we need this data because we're having a discussion with EPA about Azinphos Methyl and this particular commodity is involved in that discussion. So what can you tell me about it.

What happened in the FY 2000 budget is basically that NAPIAP money went from being a formula fund, which Michigan State and other universities basically count on as being money in the bank. It came to them annually. It got turned into a competitive grants program.

So it's a transition I think that we all feel like needed to be done. However, it's come at kind of an inopportune time for us, because Al had just gotten to the point where we had done some reforms within the NAPIAP program and the program was being very responsive to our needs.

So we kind of had a monkey wrench thrown into this, where universities that had counted on this money in the past no longer had access to it, and we're going through a competitive grants process now basically to rebuild that whole infrastructure. And I think in the long haul we will see a system that is even going to be more responsive.

I also think it's going to be a system that we are

-- as Dennis eluded to -- able to take some of the money like the Crops at Risk and RAMP and eventually let that be handled at the regional level by the stakeholder panels that are involved in these pest management centers.

So that is the policy interface. These centers are going to continue to be the folks that Al is going to be depending on to answer questions. They're also going to be responsible for doing the crop profiles and working with commodity groups on the pest management strategic plans. And hopefully having a research granting mechanism as well.

MALE SPEAKER: These are not restricted to land grants, correct, for any institution?

MR. KOPP: The different funding lines have different eligibilities. Some of the eligibilities extend beyond. All of the integrated categories in the yellow sheet, four year colleges and universities, all of them in the United States, are eligible.

MR. JENNINGS: Yes?

MS. WITTENBERG: Margaret Wittenberg with Whole Foods Market. I notice that you had talked about the NRI funded pest management research. And on the white sheet in the more detail it says that it supports the development of

fundamental knowledge needed to form the basis of novel pest management strategies, etc.

And you had mentioned that this is research of biotechnology. Is this money all towards biotechnology solutions, or is there any thought of going into sustainable agriculture techniques and moving more towards that or organic techniques -- organic agriculture techniques?

MR. KOPP: It is not all in biotech. I used that as an example. It's probably an example that everybody in the room can relate to, because that has been sort of a drift of an awful lot of the base ag research.

It -- again, as I said, it wasn't targeted towards any particular commodity. It is not targeted towards any particular, let's say, production system such as organic or sustainable. The base research, if it is good sound research, should be applicable to not only many different commodities, but also to many different production systems or types of production systems. But it is not all biotech.

MS. WITTENBERG: Well, how do you make the determination? I'm sure you get a significant number of different grant proposals.

MR. KOPP: Okay.

MS. WITTENBERG: So how do you make the decision on -- if you consider those three different methods or alternatives towards working for pest management strategies?

MR. KOPP: Okay. That probably isn't even figured in the process, because this is a totally competitive process built to almost mimic the NRI grants process. There is a request for applications or a request for proposals that goes out once a year. And then the scientists across the country write their proposals for that request for proposal.

And then a peer panel is brought in, and they are then -- these projects are all in the various categories -- in entomology, plant pathology and such -- and they are all evaluated.

Now to get the 14.5 million, what we've done is we've looked at the types of research that is being done in NRI in all of these different categories. And those that relate to developing technologies that might relate to pest management, we pull out and we highlight and that's how we come up with the 14.5 million.

These are not dollars that are specifically answered to any one particular thing. It might be -- some of those might be entomology, plant pathology and nematology

type studies. Or they might even be looking at enzyme systems in certain insects that would relate to any. Looking for that weak link that we can go ahead and pull legs out from underneath a particular pest, weed or disease problem.

MR. JENNINGS: If I may try to -- Dennis probably can't say this. But probably the most direct result of any funding here will be publications in the Journal of Electrobiology and things like that. So it's way off.

MR. KOPP: You're right. I couldn't say that and I wouldn't say that, as a matter of fact, Al.

MR. JENNINGS: It's hard to find out how much of it relates to anything today.

MR. KOPP: Yeah, it's looking down the road. Question? Yes.

STEVE: It seems to me ultimately with FQPA and implementation that in order to ensure the safe use of pesticides, one of the most important things we can do is to deal with the training issues associated with the pesticide applicators.

Can you talk just for a second about how USDA and EPA have arrived at the funding levels they have for the pesticide applicator training program?

MR. KOPP: I can tell you how the USDA arrives at it. It has not funded the PAT program in dollars that go to the state. The decisions that are involved in that, I really don't know. I mean, you know, there are hard decisions that are made at budget time, and this is an area that we traditionally have not funded.

We do provide the leadership in putting the programs together nationally, and we also work in very close coordination with EPA. Now EPA has been a yeoman in providing that funding through the years that is then -- goes into the state land grants. It goes through our agency, but it is passed to us from EPA and then it's distributed.

The thought process on the amount that EPA will put into this is a question that EPA could probably better respond to than I.

MALE SPEAKER: Steve, let me just add something. The fact that it is not in the FY 2000 budget doesn't mean that USDA didn't -- responding to this program, we did ask for one and a half million. It was not funded.

I think where we stand with the FY 2001 budget right now, it does look like one of the chambers -- I'm not sure which one -- has put one and a half million in for USDA

programs. So our intent would be to combine that up with whatever EPA is able to put in the program as well.

And I think as we go on through the FQPA implementation issue and some of the peripheral related issues that we've had to deal with as part of this as well, we do realize that there is a need to do a heavy investment in this kind of infrastructure. And I hope it's part of the discussion that we'll be having over the course of this committee. It's definitely an under utilized program in many senses. It certainly is one that is undefined.

MR. KOPP: I know there is opportunity for growth there. Thank you.

MR. JENNINGS: One more question, maybe? One more? Okay.

MR. WHITACRE: Dennis, on the special research grants, there is -- other is 57.7 million. What is in that number?

MR. KOPP: Could you help me where you're at?

MR. WHITACRE: All right. I'm on the first table on the yellow sheet.

MR. KOPP: Oh, special research grants. Okay. And into other? Okay. Those would be base funds that would go

to support the agricultural experiment stations in the land grant institutions. And that then provides the scientists, or a portion of the scientists in the land grant institutions, as well as the superstructure of research that exists throughout the country.

So that's -- it's a big investment and it's virtually thousands of people scattered across the country.

MR. JENNINGS: These are Hill earmarks and we don't put those in the present budget.

MR. WHITACRE: There is one other program that you didn't mention which is still hanging on by its fingernails, but that's this Section 401 of the initiative for the future of food and agriculture systems.

And a caveat -- I won't go into any huge detail. We do have some FY 1999 to 2000, which it was a two year, that ran toward research programs that the budget committee prohibited us from spending. But they forgot to put a prohibition on the '99 money this year, so we have 120 million dollars that we have put an RFP out. And I think within that 120 million, the Secretary did designate somewhere between 25 and 30 being able for natural resource and general pest management related issues. So those grants

are out.

And how we dealt with the pest management issue is where a commodity group or a research institute -- and these are available to any research institution which has the capability, including private -- that if you basically come in with a proposal that was a combination of crops at risk or RAMP or had some complexity to it that was beyond the 406 programs, which are crops at risk, RAMP and Methyl Bromide transition programs, we would try it with one of those programs through this.

And so far, because our approach still is not done for FY 2001, we do have that money available to us. I think the Senate has not rescinded the money from us. The House has done that, the money that we have in hand now. So we are trying to get that out the door.

MALE SPEAKER: Very quickly.

MR. KOPP: Thank you.

MR. JENNINGS: Okay. Thanks, Dennis. Our next presenter is Doug Caquino (phonetic), who is from the Natural Agricultural Statistics Service, who will talk to us about the activities of NASS in the area of pest management.

And with that, Doug?

MR. CAQUINO: Well, I'll begin by there is another handout. We want you to leave with lots of paper. No, not really. The intent is to certainly provide you more detail than we can address in the short time of this morning.

So, again, good morning, ladies and gentlemen. I would like to introduce you to the Natural Agricultural Statistics Service. Many of you or some of you certainly are familiar with our program. Others are not. But we are certainly responsible for survey and census data activities and gathering and dissemination of information for the Department of Agriculture.

We collect statistics in a timely manner, consistent and scientifically based. Statistically reliable and in a transparent manner with a probability based program effort targeting and collecting data from agricultural producers.

Your handout is essentially a narrative of my talking points. I had an overhead that I won't -- I don't have it in Power Point, so I'm not going to display it. But basically it covers and focuses on the environmental program that has been implemented to date that NASS has been an integral part of.

The program -- I think I need to point out, although it's probably -- it's maybe somewhat redundant. The program is defined and bounded by resources. And, of course, as you know, these resources originate from Congress in terms of budget and staff allocations. And also I think another key element of this is data users' needs determine the focus and target of how those resources are utilized. And I'll talk a little bit more about that in the course of the next few minutes.

First I would like to -- I'm going to sort of talk through the talking points based on your narrative and the subheadings that you have in your handout. From a historical perspective, I would like to just leave you with a few key points.

NASS began our effort in data collection of chemical use statistics in response to -- in 1990 with the Water Quality and Food Safety initiatives, and of course more recently with FQPA in 1996. Since 1990 we have been involved with annually publishing reports and statistics covering major field crops and in alternating years fruit and vegetable data associated with chemical usage. Also your handout identifies a number of these numerous other chemical

use reports that we have been publishing on an annual or periodic basis.

We continually on an annual basis evaluate these programs and address them from -- I would like to point out three, at least, major areas. One is coverage needs. Secondly, survey methodologies. And third, another key element is response burden and ability to report these data.

And a part of that process of how we accomplish it is through some -- NASS has been very actively involved with partnering and interacting with a number of organizations. And that is not restricted or limited to just organizations within USDA and certainly the collaboration with the Office of Pest Management Policy. But also extending beyond the agencies that are going to be sharing here this morning in discussions, and include the Environmental Protection Agency, other government agencies, state departments of agriculture, university researchers, etc. All part of this process of assessing in partnering in terms of ensuring that we end up with products that are useful, that are defensible and that are addressing the needs of our constituents.

Well, in essence I guess I would like to maybe summarize what we think are at least some of our key program

goals. And one is -- or first is to provide essential pesticide use data statistics for the chemical use in risk assessment. And secondly, provide support as a statistical agency to other organizations -- in many cases, government agencies that are collaborating as well as universities -- on this subject of chemical use.

Being proactive I think is also an effort or a challenge that we undertake in terms of developing and evaluating new programs. I'll talk momentarily about a program that is in its infancy stage right now. But we're developing specifications and will be initiating a new data collection effort associated with nursery and greenhouse for chemical use data collection, targeted to begin the first of this next year for the year 2000 crop year.

That's in process. It's a new program and we'll talk just momentarily later about that. So this is a dynamic process. It continues. It's not the same from one day to the next. Another key element of this, of course, is being able to provide this information that we collect and compile in a manner that is accessible and that it is easily useable by constituents and by data users.

One effort that we have undertaken in the last year

and spent a good deal of resource energies is working with organizations and agencies like EPA, with BEAD and with staff that are literally down at the technical level using this information, and ensuring that they understand the scope and the methodology and that interpretation is properly employed from the data that has been collected. That's just one example.

And then, of course, finally maintaining the integrity of a good statistical program with good statistical results and quality of data that serves the needs of all the public, not just one constituent or a specific group.

So this data collection program really depends on several voluntary -- and I stress the point -- voluntary surveys of respondents to compile this chemical use information for the nation's agricultural producers. So during a typical production year, we're surveying typically at least on a normal year about five national level surveys that are conducted focussing on these priorities.

And I'm not going to give you a whole list of acronyms or names. But let me just list these real quickly for you, because they'll tie into a little bit of the end discussions relative to the specific commodities of interest.

But the Agricultural Resource Management Survey. These are annual surveys that are conducted. This particular survey is coordinated and in partnering with the Economic Research Service to provide information relative to field crops or major field crops. And I'll come back to the commodity breakdown in a little bit.

Secondly, we conduct on an alternating year basis a vegetable, fruit and nut chemical use survey. This is a separate survey targeted specifically to those -- that industry or those industries.

A third major survey activity is independently focussing, with a major objective of looking at chemical usage, on post-harvest commodities. And typically we target two commodities on a given year for specific information related to chemicals that are applied where the particular focus or need would be at that point in time. And that's been in place since 1997.

We also periodically and have broaden our coverage -- and this varies from year to year. There has been a focus on collecting baseline statistics on livestock and livestock facility chemical use to be able to look at the whole macro picture of what is the total chemical usage in agriculture.

And I might add, as I said earlier, the last or more recent survey activity that is initiated -- or we will be initiating this coming year is the nursery and greenhouse chemical use survey, which will be conducted on a biannual basis.

All these surveys basically contribute a core of information for pesticide use statistics covering the areas applied, the number of applications, rates of application, rates per crop year and total active ingredients applied.

In addition to the pesticide use statistics, of course we also collect, and have collected, statistics related to pesticide management practices and certainly the link to the integrated pest management program. And also an especially critical element that led to the initiation of the program in 1990 is fertilizer statistics as it relates to water quality, etc.

Our commodity coverage -- and I want to point out just a few key points there. Your narrative gives you a lot more detail that I'm certainly not going to cover. But this has changed over time, and this is a dynamic process that is impacted by bottom line resources and also a learning curve.

We're starting, for example, with the nursery and

greenhouse program, at a funding level less than what we originally had requested or expected. So we're beginning, not only because of funding requirements and resource requirements, but also the learning curve of understanding the complexity of the industry. We're beginning in somewhat of an elementary stage, but it has some basic core statistics that we intend to publish for that particular industry.

As we learn through the process of one or two iterations, we will hopefully be able to refine, expand and target maybe certain modules or particular areas of interest within these respective industries.

And that's a point that I want to leave you with as you look at the different commodities that we've covered and the coverage of these commodities. They are all linked -- I think another key element is that they all link back to our production statistics. So if you're looking at acreage that is treated for corn, for example, it all relates back to how much corn is produced in the United States. What is the acreage.

So in the case of the nursery program, which was nonexistent and we did not have nursery production statistics, in order to develop that program we've also had

to expand that particular element of our estimating program in NASS in order to have that bridge.

For field crops we have rotated on a limited basis what commodities we're surveying from year to year. The core has been cotton, soybeans and corn. We do not survey every state in the United States that is a corn producer. We're targeting major producing areas, which our targets have been 80 to 85 percent of planted acreage covering 30 plus states.

In the last couple of years, because of need and because also we're looking at burden and other factors, we've rotated wheat and potatoes in and out of the program from year to year and redirected those resources to collect information. In the coming year, for example, we rotated out potatoes and we're collecting information associated with rice and sugar beets for the first time with field crops.

Resources limit us from collecting data for every commodity for every year. Plus another key element of that is burden on the constituents or respondents to collect that information. I pointed out earlier that this information is collected on a voluntary basis of agriculture producers. We have received and had very cooperative support and very good support from the industries to provide this information. Our

response rates exceed in most cases 80 to 90 percent, in that range, of participation.

And part of our successes have been our ability to market and promote, and with your all's help promote the purpose and uses of these data. But if you exceed -- you reach a certain point where you have diminishing returns. If you collect the data too frequent, or it's not appropriately used, or the product loses its utility, then you start seeing a downward trend. So we're trying to keep at the top of that curve and be optimal.

In the case of vegetables and a couple of other commodity areas that I want to highlight for this coming year, later this fall we will begin collecting additional crops in the vegetable area. In fact, we're expanding from 23 to 42 crops in 19 states for this current year. That is including a number of commodities that we historically haven't collected because they're fairly regionalized or localized. But they are still significant in terms of looking at safety for particularly infants and children, which is the part of the emphasis on FQPA.

In the fruit industry, in 1999, which was the last data survey period of record, we expanded to 30 commodities

in 14 states, which covers essentially all of the fruits except for the tropicals which are primarily grown in Hawaii.

Another couple of key areas. I mentioned post-harvest chemical use and applications. And there we have collected data on basically two commodities per year, beginning in 1977 with -- or 1997, excuse me, with apples and potatoes and then subsequent years with corn, wheat, soybeans and oats. In the current year we're collecting information on rice and peanuts.

And how do we arrive at that determination? That's in collaborative efforts with USDA, with the Office of Pest Management Policy, with EPA and organizations as to where is there the greatest need and the most emphasis at the present time.

I mentioned horticulture and nursery. A couple other details related to that, right now we're targeting roughly 17 states to be included in that chemical use survey. And that would be a sample for operations of $10,000 in gross sales or larger. So we will be excluding the very small operations, at least in this initial effort.

That gives you a little bit of background in terms

of coverage. I did mention that we do -- we also have published livestock and general farm chemical use statistics, primarily for base lining. We've also over a period of the last several years collected, and continue to collect, pesticide management practice information to look at the progression and the improvement and the adoption of those programs at the national and regional levels.

A couple of other key points just in closing. One is accessibility to this data. This information, of course as most of you, I think, know, is available by subscription, or more accessible and less costly it's free on our web site, which you have information in your handout. You also can contact any one of our field offices.

We're working in looking at development of some new strategies and new ways to provide this information in more of a user friendly mode. That is in development and hopefully we will have some products available. Later this year is our intent.

As far as contacts for further information or clarification, you have those in your handout. I would like to in closing, though, encourage you to direct any questions you have either to myself. I'm also pleased -- I would like

to introduce Linda Hutton who joined me this morning. She is our Chief here in Washington of our Environmental Economic and Demographics Branch. What that means, the publications and products that I talked about are the responsibility of her staff.

My primary role is to ensure that these program areas, all these surveys, deliver the type of data in a timely manner and in a consistent manner as I described earlier with these goals to her shop for final analysis and ultimate publication.

So with that, I appreciate the opportunity to be here this morning. I would be glad to answer any quick questions.

MR. JENNINGS: Time for a couple, yeah. Wally?

MR. EWART: One of the areas specifically that is of great interest to a lot of the commodities is the way pre-harvest intervals and reentry periods are coming into view with the review of all of these chemicals. And your data initially certainly didn't cover either one of those areas to help us out.

And I just want to know what your status is in working with the Office of Pesticide Management to really,

you know, work that out and try to get that data that is critically needed right now?

MR. CAQUINO: Excellent question. In fact, I was in a meeting a week ago in Michigan where some of you may be aware that we've done a couple of pilot studies two years ago where we collected for the first time in a test of capturing or being able to collect target pest information, as well as pre-harvest interval associated with vegetables.

And we have a research program or project that we should have -- or Michigan State will be providing a report. I think there are like 17 vegetable commodities, in this case, only for the State of Michigan. It's a pilot that would be available, I would expect within the next month or two months at the latest.

This past year we collected information for fruits in three states: Washington, Florida and Michigan. We encountered some very intense respondent burden concerns that we're trying to address, and truly we're evaluating strategies to be responsive to providing this information.

Another complexity associated with this are states which have adopted mandatory reporting. California is an excellent example. Their mandatory data requirements do not

include these particular components. So that is also in the forefront of our discussions, and they have been also as we collaborate with the States of Oregon and Wisconsin in looking at their upcoming and development programs to capture this type of information.

So I don't have a quick or short term answer. We will have some preliminary results or initial results from the pilots that we've done, Wally. But the long term thrust of this, I think it comes down to two factors. One is we have to develop an appropriate strategy to collect these types of information so we can collect information in a least burdensome manner, but also a quality manner. And secondly, it comes down to resources.

(END OF TAPE TWO, SIDE ONE)

MALE SPEAKER: -- effort to qualify why there are changes in variability from year to year due to weather conditions, product availability or things of that nature?

MR. CAQUINO: Our function, which may have come out in my discussion, is strictly to provide the statistics for analysts and further interpretation by experts which may be -- you know, whether it be a university or other sites.

No. Our objective as a statistical agency is to

provide factual information that is scientifically based, but not to try to interpret the results beyond the point of ensuring that the data are valid and are of quality and defensible.

MR. JENNINGS: Time for one more. Okay, I guess Jamie?

MS. CLOVER-ADAMS: I just have one question. When you talked about how your data goes from NASS over to EPA to use in the risk assessments, do you include in that -- or is included in that database data that has been gathered by state statisticians specifically on commodities in a state?

So if a state took the initiative to go collect their own data and enhance what NASS has done, is that part of the database that goes to EPA to make risk assessment decisions?

MR. CAQUINO: Only to the extent that that is a collaborative effort that is a part of our national program. So if a state -- and let me translate that.

MS. CLOVER-ADAMS: Please.

MR. CAQUINO: If a state is conducting their own survey effort that has not been built into the design of our national data collection program -- in other words, we do

collaborate with states like Kansas and a number of other states if they let us know and we can work up front. Basically they supplement our sample size at the national level so that that information is following the same methodology and the same process. So, yes, in turn that information is available and is a part of that effort.

But if a state is functioning independent, and maybe our state office has worked with a P-AP or, you know, a state department of agriculture on a separate project, that information would have to be accessed by EPA through other means for use by EPA.

MS. CLOVER-ADAMS: And secondly, you talked about reporting burden. Have you seen on a national level any decline in participation in feeling from producers that they just don't want to provide this information?

MR. CAQUINO: I hate to generalize to that extent. I think we have been very successful over the long term here, or at least the short term since the '90's, to maintain response rates at a very high level. There is some variance, you know, from year to year in certain areas of the country or maybe for a particular commodity or industry.

But I would say no. I think it's maintained that

level. Now whether we can continue that same achievement over a longer period of time will be dependent -- I think one of the critical elements is being able to ensure the constituents that this information is truly being used in the decision making process.

I keep hearing that question, and we're constantly responding to that question regularly.

MR. JENNINGS: Yeah. Steve, you had a tie with Jamie, so ask your question and then we need to go on.

STEVE: I'll try to be real quick. Traditionally the data I've seen reported is pounds of pesticide use by acre or by crop. But I've not seen something that, I think, tells an entirely different picture, and that is pounds used per unit of food produced.

And I don't know if you all do that. Have you ever considered taking a look at that? Because that really paints a different picture of efficiency.

MR. CAQUINO: We haven't, as you know, Steve, presented it in that fashion. I think that's an interesting point for us to consider. And we are looking at, and would welcome, you know, ideas from this audience to facilitate interpretation and use. We're looking at some other

alternatives, but not that particular one at present.

MR. JENNINGS: Okay. Thank you, Doug. Doug will probably be here over the lunch break, so if you have more questions, you can talk to him then.

To continue on, we have two more data collection programs to talk about, two that are absolutely critical in the dietary risk assessment. Dietary risk assessments, as you know, are driven off of what and how much do you eat and how much residue is there. So our next two presenters will talk about those two subjects.

First is Elana Moshea (phonetic) from the Agricultural Research Service. And I think it's called the Food Surveys Research Group. Is that close? And that group has been collecting data, essentially answering the question of what do we eat in America, for a number of years. And I've asked Elana to talk to you about the survey and the results and the plans.

Thanks.

MS. MOSHEA: I've got a handout as well. A couple of them. Good morning, everyone. We're going to talk about food just before lunch. In the time I have this morning I just want to talk about first, briefly describe USDA's Food

Consumption Survey Program and second, talk to you a little bit about work that we have been collaborating and working closely on with EPA to take the data from the Food Consumption Survey Program and make it useful in the pesticide risk assessment work.

A couple of handouts are going out. One is describing USDA's most recent national Food Consumption Survey. It's USDA's tenth nationwide Food Consumption Survey. It was conducted over four years, 1994 through '96, and then one final year of collection in 1998.

What we do is knock on the doors of Americans and ask them if we can come in. And we sit down across their kitchen table and ask them everything they ate and drank the last 24 hours in pretty great detail.

We enjoy, I think, a very good response rate. Doug was talking about response rate and response burden. I think the American public is still willing to let the government inside their home and tell them details about their life, which we're very glad of. This latest survey had about an 80 percent response rate, which is very good from a national sample of households drawn.

The survey can take, depending on the individual in

a household, from anywhere to an hour to up to two to two and a half hours. There is no monetary incentive or payment for these individuals for doing this. This is out of the goodness of their heart. We give them some, what we think are gifts: an insulated bag, measuring cups and spoons and a special ruler. And to a typical American, they're still happy to get that. I see some chuckles. But people are glad to get those kinds of things, so it's still boding well for us.

I talked about the four years of collection. The first were from '94 to '96. This was on 15,000 Americans across the country sampled. We collect two non-consecutive days of food intake on each of these Americans. It's a standardized, scientifically peer reviewed methodology that is used.

The '98 year of collection was just on young children, zero or infancy up to nine years of age. This final year of collection for this last survey was done directly in response to the Food Quality Protection Act to provide additional data on very young children.

And that data obviously has finished in collection. All of the data now has been reviewed and processed and

released. It's on a two disk CD-ROM that is available. I have a few copies with me that after we finish if anyone has a burning need for it right now --

MALE SPEAKER: We'll have an auction.

MS. MOSHEA: -- they can -- we'll have an auction.

FEMALE SPEAKER: With measuring spoons?

(Laughter.)

MS. MOSHEA: Well, if you come to the Beltsville Agricultural Research Center field day, we give those out at field day. But unfortunately we don't have measuring spoons for you. But if I would have known you wanted them, I could have bought them with me.

Anyway, I have a few of the CD's available. All of the data that is collected on this survey is publicly released. The questionnaires are on the CD. All the methodology of how we collect the survey is on the CD. You, in fact, could replicate the survey, except for the sample design, with the information on this CD. So it's all publicly available.

It can be purchased from the National Technical Information Center for $90.00. And on the second page of the stapled fact sheet the information on how to order it is

there. But I would be happy to mail it to all of the CARAT members if I -- if Al probably wants to provide me an address for all of them. So just let me know.

The second handout is a summary of the information that is collected. There are five different questionnaires. There is just a wealth of information from this survey, and this is a general summary of that information in addition to the detailed information of food intake.

The second item that I wanted to talk about was a project we've been working on with EPA to take the information from this survey and translate it into commodity intake. Americans report what they eat and the way they eat it on their plate -- pizza and hamburgers on a bun, etc.

But that's not the way the government regulates pesticides that are used on crops. We regulate wheat and potatoes and tomatoes. So that wonderful data that Americans give us on what they have eaten has to be translated into those EPA defined commodities. And we have worked and done that translation on all four years of this data. That work now has been transferred to EPA and it's in its final stages of review there. And my understanding in working closely with our counterparts at EPA is they will be releasing that

translation on a
CD-ROM as well.

So this CD-ROM is the foot intake data the way people report it. There will be another CD-ROM coming out that will be this food intake data, consumed by all the individuals, 22,000 across America over those four years, into EPA defined commodities. I want to be sure you understand the differences between those two particular products.

With that, I think I'll close unless there are any questions.

MS. PELTIER: I think there is a lot of interest in this NASS data that you've collected here. But I think there are some other specific questions that seem to come up a lot when you talk about this in the context of FQPA.

For instance, in this area of looking at food nutrient related variables, do you ask -- if it talks about a child eating it, do you ask whether the product was consumed fresh or processed? Whether it was processed baby food?

MS. MOSHEA: Yes. There is extensive detail. And as we designed these surveys and the questionnaires, we work with all of the federal users that use this data, and EPA is

one of those users that we consult with.

So, for example, on baby foods there is very specific data that is collected, right down even to brand names of baby foods, and it's reported by brand name on our database.

What was the earlier part of the question you asked about baby food?

MS. PELTIER: Well, the other question is, how else would this data be used? I mean, I know -- I'm familiar with it within the EPA context.

MS. MOSHEA: Uh-huh.

MS. PELTIER: But other things, like kind of eating occasion. You know, whether it was breakfast, lunch or dinner. Obviously within the EPA context it doesn't matter.

How else does the agency use this data?

MS. MOSHEA: Oh. The data is used extensively by a number of different federal agencies that are involved with food programs and food regulation and policy. It is used to set food fortification levels.

In 1999 the Food and Drug Administration required fortification of Folaid (phonetic) in grain products. This consumption data was used to determine what should the level

of fortification of Folaid be and what types of food products should it be required on. That's one example.

It is used extensively in USDA's Federal Food Assistance Programs. On the sample -- or on this fact sheet you can see that we over sample for the low income population. So we're concerned about the poorest of the poor. What is their nutrient intake? What is their food sufficiency? Are they getting enough to eat?

So those are just a couple other examples of how this information is used. The President recently announced the year 2000 dietary guidelines for Americans. What Americans should eat to maintain health and prevent disease. This food consumption data was used in that process of determining what those new dietary guidelines should be.

MS. PELTIER: And one final question.

MS. MOSHEA: Uh-huh.

MS. PELTIER: The statistical significance of the individual ethical groups that you surveyed for, I guess -- you know, it's a program that is designed to be used in a lot of different ways.

My question is, how do we assure that the collection of this data from specific ethical groups and

specific age groups is going to be particularly significant for EPA to use it the way they are in making a determination of whether or not there is a problem identified with consumption of particular foods?

In other words, if you're doing this randomly, how do you know you have the right make up of --

MR. JENNINGS: You might want her to repeat the question.

MS. MOSHEA: You want me to repeat that question?

(Laughter.)

MS. PELTIER: I'm sorry.

MS. MOSHEA: It's a very good question and it comes up frequently. Let me repeat it and be sure I've got the essence of it.

How are we assured that the sample is statistically reliable, one in terms of ethic groups of the population in this country, as well as various age groups of the population?

Let me answer the age groups first. With the last year of collection, the 1998 year of collection for very young children, the sample size for the first three years was not sufficient according to EPA for looking at risk

assessment for very young children. And that's why USDA went back out in the field in 1998 with the same methodology and sample defined to gather up the same kind of data on 5,300 young children, zero to nine years of age, so we would have a very wealthy and rich database for very young children. Now up to the age of 19, this database provides two days of dietary intake on 12,000 children. So that's a very strong database for use and statistical analysis.

For ethnic groups the population was sampled based on what the population is. Our sample is about -- I'm going to probably give the wrong statistic. But I think it's close to 12 to 14 percent blacks, which is about what blacks represent in the United States. Certainly whites make up the majority of the sample. When you get any further down into other ethnic groups, the reliability of the numbers is limited, driven by the sample size and you heard earlier this morning, you know, driven by resources.

MS. PELTIER: Thank you.

MALE SPEAKER: Do you ask any questions on food preparation, where they wash the food before they prepare it? I didn't see that in here anywhere.

MS. MOSHEA: Yes. Yes, we do. We ask about food

washing for -- I believe it's for fresh fruits and vegetables. We also have some specific questions about outer leaves being trimmed off from various types of foods. And that was done specifically in response to EPA's request.

We asked some specific questions on home food grown -- consumption of food grown by garden or given by gifts that were home grown. We asked some specific questions on fish and consumption of fish from various places. And these questions were specific from the Environmental Protection Agency.

And the questionnaires are right on this CD, as well as the questionnaires are on our web site. And if I could just take one more second. I know Al is looking at the time. On the bottom of both of the fact sheets is our web site address, and you can download our survey questionnaires as well from the web site if you don't want to get onto a CD.

MALE SPEAKER: Anything on the preference for organic versus regular food? I mean, do they make a choice going through the organic section of the supermarket?

MS. MOSHEA: We do not have that on this particular questionnaire.

MALE SPEAKER: I'll be real brief. I just had one

question, kind of a follow up to Jean-Mari's. Do you also consider social economic level other than ethnicity?

MS. MOSHEA: Yes, we do.

MALE SPEAKER: Is it weighted?

MS. MOSHEA: Yes, it is.

MALE SPEAKER: Are your figures weighted?

MS. MOSHEA: Yes, it is. One of our weighing factors is income -- household income -- because that's very important in terms of food intake, and specifically for USDA with the Federal Food Assistance programs.

My phone number is also on the fact sheets, so as you get into this data and you have other questions, please feel free.

KEITH: I have several questions -- (inaudible) -- on the issue of outliers and how they're dealt with. But -- (inaudible) -- any discussions you might have on EPA -- (inaudible)?

MS. MOSHEA: We have an extensive quality control and review program of this data. But I want everyone to remember we're relying on the typical American to remember everything they ate and drank in great detail. Usually we would go into the home tonight after dinner and ask them

everything they ate and drank for all of Wednesday. So they have gone through all of Thursday and we've asked them, then, for the following day. So the methodology is the best that there is currently, but it certainly has limitations, one of them being the human.

Then there is the issue --

(Laughter.)

MS. MOSHEA: Which, of course, we all are. Then there is the issue, as Keith talked about, outliers, or individuals who have fallen into the sample who had unusual intake for that day. A young child who went on a food jag and just ate grapes, I think is one of the pieces of data we have seen from the various surveys.

That data is carefully reviewed, not only at the collection point but at various stages and when it gets into our office by a nutritionist as well. And we look at that very carefully. We feel as though once it has gone through all of our checks that that was legitimately what a respondent ate. And so the information that is on the CD, we stand behind.

Looking at that data, though, you will see individuals that fall -- you know, there is no other five

year old in the whole survey that ate that amount of grapes. And so is that a typical consumption for all five year olds on grape consumption that day or not? I think that's the question that Keith is probably eluding to, and that is what probably has been debated a lot between USDA and EPA.

MALE SPEAKER: Well, another one. Is that to say that if the parent reports 25 happy meals and they really meant two and a half happy meals, that that is something your folks will catch?

MS. MOSHEA: Yes, we would catch that. Yes. Did I answer the question, Keith? Thank you.

KEITH: That's Elana.

MR. JENNINGS: Okay. Last and certainly not least is Martha Lamont (phonetic) from the Agricultural Marketing Service who will talk about the Pesticide Data Program, the Department's efforts at collecting pesticide residue information as close as we can to the dinner plate.

Martha? Do you want me to hand those out?

MS. LAMONT: Yeah.

MR. JENNINGS: And of course Martha has a handout.

(Laughter.)

MS. LAMONT: I will try to be brief. It's almost

lunch time. I'm here to talk about the USDA's Pesticide Data Program. You are going to come across our data prepared mostly as PDP. These are the subjects that I am going to be covering in my talk.

Basically how this program got its start, a little bit of background information, what makes the data useful for risk assessment, the states that are participating in this program, a little bit of commodity history -- the program keeps changing focus, depending on data needs and our sampling of laboratory operations -- how the data is reported and also new initiatives that are coming out.

This slide describes how this program started and what has impacted our operations and the focus of the program. As you may remember, in 1990 the CBS reported Alar in our apple juice and created a lot of public concern about the safety of our food supply. And at the time, there was no data available to verify or deny the findings of this report.

As a result, President Bush authorized the creation of a national pesticide program and provided funding beginning October 1990. That's when PDP was officially started. Later on the National Academy of Sciences issued a report on pesticides in the diets of infants and children,

which was the basis for the Food Quality Protection Act. And those two reports of those two items have impacted PDP operations significantly.

What makes PDP data useful for risk assessment. If I could narrow it to two criteria, I would say that it is the way the samples are collected and how the samples are tested. Our sample collection is based on a state population. The larger states collect more samples than the less populated states.

Also when the samples are collected within the state, the sites that are visited are those that distribute the larger volume of produce. We assume that a larger distribution -- a larger volume of distribution means more consumption. Therefore, that measure can give you a very good estimate of exposure.

We place special emphasis on children's foods. This is particularly true after the NASS report was issued, where a lot of deficiencies or data gaps were noted for children's foods.

The data is treated depending on -- or the samples are treated depending on what the use of the data is intended. For chronic risk assessments, we do composite

samples. For acute risk, we do single serving samples.

Also, because of the way the data is collected, we can all note pesticides -- multiple pesticides that are detected on the same samples. This has not been used so far. But I believe EPA may be getting ready to do cumulative risk, and at that point this data will be very important.

Our data is QA/QC extensively. And I think most of you that have had an opportunity to use the data can see the extensive QA/QC notations that we have in our data. The data is centralized in our computer database in headquarters in Manassas, Virginia.

These are the states that are participating in the program. We have 10 states collecting samples for us and also providing testing services. Together the states represent over 50 percent of the population, if you take into account also the neighboring states where produce is distributed from these states.

I think I should also let you know that not only do you -- when you go to Texas and collect samples in Texas, you're not going to find produce that is grown in Texas. You're going to find it from California or from anywhere in the nation, because produce moves across the nation in the

most incredible ways.

(Laughter.)

MALE SPEAKER: That's true.

MS. LAMONT: This slide gives you a little bit of commodity history. As I said, when we started back in 1990, we focussed on fresh fruits and vegetables. But we are a program that is very dynamic and we change with the time.

So when the NASS report was issued and it was noted that there was a deficiency on processed products, we paid attention and we added processed products. We started putting canned and frozen products and then after that fruit juices. We added grains, milk and corn syrup. Right now we're in poultry, and we plan to add beef if the funding comes next year.

Where we collected samples. Again, when we started we were limited to terminal markets and distribution centers, because that's where most fresh fruits and vegetables are distributed through. But then when milk came, we had to move into milk processing plants. Then for grains we had to go to silos and elevators to collect the grain samples. For corn syrup we went to corn refineries.

Oats is a slight departure. We thought we were

going to find oats like we found wheat and soybeans. But actually oats are mostly imports, and we found them in terminal markets and distribution centers. Only five percent of the oats consumed in the U.S. are domestic products. The rest are imports.

Poultry samples are collected in slaughter plants, and we are collecting these samples with the help of our sister agency, the Food Safety and Inspection Service. They go to about 174 sites and collect samples for us and send them to our laboratory in Gastonia, North Carolina.

Our laboratory operations are very dynamic. Samples are -- the chain of custody for samples is very well documented. We try to be very, very tight on our chain of custody procedures. Samples are logged in in our system the minute they arrive in the laboratory and are prepared according -- or emulating consumer practices, with the exception that we do not cook samples. So they may be washed, outer leaves removed and edible portions removed, but we do not cook samples.

Again, samples are prepared depending on the data is going to be used. If the data is intended for chronic risk, we're going to composite the sample. The sample may

range in size from two to five pounds. So preparing a sample for chronic risk is very easy. It can be done quickly. For data that is going to be used for acute risk, on the other hand, it can be very, very time consuming and very expensive.

We only use multi residue methods. That is, methods that can capture many pesticides in one sweep. We try for economic reasons not to use single anno like methods, because they are very expensive and they don't give us much for the money.

The detection systems that are used in the laboratories are very, very sophisticated. We keep changing technology as new advances are coming out. We just finished buying LC systems for most of our laboratories, because the new safer pesticides that are coming out in the market do not -- are not amenable to most of the conventional technology that has been used in previous years.

What you use to detect organophosphates and carbonates and organic chlorine is not suitable for the new safer pesticides -- the Pyrethroids and all those chemicals that are being approved for use now. So we have had to acquire new technology for our laboratories. With the low detection systems that we're using now, we have found

a lot of problems that, you know, we have not seen before. And that is residues that we know are not coming from applications during the growing season or post-harvest applications, but rather contamination from crop and crevice treatments that are used, for example, for food facilities or in grain elevators. So in those cases, we are seeing very low levels. We are reporting in the part per billion, and it seems like we are moving into the part per trillion area.

Our quality assurance and quality control program is very strong. We require the laboratories to continuously demonstrate performance. And we keep performance not just for the individual laboratories, but for the program overall.

I went over this before, and this is just to illustrate the differences between getting data for chronic risk assessments as opposed to acute risk assessments. The cost is about three times -- you know, acute data for acute surveys is about three times more expensive than for chronic risk.

The methods that are used are different. The samples are much smaller, because we're talking about many homogenizing five pounds of samples as opposed to homogenizing one single apple. So the methods have to be

modified in order to be able to test such a small sample.

And because of the cost for chronic risk assessment, we do all the screens. But for acute we have had to limit it to organophosphates. In most cases, potatoes were done only ala carte. It is so expensive that we cannot do all the screens.

This is just to illustrate the differences between fresh and processed commodities. It doesn't always hold true to use processing studies that the agency receives from registrants. You can see here that the profiles for apples and apple juice are very different.

For example, for Azinphos Methyl the detections for apples were 55 percent, whereas for apple juice it was five percent, and you can see the maximum concentration detected in each case. In Carbaryl you can see a higher detection rate for apple juice than for fresh apples, but, again, the concentration levels are much different.

What I'm trying to say is that in most cases what we have observed, this has been observed also in grape juice and orange juice. Processing studies don't tell you the whole story. The amount of imports used in juices -- in juice concentrates -- is much larger than what you see in the

fresh commodity. So their profiles do not match.

This is our quality assurance and quality program. We follow standard operating procedures. The methods that are used for each crop are validated by the laboratory. I should say not just for each crop, but for each matrix. A laboratory that has been validated for testing oranges, it's not ready to test orange juice, as I was saying before, because oranges may be mostly a domestic product.

The matrix you see in testing fresh oranges is not going to be the same than what you see testing orange juice. So we have had to require the laboratories that are going to move from the fresh commodity to the processed commodity to do a revalidation.

All the laboratories are required to participate in our check samples program. We issue no less than three check samples per laboratory in a year. And in a check sample they receive several matrixes spiked with pesticides of different concentration levels, and we monitor their performance.

We do control quality assurance on site. We have a quality assurance officer in each laboratory facility, and we also do quality assurance for the entire program. We do data and laboratory reviews. Our chemists in headquarters visit

the laboratories and do audits of the laboratory's operations to make sure that the laboratories are following our quality assurance and quality control procedures.

The requests for data have increased significantly, I guess as the program has gained popularity and more data is used. We get a lot of data requests from all sorts of organizations. We either refer them to our web site or we do customize data reports. That is our web site, and we participate in the National Pesticide Residue Database which is run by EPA.

This describes the data life cycle from sample collection through laboratory analysis. The data is entered into a PC at the laboratory, and the data is transmitted -- once approved by the QA officer, the data is transmitted by telephone line to our computer in Manassas, where the data is reviewed by our chemists. When the data has been reviewed by the chemists and the quality assurance and quality control criteria is met, then it goes into our permanent database, where once again at the end of the year it goes through one more level of review before we issue our annual summaries.

What are we doing right now? We have gone back to

some of the commodities that we had earlier in the program. Oranges, peaches, grapes, lettuce and green beans are back. Those are earlier commodities. We're trying to test for pesticides that were missed the first time around. We are doing a cherry survey. This is one of the times when we have had to deal with seasonal crops.

Cherries is a very short season commodity. So we started in May with about half a sampling. Thirty two samples were collected in May. In June we'll have 62 samples, and in July we'll have to triple the amount of samples to 186. In August we go back to 62 and then the season will be over. We did this because the season is so short that we needed to get enough samples to have a significant amount of data for the year. We'll repeat the survey next year.

Apples and rice are coming in October, and broccoli will be brought back in January 2001.

The program has changed somewhat from what we used to do. We are doing a lot of market research before a commodity is brought into the program. And we're doing this because we don't want to make trips to sampling sites and come back empty handed. It is very expensive. It takes a

sample collector's time and gas. So we're trying to be successful every time we make a trip to the sampling site to make sure that we find what we're looking for. And our collection rate -- our success in collecting samples has increased dramatically.

We are doing, as I said, for cherries a targeted sampling. We are also targeting a sampling for foreign products. In the past comparisons have been made between domestic and foreign products, but it is not, I would say, sound -- scientifically sound to make a comparison on 700 and some data points for a domestic product and 10 data points that are from a foreign product.

(END OF TAPE TWO, SIDE TWO)

MS. LAMONT: -- for peaches during the time of the year when we knew Chilean peaches were coming into the market.

In the past we had pretty much a standard -- you know, 140 some pesticides that we tested in every single commodity. Now with so many commodities in the program, we're doing more -- we're focussing more on registered uses. And for these we are working more with EPA and the Office of Pest Management Policy to see what pesticides are being -- I

guess being used more now that some of the older pesticides are being phased out of registration.

We're working more with NASS so that we can make a better correlation between pesticide residues and pesticide usage. And our program planning is much more extensive than it used to be. We used to rely only on EPA for, you know, deciding what commodities to put in the program. Now USDA has a more active role through the Office of Pest Management Policy.

And we have also met with grower groups, registrants and consumer unions and have listened to their concerns and their opinions about what commodities should be put in the program. In fact, we met last -- I think it was sometime around April with a consumer union and most of the commodities that went in the program were based on some of the recommendations that they had made.

In summary, I think PDP has enhanced the ability of the government to respond to food safety issues. The program is very dynamic. It has changed based on data needs. We support minor uses. We're trying to work with grower groups and trying to find out what pesticides are gaining popularity to see -- to give them priority to be added in the program.

The data is accepted in foreign markets. It has allowed, you know, for many barriers to be brought down that, you know, are concerns about the residues in our produce. I think we are going to be able to see better correlation between residues that we detect and usage data that NASS is collecting.

And that concludes my presentation. Do you have any questions? Yes?

MALE SPEAKER: To what extent, if any, do you interact with FDA on data from imports?

MS. LAMONT: In terms of how much data is coming?

MALE SPEAKER: Well, I mean, do you interact with FDA on collecting the data on the imports like you do with EPA on domestic products?

MS. LAMONT: The only -- we work with FDA only in the sense that we report all tolerance violations that the laboratories report to FDA staff. But other than that, no.

And also we have relied on the chemists in FDA. As you probably know, the leading pesticide chemists come from FDA. So we have worked with them when it comes to methods -- you know, development and methods and issues. They are only a phone call away and they have been always very helpful to

our chemists.

Yes, Wally?

MR. EWART: On the data that you gave for the commodity that was up there seems to always appear. I don't know why.

(Laughter.)

MR. EWART: But it seems to always get up there. When you were showing fresh and processed, the apple juice versus apples, I believe those are from different years, aren't they?

MS. LAMONT: They're 1996.

MR. EWART: I mean the two. Are the apples and apple juice from the same year?

MS. LAMONT: Yes.

MR. EWART: Or for two different years?

MS. LAMONT: No. Unfortunately, as you know we cannot collect, you know, data for a fresh commodity and a processed commodity within the same year. But that brings an interesting point. I think it would be good to do collection of a fresh commodity and a processed commodity within the same year.

MR. EWART: Because it may have confused some

people, because some of the numbers there don't look like they make sense, at least one of them, and really has a lot to do with the years that were available to you, as I understand it.

MS. LAMONT: Right. And it's also difficult to know -- you know, you know that the year of production doesn't necessarily mean the year it was available, because it may have come from storage. Right.

Yes?

MALE SPEAKER: You said you used multi residue methods?

MS. LAMONT: Right.

MALE SPEAKER: Or are you using --

(Mike noise and laughter.)

MALE SPEAKER: This question really isn't that offensive.

(Laughter.)

MALE SPEAKER: Presumably as the shifts in production systems change with EPA regulation, we're going to see less and less use of OPs, carbamates and organo chlorines, which current multi residue methods handle.

What are you expecting to do two, three or four

years down the road when most of the compounds used on green beans have nothing to do with any of the current multi residue compounds?

MS. LAMONT: The methods need to be modified. This is a concern that I have expressed time and again to anyone that would hear me.

(Laughter.)

MS. LAMONT: That, you know, the changes in registration are not being addressed on the enforcement end. If the agency -- if EPA approves a method of enforcement that is a single anno light method, as is happening very often now, very few enforcement agencies are going to be able to use that method. First of all, because it is so expensive, and second, because the laboratories are in charge of enforcement and do not have the technology that is required for enforcing this method.

I think that there is a lot of room for method development. FDA -- Milten Luke, the guy that developed most of the multi residue methods, said that minor manipulation or modification of this method would allow for -- for example, for screening of Pyrethroids.

But money has to be put in. It has to be sent to

this -- you know, groups like FDA where method development for, you know, group -- entire classes of pesticides needs to be done. Otherwise, it's going to be left behind.

MALE SPEAKER: Well, let me add to that. We had the same concern. I mean, our mainstay are multi residue methods. And as the diversity of pesticides increases and the newer classes of chemicals, we would have this very serious concern about not being able to provide the coverage. So we desperately need to, you know, assure that we have multi residue methods, because clearly we can't run 30 different methods on one substance.

MS. LAMONT: Absolutely.

MALE SPEAKER: And we don't have the research money to do that kind of work. Now in fairness, EPA does have projects going. We have an interagency working group to look at the new OP method that EPA has developed to go down to lower levels and it covers other OPs. It's an impulse flame 2-C method. So they are developing approaches.

I also want to throw my two cents in on something else with respect to the food intake surveys that ARS is doing. Those are also an anchor for us. We use them in all our food safety work across the board, whether it be

microbiological risk assessment, which is in its infancy or chemical contaminants like lead, feumolisins (phonetic) and, you know, micro toxins and so on.

Whether it be broad risk assessments or whether it be -- we have an enforcement situation, we have to understand whether it's something that should be recalled or something we, you know, should take an enforcement action on a specific lot of product, and we go to their surveys to understand what the health risk is.

MR. WILSON: Yes. Jeff Wilson, Canadian Horticulture Council. As we move from basically modeling to verifying it through field data like you're doing, I guess a fair question is, from USDA's perspective are the results you're generating what you expected?

MS. LAMONT: In terms of detection rates?

MR. WILSON: Well, I would assume you're comparing what you're seeing in the field, on the grocery shelves and on the dinner plate with empirical type modeling of the path that generated that very data before it was verified in real world conditions.

Are you finding that the results -- the residues you're generating and showing up through your projects, are

they what you would have expected? And tied into the previous question, how do you bring on new technology and verify it from a modeling context into a real world context as well?

MS. LAMONT: We haven't done any modeling. You know, the only role that the Pesticide Data Program has is to collect residue data. The questions you have, the only thing that we have been able to correlate is pesticide usage with detection rates. In several commodities we have seen that they are in agreement. But for that we have to exclude imports, so there has to be some data manipulation before we can do that.

MR. JENNINGS: Any other questions?

(No response.)

MR. JENNINGS: Am I authorized to call a lunch break then?

(Laughter.)

MR. JENNINGS: We'll meet back at 1:30.

(Whereupon, a lunch recess was taken.)

AFTERNOON SESSION

MR. AIDALA: Let's get started here again for a session. So Steve went to Starbucks and didn't get anything for the rest of us.

STEVE: I'm going to stay awake. I promise.

MR. AIDALA: Okay, good to hear. Well, it says we're going to EPA does all the report outs. I don't know what this means. But we're just starting on the budget part. A real quick update on the budget situation, which is always terribly relevant to the future of all of our programs from both EPA and USDA.

And for EPA, Joe Merenda.

MR. MERENDA: Is there any way that we can lower the temperature a little bit?

MR. AIDALA: I don't know if they're working on that or not. There is a fan over in one corner. Marcia, it isn't doing you any good there.

MS. MULKEY: We looked into it to see if we could.

MR. AIDALA: And Bill. Yeah.

MS. MULKEY: It's all this body heat.

MR. AIDALA: Aren't you from Arizona or something? Isn't this --

FEMALE SPEAKER: Texas.

MR. AIDALA: Texas or Arizona, same thing. But, I mean --

(Laughter.)

MR. AIDALA: -- isn't it hotter in Texas, Bill?

MALE SPEAKER: He's from Arizona. That's all.

MR. AIDALA: So anyway.

MS. MULKEY: All I could suggest is shedding ties and jackets.

MR. AIDALA: Yeah, shedding coats and ties. And we won't go any further than that, but feel free.

MALE SPEAKER: Thank you.

MR. AIDALA: It's not California.

MR. MERENDA: Well, I'm sure that all of you are thrilled with the idea that the first topic on your agenda after lunch is something to put you to sleep for a few minutes. I will try to be brief. Al Jennings and I are going to do a little tag team here. I'm going to talk briefly about the pesticides budget at the U.S. Environmental Protection Agency, and then Al will fill you in on USDA.

You do have -- I believe it's paper number three in your notebooks. It's on budget background information. I just want to put up a few slides to try to put a little bit of this into perspective for you.

First off, where are we today with respect to the pesticide budget and how do tolerance reassessment and re-registration of pesticides, which is what you're mostly interested in, fit into that. That's the overall pie chart. If you add them all up, it's something like a 117 or 118 million program.

About just under 40 percent is made up of the two slices in the lower portion of the chart, which is tolerance reassessment and re-registration. The registration program makes up about another third of the total and then all of the other activities make up the --

(Tape malfunction.)

MR. MERENDA: What are the key changes that are down as investments in the President's budget request for fiscal year 2001? There is a total of eight and a half million dollars of increases relating to the pesticide program.

Let me warn you not to fall into the trap that I

have fallen into many times in budget related things, which is to take it all at face value and say oh, that means the total in 2001 is going to be eight and a half million dollars more than what you just showed me. No, that's not how it works. This is budgeting.

These are the increases. In any budget, as you I'm sure know, there are always decreases that happen at the same time. So actually the net gain in the pesticide program area is more like two and a half million dollars. But what's significant about these is it shows where the agency, EPA, is proposing and the President is proposing through this budget to put more of our resources. And those are --

(Tape malfunction.)

MR. MERENDA: -- EPA's notice to accelerate the registration of reduced risk pesticides, leading to the ability for transition away from some products that may be unavailable for particular uses.

About three and a half million dollars is associated with tolerance setting and reassessments. Now that tolerance setting includes new tolerances, as well as tolerance reassessment, the way this particular line item in the initiative shows up.

The next item is an important one, which is a further expansion of the regional strategic AG partnerships, which is an effort on the part of EPA through its regional offices to work with growers to increase the -- this strategic AG partnership program is aimed at getting some of the better technologies more readily available and tested out in the field through grants that would be given by the EPA regional offices.

The endocrine disruptors screening program has an increase. But this is one of those where if you look at the full numbers, you will see that actually for the Office of Prevention of Pesticides and Toxic Substances' portion of the endocrine disruptor program there is a net decrease from 2000 to 2001, because in 2000 the Congress didn't add on, and the budget process doesn't work that add-ons carry over from year to year. But the add on is removed, but there is another two million dollars that is being put on to offset part of that.

And then lastly expanded worker protection just under a million dollars.

So in terms of areas of emphasis, that's where the effort is going, and a big chuck of that will be associated with the effort that you all are dealing with in this

committee with the reassessment of tolerances and the re-registration of pesticides.

MALE SPEAKER: The strategic AG partnerships, those are grants made to -- from the regions to local commodity groups or research groups or whatever?

MR. MERENDA: Correct. Various types of groups and academic groups in some cases.

MS. MULKEY: We're going to talk more about that tomorrow in that section on EPA transition activities. We're going to talk about -- this is additional money. We already have some out there, right, Joe?

MR. MERENDA: Correct. Yes. This is an increase to a program that was started as a pilot, and this will expand it.

The other figures were total dollars. But just to indicate to you where we feel some of our pain within the program is trying to implement this, we do a great deal of this work, of course, with extramural support. But a lot of the work is also dependent upon the staff in the Office of Pesticide Programs, whether here in Crystal Mall or at our two laboratories in Bay St. Louis, Mississippi, or Ft. Meade, Maryland.

And what this slide just shows is that we are down -- the entire agency has been under a hiring freeze for over a year, and we are down from where we were last year in our authorized staffing level. We are anticipating a modest gain in fiscal 2001. Of course that is subject to the decisions that the Congress makes in doing the appropriation bills.

So reflecting where we think we're going, we think we're looking to regain some of that past loss. But we don't know for sure yet until the appropriation process is completed.

FEMALE SPEAKER: Joe, do you have a breakout of how many registrations and re-registrations? Do you ever break it out that way?

MR. MERENDA: I don't have that with me. We can -- I'm sure -- I know we have them. I just didn't bring that one along.

All right, here we go. And just a few of the issues that we're raffling with and which are going to be facing us not just this year, but beyond this year.

I already mentioned the challenge of recovering from last year's hiring freeze, which is an issue for us in terms of the amount of staff we have and some of the

expertise we have. We are working hard now that the freeze has been lifted to try to build back some of the capacity that we've lost. But it will take us a period of time to do so.

There is another big financial issue which is on the horizon. The maintenance fees, which currently support approximately 200 of our 850 or so employees that are on board, will be reduced by two million dollars, from 16 million dollars to 14 million dollars in fiscal year 2001. And at present that entire line item of maintenance fees, which goes directly to support staff, will disappear in 2001.

This is clearly a major issue for EPA and the administration to try to resolve how this will be funded. And of course there are many budgetary ways to work that out, but it's an issue that is clearly in our minds.

Another issue which is in our minds and in the minds of many of you is the issue of tolerance fees. Under the Food Quality Protection Act, EPA is directed to recover the full costs of setting and reassessing tolerances. EPA put out a proposal for this, which received extensive comment and not very favorable comment from industry.

We are currently working on a final version of that tolerance fee rule under a couple of constraints, one of which is that the Congress has told EPA in the appropriation language that we are not allowed to promulgate the final tolerance fee rule this fiscal year. And there is similar language in the current appropriation bills to extent that for another year.

At the same time, we have in our budget for 2001 a seven million dollar offset as identified by the Office of Management & Budget. That means EPA's budget has been reduced by seven million dollars in anticipation of our collecting an additional seven million dollars in 2001 for tolerance fees. Whether we can collect that obviously depends upon whether the rule is in place or not. And so we have a potential seven million dollar shortfall that we get to loss sleep at night after night until the time comes.

The next item, funding for registration review, many of you may be aware that another element of the Food Quality Protection Act is telling EPA to establish a program that we're calling Registration Review, which requires us to get in place -- not by a specified date. But to get in place in a timely manner a program in which we will on an ongoing

basis re-look at all existing pesticide registrations.

This is so we don't end up having to do re-registration all over again with a backlog, but to set up an ongoing program with the goal of looking at every registration at least every 15 years. This is an area that we have had in our budget over the last couple of years. But it's been quite vulnerable to budget reductions, and so we have not been moving ahead on that as quickly as would have been ideal.

We have in the 2001 budget request the funds to allow us to move forward. We put out an advance notice of proposed rule making on that program this year. We need to work forward toward the proposal, and so we are hopeful that we will be able to keep enough of a budget to move ahead on that.

But it's another one of the things that we lose longer term sleep over. It's not an immediate crisis like some of the others, but it's an issue that is facing the program over a longer period.

And lastly, some of you are intimately familiar with the issue of fee for service. This is a proposal which has been under discussion for some period of time as to

establishing a different type of fee for registration of new pesticides, which would support a big portion of the registration program from registrant paid fees in exchange essentially for guaranteed acceleration of the decision process.

That doesn't mean guaranteed favorable decisions. It means getting to a decision quicker, not having the backlogs that currently exist when a registrant brings in a new proposed pesticide registration and it gets in the que, and we give it a priority based on the amount of staff we have, and it takes many years sometimes to get to the decision point.

Whether that will happen is an unknown at this point. That requires new legislation, and we don't know where that will be for fiscal 2001, whether it will happen or not.

So that's basically what I have. I can do a few questions at this point, or we can have Al present his and then we can do questions together, whichever you would prefer.

MALE SPEAKER: I have a question.

MR. MERENDA: Yes.

MALE SPEAKER: Well, two questions, actually. Two questions. On the 8.5 million, I think most -- I take it that most of that is contractual monies?

MR. MERENDA: That's total, but, yes. Since our staffing is not going up at a significant rate, the increase is basically contract money.

MALE SPEAKER: Okay. The second question, and you don't have to answer this. But I'm really curious.

FQPA provided for assessing new tolerance fees, but you spoke of barriers to being able to introduce those. I'm aware of a barrier in 2000, but not in 2001. Can you articulate a little bit about what is behind the barrier you eluded to?

MR. MERENDA: The barrier I think you're referring to in 2000 is in our appropriation language for fiscal year 2000 that prohibits EPA from promulgating the rule this fiscal year.

What has been put into the House version of EPA's fiscal 2001 appropriation is essentially the same language, and I understand that the Senate is planning to do similarly. Now this is not been enacted, so we don't know whether that will be there. But the indications are that there is strong

interest in continuing that prohibition on promulgating the new tolerance fees in 2001 as well.

MR. AIDALA: Pass it to Eric.

MR. OLSON: I'm just curious. What is the agency's contingency plan in case you do lose 200 people? Have you guys started thinking through what the impact of that would be?

MR. AIDALA: A prayer.

(Laughter.)

MR. MERENDA: I'll go with Jim's answer. No, we do not have a plan for reduction in force that we have set up to deal with that. Remember, that is for fiscal year 2002 -- no, no, not the seven million. I'm sorry. I'm confusing two things.

The maintenance fees in fiscal year 2002. Losing the seven million dollars, Steve, do you want to say something on that?

STEVE: Well, I was just going to say, we have informed everyone, including the Office of Management & Budget, that as we approach and prepare our 2002 request, obviously this is going to be one of the issues that has to be addressed.

And so that is an opportunity in the discussions for fee for service. There has also been discussions of a continuance of the maintenance fee as part of the fee for service program. That's a second option. And perhaps others. Obviously we want and we need the re-registration program to continue and tolerance reassessments to continue, and we don't want to put any of our employees at jeopardy.

And those of us that have lived through reduction in force kinds of actions, which we don't even want to get into at all, are just devastated. So we think that there are a number of opportunities or ways of doing that.

MALE SPEAKER: The 12 million or so that is in the OPP budget for endocrine disruptors work, where is that being spent? You know, you don't have a division for endocrine disruptors and we don't hear a lot about that. I know there is separate committee work going on to deal with that.

But is that outside of EPA? Is it an ORD?

MR. MERENDA: The endocrine disruptor training and testing program money, that 12 million dollars -- and I don't remember the figure off the top of my head. But a portion of it is for the Office of Research and Development and their

research and development efforts.

The other portion is actually to be managed by Steve Gallston's (phonetic) shop, Office of Science Coordination and Policy, out of our office -- the AA's office. And the large bulk of that, we are now in -- (inaudible) -- procurement process. We're actually beginning to do the screening. We're right now in the testing validation.

We do have some updates. In fact, we are about to issue a report to Congress on the status of the endocrine disrupting and screening program. So I expect within the next couple of weeks that will be publicly available, which details the specific activities that we're involved in and sort of the time schedule in some sense of where the funds are going.

MR. AIDALA: I had all these numbers memorized nine days ago, but I've conveniently forgotten them. I think in the ballpark, again, the numbers are like one, three and eight. One million is in like OPPS proper. Three is in the ballpark. These are sort of more boundary kind of numbers. ORD in about seven or eight, and the validation -- basically it's the validation contract stuff to validate the screens.

That's why you don't see a division or, you know, a bunch of people with the word endocrine labelled on them.

MR. MERENDA: Anything else? I guess not. Al?

MR. JENNINGS: Okay. I'll keep the USDA format here by handing out paper. Thanks to Dennis' earlier handout and discussion, this should be a really quick and easy thing to go through. I'm going to wait for the paper to work down, because it doesn't make a lot of sense unless you're looking at it. It may not make a lot of sense even if you are looking at it.

MR. MERENDA: I was going to say, don't set that one up.

MR. JENNINGS: I thought I would beat Jim to the punch there. Okay. This presents program areas, many of which Dennis already talked about, broken out by agency. And the columns on the right show the '99 - 2000 and the 2001 President's budget request, and changes are indicated as well as summaries by agency.

So Agricultural Research Service -- just starting at the top -- the area wide IPM Research Program, this is a program you may associate the coddling moth fair moon effort with most closely. That effort is pretty much shut down now

and we're on to other things. There is a stored grain area wide program being run out of Oklahoma state. Leafy splurge some place out in the west. And in the midwest there is a corn root worm bait attracted program underway. And one other that I can't remember.

But, again, this is an effort -- this is kind of unique to ARS. The area wide programs are on the ground, and they are demonstration programs involving growers, and the kind of program that if you do not have a large area of land under the program, it's simply not going to work. So hence area wide efforts and really applied pest management.

The next line down, ARS minor use clearance, Dennis mentioned the IR-4 program that does the research, assembles data in packages to get registrations for minor uses. That is a shared program. ARS, as you can see here, contributes about two million dollars annually. And if you look down at the bottom of that first page, that's the CSREES component that Dennis mentioned.

So to figure out what the department is spending in the IR-4 program, you have to add those two together. So as you can see, that's about 13 million in the 2001 budget.

Okay. Alternatives to Methyl Bromide. Dennis did

talk about methyl bromide, but this is the ARS component of Methyl Bromide alternative research, a program that has been in place for a while, and we are continuing to ask for increases because of the importance of that phase out date.

And then of course the most important item on this page is the last of the ARS items, which is my office, the Office of Pest Management Policy. And you can see the subtotals there for ARS and the increase that we're looking for in the 2001 budget.

Again, looking at CSREES, as I said, Dennis did a lot of these, so I don't think we need to go into very many of them. The numbers are here just for your reference. And in fact, I will not go into those. I think the only ones that we do need to mention are maybe the new ones, again that Dennis did mention, starting on the second page, crops at risk and RAMP, and Methyl Bromide transitions are at the top of the second page.

The funny little thing in the middle where it talks about the P I A P or PIAP program, that's kind of an accounting method and reflects what Keith explained earlier today about how what used to a formula fund program in 1999 got switched into this integrated program and is now

competitive for year 2000 and as far as we know for the future.

Again, pesticide applicator training. That was discussed a little bit earlier today. We have, I think ever since 1998, been requesting Agriculture funding for that and we have not received it. So again this year it's in the President's budget and remains to be seen what Congress will do with that request. But we have been successful getting it approved by the President and failing on the Hill.

Let's see. I think if you flip over to the third page there are probably some programs that Dennis didn't dwell upon as much when we heard from him earlier today. The top line there, the NASS Pesticide Use Surveys that Doug Caquino talked about before lunch. You can see we've traditionally tried to increase funding in that program. The increased funding would go into, as Doug mentioned, the nursery and greenhouse area, as well as our priority would be getting more detail and more information on the minor crops, the fruits and vegetables, with additional funding.

The next line down, FSIS is the Food Safety Inspection Service, and that reflects the -- when Martha mentioned that we're getting into poultry sampling, and

hopefully meat next year, and that we will be relying on FSIS to pick up those samples for us, because they're the ones with inspectors out there at the slaughter houses. So that's just to cover the extra cost for FSIS.

And then finally AMS Pesticide Data Program. That's the program Martha briefed you on. And again we are continually seeking increases there to keep up with EPA's demands.

In 2001 we are hoping to get some additional money that would let us get into drinking water, which there is a notable lack of data on what's going on at the tap. And for many EPA risk assessments, they are relying on modeling, and we would like to figure out how to get into that system and start collecting the information.

I think if you're familiar with modeling programs, you know a million dollars isn't going to take you very far if you're trying to figure out what's in the drinking water in the entire U.S. of A. But at least we'll hopefully get started in 2001.

And the last page is full of footnotes to explain all the stuff that I didn't explain very well. So let me stop at that. It's quick and you can probably look at this

at your leisure later on. And if you have any questions, I'll be around all day today and all day tomorrow, or if you have questions based on this quick overview, feel free.

Steve?

STEVE: Twenty one point 5 million dollars on Methyl Bromide research. Couldn't we make ozone for that much? I mean that's a phenomenal amount of money.

MALE SPEAKER: I'm sure ARS would consider a proposal for that.

STEVE: Yipes.

MALE SPEAKER: I wasn't going to add those up, Steve. Is that what they come to?

STEVE: Well, five million for CREES and 16 and a half for ARS.

MALE SPEAKER: That's about what it comes to.

STEVE: Well, we'd better get something. We've been doing that for how many years now?

MALE SPEAKER: Buy out every strawberry and tomato grower, right?

STEVE: Exactly. Anyway, a question for Keith, I guess. What is the situation with the budget now relative to the committees?

MR. PITTS: I was trying to take some notes as I was walking through this budget. But I think primarily what we're seeing in 2001 is basically holding at the 2000 levels. I'll point out some notable exceptions.

This isn't uniform, but in the case of some of the competitive grants, one house or the other has done some additional, I think on crops at risk. The House has two million in that program now. RAMP, I think we're up to four or six million. Again, the House didn't add on there. Five or six million.

The Methyl Bromide Transition Program, I think again the House has three million there, up from two. The House or the Senate, one of them, has one and a half million in for pesticide applicator training. They don't have it in the other. It's been zeroed out. The organic transitions program, I think a million has been retained in the House budget as well.

NASS, I think is at 7.1 million. We may have a full 7.3, so it's fairly close. FSIS, I think the increase is in there as well. It's kind of hard to tell with that, just because the Congress does line items differently. And PDP as well. I think they're at slightly above 14 million,

so I think in general we covered that program as well.

MALE SPEAKER: When you say the House -- (inaudible) --

MR. PITTS: This is coming out of the committees. Again, neither House has approved our appropriations bill yet, but that's where we stand coming out of the two committees.

Al's office also, let me just say, is at 2000, other than the House I think has added about 300,000. We do have a reprogramming letter that just got sent up to the Hill last week requesting another $550,000 for Al's office. He's basically out of money for the rest of the year, so we're kind of shutdown.

MR. JENNINGS: I'll be selling pencils on the corner after the meeting.

MR. PITTS: That's at least our understanding right now. And, again, the appropriations committee did just recently do a reallocation that looks like another hundred and some million have been put into the Ag approach allocation for the committees. Now how they're going to spend that, I think primarily it's going to be an offset for a disaster payment on apples and potatoes.

(END OF TAPE THREE, SIDE ONE)

MALE SPEAKER: -- so they don't have any pesticides?

MR. PITTS: I think you can talk to Robin about that one. But New England apples I think had a drought and then they're having some major disease problems this year.

MALE SPEAKER: And the apples going to Vermont in particular, perhaps, or whatever.

MR. AIDALA: Anything else on budget? We can move on. We'll a little behind schedule. But I would like to recommend our schedule is to -- well, obviously risk assessment is already tough enough to try to do in a half hour, so we'll keep that on hold.

But I suggest if we can to cut the next two items in the agenda here by 10 minutes, the channels of trade and worker protection issues. Obviously if we need to take a little more time in the discussion, we will, because that still at least gives us one other half hour segment after the break to make up some of the time. We like to keep to our schedule more or less in particular areas laid out on the agenda.

So if we can do risk assessment now? I think this

is Lois and who else, Mike? And Denise and Mike. Okay, great, come on down.

And then again, I'm going to have to leave in about 15 or so minutes. I apologize to the group. Because there are PCB's on the Pacific Islands that shouldn't be there.

MS. ROSSI: Are there plans to have the -- (inaudible)?

MR. AIDALA: No. Can we turn this computer thing off, which is also generating heat and light, sound and jury?

FEMALE SPEAKER: No one knows how to turn it off.

MR. AIDALA: Well, who brought it here? Is there anyone who would like to take it home with them, please?

(Laughter.)

MS. MULKEY: Well, I'm going to make a fool of myself acting like I know what to do.

MR. AIDALA: It's EPA equipment.

MS. MULKEY: I'm hoping there is an off button.

MR. AIDALA: That's one good start. And you can always pull the plug.

MS. MULKEY: Martha, do you know how this works?

MS. LAMONT: It's your machine.

MS. MULKEY: What about pulling the plug?

MR. AIDALA: This is cooperation between our health and environment division and SSRD in action.

FEMALE SPEAKER: There you go.

MR. AIDALA: See, the states always act autonomously.

(Laughter.)

MS. MULKEY: And practically, right.

MALE SPEAKER: It's a high tech state.

MR. AIDALA: Yeah, it's a high tech state. That's right. Here you go.

MS. ROSSI: Okay.

MR. AIDALA: Who are you?

MS. ROSSI: I'm Lois Rossi. I'm the Director of the Special Review and Re-registration Division. And for those of you who that means nothing to, it's the division within the Office of Pesticide Programs that is responsible for the re-registration program and the tolerance reassessment program. And even more relevant, the place where the OPs -- the organophosphates -- are being reviewed.

We're a risk management division and we're coordinating the reviews and issuing decisions on the organophosphates, as well as the other chemicals that are

going through tolerance reassessment and re-registration.

If that isn't enough to keep us all busy, I think trying to cover the topic of risk assessment in 30 minutes is a little bit of a challenge. The way I've chosen to approach this topic today is from a risk manager point of view. And with me are two people from our Science Division. To my immediate left is Mike Metzger. He is with the Health Effects Division -- a Branch Chief in the Health Effects Division. And to Mike's left is Denise Canter, who is the acting Director of the Environmental Fate and Ecological Effects Division.

And for those of you who are more familiar than others with our risk assessment process, some of this will be a review. But I've also chosen to point out a lot of the recent developments in risk assessment and refinements and other assessments that we've been doing for those of you who are a little bit more familiar.

So I'm going to try to cover this fairly quickly and then leave enough time for questions that you may have. The foundation of our risk assessment is data. That is the building block of all our risk assessments. And the pesticide program is very rich in data.

Many of these pesticides that we're reviewing have two, three or even 400 studies that have been submitted over the years across all the disciplines: toxicology, residue chemistry, ecological effects, environmental fate and product chemistry. And the main purpose of the early stages of re-registration was to make sure that these chemicals did have a database up to current standards.

The risk assessment process has four basic steps. And when I was trying to think about this presentation last night, if you think in terms of the risk assessment process and these four basic steps, you can kind of key in to where your particular questions or particular concerns are. And oftentimes, I think, we focus on one or the other, and it may be even the wrong place when we're trying to understand the assessment on a particular chemical.

But the four steps are hazard identification, dose response assessment, exposure assessment, and last but not least one that we often forget, and I think one that we're trying to concentrate quite a bit on, is risk characterization. And as we review these risk assessments as risk managers particularly, and as stakeholders, I think it is important to keep these four pieces that constitute what a

risk assessment is in mind and which one data can best address, or which one our intentions should be focussed on.

Very, very briefly, our hazard identification consists of looking at toxicity tests, of which we have quite a few. These are the developmental toxicity studies, reproduction toxicity studies, cancer and acute toxicity studies that are done in laboratory animals and that are exposed to the chemical that we're looking at by different routes for different periods of time. Short time all the way up to two years.

And we look at the endpoint or the effect that's being shown in these studies, which many of you are familiar with: cholinesterase inhibition -- that's pretty much the endpoint of concern for the OPs -- cancer or developmental effect.

The second part, the dose response, is where we select the most appropriate endpoints for these risk assessments. And I think that's another area where the endpoint selection -- oftentimes we don't focus on the endpoint selection and the endpoint selection plays a very critical role in the outcome of the risk assessment. Terms that are associated with that particular step are determining

a no effect level, a low effect level and an uncertainty factor.

The third part, which is the exposure assessment, which many of us concentrate a lot of our attention on and many stakeholders have certainly provided information that plays a critical role in that, is where we look at where the pesticide exposure occurs. It can occur -- we look at all the routes: oral, dermal and inhalation. We look at different path ways, food, residential activities, drinking water and occupational exposures.

And I think that's an important point to remember in re-registration, that in re-registration we do look at every single one of these routes of exposure and all populations that could be exposed: children, adults, workers, bystanders, harvesters. Different populations of people that could be exposed.

In other words, those who use a pesticide, those who might be eating foods with residues, drinking water with residues, coming into an area where a pesticide is used, touching surfaces, contaminating hands. And in the case of children, we even look at hand to mouth exposure.

And lastly the last phase, which is risk

characterization which the risk managers do play a significant role in, is the process of combining hazard identification and the exposure information to describe and estimate the overall magnitude of the health impact or the environmental impact.

Once our magnitude of risk has been estimated and quantified, the agency generally characterizes the nature of the risk in the risk assessment process. And here again, I know for those of you who have attended some technical briefings, we always begin our technical briefings by saying that we have a lot of numbers to present. And we ask -- we try to not just focus on the number, but what the number really means. And I think the agency has come a long way in the last year in trying to determine what the numbers mean.

Key points that we consider in this risk characterization are the kinds of health effects that are likely to arise, the potency of the risk, the population affected and the likelihood of exposure.

We typically do for a typical re-registration decision for a food use chemical -- non-food is a little bit less. But we typically do the following types of risk assessments. We do a dietary risk assessment that includes

food and drinking water. We do a nonoccupational assessment if there are residential uses or nonoccupational uses like recreational uses, such as on golf courses. We also look at exposures that could happen in places like schools and playgrounds.

We do an aggregate exposure, which is food and drinking water, and if there is a nonoccupational component like residential, we include that. We also look at the occupational. We look at handlers and post-application workers. Those people who might be doing activities after an application occurs.

That's for the human health. We also have the entire environmental and ecological side, where we look at the fate of this chemical, which is often a very important factor in characterizing the risk. We look at water resource assessments. Our models and our monitoring data that we have to estimate the water component of the risk assessment.

We look at the ecotoxicity. We have acute and chronic studies on birds, fish, vertebrates and plants and we assess those. And of course, again, we are characterizing those risks.

These have been the basic risk assessments. A

little bit added to, as a result of FQPA, the aggregate. But these are pretty much the risk assessments that you will find in any reg that you go back, even pre-FQPA, because these are the assessments we do for re-registration.

Now in the last year we have certainly come -- we have made a lot of progress. You heard the presentation this morning on the science policies. We've had policies developed. We've had processes to develop. We've had risk assessments and characterizations to develop. We've had a lot of work.

And when you think back, for those of you who have been in the pesticide game for a long time, there are a lot of things that we take for granted right now that weren't really even in our vocabulary as recent as two or three years ago.

With regard to dietary, which I think probably is the assessment that most people and most stakeholders are most familiar with. And most people who have been following the decisions probably have -- are able to communicate and talk about this assessment probably the best.

But within the last year many of the -- much attention has been focussed to making these assessments as

realistic, but yet as protective as possible. We utilize now routinely the Pesticide Data Program. We also utilize market basket surveys, of which there are some coming in on the organophosphates as well as the carbamates. The word Monte Carlo was really -- maybe as recent as two years ago was really just a place and now it is a model that we talk about in conversing. And processing factors, percent crop treated and usage information.

We're looking at all kinds of populations. And more importantly, I think, we've begun to dig into what these risk assessments really mean: identifying drivers and understanding the distribution and understanding what is happening at the 99.9 percentile. What is actually going on? Give us the ability to direct our risk management decisions. And those have become pretty commonly discussed terms with many stakeholders.

With worker -- which, again, we have always done worker risk assessments in re-registrations. We utilize the best data we have. Generally that is data -- we have a lot of data available now that is associated with the route that we're concerned about. A dermal route. We usually have 21 day dermal studies that we utilize, as well as inhalation

studies.

Gaining and understanding of what exactly is happening in the field allows us to not only improve our assessment, but also be most protective. We look at acreage treated. We look at equipment. We've been looking at activities. We have gotten a lot of information. We have gone out to the field and observed a lot of these things first hand, and we've gotten a lot of information in on that. The amounts handled and that kind of stuff.

Oftentimes with worker risk assessments we are -- we hear the comment that we're using models to estimate worker assessments. And first of all, on a lot of chemicals, we have chemical specific data that has been generated over the years or even in recent years. It's specific to that chemical, but just even the class of chemicals.

But we also have something that we call the pesticide handlers exposure database, PHED or -- what's the other way they call it?

MR. METZGER: P H E D.

MS. ROSSI: P H E D. And that is not a model. It actually is a series or a set of studies that we use when we don't have chemical specific data but we're trying to do an

assessment and we can find something that is very similar. But it is -- they are actual studies.

With regard to reentry, the agency put a lot of effort back in 1995 in generating a data call in to call in data that would refine and particularly allow accurate assessments for post-application reentry activities. Much of that data is coming in and we are looking at it and incorporating it into our risk assessments.

I think we've also -- not only on worker risks but on the risk assessments, because of a lot of the public outreach and the public participation that we've incorporated in making the process transparent over the last year, we have worked on ways to explain our risk assessments. We have put equations up. We have showed what variables go into equations.

And while I know this may not be totally clear to everyone, I think there have been strides in trying to make this information more understandable and more -- for people to have a better understanding to see where the agency is coming from in trying to protect workers.

With regard to residential, we have begun first of all to routinely do these risk assessments if there is a

residential use and refining them according to SOPs that have been thoroughly reviewed by our Science Advisory Panel. And, again, trying to use the best data and assumptions.

We've also begun recently to do assessments from exposure -- exposure bystander assessments of a pesticide that may drift off site to nearby people. And we have begun to do a few of those.

With regard to water, I think that's another area where oftentimes models are associated with our risk assessment. And they are, but we also have a fair amount of monitoring data that gives us a lot of valuable information on what are the levels of pesticides in water.

I think with regard to the water and the ecological assessments, what we often do is an early screening of a pesticide using conservative models. And if the pesticide passes this screening, we pretty much stop. We don't put any further resources into it. If the screening shows that there could be a problem and that water is a potential problem and a route of exposure of a pesticide, we then go into the next level of looking at what's out there. Who has monitored for it. We work very closely with USGS, and that relationship has become even closer over the years.

We try to characterize these numbers. What do these water levels that we're finding. What is the numerator detects over the denominator of those tested, trying to recognize uncertainly in both directions. Is this an over estimate or could it be an under estimate based on what the information that we're using shows us and represents.

We've also begun to monitor -- require a lot of monitoring data. And even there are a lot of discussions going on right now of getting monitoring data on drinking water from the tap. The next probably big step in monitoring in water assessment would be to incorporate that into the Monte Carlo. And that is being worked on in HED at the moment.

With regard to ecological effects, again, we do some screening models to estimate a concentration, for example, that might be in a water body at the end of a field. And, again, if after a screening model it passes, we stop there. If further refinement is necessary, then we will go ahead, and the next major step, I think, in that area is doing probabilistic assessments for ecological effects.

So those are some of the things, I think, that have changed in the last year, as well as a very, very short

overview of what risk assessment means. So with that, we can have any questions.

Everybody understands or is totally unclear. Jean-Mari?

MS. PELTIER: Lois, I want to applaud you for the job you've done in making the risk assessment process more open so that we can participate in it. And we have really appreciated that, and particularly appreciated the conference calls that you've set up.

One of the areas that we were also grasping with when FQPA first passed was what kind of data could we in the grower community supply to the agency in order to be helpful. And a lot of us embarked on creation of crop profiles and now PMS plans, and we're continuing to walk along that path.

But in this area of worker exposure, some of us have wondered what we could do in terms of generating data that would be helpful to the agency in terms of refining the risk assessments on the worker exposure side, and wondering if there is some kind of data generically that we ought to be looking at that would be helpful to come up with other ways of mitigating other than just extending the PHI?

MS. ROSSI: Well, there are a lot of data,

actually, and we've had some discussions in many of our technical briefings that we've had outside of Washington, D.C. But I think from a tax point of view, which is largely a burden on the registrant, I think having the appropriate studies that reflect the route of exposure is probably the best thing, the 21 day dermal and inhalation study.

From the grower point of view, I think the types of things that I mentioned about the acreage treated. Those are variables that we're finding do make a difference. The equipment. What is being used out there. Activities in the field. And I think we developed a couple of matrixes that we have shared with USDA, as well as grower groups and registrants, which show from records kept actually out in the field how many hours a pilot applies a pesticide, how many acres treated or different tasks that are done as workers reenter fields. That kind of information has been helpful.

The other type of information that is also helpful, which, again, is largely a burden on the registrant, are studies that are actually done using closed systems, and in some cases even the formulation that is applied using the closed system. That has provided valuable data.

So I think, you know, the practices and -- you

know, again, the bottom line is figuring out exactly how the pesticide is used. And the closer we get to that and the variables associated with that, then the more confidence you have in the risk assessments.

MALE SPEAKER: I have a question about -- two questions about the water issues. You mentioned that the probabilistic risk assessment might be a methodology that you'll be using to analyze data about water quality impacts.

One of the debates that is raging in California now is your Office of Water people, as implemented by your regional office people, have said that that's not a methodology that they're willing to look at for trying to analyze what sort of water quality impacts there might be for pesticides and what sort of management measures can be taken to try to reduce those impacts.

So have you had much discussion with your Office of Water people, is one question, and how can we solve that problem.

And the other question is on the risk management having to do with water quality impacts. How are you going to be factoring in monitoring data and some of the toxicology data that water agencies perhaps throughout the country, but

certainly in California, have on the tools that you have to control those impacts?

MS. ROSSI: Okay. Denise, do you want to take the first part?

MS. CANTER: Yeah, I'll take the first question. Actually I received a series of e-mails recently on this exact issue and this exact topic.

And the way that I think of probabilistic ecological risk assessment is in the sense that it provides the risk manager with a sense of the probability of, and the magnitude and severity of impact at a particular location or across multiple locations.

So, for example, if I were to say to Lois for a particular pesticide that I expect that in 90 percent of the cases I will see -- or she will see 70 percent mortality at these types of locations, she then has to take that information and decide whether she believes that to be a significant enough impact to trigger any type of regulatory measures to reduce those risks.

In the context of -- I believe these have come in the context of TMDL issues. My communication to the Office of Water people is that the issue of how you conduct a risk

assessment, and what you are able to provide in terms of being able to go a step further than just saying a point estimate can result in this kind of an effect, doesn't really have a bearing on the risk manager's decision of what is a significant impact.

It really is -- it's not the risk assessment itself that presents things probabilistically that is a problem. It's that we really don't have a metric yet for saying okay, from a risk management standpoint really what do we view as a significant impact. In the TMDL context, it's pretty much a -- it's already been defined as an exceedence of a particular criteria.

Well, that is a standard that exists. If I describe what that really means at a particular site -- at that site it means a 70 percent probability of 50 percent mortality -- that doesn't change the fact that that standard exists under the TMDL program for that particular location. I just provided more information on what that really means to the risk manager -- management side of the program.

That's the way I view probabilistic risk assessment. To me, saying you don't want to do a probabilistic risk assessment says I don't want to better

understand probability magnitude and severity of impact.

MALE SPEAKER: Well, actually the problem is not that it's the tool.

MS. CANTER: Right.

MALE SPEAKER: The problem is not that it's the tool. It's that there do not exist standards at which the impact has been defined. And the biological and excellent toxicity tests that your Office of Water developed ten years ago are now being used by California and probably other states to determine what the no toxic standard means.

And so that's part of the issue. But then they are leery of using probabilistic risk assessment as a tool --

MS. CANTER: Uh-huh. Right.

MALE SPEAKER: -- to try to characterize what sort of level of acceptable risk there would be.

MS. CANTER: Right. Right.

MS. MULKEY: Denise, you haven't answered the question about the data that are available through state monitoring and so forth and what kind of use we're making of it. That was the second part of the question.

MS. CANTER: Sure. Sure. In terms of our access

and our -- in the Environmental Fate and Effects Division we have the responsibility for the aquatic risk assessment, as well as the characterization of the occurrence of pesticides in surface water and ground water as an input to the drinking water assessment. And we do as thorough a search as we can to bring in all available monitoring data into that assessment process.

Now for some pesticides there is a lot more data that exists through Drinking Water Act records and files and state files, and also under the USGS' nautical program. For other pesticides, it's not so rich. But I would say generally over the past several years we're seeing more and more monitoring occurring, and more and more water related data, actual hard measurements in the field, coming in. And that is part of our assessment process and we build it into it.

We also work with Lois for cases where we don't have a lot of monitoring data to help design follow up monitoring studies to provide us with additional data to better understand what those impacts are in the environment.

MS. MULKEY: Risk assessment is one of those topics we could spend the whole day on. But in the interest of

moving forward, unless somebody has a question that you think you can't get handled -- get your private curiosity settled -- maybe we can move to the next topic on the agenda.

Thank you. Thank you. And the next topic is --

DR. TROXELL: Channels of trade.

MS. MULKEY: -- channels of trade.

DR. TROXELL: And I'm going to do what Al Jennings did and have Dr. Cachtauck (phonetic), Senior Developer in my office who is responsible primarily for developing this and really knows what is going on, give a brief run down of our channels of trade implementation approach. And maybe we can pick up a little time. We'll see.

MS. MULKEY: Do you want to use this mike?

DR. CACHTAUCK: Sure. Let's see if I can guess this right. Okay, thank you. Okay. There is a handout that covers these slides one by one available in the back. Here is what our document looks like. By the time you subtract the cover and the references, it's only 11 pages. It's been issued as a draft on June 2nd through a notice of availability in the Federal Register. We're going to take comments for 60 days.

And the document itself is available at the FDA

cfsan web site. You would go to www.fda.gov. Go to foods. That gets you into cfsan. And then under what's new, you will find this document.

It is specific to Methyl Parathion. And what it does is it presents our planned enforcement approach for foods containing Methyl Parathion residues in accordance with the channels of trade provision of the FQPA. As I said, it's issued in draft. This is not the final guidance. This is what we think will make sense. It's a planned enforcement approach, but the final guidance could differ if comments persuade us that some changes are appropriate.

What is this channels of trade provision? Well, just to set the stage a little bit, for Methyl Parathion most of you probably know that the last permitted date of application of Methyl Parathion to approximately 30 commodities was December 31, 1999. Those were covered in EPA's cancellation order. The corresponding tolerances for those commodities have been proposed to be revoked on June 2nd, the same day we issued our draft guidance. Therefore, a situation can very readily arise where once that tolerance revocation is finalized, FDA, which monitors pesticide residues in the food supply, could encounter foods

with residues of Methyl Parathion resulting from legal application of Methyl Parathion last fall prior to the December 31 cutoff date.

And this is the situation that is addressed in the channels of trade provision. Some people refer to it as the safe harbor provision. I snuck that it in, because my lawyer isn't here today. But the legal term is channels of trade.

And what the channels of trade provision says is that if FDA encounters such a residue of Methyl Parathion or other pesticide revoked under FQPA after the tolerance is revoked, normally that food would be considered adulterated subject to regulatory action. But in this case, food is not adulterated because of this residue if the residue complies with the former tolerance and the responsible party can demonstrate to FDA that application was made at a time and in a manner that was legal under FIFRA.

So the key things to remember here is if one encounters a situation where FDA finds a residue of Methyl Parathion after the tolerance is revoked, the burden of proof under the law is on the party responsible for the food, and what they have to demonstrate is that the residue resulted from legal application. We're talking about application on

or before December 31, 1999.

And food that meets these two tests -- complies with the former tolerance and legal application -- will not be subject to regulatory action because of the residue, may remain in the channels of trade and be sold in the normal fashion.

And this is not going to be business as usual in terms of the standard procedures that the public has come to expect from FDA over the years. This is a first time situation. And we issued this guidance so people could have some idea of what to expect from FDA if one is ever in the situation where they have to make this showing that they meet the -- that they comply with the channels of trade provisions.

And we know for a fact that with respect to frozen foods, if a crop like carrots was harvested in the fall of 1999 and has Methyl Parathion residue on it, was cold stored for some period of time and then frozen, once the freezing takes place, residue of methyl parathion is essentially going to be on that product indefinitely. And in many cases frozen food items can stay in warehousing in distribution channels for up to four years after the crop is

harvested. So frozen carrots from the 1999 fall crop could conceivably be monitored by FDA in the year 2001, in the year 2002. We could find a residue of Methyl Parathion in those frozen carrots, and that would engage us in the type of situation that the channels of trade provision addresses. And that could be the case for up to four years from information that has been provided to us.

Some of the same things. Just the last permitted date of application, 12/31/99. Here is some other information about other kinds of foods besides frozen.

Ambient stored foods and refrigerated stored foods. We believe based on what EPA has told us that Methyl Parathion residues in ambient and refrigerated stored foods will dissipate to nondetectibility in the case of ambient by September of this year, and in the case of refrigerated by December of this year.

Under worse case conditions -- and by worse case I mean application was made to the crop on December 31, 1999, and based on what we believe happens in terms of dissipation -- the longest that these residues could be present would be September of this year and December of this year in the refrigerated and ambient stored food items.

So really what we're talking about is beyond the year 2000 if Methyl Parathion is legally applied to the crop in 1999, we don't expect to find residues in foods other than foods that were frozen. We don't expect to find residues of Methyl Parathion from the 1999 crop in refrigerated and ambient stored foods after these interim periods reaching into September and December of this year. So most of the real nexus here of what the law addresses and what we expect to encounter is going to be in the area of frozen foods.

Here is what we expect to happen this year. We're in the year 2000. We don't know when the tolerance revocation is going to be finalized. EPA has taken comments for 60 days and has stated that they will finalize revocation as soon as possible after the comment period.

Once the revocation is finalized and until the end of the year 2000 -- whether it be August or September or until the end of the year -- if we encounter Methyl Parathion in a food that is necessarily from the 2000 crop -- something like fresh lettuce, we think is a good example, where there is no way that application could have been made in 1999 -- that food is subject to enforcement action. There is no way we believe that the responsible party can make a showing that

they complied with the channels of trade provision, because that food wasn't in the farmer's field until this year.

(END OF TAPE THREE, SIDE TWO)

DR. CACHTAUCK: -- tolerances. These are going to be crops that would be the crop of this year's growing season and there is going to be no safe harbor, if you will, for those.

The foods not necessarily from the 2000 crop -- one example is apples that could have been harvested last fall, cold stored and being brought to market -- if we encounter Methyl Parathion within the former tolerance, until the end of this year we do not plan to ask the holder of those apples to demonstrate to FDA that the residue results from an application of Methyl Parathion in 1999.

If you will, we're going to take a common sense approach that apples that are being marketed this year, unless we know otherwise that they are the product of this year's harvest -- and that isn't going to really be happening until the end of the year. Apples that were harvested last year, we're not going to ask the responsible holder of those apples to demonstrate to us what we think is obvious.

But when we get into next year, we only expect to

find Methyl Parathion residues in frozen foods. If we find Methyl Parathion residues in nonfrozen foods, we're not going to assume that those residues result from application of Methyl Parathion to the crop in 1999.

And in that case, if we're dealing with apples again, we're going to ask the holder to demonstrate to us that those residues resulted from legal application of Methyl Parathion, i.e., before December 31, 1999. We don't think that that kind of situation is likely to be one in which a processor can show that they complied with the channels of trade provision.

But we do expect in monitoring frozen foods beyond the year 2000 that we will encounter frozen food items with residues of Methyl Parathion where the holder will be able to demonstrate to us that the residue results from legal application of Methyl Parathion. But that burden, under the way the law works, gets put onto the holder of the food.

And here are some of the kinds of things that we think could work in terms of how that showing would be made.

Packing codes, for instance. The packing code on the package of the frozen food item showing that the product was packed -- was processed in the year 2000, getting back to

the frozen carrots, again. Frozen carrots from the 1999 harvest may not have been frozen and packed until sometime during the year 2000. And a packing code could indicate that, or batch records could indicate that. And we think that these are the kinds of records that most food processors maintain.

So if the holder of the frozen carrots could demonstrate to us that these carrots were packed in the year 2000, we would say that they have met their burden of documentation that the residue results from a lawful application of Methyl Parathion.

It gets a little bit more tricky when we're dealing with something like a blended juice. I looked at the Methyl Parathion tolerances and 30 are proposed to be revoked, but there are others that are going to remain. And one of the ones that remains is cranberries. Apples is proposed for revocation.

So if I'm interpreting this correctly -- let's take a mixed juice like a cranberry apple mixture. It's conceivable that legally treated cranberries will --

MALE SPEAKER: Go on.

DR. CACHTAUCK: Okay. Legally treated cranberries

from this year's harvest -- from next year's harvest could introduce Methyl Parathion residues into the product. Obviously the tolerance would have been revoked for apples.

So if we find Methyl Parathion residue in a mixed juice like a cranberry apple blend, what we're going to want the responsible party to show us is that some kind of a program is in place to ensure that apple concentrate or incoming apples do not have Methyl Parathion residues. Obviously introduction of Methyl Parathion from one of the ingredients would be permissible, but not from the other ingredient.

And this kind of situation could apply in a variety of cases where you have blended ingredients in products where tolerance may still be in effect for one of the ingredients and it may be revoked for the other. So I'm sure that's going to get some questions.

We're going to handle imports the same way as we handle domestic. Fresh lettuce offered for import, once the tolerance is revoked, is not going to be allowed to enter the U.S., because we assume that that's necessarily a crop of this year.

Starting in 2001, the same way that we would handle

residue findings in a frozen food, if a frozen food is offered for import, the entry is going to be detained and the burden will be on the importer to make a showing of channels of trade compliance.

And finally -- well, next to last, we're trying to minimize the burden. The law places the responsibility to make this showing on the holder of the food. We've cited examples of documentation, such as packing codes and batch records, that we think most processors already maintain.

And last, as I said, we're entering into a not business as usual situation here, and if we didn't issue this guidance document, I'm sure no one would have any idea what to expect from FDA.

With respect to future pesticide tolerance revocations that might -- that will follow under FQPA, we're considering issuing a generic guidance document incorporating these principles in this document. If these principles can be applied in a broader manner to other pesticides, and thinking in terms of the way we're dealing with the year 2000 as a transitional year and looking at frozen foods as sort of the category, we would have that ongoing nexus.

To the extent -- and then maybe a four year maximum

window in which the channels of trade situation could be shown to be complied with for a given pesticide. To the extent that these principles might work more broadly and we will not have a proliferation of guidance documents, we're considering a future generic guidance document.

If a pesticide doesn't fit this general approach, obviously we may have to have in those cases other specific guidance. But the fewer guidance documents in a not business as usual situation that we can have, I think the better off we all are.

So that is the channels of trade presentation. Dr. Troxell and I will try to answer any questions that you all might have. I'm going to sit down.

MALE SPEAKER: Good timing. Gosh, I wanted to talk about the channels of trade issue, but you opened up a whole other bag of issues with the mixed foods -- the blending concept.

I'm particularly concerned about -- what you have suggested relative to Methyl Parathion then suggests that for each product in any mixture, we have to have a testing program that would prove that compounds that might not be registered for one of those compounds -- or one of those

foods in the mixture was not on those foods.

So, for instance, fruit cocktail. I have to have a testing program for every product that goes into fruit cocktail to assure that a pesticide not registered for grapes isn't on the grapes, but well may be on the pineapple?

That's new. That's -- FDA has never required that sort of testing or procedure.

DR. TROXELL: Okay. Let's talk about two things. First of all, as Mike said, this really is only relevant to frozen foods. So even that example of cranberry apple cocktail, since that was probably, you know, concentrated and so on with a lot of heat, thermally Methyl Parathion is going to be composed. There's probably not really going to be a real situation. It's just illustrative.

The second thing is, there are supposed to be incoming ingredient controls, and I would think that manufacturers have some understanding of where and when they got the crop from.

So there is no simple gate that we can -- you know, today you can and tomorrow you can't. So there has to be some kind of transition to deal with the channels of trade.

But I guess several other things. This is draft

guidance, for one. Secondly, we're trying to keep it relatively simple. It may have sounded more complex than it really is. And thirdly, think of this as kind of a pilot for more pesticide situations coming down the road. You know, fourth, remember that EPA has, you know, on the order of six months to revoke the tolerance after registration has been canceled. In this case, it's extending more than six months.

So there are a lot of products in the future where the pesticide will degrade in storage or through thermal processing and so on. So this may not be as big a problem as everybody is concerned about. However, we don't do the processing, and we need to understand what the problems are here.

I think it's not going to really work for us to just hear that won't work. That won't work. Give us some solutions to make this work as well as it can.

MALE SPEAKER: Keep the tolerance.

DR. TROXELL: Well, okay. But that's been discussed extensively with EPA. And you have to also think that pending that that won't happen, that you won't keep it much beyond six months, then what are the practical approaches to implementing this provision of the law.

The other thing, FDA samples almost a hundred percent of raw agricultural products. We sample from packing houses and so on. We do very little sampling of finished products. Total Diet Study does and so on. But we do have to provide guidance to assure compliance with the channels of trade provision of the Act.

And generally we may have to go out with a little assignment to see that this is being followed. But, you know, keep in mind that principally FDA's enforcement monitoring and surveillance is on the raw agricultural products.

MS. MULKEY: Yeah. Terry, if I may. I take it we could have a discussion about whether and why this issue of blended commodities, one of which has a tolerance and one doesn't, would be handled differently in the channels of trade context than in just ordinary context.

I mean, the part I didn't understand -- and I'm not suggesting we try to resolve it here -- was why it would be different in this context than in, for example, a situation where you have a newly registered pesticide registered for one of the items in a blended -- registered on cranberries but not apples and it shows up in cranapple juice.

I assume we could have some opportunity, obviously not today, to try to understand why you would treat that differently in the channels of trade scenario than you would in any other scenario.

DR. TROXELL: This is not going to be to us a major issue, because, again, we deal with packing houses and so on. We do not deal with mixed bags of frozen foods usually. So we get them one at a time when we can tell whether or not there is a tolerance or not a tolerance, and we can say you're either, you know, over or either you have a problem or you don't.

But there will be cases where people will do measurements and then they'll be saying, what about this, FDA. And then somebody is going to have to be able to show when those cases arise that they've actually followed the channels of trade provisions.

MALE SPEAKER: Well, I agree we should probably do the mixed blended products off line, because that's a day's worth of discussion. But you brought up so many other things here.

I guess essentially what you're saying is, don't worry because we don't test your product if it's a mixed

product, and you can rely on our discretion. Because that's kind of what it comes down to in this case.

And I guess my question -- I've done this to Paul before, so I'll do it again. What is the State of California going to do when they test and find Methyl Parathion in frozen carrots? Are you going to follow FDA's discretion? And the 49 other states, are they all going to do the same thing?

Now this presents a problem if there isn't some uniformity relative to this. And I know that when we had this discussion before, Terry, you said we would request the states be reasonable about this. But as a food processor, it puts us in a real bind. We don't want -- as much as we love and trust our government, we don't want to put our product on the line based on discretion.

So what will essentially happen is we'll say we're not taking any of your carrots if they were produced during the year 1999. We won't touch prior to the year 1999. And so now you've got a channels of trade problem, because processors just don't want to take risks.

And this is not necessarily your problem. It was created by EPA's decision that they can't hold onto these

tolerances for longer than six months.

MS. MULKEY: I don't think that was a discretionary act on EPA's part, either.

MALE SPEAKER: Let's just stick with one commodity, the one you always talk about.

(Laughter.)

MALE SPEAKER: We won't name it. When you go and actually drink apple juice in the United States off the shelf, usually you're drinking a mixture of juices, some single strength and some concentrates. The concentrates -- 50 percent of them come from offshore. The concentrates are also produced in the United States by a lot of processors.

Usually the larger processors are going into a 100,000 gallon concentrate tank, 70 percent concentrate -- 70 percent soluble sugars. That is held at about 32 to 35 degrees. It is not frozen. And I would tell you that Methyl Parathion, based on our very limited experience, is stable under those conditions. And what's more, I don't think there is any difference between that and being frozen. But it's not frozen. I mean, you know, it's liquid.

So in talking about this crop and this commodity -- I can't talk about every other one that has a processing step

that does something like this. But it's just -- I don't know what your data is. But I'm sure your data doesn't cover frozen -- not frozen. But concentrated -- chilled concentrated apple juice and then its use.

And it's a bleed and feed system. It is not -- you know, you don't make a 100,000 gallon tank and then drain it down to nothing and then fill it again the next year. So you've got maybe -- you know, maybe a hundred different growers or maybe 500 different growers' crop in there. You may have two seasons. Possibly two seasons in the tank. If you buy offshore, you know, you might even blend that tank to get a certain acidity or color.

And so you're talking about something that isn't a plug flow. It's really -- you know, it's really a composite product for both seasons and growers and treatments. And in the past, as you know, all those, with rare exceptions, have all been legal product because they were done under good agricultural practices and had residues that are legal.

And now we're in a situation where you're telling us, because there is some study that I don't know about, that you won't have a Methyl Parathion residue unless it's a frozen product.

MS. MULKEY: Maybe in the interest of our agenda management this would be a good time to point out the fact that there is a public comment period for both the FDA approach and for the EPA proposed revocations. And this kind of very specific comment relating to, for example, apple juice would be highly appropriate for inclusion.

We generally -- and we don't have any of our lawyers here -- would say we have to write all this down and docket it and put it in our comments. So we probably ought to avoid having this forum become in effect an opportunity to comment on the rules for that reason as well.

But it is clearly important. I don't believe we have a verbatim recording of today's session. We will have tomorrow. Is that a verbatim -- well, maybe we will be able to docket then. That's good. It's good to be able to follow the rules and play by the rules.

But in any event, we do have an agenda management issue. We know that this is a topic of considerable interest. I don't want to cut off anybody's opportunity to be heard, but we do have a timetable problem.

MS. LUDWIG: This is Sarah Ludwig. I work for Shrim (phonetic) Williams & Associates and represent various

California commodities. And I have to admit, listening to this presentation, to me what I do not understand and what I would like to understand, is why can the EPA not do time limited tolerances based on the kind of commodity?

That would eliminate FDA's need to do this whole song and dance. If the EPA took the stance that this is a transition issue. This is something that is part of allowing growers to move away from these compounds. To make time limited tolerances based on the information you have -- and maybe it has to be down to the kind of commodity: the juice, the concentrate, the frozen.

For example, I work with nut crops. They get mixed up. It's the same issue. You have a large silo with all the nuts that are harvested coming from multiple growers. It would be very difficult to document two years down the line where that bag of nuts came from.

But I would like to understand this whole -- we've heard now FDA's side. I have not understood EPA's position on this issue.

MS. MULKEY: We did try to lay out in our proposed revocation both our explanation of why we believe it was appropriate and legally required to go forward with

revocations. But we also expressly invited comment on ideas, such as the one you just described, or any others.

So it seems to me that if I or someone else on behalf of EPA said today anything sort of beyond what we laid out there, it would appear that we're not as open minded as we in fact are in terms of attempting to hear that. We did try in that document to very explicitly lay out what we understood to be the statutory underpinnings of what we were doing.

We also all have an interest -- everybody -- in having the channels of trade provisions work, because whatever else we do, there are going to be circumstances and scenarios in which it's very important for them to work. And we have already experienced some revocations where the availability of the channels of trade provision has been relied on.

So whatever else happens, we all have an interest in identifying a way to maximize the success of an approach that FDA can use, regardless of whether the channels of trade provision is invoked in every single possible scenario for every single possible commodity every time there is any action involving a chemical and dietary risks.

So I would make that sort of plea to all of us, that whatever else we say about whether we want to avoid invoking the channels of trade provision for some subset of circumstances, we have an interest in having them be workable for this subset of circumstances where they're inevitably going to be triggered, regardless of whether this revocation has, you know, an exact time line in it or not.

And we can take one more question.

DR. CACHTAUCK: Yeah. I just wanted to point out -- well, I'm sure you can trust your government. My point about our principally sampling raw commodities was not to say that we intend to give a free pass on everything. Because if we are putting this out, it's intended that industry make the best of assuring that they're not pulling crops from the year 2000 where Methyl Parathion was used and mixing them with other ingredients, for example.

But as a practical matter, that's how we do our monitoring normally, looking at raw products. And, yes, we need a very efficient approach to the channels of trade, because we don't have resources to go chasing down these additional situations. And every resource we put on that takes resources away from our general monitoring and our

other food safety issues. So we want the smoothest transition for these tolerance revisions that we can get.

MS. MULKEY: Maybe we can take one more question.

MR. MASS: Andy Mass from Makhteshim-Aghan of North America. After tolerance revocation, is the enforcement method used to establish that something is MP free, for example? An EPA enforcement method?

DR. CACHTAUCK: There is no EPA enforcement method. There is FDA.

MR. MASS: Or FDA?

DR. CACHTAUCK: FDA has its multi residue methods that it has been using. And they have a level of quantitation that we use as a practical level of quantitation for our labs around the country. The same level we would use for a nontolerance commodity right now, we would be using on these commodities where the revocation -- where the tolerance was revoked.

MR. MASS: Thank you.

DR. CACHTAUCK: Now at the risk of complicating this thing even further, the Department of Agriculture through the Food Safety Inspection Service enforces tolerances that EPA establishes on meat, poultry, milk and

some egg products. Therefore, we have a similar enforcement issue that FDA does.

And within the next -- hopefully -- few weeks, FSIS will be issuing a general guidance document on how they would propose to deal with this issue. It will look very compatible with what FDA has done for Methyl Parathion in terms of a process and a procedure and a presumption.

So when you're looking at this issue, please keep an eye out. I said in a few weeks I hope to see the FSIS proposal out on how we will deal with the meat, milk, eggs and poultry.

Thanks.

MS. MULKEY: All right, thank you. Well, we are almost exactly a half hour behind schedule. And that was not meant to point to this topic as the reason we've accumulated to that point.

Kevin, we've already asked you to truncate your discussion of what's going on with worker protection. You heard a little bit about worker protection risk assessment. I don't think that's the thrust of Kevin's presentation. It really has more to do with our programs regarding worker protection beyond the individual chemical management process.

MR. KEANEY: Well, since I'm not running the Power Point, I can certainly truncate what I'm presenting. My name is Kevin Keaney. I am the Branch Chief of a Certification of Worker Protection Branch. And I want to present some quick background on the worker protection regulation: the history, where it has taken us to at this point and what we anticipate in the near term in the national reassessment -- or national assessment of the program.

The regulation itself provides basic protections -- very basic protections -- for agricultural workers. The protections are grouped around three significant regulations. It provides information through basic safety training posters and basic safety training. It provides notification of workers, and then central postings as far as specific applications and site information about those applications.

It also protects them with requirements on the label for protective equipment or gear, and specifically details restricted entry intervals based on the toxicity and methods of application in the product. And it also provides specific label directives as far as protecting during applications.

And then in the event that exposure might occur,

there is a requirement for decontamination supplies -- really an exalted term for water, paper towels and soap -- in the field for a certain period. And then the provision to provide emergency assistance if there is some exposure. So it's very basic -- very basic stuff that a lot of other industries had for decades.

The time line? It was a '92 standard. It passed in '92. It became a regulation in '92. It went through a relabelling exercise in '93 relabelling products. And in '94 it attracted attention -- the attention of a number of groups that became a coalition that brought the issue to Congress and there was a congressional delay. A congressional delay probably motivated by contentions that there were certain provisions that were just not workable in the field. Contentions that this imposed a burden on the grower for training and outreach communications that they may not be accustomed to doing, and we, the agency, should provide some means for them to do that. And I'll show you what we did as a result.

So this congressional delay to '95 and we had full implementation in '95. We had initial public hearings to see how things were going in '96. A publication of the results

of this national dialogue in '97 that focussed on certain themes that we find are still consistent themes of concern in the regulation of what we're seeing now. So that is sort of a rough chronology of the regulation.

As a result of the congressional delay and adjustments to make things a better fit in the field, we did undertake a number of amendments. We changed some of the training provisions. We allowed a crop -- a certified crop advisory extension, so that they could continue to work and be advocates of integrated pest management and so forth.

We made some adjustments as far as the use of decontamination supplies. We had an irrigation exception for certain kinds of yields, so that irrigation activities could be conducted. Certain products are low -- their level of application is low contact, so we had certain provisions to allow low contact exceptions.

And there was some specific language in the initial regulation speaking to English and to Spanish, and there are other populations that need to be contacted. But if you were dealing with a population that spoke an Asian language that's a labor force, you were not in compliance if you used an Asian language and sign and so forth. So that was just an

oversight in the initial drafting. So we changed that so that if you're speaking to the labor pool, use the appropriate language, whatever that will be.

So we made those changes. There are still some pending actions. There was some concern about the provisions in the regulation about gloves and prohibiting glove liners. An argument was made to us that you're going to have the gloves not worn in hot weather or very cold weather if they don't have liners. So, you know, what is the gain there? You're going to have people not using the gloves.

So we had a proposal and a final that will probably be published next month. And we'll provide for glove liners and also address issues raised by agricultural pilots -- the aviators -- of bringing gloves in the cockpit as being -- just inappropriate of bringing gloves that may be contaminated into the cockpit. So that will be addressed in the glove amendment that we're going to put out next month in final.

Researchers have petitioned us for an exemption. We've met for a number of meetings with the researcher community. I think we've reached a point with them which we will memorialize in a letter to them that takes them point by

point through their concerns and explains how they can function within the existing regulation and still do their business where they thought they were constrained. They were essentially reading constraints in the regulation.

There is a rose growers exception petition to us to renew an exception that they have to allow an early harvest of roses. We published that and we're considering that.

We have formed a -- as a pending action, we have formed a worker protection assessment group that is conducting national assessments. We're also working with making more transparent the whole method of assessing restricted reentry intervals.

And as some of you may recall, when the initial regulation went into effect in '92 there was a hazard communications proposal component there that never was brought final. And we've withdrawn that proposal, but it still has that aspect of the regulation that we have to be more explicit and address how do we sort of track the OSHA pattern and provide a hazard communication element for the protection regulation. We'll be addressing that within the national assessment.

One of the charges that Congress made, as I

mentioned, was that there was a lot of training -- safety training burden put on the agricultural community and that we should provide the wherewithal to conduct that. So we did this. And these are all in Spanish. The materials themselves are in English and Spanish.

But we have the Budget and Management of Pesticide Poisoning's acute effects document that is out. The new edition that is out in English and Spanish. Chasing the Sun, a Novella video that provides basic safety principles for workers.

We're trying to take some different approaches into the agricultural labor pool there with some -- (inaudible) -- traditional approaches to training, such as this next point, English as a Second Language program, which is built around the basic safety principles that are outlined in the regulations, to reach into the elementary schools or anyone who is doing English as a Second Language, and essentially build an awareness of English, using the principles that we're trying to convey for pesticide safety.

There is also the basic protect yourself from pesticides for workers, the manual for training workers, and protect yourself from pesticides for handlers -- pesticide

handlers. We have some audio tapes. A wide variety of audio tapes, Rio Pesticidos, in Spanish, English and Asian, which again focus on the various principles we want to convey to the labor community.

A video, The Playing Field, which, again, is a Novella, built around occupational health and safety issues and worker protection issues. It relates to the Spanish community which we're trying to reach. It's built around, as I said, a Novella approach involving children and family and so forth in there. Their interactions with their jobs and basic safety principles.

The Playing Field, again, has also been converted into a basic curriculum for lower grade levels in agricultural communities, primarily border communities and Spanish labor communities, so that they can bring this into the schools, give it to the children and the children bring it home and so forth.

There are a lot of compliance guides that we put out, using titled just that, how to comply. How to comply with the regulation. Heat stress is a big concern. We have various guides on how to control heat stress in agriculture. We have a web site that deals with the three programs that

our branch work with. That is the Worker Protection Regulation Recertification and Training Program, the Pesticide Applicators and a new initiative to create a fairly dramatic outreach into the primary care medical provider community to make them more aware of the implications of working with and around pesticides.

All of these materials can be released to anyone once we release them and distribute them. We've done millions of copies of things in the early stages. Ray McKowski's (phonetic) outfit came in and helped provide funding to do millions of copies of the worker safety training manuals for free distribution. Most of it is free or very, very low cost. Gimpler (phonetic) is the Ag supply house. They have a whole catalog of materials based on things that we've done and actually is producing it a lot cheaper than we could.

And as I said, we're taking sort of nontraditional approaches. We've got a number of games of bingo. A bingo game based on basic principles in English and Spanish. We're in a cooperative relationship with a Hispanic radio network to do particular programs and spots to target the community we want with information that we think is appropriate.

The future direction for the whole program? This national assessment is very -- it's going to be consuming us and we hope a number of the stakeholders playing in this arena over the next year or perhaps these next few months. We'll form a national assessment group. We'll go towards recommendations coming out of the group.

And primarily trying to move towards a point where we're having a closer coordination between the worker protection regulation and a certification and training program. Because you're dealing with essentially the same labor pool, or at least a continuum from field hand through handler perhaps into the applicator community. The applicator community is becoming more Spanish speaking. The worker community already is 70 percent Hispanic.

I said we're going to do this national assessment. It's going to consume us and our stakeholders. Part of the impetus for this program review is recommendations coming out of our Children's Health Office. Their advisory committee recommended that we look at those regulations to see how effectively it protected children, women and pregnant women.

The General Accounting Office audit, that you may be familiar with, recently focussed on the program, its

implementation and enforcement. There are a number of advocacy groups' recommendations coming to us. They have come to us over the last year.

Just the other day, Monday or Tuesday, in the Post there was the news notice about the human rights watch study that focuses mainly on the Fair Labor Standards Act and the Department of Labor provisions, but also brings in the worker protection regulation as needing a look, which we are. Which we are doing.

We had planned the review. This is the five year point. It was fully implemented in '95. It's a logical point to look at it to see how its working as far as implementation and enforcement. So we were planning it and we're getting any number of added incentives from a variety of corners.

Now we're going to do a comprehensive assessment. It's going to review the process we use to calculate REIs. It's going to review the process we use to calculate the risk to agricultural bystanders. It's going to increase the project. It's going to focus on medical activities related to farm workers and farm worker children to pesticide exposure.

And all of this will be, as I said, folded into the outcomes and recommendations of this national assessment that we formally began two weeks ago with a workshop in Texas.

Our review process to look at REIs will involve upgrading -- this may have been covered a bit earlier, but I don't think so. It's going to upgrade the transfer co-efficient database for agricultural activities. It will identify relevant data in ongoing research for young field workers and see that that's incorporated. And it's going to have an internal review of the restricted entry interval algorithm and try to turn that on to just something that we can surface that you can understand and make the process transparent. And that will be formally brought forward sometime this summer.

(END OF TAPE FOUR, SIDE ONE)

MR. KEANEY: This was begun last year in September by bringing the standard operating procedures before the Science Advisory Panel. And the revised standard operating procedures were scheduled to be out this month. I'm not sure. But it's a summer activity to bring that forward, again, and make that more transparent how we're doing business there.

A very quick overview of the projects focussing on farm worker health. That's the array of things that I'm going to make a few comments on. And these are all provided in the outline handout that you have.

One significant exercise is the pesticide national strategies for health care providers that I mentioned. In '98 we brought together a federal interagency coalition represented by EPA, USDA, Labor and HHS. That led to a '98 workshop where we brought together an expert panel from the medical -- the primary care medical community, deans of medical schools, directors of clinics and networks of clinics. Another workshop here especially formed an approach to take which led to workshops based around the medical practice, medical training and resources.

And out of those workshops we have a draft strategy that is going to be published next month for comment. A national strategy for health care providers to deal with pesticides. And it involves raising awareness in the health care community, changing the burden on the medical schools, changing the retraining exercises, developing modules, developing access to resources through some common gateway media or other consortium of interest. So we'll finalize

this draft strategy and hold a national forum to focus around these issues in 2001 -- late in 2001.

We're also involved in a lot of minor health activities, either through funding or through staffing or a combination of staffing and funding. We participate in the Bi-national Migrant Health Coordinate Group, Migrant Health Clinic Evaluation Work Group. We're part of the Migrant Children's Consensus Project with funding and support and resources with our staff. We're also participating in the National Children's Center for Rural and Agricultural Health and Safety Studies.

MS. MULKEY: Can we try to wrap it up?

MR. KEANEY: We're part of the -- (inaudible) -- project and NASS project, which is going to actually give us data from the field. We'll be getting usable data from that this year. It involves a collection of states that we can use as a sampling projection. We're part of the National Agricultural Worker Survey -- Marcia is waving. We're part of the Health and Nutrition Study, the Standard -- (inaudible) -- Health and Nutrition Study.

And as I said, these are all outlined. You can see that we're involved in quite a few things that will get us

better information regarding exposure and better information -- and better reach into the health care provider community.

We're conducting an organophosphate exposure study in New Jersey that is going to work with families and see what sort of take home exposure is involved. Working with Rutgers, it will be bio monitoring and questionnaires and so forth.

We, of course, support the MBTN. We have some medical outreach to tribes.

But all of this is feeding into the national assessment, and the national assessment is a consensus in collaboration and a building exercise with USDA, EPA, Department of Labor, HHS, states, farm workers, farm worker advocates and farmers. From our perspective it's a two track exercise going on, coming out of the program office here and coming out of the enforcement office.

There is a specific enforcement program review being conducted that is going to look at the regions, how we give guidance and definition of the regions. How we collect data from the regions and how they interact with the states to do the same thing. We're going to conduct this integrated review of regions' and states' interactions relative to

worker protection. We are out of this exercise going to have a specific response to the GAO audit and the points that are raised there.

We'll create a strategic plan for the program and program change in the future. We had our first workshop in Austin a few weeks ago. The next workshop is going to be in Sacramento in November, and the third workshop is in Orlando in February.

MS. MULKEY: Thank you. We can take a couple of questions and then we'll try to get a little break in here.

Shelley? And welcome. Nice to see you.

MS. DAVIS: I have a few questions basically on timing. I appreciate that you're doing this national assessment, and that's a fine effort. But I'm concerned that everything not be put off until the conclusion of that effort.

But let me just ask in specific two things that I thought I heard you say. We're going to await some kind of final conclusion. One is enforcement problems. The GAO raised significant problems with enforcement. A number of advocacy groups have done reports on the poor state of enforcement.

And I wonder when we're going to see some actual improvement in enforcement?

MR. KEANEY: The number of things that we found in the Austin workshop are things that we can immediately act on. And anything that we can act on immediately or sooner will be acted on before the final recommendations package, obviously. There are a number of things relative to building infrastructure in the states, getting a better handle, and on enforcement what is or isn't happening, and bringing pressure to bear on that.

So I spoke of a year or 18 months, but that's to the final articulation package of recommendations. We'll begin a number of things immediately, as soon as we, you know, frame the issue and how we can respond. Some of them we've begun already by forming workshops and by forming grant activity to support change.

So it doesn't -- it isn't waiting until a year or 18 months to do something.

MS. DAVIS: How about -- just to follow up on that, because I want to make sure I understand what is happening and what's not happening.

Are you giving greater guidance to the states as to

how to actually enforce the standard?

MR. KEANEY: Yes. That was something that had a clear focus in the workshop and in the GAO audit. It's how do you define an inspection. How do you report an inspection. How do you track resolution of the action. And that is on an accelerated track out of our Office of Enforcement to make sure all of that is clearly articulated and consistent across the country.

MS. DAVIS: The other question I had was on the hazard communication problem. As you know, the initial proposal was issued in '92 and here we are eight years later.

When do you anticipate a new proposal?

MR. KEANEY: On hazard communication? Hazard communication is something we can probably begin to address without a proposal. I know we've talked about the best ways of conveying what workers feel they should know and have a right to know.

And in the Austin discussions, some of the breakout sessions did revolve around how best to convey necessary medical information that might be appropriate and necessary signs and symptoms that might be appropriate. And some of the states are doing that. We can model on those states and

eventually fold it into perhaps some regulatory change.

But I think we can begin action on that just out of this assessment exercise.

MS. DAVIS: Well, when are we going to see crop sheets, for example?

MR. KEANEY: That was one of the options proposed, yeah. And as I said, we can work with the states that are doing that and see how effective it is and provide it as a model. I see that as an appropriate way to address the issue.

MS. MULKEY: Okay. Thank you. We can take two quick questions?

MALE SPEAKER: Are there copies of the audit available from GAO?

MR. KEANEY: The GAO audit is on the GAO web site. And whatever the date was -- it was a few months ago. But it's on the web site -- their web site.

MS. MULKEY: Okay.

MR. KEANEY: And the Human Rights Watch report is on their web site, humanrights.org.

MALE SPEAKER: Having worked on the research -- (inaudible) -- you mentioned a letter. And I was curious to

know when this letter will be distributed so we know what your stand is?

MR. KEANEY: Right. It's drafted now. It's coming out of my branch -- you know, it will be out of my branch next week, perhaps.

MALE SPEAKER: I hope your choice of words was unfortunate, because you said the letter was going to be memorialized.

(Laughter.)

MS. MULKEY: I think what he meant was it's going to reflect the discussions that were had.

MR. KEANEY: Yes.

MS. MULKEY: That we think was the resolution of the petition issues.

MALE SPEAKER: Well, I'm glad you realize that -- (inaudible).

MS. MULKEY: Well, we're actually feeling very good about what we think is a meeting of the minds in that area.

Well, we have seven minutes until four. I know everybody is dying to make your phone calls and have your visits. But we are scheduled to finish entirely at five. If you will really come back by no later than five after four

and be in your seats, we can do that, and you can make all those phone calls and have those visits at five. And it's in all of our interests to do that.

So, please, let's make this break a short one.

(Whereupon, a brief break was taken.)

MS. MULKEY: We have three topics remaining for this afternoon. They were originally scheduled for an hour and 15 minutes. We're going to do them in 45. That does not in any way diminish their importance. I think it does reflect the relatively straightforward nature of the information we have on these three topics. We are primarily providing status, rather than a lot of content on these three topics.

Linda Werrell is a key member of our team on Public Health Pesticides. But the leadership of that team is away only by coincidence and for a brief personal break. So Arnold sends his greetings along with the rest of the team.

But Linda will ably, I'm sure, provide this information.

MS. WERRELL-GERBER: Well, good afternoon. My name is actually Linda Werrell-Gerber.

MS. MULKEY: Oh, is it?

MS. WERRELL-GERBER: Yes. And I'm a member of the Public Health Steering Committee. And what I wanted to do today was really more to supplement the background information that you have already been provided. Not of course to read it, but more to augment the information with perhaps a little bit of detail that will be helpful for you tomorrow and any future deliberations you may have.

First, starting out I do want to again mention that we do have a public health official here. That is Arnold Laye (phonetic). We are working, of course, with CDC, and Arnold's counterpart is Michael Megian (phonetic).

As a first point of clarification, I want you to realize that FQPA directs EPA to consult with HHS, not CDC. But CDC, of course, is the designate for HHS. And when I am speaking about the two, I'm speaking about our counterparts in CDC. But please remember FQPA directs us to consult with HHS.

We do have a Public Health Steering Committee which was established back in '98. And that group has been the one that is producing the documents that you may have heard about. For example, we are working on the memorandum of

understanding with CDC. We have worked on the CDC consultation coordination packet process that we are following at this point.

And we've also instituted monthly conference calls. This has been enormously helpful for all of us. We've been able not only to keep in touch on the day to day what is happening with the OPs. Where is the document that we sent you. Where is the response. That kind of logistical information. But we have also been able to keep each other current on future things that are coming up. We anticipate some resource needs. That sort of thing. So we do have a monthly informal conference call implemented.

I want to just highlight very briefly for you three particular things that we're working on. You may have heard the first one. It was the publication of a PR Notice for Public Health Pesticides, Pests of Significant Public Health Importance. That was published for comment back in April, and I hope everyone here has had a chance to read it and will provide us your comments. The comment period is to be closed in July.

But related to that PR Notice, I wanted to clarify two issues for you which are crucial for you to understand.

FQPA never defined a public health pest. FQPA defines a public health pesticide. And to be a public health pesticide, three things have to occur.

First, that pesticide has to be a minor use. A minor use is defined both in terms of acreage and in terms of economic incentive. Secondly, the pesticide also has to be used for vector control for another recognized health protection use. A vector is described and defined very broadly in FQPA as either an organism capable of transmitting a causative agent of human disease. Or it is also described as an organism which is capable of causing discomfort or human injury. So you can see that is very broad.

What I am passing out right now is essentially a copy of that definition so you're not going to have to write it down.

So we have, first it has to be a minor use. Secondly, you're going to have to be controlling a vector. And third, it has to be a pesticide used predominantly in a public health program. Unless the pesticide meets all three of those criteria simultaneously, it is not considered a public health pesticide for the purposes of FQPA.

This is an important point, because there seems to

be some confusion on a public health pest and a public health pesticide. So what we're talking about today is a public health pesticide.

You will note in the PR Notice, which is available, again, for you on our web page, that EPA has taken this approach. We believe a vector is significant if the federal, state or local public health programs have devoted substantial resources to the eradication of that pest. And that is how we're looking at these definitions.

So when you look at the proposed -- the draft PR Notice, you're going to note a small subset of what may be considered public health pests. That is because we are applying the definition as is described in FQPA, and we're applying that to the information we have.

So we're not only going to be looking at vertebrates and invertebrates, your typical ticks, fleas and that sort of thing. Rodents. But you'll notice a significant component also of microbial, fungus, virus, bacteria and that sort of thing.

We consider this list to be a living list, so we don't consider this to be static. If in the future we need to add or in some way amend this list, we are certainly open

to that, and that is going to be the purpose of receiving comments from you.

The next thing I wanted to highlight is our consultation with HHS and CDC, who we are working with at this point. We recognize that that consultation really needs to be done as early in the process as possible. So to that end, the Public Health Steering Committee has developed a consultation process, which we have been following and which we have used significantly with several OPs and carbamates currently.

But remember that we see this both as a formalized process. We send formalized documents to CDC for review, and we receive back formalized comments. But don't forget that we also have an informal process related to the conference calls that we are participating in monthly and have been very useful for us.

The last thing that I wanted to highlight for you relates to the study. It relates to the data gaps. You may have -- be familiar with the provisions in FQPA related to economic inventive and related to the fact if there is a pesticide which has a significant public health use and again meets those criteria for a significant public health use, but

for the registrant there is not adequate economic incentive to maintain that use. But if it is significant and there are significant data gaps, there are provisions within FQPA to provide for HHS to complete those studies that are necessary to retain that registration.

That is one of the most significant things, perhaps, that is left open at this point. We do not have a process in place. Luckily that has not come up as a crisis as of yet. And I would like to point out that we do have our consultation process in place to hopefully forestall that problem from occurring. But I do want to highlight that for you. That is one of our outstanding activities to date, developing and working with HHS to develop this data program.

In sum, let me just tell you what our current activities are. We are looking for the completion -- the signing of the MOU. This is basically going to provide the framework for us, the duties and responsibilities of both parties, of CDC and EPA. Something we can look to and compare our activities to make sure that we're meeting up to our requirements.

And the next significant thing we're working on is a process for an expedited review for public health

pesticides. If a pesticide can be shown to again meet those three criteria, there are provisions within FQPA which will allow for a fee waiver, either for the re-registration or the registration maintenance fees.

So we are looking to set up these processes, to sign the MOU and to complete the data gap work that we're doing with HHS.

And I know that was just such a brief skim run through of Public Health, but I know you've been sitting here for a long time. I wanted to give you a brief snippet on what we're doing and focussing on, and reminding you specifically of how a pesticide gets to be termed a public health pesticide per FQPA, and then what we are doing currently to meet those obligations.

Are there any questions? And I'm sure it's not because that was unclear.

MS. MULKEY: Why don't you start over here next to the mike.

MALE SPEAKER: With respect to the definition of the public health pesticide, does this imply that private efforts to control vectors are not considered public health pesticide uses?

MS. WERRELL-GERBER: We are looking at the issue of a significant vector. We're looking at that as being termed as when there are public efforts that are put in place to control that vector, either federal, state or local.

So by the way we are looking at this right now, private issues related to controlling that vector would not be included.

MS. MULKEY: One of the confusions has been that there is another context in which we talk about public health claims. For example, we require efficacy data when people make public health claims. And that's a different sort of context. There we're talking about private, public, commercial or whatever.

For this narrow question about this provision of FQPA which relates to public funding of data gaps and other narrow purposes, it's what Linda's answer went to with respect to that section of the statute. What we did in this draft notice on significant public health pests was also articulate our thinking about what is a public health pesticide within the meaning of that section of FQPA and not for any other purpose.

MALE SPEAKER: But these three criteria for the

definition are from the draft PR Notice, not all specifically from the law?

MS. WERRELL-GERBER: Those are from the law. And what we have tried to do -- again for this narrow purpose. Not for anything else that we can identify as a pest -- a public health pest, perhaps, which did not make that list. We applied the provisions that were in the law, those three, and applied what we know from our own data and speaking with people who are stakeholders.

So, yes, that is from the law.

MS. MULKEY: And we can take some of these other questions.

MALE SPEAKER: Thank you, Linda. I think you did a very good job in short order, and I appreciate the explanation. I've got a few questions.

First of all, are you personally involved in the monthly telephone calls with HHS, and if so, what kind of credible information are you receiving from CDC with regards to the questions that you have?

MS. WERRELL-GERBER: Okay. Let's take that sequentially. I actually set up and participate, so that would be yes.

MALE SPEAKER: Okay, good.

MS. WERRELL-GERBER: And I'm not exactly sure how to address your use of the word credible regarding the information we receive. But I can say that regarding those conference calls, they have been enormously fundamental in making sure that we all know what is happening logistically with the OPs, for example. So I know where documents are in review and when we get them back.

We have talked extensively, for example, about this Public Health PR Notice that went out. We consulted with CDC and received a lot of very good feedback from CDC. We've also identified other areas of potential joint interest: dust mites and looking at safer chemicals for mosquito control. A host of different things that we've been working on together.

The conference call has not been insofar as to discuss particular OPs, for example, necessarily the details and nuts and bolts. We have been getting those back in a written format.

But what the conference calls have done is to make sure we're on the same page with how we're handling things logistically. We've talked about participation in the West

Nile virus concern. We've talked about how we're going to coordinate future communications efforts. And we've talked about future things and current things we're working on of joint interest.

So it's more of that kind of conversation as opposed to a transmittal of a particular review or discussing technical information related to a review they may be doing.

MALE SPEAKER: Okay. One more question and I'll shut up. Where is CDC today? Why aren't they at this meeting?

MS. MULKEY: Maybe I can answer that.

MALE SPEAKER: Okay.

MS. MULKEY: Dr. Jackson, like Dr. Troxell, is in ex officio member of the CARAT and expects, as I understand it, to be a meaningful participant. But I believe it is accurate that he was unable to attend at all this week.

Margie might be able to give us a little bit more details on that. I saw her report of, you know, the several people -- fortunately not a very large number of people. But the handful of people of CARAT members who were not able to attend, and I understood that he was unable to attend this particular session.

MALE SPEAKER: Marcia, would you all consider establishing an IPA over at HHS to help jump start this process to get it moving more fluently?

MS. MULKEY: I feel that we have made some real progress in our ability to work together.

All right. Anything else on this? All right. One more, maybe.

FEMALE SPEAKER: I have not had a chance yet to read the Federal Register Notice. And something that probably Dr. Troxell dealt with more than he cares to admit to, have micro toxins been at all considered in your public health considerations?

MS. WERRELL-GERBER: In the public health considerations, again including not just the vertebrates and the invertebrates, we do have significant input from our antimicrobials division. And on the draft PR Notice, which you'll see when you go on there, there is a significant component of those pests which they regulate in the antimicrobials division.

FEMALE SPEAKER: But micro toxins you can have different ways. It can be directly from -- I mean, from fungi, but sometimes the pesticide isn't directly at the

fungus. For example, in that industry you use insecticides to prevent damage to the nuts which allows the fungus to come in and grow that produces the micro toxin.

And in the U market, micro toxins are a big deal at this point in time. As I said, Dr. Troxell has dealt with this probably more than he cares to admit to. And I was just curious if that whole subject matter had even come up.

MS. WERRELL-GERBER: I don't recall that discussion. But what I really would invite you to do is look at it. There is another month for comment available. And we really are very interested in learning and getting the best information. So I really invite you to submit that so we can consider that more fully.

MS. MULKEY: All right.

MALE SPEAKER: Just one. The CDC recommendations or communications to you, are those publicly available? I mean, do they send memos that make recommendations to you that would be part of the docket or the public could have access to?

MS. MULKEY: We have treated, I believe, their communications to us for the most part the way we've treated USDA's communications to us, which is for the most part --

(Laughter.)

MS. MULKEY: Excuse me. I can't -- can we adjourn at five minutes after four? I believe we're still treating those as internal deliberative material. But I need to check on that. But I think that's where we are with USDA comments. And I think we're already in that relation -- now there are some communications from them to us that are definitely public and we are routinely making public.

We made no secret of the fact that mosquito side use of Chlorpyrifos -- which we understand not to be used with any frequency. But it is a registered use that it was retained in our agreement with the company, in no small part because CDC recommended that.

So that is an example of one that -- although I don't know if their communication has been made public. The fact that they communicated that, we've certainly been up front about.

All right. Well, perhaps we can go to the next topic, which I agreed to do, which is our discussion of the human studies. I think this also can be short and largely about status.

Those of you who have been following this issue

know, but it's always worthwhile to put this into a little bit of context. There are a whole range of kinds of studies done on or about pesticides that involve some use of human test subjects. For example, tests of skin irritation on humans are routinely done. There are some tests which we require in certain circumstances that involve -- because of the nature of the pesticidal use and the issue,

But for throughout at least the modern history of the testing of the toxicity of pesticides, the agency has always accepted and been comfortable with animal test subject models as a means of analyzing the toxicity of pesticides, of establishing -- if you will remember from Lois' discussion -- both the toxic endpoint and the dose response part of that.

However, there have always been some -- I don't know about always. In the same era there have been a relatively small number of available tests done with human test subjects instead of other animals. In a few instances, they'll probably conduct it initially for the purpose of learning -- sort of in the pesticide regulatory context learning about the toxicity of the pesticide. In other instances, it's done for some other purpose. I know of at least one that was done to try to understand the possible use

-- in anticipation of the possible use of the compound as a drug.

But in any event, there were a relatively few number of these kinds of studies that were conducted and that were taken into account by the agency through the years, together with the required animal toxicity studies, and not to my knowledge ever in lieu of, although it may have worked out that way sort of in a backhanded way. But there was never any change in the requirements. There was never any requirement that these kinds of studies be conducted in human test subjects.

After the passage of FQPA and perhaps linked to it, I would say apparently linked to it, a number of pesticide companies did embark on studies of this type in human test subjects, and were entirely up front about doing so. And some of these were submitted to the agency, and in other cases the agency was informed that they were underway.

This can be significant because there is normally a safety factor. A margin of safety put in place between the level of exposure of concern in animals and the acceptable level in a regulatory standpoint to account for the possibility that the animal to human leap is not sufficiently

protective.

And so one of the reasons why one might contemplate conducting a study in human test subjects is that one -- the regulatory agency might decide that it no longer needed that margin of safety and therefore there might be an opportunity to tolerate -- for the regulatory system to tolerate up to ten times more exposure of the substance, all other things being equal.

When it became clear that there was this at least minor surge, if not surge in the conduct of these studies arising out of -- or at least apparently rising out of concerns about the regulatory impact of FQPA, the agency took a good hard look at what it knew and thought and understood and was prepared to do with respect to these kinds of studies.

And at that point in about the summer of 1998, the agency did two things. One, it announced that while it figured out what it was dealing with here, it would not rely on these kinds of studies in making any final regulatory decisions. Now by these kinds of studies, I mean these NOEL toxicity studies that we otherwise would consider the animal models. I don't mean any study that might have some

connection to human test subjects.

It also convened a panel -- a combined advisory panel of the agency's Science Advisory Board, the FIFRA Scientific Advisory Panel, and a special panel which had a broad representation, very diverse, ranging from experimental toxicologists to medical specialists to the nation's sort of premier medical atheists, to whom the agency posed a series of questions about human testing in general and about this particular form of testing of pesticides in human test subjects in particular.

That panel had a long and very extensive public discussion in December of 1998. Have I got this right? At which time they went away to write a report reflecting their advice to the agency. And from everything I know, both on what is in the formal documentation that has been provided to the agency and from hearing these people quoted in the press and otherwise, they found this to be an extraordinarily troubling and significant and intellectually and perhaps even ethically and morally challenging issue with which they struggled mightily.

They found it less than easy to agree on an articulation of what they thought as a group. There were

exchanges of drafts. There was a certain amount of drama associated with the exchanges of these drafts. And strong feelings which appeared -- appears to me to have been as much about the way in which things were said than the fundamental thrust. I know that only with the benefit of hindsight having seen what ultimately appears to be about to come out of this process.

But at the end of the -- well, not at the end of the day. But sort of in the middle of the day, I guess late in the summer of 1999, we were informed that the group felt that the continuing exchange of paper was not the most productive way for them to get to the point of offering the agency their advice. And they asked that we convene another public meeting, which we did. And that was in the fall of -- I believe it was November of 1999, where the panel conducted yet another extensive, open public forum discussion of these issues.

And since that time, they have been working to produce a written report. There is now in the public docket on the SAP web site essentially the ultimate version of that report. That is, the report that reflects this sub-panel and which was being submitted -- which is a public process under

the SAB processes -- to the Executive Board -- or Executive whatever they're called. I hope I get this right. But the Executive group of the Scientific Advisory Panel.

And it is in the public domain. It has a summary -- sort of an executive summary -- which, depending upon how careful a purser you are of language, either fully reflects the full content of the report or doesn't quite fully reflect the full content of the report.

But I'm certainly not going to try to do my own summary. I'm not going to read to you their executive summary. And I'm going to try to minimize my characterization of the content of that report. It speaks for itself and it is publicly available.

But I think it would be fair to say that the fundamental thrust of that report is a general and strong lack of enthusiasm and perhaps even rejection. Lack of enthusiasm for, and perhaps even rejection of, the concept or the practice of conducting these kinds of tests of pesticide toxicity in human test subjects, for what appear to be a mix of reasons having to do with scientific reliability and ethical concern.

Not least of which is a pretty significant

discussion of the benefit to the test subject or the lack thereof, as well as the necessity or the value of this information relative to information that can be obtained in other ways, such as with animal test subjects, as well as with things like epidemiology studies.

That's context. Now what is EPA doing about it? We have since July of 1998, as the Administrator announced, not relied on any of these kinds of studies which we had for purposes of regulatory decisions. It is important to take note that it's not as if we have analyzed any of these studies, determined that they are clearly scientifically valid and simply set them aside and notwithstanding that we're not going to consider them purely for ethical reasons.

We have simply not worked through them to the point where you would reach -- put that fine a point on it. So it's entirely possible that none or very few of these studies could have or would have been relied on, in any event, after a very thorough analysis of them, notwithstanding the fact that perhaps in the past some of them had been.

We have revisited our analysis of the animal toxicity database thoroughly under all of these compounds, and we would have done that with regard to this part of the

database had we decided not to factor them in during this period.

So that's the important point to remember. It's not accurate to say that but for this policy you could have or would have had some kind of different outcome in the analysis of the toxicity of these compounds. But in fact, we have not factored in those studies -- that kind of study where we had them, and we have not had them for more than a relatively small handful of the compounds that have been active.

But we have not done so, and we continue to not do so. And the agency announced after this report was made public, in response, I believe, to a reporter's question rather than on our own initiative, that we had not seen anything in this report that was inconsistent with the approach we were taking on an interim basis.

In other words, that the publication of this report leaves us comfortable with proceeding on an interim basis with the approach that we announced in July of 1998. We have also said that we expect now, or as soon as this report is formally available -- as I said, it does have one more sort of phase or process to go through before it is made available

to us as the advice of this panel. We do now expect to develop a policy in this area, to propose it and to take comment on it, after which we will develop a more -- a longer term approach to this issue.

There are a number of other policy questions relating to the conduct of any kind of study in human test subjects. And there is a government wide enhanced attention to studies in human test subjects. There has been a reorganization of the government's approach within HHS to this. The appointment of a human test subject -- the press word is Zar (phonetic). I doubt that that's anywhere in its title. I've not yet seen a government official in the United States with Zar in its title officially. But there is.

And I suspect EPA will be actively involved in looking at the ethics issue, the oversight issue, the common rule issue as it relates to the whole range of these kinds of studies. That is, any kind of study involving human test subjects and pesticides, or for that matter, other pollutants or contaminants.

But with respect to the relatively narrow but high profile subject of the toxicity testing, endpoint selection testing, NOEL testing, systemic toxicity testing or whatever

you find as sort of the way of thinking about this universe of tests in human test subjects -- with respect to that, we expect to move very quickly to move from our current interim approach to the development of a policy using public processes.

(END OF TAPE FOUR, SIDE TWO)

MS. MULKEY: Any questions on that?

MALE SPEAKER: The Washington Post article that you referred to gave the impression, if you weren't familiar with the subject, that the agency had made a final decision.

And you're telling us that a policy -- a final policy has yet to be developed. Is the agency going to set that record straight or let the article stand?

MS. MULKEY: Well, my understanding is that all the agency officials that have been asked the question have answered it in the way I've answered it.

We said two things. We said there is nothing in this report that causes us to deviate from our interim approach, which is the approach in which we are continuing not to consider these studies. Now that's a message. It is a message about what we're doing and how we're doing it as we go on. And that's part of our answer, and the other part of

our answer is that we expect to develop and implement a longer term policy.

And I don't know -- I do know that the only person who I'm aware that that reporter spoke with answered the question the way I just did. And I don't know what else to say about that.

MALE SPEAKER: Well, has the agency made a final decision on the human studies issue?

MS. MULKEY: We have made an operational decision that is effective now. We also intend to take -- to involve the public in the process of our policy. So I --

MALE SPEAKER: That is not clear from the article. The article implies very strongly that the policy -- the final policy is set.

MS. MULKEY: There are a lot of articles written about our work in many forums which leave an impression which is different from the way we articulate what is going on.

MALE SPEAKER: And that's my question. Are you going to set that record straight?

MS. MULKEY: I don't believe -- I believe that every time we've been asked, including by that reporter, we

have given a straight answer. I mean is there a --

MALE SPEAKER: It only takes once to be quoted in the newspaper to realize that it doesn't come out the way the said it. And if you let it stand, then that's an effective announcement of an agency policy, which isn't exactly the way you're explaining to us now.

MS. MULKEY: Well, there are many, many times when I've been misquoted in many publications, where I just simply go about my business, explaining the truth of my view in every forum that comes up. And I don't -- I mean, that one happened not to be me who was interviewed.

But that's the only way I know to keep the record straight, is to continue to tell the true story when asked, and when given the opportunity, or when we choose to take the opportunity. And one of the places we did it was in this very public forum today.

Any other questions? Yes?

MALE SPEAKER: You mentioned the sort of anecdotal studies of compounds intended for a drug, or a class of compounds that might have been intended for another use.

Did you use that information in the -- (inaudible) -- tolerance per se?

MS. MULKEY: In our interim approach we have said we will not consider any of that group of studies where there was a deliberate dosing and that the approach was designed to establish a NOEL.

And so now whether in the final policy we will make some distinction between past and future, between purpose, I -- one would need to study in the first instance to try to get a sense of that. Look at what the advice of this advisory committee is. And it does not lend itself to sound bite summaries. They do struggle with both ethics and scientific usefulness.

It may very well be that that very small subset of studies has sort of less scientific usefulness. It may use many fewer test subjects or so forth. So while it may not -- it just may not be implicated in the ethics piece, because it may sort of trip over another piece of it. It's not -- there is no sort of one size fits all answer to that question, I believe.

MALE SPEAKER: Marcia, you eluded to a final stage of the committee -- of the panel.

MS. MULKEY: Uh-huh.

MALE SPEAKER: And then you eluded to two things

that caught my attention. That there is going to be one more stage before there is a final report. And number two, that you felt that -- or believed that in a relatively short period of time then there would be a proposed policy.

Can you just say what the time frame might be for those two things?

MS. MULKEY: Days or very few weeks for the first. I believe that this executive committee had their discussion, which I believe was public. In fact, my notes say that Ed Gray made comments at it, so it must have been public. So they've had their public -- the executive committee has had their public discussion and I think acted in that discussion. And so there is really very little left to do but whatever revisions.

But, you know, I'm not going to speculate about the pace at which they will do that, having made the mistake of speculating in the past about their pace. Our hope and expectation is to propose a policy in the course of this summer. Our hope is also to have available that final report before we do that.

I suppose there is always the possibility that we would operate on the basis of what we've already seen if so

much time past. But right now we don't have to contemplate that.

Okay. We do have one more topic.

MALE SPEAKER: I think Mike Fernandez is here, the Associate Administrator at AMS. I think some folks wanted a briefing on where we are with the Organic Foods Production Act.

MR. FERNANDEZ: Since it's the end of the day, I'll try to be short. I guess ostensibly I'm here to talk organic, but really I just -- I miss these little gatherings so much.

(Laughter.)

MALE SPEAKER: And we miss you, Mike.

MR. FERNANDEZ: Thank you. I knew I could count on some comments from the peanut gallery.

The Organic Foods Production Act was in 1990. We are now nearly ten years later, sprinting or perhaps limping towards the finish line towards a final rule. Just by way of background, the Act really calls for a uniform national standard of what is organic foods production. It's really a method of production claim.

The purposes were essentially sort of a consumer

protection kind of purpose, so that when you go to the store you know what it is that you're buying when it's labelled organic. Also sort of a level playing field for the industry, in the sense that -- before this and even now there are multiple state standards, multiple private and public standard setting bodies and certification agencies that sort of effectively set their own standards.

So that can sometimes have some problems in interstate commerce, although in the ten years since the law has passed, it has worked itself out somewhat. It has become more of an issue in the international trade arena without a national standard. It's becoming more difficult to export our products into some other markets.

So a national standard here -- a national program -- will definitely facilitate international trade in U.S. organic products.

The first proposal was in 1997. There were 275,603 public comments on that rule. The vast majority of them, frankly, were not positive, if not openly hostile. And there were what we refer to as the big three, where the most of the comments came, which had to do with the use of genetic engineering, biotechnology techniques, the use of bio solids

or sewage sludge and the use of radiation. And those three issues pretty much made up the vast majority of the comments on the first proposal.

It was re-proposed this year in May. March, excuse me. But even before the re-proposal, the Secretary made an announcement after the initial review of the first 275,000 comments that those big three -- the biotech, radiation and the sewage sludge -- would be out in the re-proposal and that we would re-propose the rule. And we basically made a virtual rewrite of the rule which was published in March.

I would tell you all -- at this point I would normally tell you all to go submit public comments for the record, but the record closed on June 12th. So if you haven't, you're too late.

We did, however, get approximately 35,000 comments this time, which is small potatoes in comparison to the first time, although for most people that would be a rather overwhelming number of public comments. We don't actually have a final count right now, because as is typical with these things, everybody submits their comments at the last minute. So we're still opening the envelopes and counting up the mail, but we'll have somewhere between 35 and 40,000

comments.

Because we haven't really analyzed those yet, I'm not going to try to do too much analysis of that, other than to say that the vast majority of those are essentially form letters or a variance of a few form letters that were circulated. Which doesn't mean that those comments aren't useful or don't need to be answered, but it does make the task somewhat easier, given that many of them are more or less the same.

There probably are a handful of issues that may be of interest to you guys, and I'm going to just run through a couple of them and then take questions if there are any.

Obviously the issues surrounding biotechnology and the use of genetic engineering were controversial before. It remains controversial now. This re-proposal basically -- there is an outright prohibition on essentially any use of genetic engineering. Any use of genetic engineering in organic food production. This is a method of production claim, as I was talking about before. It's not really a product content claim. So that the prohibition is really on the use of certain techniques, not on the presence of a product of biotechnology in a final consumer product.

So in other words, you may have where the rule would essentially allow in a certain sense the unintended, advantageous presence of some minute amount of a biotech product in a final product, and that would not necessarily be a violation of the standard. The standard is about use and is about following the organic plan that you have to submit and be certified on.

That does lead to some other questions, obviously. One issue that has come up during this comment period is about liability. There are some in the organic industry who would like to see the -- who feel that organic farmers shouldn't be liable for the presence of biotech products in their products if it comes from drift, from their neighbor or from some other source other than their own farm.

And they have asked us to do something about that. There is actually a paper on our web site which addresses that a little bit. And I guess I would have to say that while we're sort of sympathetic to that concern, the remedies that some people have suggested would involve regulating nonorganic farmers, which is outside the scope of the statute and this regulation.

Another issue that is maybe of interest to you is

some pesticide related issues. One thing -- the standard or the law obviously prohibits the use of synthetic substances as a general rule. It does allow for a petition process for a synthetic substance to be included on a national list, which would have to be affirmed by the National Organic Standards Board and enacted by the Secretary. The paper that I handed out has something to do with that. I'll get to that in a minute.

One issue that was of interest in the first proposal and then again that we tried to address in this proposal is that people asked us to set a -- set some sort of limit at which you would say that the presence of a synthetic pesticide was just sort of beyond organic. And some people had suggested a percentage of the tolerance as one sort of bench mark.

We chose in this proposal to use a different approach and a different bench mark, which was to use the national mean for certain crop chemical combinations that would derive from the Pesticide Data Program data that is maintained by the Agricultural Marketing Service at USDA. We felt that that was a reasonable bench mark because it reflected use of a product, and that if you were above the

average essentially for residues when you knew that the product was being used, that that was sort of out of the realm of what you would consider to be reasonable for an organic product.

The last -- another issue which then -- which I will touch upon. This being -- it has to do with the national list and pesticide formulations. There are a couple of things.

One is -- what this piece of paper that I handed out is, it actually has not been published. This will come out in the Federal Register probably next week. It's marked draft here. This is what is going to the Federal Register, I think, probably in the next couple of days.

And what this is, is some guidance on submission of petitions for evaluation of substances to be on the national list. As I said, there is this national list for synthetic substances that some people may want to be able to use in organic production, and also for natural substances that should not be used in organic production.

And what this guidance does, is sort of tells you if you want to petition the National Organic Standards Board and USDA for a substance to be included on this list, this is

kind of the information that you have to give us and what you have to do. So that may be of interest to some of you.

It also raises another question, which is we will be -- the substances that are on the national list are, you know, sort of generic substances, which in the pesticide world would be like canned to active ingredients, but not formulated products.

And so there may be issues where people will want to have formulated products that they want to say are acceptable for use in organic production, and where the active ingredient may be -- if it were a synthetic or was a natural, it would have to be allowed on the national list. But the issue then would come into the inert or the other ingredients that may be in that formulation.

And we are having some conversations with EPA about how we can -- if people wanted to label a product in that way, would there be a way that we could work together so that EPA could have access to -- would know what was on the national list and could then look at what inert ingredients might be used in that formulation to see if they meet the standards.

And then the last thing is that we think that there

may be -- there could be as many as 200 substances of different kinds that people may want to have us look at. It's going to tax our resources -- our scientific resources. We typically have used some contracts to review some of these materials. But the National Organic Standards Board is going to be hard pressed to make a lot of these decisions, and we'll probably also be looking to our friends here at EPA for some technical assistance on some of those reviews.

That's really just a quick overview. As I said, the comment period closed on June 12th. We have said in the past, and we are desperately trying to stick to having a final rule out this year. So that's sort of the time frame.

MALE SPEAKER: Could you expand on what you said about genetically modified -- a minute amount of a genetic modified product? I think you said inadvertent, that was in another product that would not --

MR. FERNANDEZ: Right.

MALE SPEAKER: Could you expand on that? I don't understand that.

MR. FERNANDEZ: Sure. The issue is -- let's say you have -- you know, you have corn chips that are organic. And you have -- you're both the producer and the processor.

You would have to be certified, you know, for organic production in order to be able to label that product as organic.

And to get that certification requires you to have an organic plan. And if you're a corn grower, your organic plan is undoubtedly going to have to deal with where you get your seeds. You know, what kind of varieties that you use to make sure that they're not Bt corn or other genetically engineered corn. How you keep your product segregated, if you have a split operation or in the transport from your farm to wherever the processor is.

Again, the processor is going to have a plan that's going to have some of those same kinds of things in it. How is he going to keep the products segregated to make sure that they're not, you know, somehow being mixed and, you know, those kinds of things.

And despite all those -- and there is an audit trail from, you know, sort of seed to table. And despite all those best efforts and following all those best plans, you somehow -- you could find that there was some level of bio -- you know, biotech corn in your corn chips.

That would not necessarily be a violation of the

Act. You had not used the product. You had not planted Bt corn. You had not -- you had followed your organic standard -- your organic system plan. And so that product -- you would not necessarily be in violation of the Act then. It could trigger an investigation to see
-- you know, by the certification agent and whoever else to make sure that you were following your plan and you did all the things that you were supposed to do.

But if you followed your plan, you know, that would not be a violation of the Act. So that's what we're talking about.

MALE SPEAKER: It's a matter of degree. That's really it.

MR. FERNANDEZ: No, it's not a matter of degree. It's a matter of what you've done.

MALE SPEAKER: Following your plan.

MR. FERNANDEZ: Right. Your actions.

MALE SPEAKER: And it's process based.

MR. FERNANDEZ: Right. Because it's what -- it's the process that you followed. It's not the content of the product that is being certified.

MALE SPEAKER: Steve?

STEVE: Yeah. Coming from a state that has an organic program that was adopted and passed by our legislature, but wasn't funded and there wasn't anything really provided to police the program, and subsequently, you know, we found that there were a lot of fraudulent things going on.

We had one organic grower, the citrus producer, that we found was applying Aldecarp (phonetic), for example. And examples go on like that in Florida.

MR. FERNANDEZ: Yeah, that's not on the list.

STEVE: Yeah. The concern with a program like this as you roll it out is given the absence of resources in a number of states, how much is the agency going to be able to put behind making sure that everybody is honest?

MR. FERNANDEZ: Right. Our rule -- USDA's and the federal rule on this is fundamentally in accrediting certifying agents. Or certifying bodies. So that could be a state. That could be a private organization. We are not certifying farms and handling operations. We are accrediting certifiers.

And that accreditation process involves, you know, paperwork. A paper sort of audit and also site visits,

including unannounced kinds of site visits. That is going to be our primary enforcement tool, through the accreditation process. That accreditation has to be renewed.

You know, if the growers that are certified by a certain certifier are starting to find -- if you're starting to find a lot of problems there, then, you know, that certifier's accreditation could be yanked if they are not doing what they're supposed to be doing.

MALE SPEAKER: Yeah. We just found that -- the accreditation is great, but unless you have some follow up capability to investigate complaints associated with the accreditation process, it starts to unravel.

MR. FERNANDEZ: Yeah.

MALE SPEAKER: And the question is, I guess, is there some potential for an income stream to do enforcement?

MR. FERNANDEZ: Well, yeah. The accreditation is a fee based, you know, deal. So we are -- the money that we have to do those things is built in. Some of that is built in. Some enforcement is built into the accreditation process in that sense.

MS. MULKEY: There's a question over here.

FEMALE SPEAKER: (Inaudible). I wanted to ask a

question regarding your comment concerning what you had indicated -- as what I understood -- that this passing of this national law could significantly expand international trade in organics.

And I wonder if you would also think that the passing of the law could in fact increase the involvement -- or increase the market in the production of organic significantly within the United States if there is going to be an impact?

In particular, as you know, we're already seeing increasing involvement of mainstream agric business investing in organic. Do you think that's going to take off even more once there is consistency in standards throughout the U.S.?

I guess I bring this up partly because I think that it seems like there is real opportunity to engage more of the organic producers in a process like this as potentially leaders in a cutting edge, even though a niche. But on those that are pursuing, you know, biological alternatives to pesticide use.

So I'm just wondering if it's going to really take off even more than it already is?

MR. FERNANDEZ: Yeah. I mean, we think -- yes. I

mean -- and, sure. And we think that having a national standard -- frankly that was the purpose -- one of the purposes of the law initially in having a national standard. A Uniform standard will ease -- will make interstate, you know, commerce easier. Will make -- we think will enhance consumer confidence.

And once people start to -- I mean, this is going to be a process -- an education process. A whole bunch of the stuff that I didn't talk about is really sort of some of the heart of the rule that has to do with the different labelling categories and what you can say on what panels, depending on what percentage of organic product you have in a processed product and things like that.

And I think when people start to realize what those things mean, I think, yeah, that certainly has a potential to increase the market as people have more confidence if they know what these products are.

MALE SPEAKER: Mike, any discussion on the wording that is going to accompany the labelling of an organic product? I mean, is there going to be an explanation from the USDA what organic means and all that, or the implications of what the organic food may have?

MR. FERNANDEZ: That was not in our proposal that, you know, was just published. I mean, we have -- it talks about what you can -- you know, how and where you can use the word organic. But it doesn't -- there wasn't -- it was not contemplated for any other, you know, explanatory language.

MS. MULKEY: Do you want to do your wrap up?

MALE SPEAKER: Are we through with questions? It's a little after five. Does anyone have any comments they just absolutely have to get out this afternoon that we couldn't pick up tomorrow?

Okay. As far as tomorrow, it looks like we're starting at 9:00. We will not be meeting here. I think I talked to a few of you this morning that actually went to Ballston.

(Laughter.)

MALE SPEAKER: We will be in Ballston tomorrow. That's actually where the meeting will be. So we'll just look forward to seeing you there.

MALE SPEAKER: Is it easy to find? Is it off of the subway?

MS. MULKEY: Yeah. The subway stop comes up in one building, and you basically get out of that building and go

across the street.

MALE SPEAKER: It's to the left a little bit.

(Whereupon, the meeting was adjourned.)

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DAY TWO

JUNE 23, 2000

P R O C E E D I N G S

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MR. ROMINGER: Good morning. I want to start this morning by reading the statement by Vice President Gore to members of the Committee to Advise on Reassessment and Transition.

I would like to take this opportunity to thank Deputy Secretary Richard Rominger, Deputy Administrator Mike McCabe, and all of the members of the Committee to Advise on Reassessment and Transition for your willingness to lend your

time and expertise to ensure sound implementation of the Food Quality Protection Act of 1996.

Working together we can achieve greater protection for the American public, especially our children, while ensuring that our farmers can continue to raise their crops in an economically and environmentally sound way and remain the most productive in the world.

The Food Quality Protection Act not only is a landmark statute but also a true partnership among government, growers, and other users, pesticide manufacturers, and the public health and environmental community.

We have made significant strides in achieving the law's goals in improved safety and sound agriculture, but challenges remain.

As we move forward with implementing the tougher standards mandated by the Act, we must do our utmost to provide a smooth transition that is responsive to the needs of agricultural producers.

Your work will help ensure that these efforts are guided by four key principles -- sound science in protecting public health, transparency, reasonable transition for

agriculture, and consultation with the public and other agencies.

Your contributions will be critical in achieving a balanced approach that meets the requirements and timetable set forth in the Act. Again, I thank you for your commitment to this vital effort.

Well, I want to thank you again -- to each of you for your willingness to be part of this committee and to be part of addressing the challenges that we face through the implementation of the Food Quality Protection Act.

So we welcome your commitment, your insights, your ideas, and your willingness to step forward and to represent your constituents.

Yesterday, I know you had a full session learning about all the work that has gone into FQPA implementation so far.

You've heard about the Department's overall program to respond to FQPA, our information collection activities, our new grants programs, and the new regional pest management centers.

The Department has also been working closely with EPA on risk assessments and developing risk mitigation

measures. And we're working closely with commodity groups who are developing pest management strategic plans -- the PMS plans.

Today we would like to focus more on these plans. The Agency will describe its transition activities and the public participation for risk assessments.

But Mike and I want to remind you that the most important part of this meeting is not what we are telling you, but what you will tell us. And we're looking forward to having your input and your feedback, so we want to make sure that you share your ideas and opinions.

We're dealing with important issues that affect all of us. This committee represents all of the major stakeholders in FQPA implementation, so it's important that you work with EPA and USDA, and even more important that you work with each other.

Some of you were part of the Tolerance Reassessment Advisory Committee, TRAC, and I want to thank you for your excellent guidance on policy and priority setting. I also want to thank you for your renewed willingness to assist the Agency and the Department.

There has been a lot of progress in FQPA, and Mike

will mention some of that as well in a minute. But there is still a long ways to go.

The schedule established by FQPA, as we all know, is rigorous. In approximately two years, in August of 2002, the next statutory deadline requires that the next set of 3,000 tolerances be reassessed.

And there are some significant issues ahead involving cumulative assessment and addressing endocrine disrupters.

FQPA implementation has, and will continue to move forward at a pretty fast pace, and USDA will continue to meet this pace working with the Agency on risk assessments and risk mitigation.

Of course, that means that we will continue to draw on our land grant partners, our commodity groups, growers, crop consultants, and researchers who have made substantial contributions to the risk assessment process.

They have acted quickly to provide accurate use information and by helping to design some practical risk mitigation measures.

I also want to commend the IR-4 Program for its non-stop efforts supporting minor crops. I want to thank the

Agency for its willingness to work in cooperation with USDA, with IR-4, with the land grant universities, and the agricultural community.

I think we have gained some valuable experience in working with EPA, and we'll use this experience to solve other challenges ahead, as well.

We've all learned a lot in the process of working together. We've had to address many issues, including changes resulting from FQPA implementation, and trade issues, pesticide resistance, invasive species, consumer demands, as well as environmental concerns -- just to name a few.

So, I'm proud of the work that we have accomplished -- all of us -- and the work that USDA has done with EPA.

We're all striving to meet the pressures and the timing of FQPA implementation, as was spelled out by Congress. Yet even with these pressing demands of the FQPA timetable, we can't lose sight of the principles that were included in the Vice President's 1998 memo and that he reiterated in the statement today.

Sound science has to drive our decisions. Decisions have to be made through a transparent process. Stakeholders have to be involved in the decision-making, and

we have to have a reasonable transition period afforded to agriculture.

So, this committee faces a lot of challenges, and I look forward to working with you and to working with Mike. Mike.

MR. MCCABE: Thanks, Rich. I am looking forward to working with you, and I think the experience that you bring to this committee and the work that you have done certainly will serve us well, not only over the -- today, but in the future as we work together in implementing FQPA.

I also want to thank all of the committee members, many of whom are here from the old TRAC committee, but some new faces.

I understand that yesterday's session went well, that it provided an opportunity for everybody to get updated on what has been happening in FQPA but also to go over some of the key issues that we face there.

I know that this is an investment of time for a lot of you. Many people have come from far away, and I really appreciate the time that you're taking to help us with FQPA implementation.

There are some tough issues ahead. And while it is

late in this administration, a lot of important work remains. We face an ambitious agenda, both here today and in implementing FQPA, and we have much to accomplish.

We remain committed to the principles outlined -- laid out by Vice President Gore that were reiterated in the statement that was distributed, and we are committed to those principles.

What I would like to talk to you about are some of the challenges that we face together that we see from the EPA perspective that are important to implementing FQPA.

First, to have a complete review of organophosphates by the end of this year. That is going to be a tough schedule. It's a schedule that requires tremendous resources on the part of EPA, and USDA, and a lot of folks here.

Second, push the state of scientific analysis forward on our science policies, such as how to assess cumulative risk from pesticides that share a common mechanism of toxicity.

Third, allocate our resources towards the scientific and regulatory work needed to reassess the Group I pesticides. This is where the environmental and public

health benefits from FQPA have and will be realized.

Fourth, continue to strengthen our relationships with all of you, our customers, and USDA, FDA, and CDC to ensure that our decisions are based on the best available information, on the most current information, on the information which is based in sound science.

As you can tell, as you know, we have much to do, but let me turn to what we have accomplished under TRAC. I think that -- by doing that, it provides a context for what we need to do here in CARAT.

Our goal is to move the ball forward in CARAT. We need to focus on new challenges ahead. We must remember that CARAT constitutes a new stage of discussion, not merely a continuation of TRAC.

TRAC dealt with a variety of important issues relating to communication, transparency, as well as how to ensure sound science.

To realize the public health goals of FQPA, we're moving forward with decisions that provide the highest level of protection for children. We've made tough decisions on many pesticides, including Azinphos methyl, Methyl Parathion, Chlorpyrifos to increase public health protection.

We've reduced risks from pesticides while trying to make sure that farmers have the tools they need. We met the August 1999 deadline to review one-third of existing tolerances.

TRAC recommended, and EPA and USDA adopted, an approach for increasing transparent and public participation in risk assessment and risk management decisions. This process has made us all work much harder but has brought about better decisions.

Moving to sound science, TRAC recommended, and EPA and USDA adopted, an approach to explain and invite peer review and public comment on critical science public issues -- policy issues. Through this process, sound science has become an even stronger cornerstone in our decisions.

Another accomplishment of TRAC, which has gone unnoticed, is the tremendous amount of education -- the learning, the teaching, the better understanding -- that has occurred on FQPA implementation.

So what are the goals for CARAT? First, is the need to place more emphasis on transition. That means how together with everyone at the table we can move away from the most hazardous pesticides in a planned and organized fashion

while ensuring farmers have adequate pest control techniques in their toolbox.

As problem pesticides are identified, we must be sure our decisions are responsive to the needs of growers. Based on my experience as regional administrator in the mid-Atlantic states, I worked with farmers. I know that farmers care deeply about protecting the environment, about ensuring that their consumers, their public have safe food.

Decisions at EPA must considers are farmers. We can maintain a strong and vibrant ag-economy while appreciating the public health provisions of the Food Quality Protection Act.

This is a challenge, but one I think we can solve. We need to continue to focus on children by giving high priority to those pesticides that are likely to lead to exposures to children.

We need to find more ways to increase the availability of safer pesticides, including making registration decisions faster and finding non-chemical alternatives.

We need to start thinking long-term to foster broad public participation in the preparation of cumulative risk

assessments while assuring their completion -- while assuring timely completion of this scientific work.

We need to start thinking creatively about cumulative risk issues, and we need to plan for these upcoming assessments.

This morning, as well as at the end of the day, we will open the floor for discussion of the agenda for CARAT, particular for future meetings. You'll each get a chance to talk about your concerns and what you hope to accomplish.

We have much to accomplish -- I'm confident that we will accomplish. I look forward to working with all of you as we make tough decisions to protect public health while making sure American agriculture remains strong; while making sure that those who work in agriculture are safe; and most important, for ensuring that the American public is safe and healthy. Thank you.

MR. EHRMANN: Thank both of you very much for those comments. My name is John Ehrmann. For those of you who don't know me, I'm from the Meridian Institute and been asked to serve as facilitator for the committee.

And what I would like to do first is initiate a round of introductions -- first around the core table here,

and then I would also at this meeting like the folks behind and the Congressional representatives to introduce themselves, as well, so that everyone is aware of who is here.

And then I'll say a few words about the agenda, the FACA, Federal Advisory Committee Act; context for this committee's work; and a few other suggestions about how we proceed.

But first, let me start with Keith and go around the table for introductions. Just your name and organizational affiliation will suffice.

MR. PITTS: Keith Pitts with USDA.

MR. JENNINGS: Al Jennings, USDA.

MS. MURTAGH: Therese Murtagh, USDA.

MR. TROXELL: Terry Troxell, FDA.

MR. -- (Inaudible): Jack -- (inaudible) -- Office of Cooperative Environmental Management for the -- (inaudible).

MR. HELLIKER: I'm Paul Helliker, the director of the California Department of Pesticide Regulation.

MS. CLOVER-ADAMS: I'm Jamie Clover-Adams, secretary of Agriculture from the state of Kansas.

MR. WHALON: Mark Whalon, Michigan State University.

MR. ORTMAN: Eldon Ortman, Purdue University.

MS. LYNCH: Sarah Lynch, World Wildlife Fund.

MR. WHITACRE: Dave Whitacre, I'm in charge of the science groups at Novartis.

MS. BOBO: Tanya Bobo, Makhteshim-Aghan of North American, Inc.

MS. DAVIS: Shelley Davis, Farmworker Justice Fund.

MS. LUDWIG: I'm Gabrielle Ludwig (phonetic), here for Western Growers Association, and I'm trying to fill the shoes of Dan Botts.

MS. MOYA: Olga Moya, South Texas College of Law.

MR. VROOM: Jay Vroom, the American Crop Protection Association.

MS. SPITKO: I'm Robin Spitko, National Alliance of Independent Crop Consultants.

MR. RUTZ: Steve Rutz, Florida Department of Agriculture and Consumer Services, also representing the Association of American Pesticide Control Officials.

MR. WICHTERMAN: I'm George Wichterman, entomologist with the Lee County Mosquito Control District in

Fort Myers, Florida -- also representing local government.

MR. EWART: Wally Ewart with the Northwest Horticultural Council.

MS. BERGER: Lori Berger, California Minor Crops Council.

MR. OLSON: Good morning, I'm Erik Wilson with the Natural Resources Defense Council.

MR. ROSENBERG: Bob Rosenberg with the National Pest Management Association.

MR. AMADOR: Jose Amador, Texas A&M University, Research and Extension Center in Westlaco.

MS. PELTIER: I'm Jean-Marie Peltier, the president of the California Citrus Quality Council.

MR. LAURIE: I'm Jack Laurie from the Farm Bureau.

MR. WALLENDAL: John Wallendal, farmer -- potatoes, vegetables, and greens.

MR. LOVELADY: Bill Lovelady, I'm a farmer, and I also represent the National Cotton Council.

MS. WIDDER: Patricia Widder, the managing director of the Poison Control Center, Philadelphia Children's Hospital and a member of the American Association of Poison Control Centers.

MR. HEDBERG: Rob Hedberg with National and Regional Weed Science Societies.

MR. GOLDBERG: Adam Goldberg with Consumers Union.

MS. BAKER: Cindy Baker with Gowan Company.

MR. BALLING: Steve Balling, Del Monte Foods.

MS. BRICKEY: Carolyn Brickey, the National Campaign for Pesticide Policy Reform.

MS. MULKEY: Marcia Mulkey, director of the Office of Pesticide Programs at EPA.

MR. JOHNSON: Steve Johnson, EPA.

MS. WHALEN: Susan Whalen (phonetic), acting assistant administrator for Prevention Pesticides and Toxic Substances at EPA.

MR. AIDALA: Jim Aidala, EPA.

MR. CHIN: Teung Chin, USDA, Office of Pesticide Policy.

MR. BURR: Wilford Burr (phonetic), Office of Pest Management Policy, USDA.

MR. PHILBIN: Errol Philbin (phonetic), USDA.

MS. STASIKOWSKI: Margaret Stasikowski, Director of the Health Effects Division in the Pesticides Office.

MS. ROSSI: Lois Rossi, director of Special Review

and Re-registration Division in the Office of Pesticide Programs.

MS. FENNER-CRISP: Penny Fenner-Crisp, senior science advisor to the director of the Office of Pesticide Programs.

MR. THOMAS: Derval Thomas, EPA.

MS. FEHRENBACH: Margie Fehrenbach, EPA, and I'm the designated federal officer.

MR. HOUSINGER: Jack Housinger, Associate Director of Special Review and Re-registration Division.

MS. KNOX: Kathleen Knox (phonetic), associate director of Biopesticides and Pollution Prevention Division.

MS. CIMINO: Hi, I'm Pat Cimino, I'm with Minor Crops with EPA Pesticides.

MS. ANTHROP: Laurie Anthrop (phonetic), from Region 9 of EPA.

MR. METZGER: Mike Metzger, Health Effects Division, EPA.

MS. GESELMAN: Claire Geselman, Field and External Affairs Division, EPA.

MR. DEZIEL: Dennis Deziel, EPA Office of Prevention, Pesticides, and Toxic Substances.

MR. PAULEY: Phillip Pauley (phonetic), USDA.

MR. TOTH: Steve Toth, Department of Entomology, North Carolina State University.

MS. WALEN: Sarah Walen, Meridian. MR. BERGMAN: Ron Bergman, EPA Congressional Office.

MS. FARMER: Danelle Farmer (phonetic), House Agriculture Committee.

MR. GOLDBERG: John Goldberg (phonetic), Health Ag.

MR. PARSONS: Doug Parsons (phonetic), EPA.

MS. HENRIQUES: Jane Henriques, EPA.

MR. EHRMANN: All right. Let me say a few words about the charter of this committee, and ground rules, and then the agenda.

The Committee to Advise on Reassessment and Transition is being established as a subcommittee under the auspices of EPA's National Advisor Council for Environmental Policy and Technology -- NACEPT as it is usually called.

So, this committee is operating under the ground rules of the Federal Advisory Committee Act through the NACEPT main charter.

As a federal advisory committee, there is just a couple aspects to bear in mind. One is that these are public

meetings, open to the public; and as you can see, we have a good turnout of members of the public with us today.

We will provide an opportunity for public comment at the end of the day. It's indicated on the agenda at 4:15 to 4:45.

For the information of the public, if you are interested in making a public comment, we would ask that you sign up for that outside at the registration table so that we can calibrate how much time we need to provide for those who do wish to make a comment.

And we will ask that you keep your comments to two minutes or less to make sure that we have adequate time for everyone.

And if I see the time of that public comment changing because of the flow of the overall agenda, I'll make the public aware of that so you can know when you would be asked to speak.

Second, there will be a summary drafted. These meetings will be recorded, and there will be a transcript and also a -- unlike the Tolerance Reassessment Advisory Committee where we recorded the meetings and then produced a lengthy summary that wasn't quite a transcript, we've

modified our approach a bit for this go-round.

And what we will be doing is actually making a literal transcript of the meeting that will be kept for the record and then doing a very short summary that will just summarize, kind of, the key points and major discussion items, so that those who wish to consult an actual transcript will be able to do that without having to go through the process of review that we had to on the longer summary.

So, it will be both a very short procedural summary, and then the actual transcript of the meetings will be available through the EPA website; and, obviously, in written form, if you desire.

The -- in terms of the way we'll operate as a committee, let me say a few words about -- I feel like to some extent I'm a football coach addressing a bunch of returning -- I would say lettermen -- I suppose that's not politically correct -- letterpersons coming back on the team for another season.

There are a number of new faces and a number of folks who did have the opportunity to participate in the Tolerance Reassessment Advisory Committee.

We've tried to do in -- the Agency and the

Department have tried to do several things to improve on that process. As the co-chairs indicated, a lot was accomplished during TRAC's -- the time TRAC was in existence.

And in terms of the process, we've endeavored this time around to have a pick-up on a number of recommendations that all of you made to Meridian when we did an assessment of that process.

One, you'll note even though it's still a big table, it's a smaller table than it was before. And we've -- they have tried very hard to keep the size of the committee to more workable numbers, which I think has been accomplished in large measure.

Two, there are a number of new faces around the table -- some interested perspectives that were not represented on TRAC, and I think that's also very helpful in terms of making sure we have -- as the co-chairs indicated -- all the appropriate interests around the table that need to weigh in on these very important issues.

Third, I would ask all of you -- particularly those who have experience in these large committees -- to bear a couple, kind of, operational ground rules in mind that I think can also help make this as effective a committee as

possible.

And that would be that remember that you're here to address the Department and the Agency and provide them advice on how they ought to be proceeding on these issues.

And I realize when you're in a public setting with a microphone and an audience, it is tempting to be talking not just to each other and to the folks up here from the Department and the Agency but to larger audiences.

And there is only a certain amount I can do to control those desires on your part, but remember that one person's most critical issue is somebody else's rambling rhetoric.

And I assure you that if we get into a pattern of long speechettes relative to important issues that you care about, that the next person I call on from a different perspective will feel obligated to do exactly the same thing.

And it becomes difficult for those of us up here -- the co-chairs, myself -- to intervene because you start feeling like, well, if they did it, I've got to give a shot to the other person, and pretty soon we're on that slippery slope.

So, I would really encourage you to keep your comments concise, to the point. You're talking to people up here who have a lot of knowledge about these issues and understand the context.

You're talking to people as your fellow committee members who understand a lot about these issues and have a lot of context.

And I don't think we necessarily need to accompany your comments with a lot of additional words that may be actually being crafted for folks other than the people around the table.

So, I would ask you to do that. We'll do our best up here to remind you if we feel like we're slipping into a pattern that's going to be not as efficient as all of you would like in terms of conducting the committee's business.

I would also ask those of you when you wish to be identified, as we've done in the past, to put your name card on end. It allows -- helps me keep track of who is where.

And as I've done in the past, I will do my best to both blend the need to take people in the order in which they have asked to be recognized, but it is -- unless I was a fly, it's impossible for me to see every card at the same time. I

don't have eyes all the way around.

I also like to be able to provide people at times the opportunity directly to respond to someone else's comment. And that's tricky business with a big committee like this to both blend the desire for people to be recognized roughly in the order that they asked to be recognized, and at the same time, keep some continuity of conversation because you want to respond to something somebody said 20 minutes earlier.

So, I would like to be able to be more responsive to people who have something they really want to say that directly follows the previous comment. And if you want to, kind of, wave at me to indicate that, I will do that. But that will only work to the extent that you, again, abide by that ground rule.

Don't -- if you trick me, then it's going to be very hard for me to allow that kind of breaking into the order in the future because it's just going to frustrate other folks if you use that technique just to make -- get yourself moved up in the queue.

So, again, let's build on our experience. You're all folks who have participated in large committees like

this, and how we all conduct ourselves will be the most critical aspect of whether you think you've spent an efficient day.

Let me just say a word or two about the agenda, and then we'll get started. The agenda for today is structured as follows -- we will shortly provide an opportunity for those who wish to to share your thoughts about what the priority issues for the committee's work should be.

You heard some of those comments from the two co-chairs, and I would be interested -- and they would, as well -- be very interested in any response you have to their thoughts and comments of priorities, as well as articulating your own.

And I'm not going to go around the table and have everyone do that, but if you wish to make a comment, we'll open up the floor for that in just a few minutes.

Then we will move to a discussion on USDA transition activities and pest management strategy planning, and there will be a set of USDA staff who will initiate that discussion.

And given where we are in the timeline, I'm hopeful we can get into that discussion before lunch, rather than

after lunch as indicated on your agenda.

Then we'll move to EPA transition activities or an update and discussion of the public participation process for the OPs that was developed during the TRAC process.

And then have some discussion about the future of this committee in terms of future meetings and structure, et cetera. And rather than get into those issues now, I think I would rather wait and talk about those at that point in the agenda after we've had a chance to hear what issues are all -- are on your minds in terms of priorities for the committee.

And I would address such issues as when should future meetings be, will there be any kind of pre-meetings, or work groups, or other activities that I know people are curious about. But I would ask that we save those comments until later in the day.

Then we'll take the public comment and then have closing comments from the co-chairs before we adjourn. Certainly no later than 5:00, and we'll see -- being a Friday afternoon -- how we do. But, again, I'll keep everyone posted on what we estimate will be our ending time if we see that being modified.

With that, let me just pause and ask the co-chairs

if they have anything to add in terms of procedure, or process, or the agenda. Okay?

Any questions directly relating to anything I've just said before we turn to us getting your sense of priorities for the committee?

Let me also ask the folks over here and from the Congressional participants if you -- as we've done in the past, if you wish to make a comment, I want to get you into the queue, so make sure I see. It's a little harder to see the cards back there, but let's make sure that you have those opportunities when you want to make a comment.

Bill has been here before, you can tell, he's going for that name tag. Let me then open it up for discussion, as I indicated.

And, again, I would ask that you keep your comments concise and to the point. What we're really interested in here is what are the issues that you believe ought to be addressed by this committee? What issues do you think there should be of priority attention, in terms of your opportunity to discuss with the Department and the Agency the issues that are under the purview of the CARAT? Bill?

MR. LOVELADY: Thank you, John. If you will --

those of you who were here at the last TRAC meeting, I think, to a person, for those who wanted to continue this process -- and not everyone wanted to continue this process. I never could quite figure out why, but there were people who did not want to continue.

But to a person, those who did want to continue felt that it was extremely important that we continue, and that there were so many unresolved issues -- namely, the -- we had science policy issues that were not resolved. How were we going to answer the cumulative risks when we -- no one knew exactly how to do it? I know we had a small briefing on it at the last meeting. But those issues are what are driving the consideration of these chemicals. These products that are out there are vital to American agriculture. They are vital to public health, and we need to have a complete understanding of all these science policy issues as we go forward.

Now, the administrator has said that she wants to complete the organophosphates by the end of the year. That is a very, very ambitious proposal. It looks like to me that it is too lofty for what we know at this point.

I would think that it's very important that we

continue to nail down these science policy issues and not move too quickly without having complete knowledge of everything -- and that we are considering.

I think it's extremely important for the credibility of EPA, and I would hope that we would see -- after all, this is CARAT, and part of that CARAT is for to advise on reassessment. It's not just transition.

And I would like to see us make sure that we know what we're talking about about reassessment before we move too far down the line.

MR. EHRMANN: Thank you, Bill. Bob?

MR. ROSENBERG: Yeah, I think I just want to second what Bill said. My recollection of that last meeting was that those of us who supported a continuation of the process did so because we believed that there was substantial unfinished business from the TRAC process.

As Bill said, I think there is still questions about science policy. There are still questions about process. And while it's good to talk about transition, and there needs to be a focus to some extent on transition, I think those other issues need to be addressed.

And I'll just -- once again, for about the

hundredth time, specifically refer to the unfinished business about which I'm talking, and that is the -- what I believe to be inattention to residential non-agricultural issues, which are very much a part of this reassessment, re-registration process.

And I would very much like to see this group address the questions of science, data, communication, and process as it relates to non-agricultural uses.

MR. EHRMANN: Thanks. David?

MR. WHITACRE: There is always a risk of being called on third or fourth because you're going to hear somewhat the same, but --

MR. EHRMANN: It's okay to say, ditto.

MR. WHITACRE: It's trite to say it because it was said during the TRAC process many times, but it's still true. That when FQPA was implemented, it presented a very daunting task to the regulator -- to EPA and to USDA -- to be able to effectively implement that law.

It -- and the reason is not only because it's new, and the standard is different, but there is an enormous amount of new groundbreaking science that is necessary that no one -- in many cases, no regulator in the world, no group

in the world has tried to do before. So, and the timelines, frankly, for that are very, very short. Ten years wouldn't be too long to work out some of the issues that EPA and now their companion, USDA, is asked to work out, literally, in very much less time than that.

So, if I were to make one appeal, one recommendation on priority, it would be to continue to emphasize this sound science. It is a major load-bearing axle for how later the success of the implementation of FQPA is going to be looked at.

That means that every place we're still using defaults that we should be working on those science policies -- how can they be refined, how can they -- is there a different way to approach how we can look at what the risks are?

Because all too often we're dealing with theoretical or hypothetical risks and not real ones. And not because anyone wants to, necessarily, it's just because of the complexity of the underlying science.

So, again, my appeal is, let's keep on these science policies, and I'm not telling you something you're not doing. I know EPA is working on this. There is

refinements underway, there is new ideas picked up.

But if there is a way to enhance that, to speed that, to get more ideas and cross-talk with other entities that can help do that, by all means, do it.

And let this committee also be aware of what you're trying and to help, if we can, but keep us appraised. How can we make it better, and how can we get this foundation that right now is still made out of jelly or sand on how to do some of these risk assessments -- make them better? Keep working on that and make that part of this process.

Although transition is important, and OPs are important, and you're accountable for deadlines, let's don't forget there is a whole host of other types of chemistry and products that are going to come after. And this committee is set up for two years, and guess what? This process is going to go beyond two years.

So, keep working on this framework and keep science up front.

MR. EHRMANN: Rob.

MR. HEDBERG: I think this is a little bit of a ditto on behalf of the Weed Science Societies. I think our major concern is the assessment process and less of a concern

on the transition process.

Point out that our people have been working in the field on better pest management practices since the inception of our societies in the past 50 years. So, we have been practicing transition, although it is incremental.

Today, we're challenged with the assessment process, and the challenge is to future availability of some of the tools which have been used -- I would argue safely -- over the past years.

Our concern is to make sure that we have the best science-based assessment process, and that the assessment be less political and more based in fact.

MR. EHRMANN: Jamie and then Steve.

MS. CLOVER-ADAMS: I guess I would make my comments from a state regulator's perspective. I think in order for us to provide good advice, first we need to understand what the standard is. What was the standard that was used on the three chemicals that Mr. McCabe talked about that already have been dealt with?

I need to understand that. I know that my staff tells me all the time we have to have a sound basis by which we make decisions in all areas of our agency, and we have to

be able to stand and defend that.

And so I think for me to provide you with good advice, I need to understand what standard was used to make the decisions that you've already made.

I would also say on the issues of transition -- while I always believe that it's important to get ahead of the curve, and I applaud you for doing that, we need to be thinking about these things.

For producers on the ground -- and I don't want to have a lot of rhetoric, but they're facing tough times. They're in transition. Things are changing so quickly in agriculture, and this is just one more thing for them.

And I think it's good that we're thinking about transition, but I also think we need to understand what the standard was for the decisions that have been made so we can apply that standard to the future decisions.

MR. EHRMANN: Okay, Steve.

MR. BALLING: Thanks. Well, beyond ditto, I would like to request that we deal with one specific issue, and it came up yesterday during our discussions with FDA, and that is the issue of revocation of tolerances and channels of trade.

This is a huge potential problem for processors and growers, as a matter of fact, and anyone who handles products that might extend for some period of time through the channels of trade.

If we have 180-day revocation of tolerances in each case in which a product was canceled -- or use is canceled -- we may -- it may work for Methyl Parathion because it is a fairly unstable product; although, Wally, you certainly suggested yesterday that we may have some problems that we didn't know about.

This is a huge precedent setting issue, and I think some serious thought needs to be given to how we might find some solutions to it. So, I would very much like that to be on every agenda.

And I would also add -- sort of relative to that -- there are lots of issues that are playing out in the next several months, and I know that we've talked about this CARAT being a two-year process and four meetings.

Well, looking at this schedule, today 25 percent of the meeting -- of the meetings will be today, and there is nothing of substance on this schedule to speak of.

I'm concerned that if we don't assure that we meet

on a fairly regular basis and really cover some important topics, that we'll lose the value of all the time and energy that EPA is spending on this particular group. So --

MR. EHRMANN: Shelley and then Mark.

MS. DAVIS: Speaking for one of the TRAC members that was concerned about reconvening this committee, I want to raise those concerns.

One of the things that really was a red flag to us was that another committee would become a forum for delay and bogging down the process and absorbing EPA's resources.

And we really don't want to see this committee take up the role of the Science Advisory Panel, or the PPDC, or the Public Participation Process, or other ways in which the stakeholders and public can participate.

What we would like to see is the EPA to focus on getting the job actually done. And to that end, to my mind, the three pesticide decisions that have been made are not finished decisions. The worker issues have still -- are still out there, the risks to children who live adjacent to fields is still out there.

So, the fact is that these committees do absorb important resources that should go into action, not talk. To

my mind -- and I raised this the very first day of the TRAC, and I'm raising it now, so, hopefully, something will focus on this -- I think we know that OPs are dangerous, and transition is necessary. And the real question is, where are the difficult crop pest -- pest management situations?

Not everything falls into that category, although some folks tend to see it that way. And I think if we could, kind of, hone in on what are the difficult issues, how do you address those issues, where do we get safer alternatives to address those issues, what are the model transition practices to get us through them?

I think that would move the process along to get us towards safer pesticides.

(END OF TAPE)

MR. WHALON: Well, I guess I want to take just a little bit -- a different track in the sense that I would like to focus on the impact of what has happened with the FQPA process already and where the burden is falling there.

And I certainly agree that we need safer pesticides, and we need those pesticides registered faster. And I think that we're on an unprecedented registration process in EPA, thanks to IR-4, especially in minor crops,

that's occurring.

But one of the things that we're not focusing on that we probably should, and I would like to advocate a subcommittee at some point to look at this more extensively, and that is the impact of this across the United States in agriculture.

And this falls squarely on USDA in a sense, but there is a lot of slippage there. These are dynamic production systems, and earlier Rich mentioned that there were trade issue fallouts, there were resistance issues that are not fully addressed.

There are invasive species, and I would point out, too, there are rebound species that we don't understand very much about, and that are plaguing various commodities as a result of FQPA.

That really needs to be looked at. It's a massive unstructured burden on USDA. It's an economic burden in terms of the resources necessary to do that. It's a personnel burden. I don't think USDA has adequate personnel at this point, especially to get that done appropriately, and it's a huge burden on USDA's partners to address that.

So, I think that that is one of the issues that

this group has to deal with because that's where the rubber hits the road.

MR. EHRMANN: Okay, Erik.

MR. OLSON: First of all, I would like to agree with everything that Shelley had just said about the importance of focusing on moving forward.

I think before getting to that, I think everyone agrees that there are complex scientific issues here. Nobody is denying that, and nobody is denying that EPA has a very significant job ahead of it to carry out the mandates of this law.

But I do think it is quite clear, as we've seen from the three major decisions that have been made so far, that FQPA is going to be forcing changes in agriculture, and in structural pest control, and in other uses of pesticides. I don't think anybody can deny that any longer.

And because it is clear that those changes are coming, I think it's very important that we recognize we're at a critical juncture now. Many of us have been working on pesticide issues for 10, 20, more years, and we've seen some of the laws come and go. Many of these issues have been debated for 30 years or more.

But I think FQPA has changed the ballgame. That we will be seeing major transition being necessitated, and I think we ought to look at it from the perspective of the farmers and the users of some of these chemicals. And from their perspective, there are huge changes coming.

And I think we owe it to them, as well as to the American public, to be talking about how those changes are going to be absorbed because as we move away from some of the older, more dangerous chemistry towards either new pesticides that are less dangerous or towards, hopefully, non-pesticide alternatives, I think we need to have thought that through so that we aren't facing a crisis.

We believe it's very important for EPA and for USDA to be ahead of that curve, to be thinking through how that change is going to be made, and for this committee to be advising, as Shelley suggested, where there are difficult crop pest combinations, where it will be important for us to identify what the alternatives are, and to talk that through.

So, I heard Dave Whitacre say that he thought 10 years was not too long to talk about some of these issues. With respect, I think it is too long to talk about some of these issues. I think we need to be moving forward.

Yes, some issues will not be resolved in the next two or three years, but we can make decisions now to move forward. And we are hopeful that -- although, certainly, other issues will be discussed, we've got to focus heavily on the transition issues.

MR. EHRMANN: Sarah, Cindy, and Paul. Sarah.

MS. LYNCH: Well, taking your admonition to heart, I'm going to be very brief.

MR. EHRMANN: Everybody has done very well so far, I would add. Keep it up, guys, you're doing good.

MS. LYNCH: I agree with Erik, I think it's like real estate. It's location, location, location. In this case, it's transition, transition, transition.

Agreed that the science policy issues are complex, but we need to be able to be thinking forward. We do know these changes are taking place. And the good news is that there are many efforts already on the ground where real world farmers are attempting to address these issues in their -- with their particular crop pest combinations, and we're moving away from reliance on high risk pesticides.

So, we're not trying to reinvent the wheel. A lot of times, the wheel is already out there in place, and that

we can learn from those experiences.

So, I recommend highly that we take advantage of the fact that there are some ongoing efforts, both USDA has financed some, EPA is financing some, some are being financed by foundations or combinations thereof.

There is just a great deal of ferment across the land because agriculture is in desperate straits, and we all recognize that, and we all realize that we need a vibrant agriculture, both for the protection of biodiversity, but also for the health and well-being of the country.

So, I say let's get on with it. Let's start focusing on transition and make sure that we have as much support as we can in place when some of these big changes take place.

MR. EHRMANN: Cindy.

MS. BAKER: Thanks. I wouldn't say exactly what everyone else has said, but I would ditto the comments that, clearly, I think that reassessment is still a topic that needs some discussion from this committee.

And I think some specific examples of things that we had talked about at TRAC but had not reached conclusions are the whole area of worker exposure and that assessment

that's taking place right now with the organophosphates.

I think that's an area that people on this committee can provide insight and additional information. I think it's an area that the Agency is seeking additional information on.

Certainly the area of cumulative risk, which did not get much discussion through the TRAC process, has a very dramatic impact on what happens to -- not only the organophosphates -- but other products.

As we look at that and an understanding of where the Agency is headed in that particular process, I think is something that this committee would be very interested in hearing.

Certainly, transition is something that we have to talk about. It's probably the third area that did not get a lot of discussion at the TRAC process.

But I think that another area that I know we're going to talk about today, but it probably needs continuing discussion, is this public participation process.

And as we look at actions that have been taken and actions that will be taken, how that process works, and whether or not affected stakeholders know how to engage and

know when to be engaged, I think is an important topic for members of this committee to provide some insight on.

MR. EHRMANN: Okay, Paul and then Jay. Paul.

MR. HELLIKER: Thanks, John. Representing an organization that went through a similar kind of reassessment process 15 years ago, I certainly sympathize with the challenges that EPA has. And those resulted in some significant changes to the way that we protect workers.

But I want to congratulate EPA on the glasnot that I think that has come out as a result of TRAC and all of the science policy papers. We find it a tremendous benefit to our operations to know what the science policies are, so I commend you on that and look forward to the culmination and the completion of all the science policy papers.

But I think that there is one thing that we need to reiterate as often as we do, which is that once we get to the end of the process of negotiating these agreements with the registrants, that really is just the beginning.
You know, the implementation of those agreements and what it actually means to operational practices and to what the requirements are that we as a state are supposed to implement, that's where it starts for us.

And I think we're seeing that the issues are still being shaken out with Gruthion (phonetic) and Methyl Parathion, and we still have a lot of things that we have to figure out there.

The recent announcement on Chlorpyrifos I think causes us some serious issues that we have to work out together. And I think this ought to be a forum for raising those issues and making sure that we all work together to implement these decisions that come out of the Food Quality Protection Act in a way that does promote change, manages it well, but doesn't have unintended consequences that we didn't expect in the first place.

I do want to reiterate what Steve says -- I think the channels of trade issue is a big issue. I think that's something that we need to resolve.

I know FDA is going through a public comment process, and we will be commenting on that. But I do believe it's an issue that is going to be very important for EPA to come up with a scheme that is both fair but also timely. And so, I hope that we can have some more enlightening discussions about that.

And then, lastly, I think we ought to be aware of

some of the actual implications of our decisions here. For example, I was talking this morning with Jean-Mari about the -- a current pest that we're dealing with in California -- the glassy wing sharpshooter, which has some implications -- major implications for the grape industry in California that could be related to some early transitions away from organophosphates.

So, it's not clear that there are direct connections, but I think there is some information that we're developing that might indicate that that could be a consequence that we never thought.

And that comes from using some of these more targeted softer chemicals, which we need to move to, but we need to move to intelligently and make sure that we don't have some consequences that are going to be difficult for all of us to deal with, and we don't create situations like we're having with the gas prices in the Midwest right now.

MR. EHRMANN: Jay and then Robert. Jay.

MR. VROOM: John, I would like to offer a suggestion. I think that was what we were tasked to do here in this session.

We've all thought a lot about the three chemicals

that have gotten a lot of attention in the last year. I wonder if it's appropriate that we refer to them as major decisions. They are significant, without a doubt, but the major impact, to me, would be to take a closer look at what kinds of consistencies and inconsistencies might be represented in those -- across those three decisions and how they might extrapolate forward.

So, I would suggest the formation of an initial CARAT work group, and I volunteer to serve on that. And I would suggest that those of us who would volunteer to serve on such a work group take the burden of the load of trying to do this and minimize the resource demand on both USDA and EPA -- but begin to develop separately but with input from the two government groups -- a matrix analysis of the consistencies and inconsistencies in those three chemicals.

And there are some that come to mind on both sides of that ledger. Certainly, the infants and children protection factors seem to represent some consistency. But analyze that a little further, the worker protection factors that were addressed in all three chemical reviews would be interesting to look at from a consistency, inconsistency standpoint.

The implementation of the six-stage preliminary risk assessment public participation process that was, I think, a centerpiece of the TRAC process, I think probably falls into the more inconsistent column across those three chemicals.

And I would like us as a larger group, but maybe in a smaller work group initially, to get back to looking at that six-stage process and, you know, what has happened there, and what could improve.

And then the last point -- just as an example, and this suggestion would be the issue that Marcia addressed to us yesterday, which is the question of toxic endpoint selection, and I'm still a little concerned about, kind of, where we left that yesterday.

And I know that you're going to issue the science policy that will address that for the OPs in a few days, and that will probably help clarify that a little further.

But, again, I think in the context of, sort of, case study analysis on these three chemicals, a quick look back to see what kind of precedent and consistency, or lack thereof, that we might be looking at on something like endpoint selection is very important. So, that's one initial

suggestion.

MR. EHRMANN: Thanks. Robin, and Jack, and Wally.

MS. SPITKO: I'm speaking from the perspective of an independent crop consultant working with growers on a day-to-day basis.

I just have one basic question for the group -- and that I think we should keep mind -- and that is who is going to pay for transition at the farm level?

Just a couple quick figures for you all. A standard pesticide treatment right now is running about 10 to $15 an acre.

The softer materials, which growers are readily adopting -- they're very supportive of them -- are running 22 to $55 an acre.

We -- whether we want to accept it, the reality of our farm situation is that our farmers are not making profits. We are barely hanging on.

I work in the Northeast, but I have many consultant colleagues in other crops and other parts of the country, and we're not doomsayers. We're just realistic. We're dealing with economic reality. There is no profit to fund these changes.

A perfect example is the replacement for Alar. Alar was $50 an acre. Whether you're pro or con, you know, that's not the issue. We have a new material finally to replace it. It's to stick the fruit on the trees so we can harvest them without them dropping on the ground.

The cost of that material is $300 an acre. You want to move away from actual chemicals to IPM techniques, like Mark's working on. His comments were right on, also.

They're all expensive. They're very expensive. They've labor intensive. They're -- who is going to fund this? Who is going to help the farmers? They are willing to move forward. But, you know, we have all these discussions, and I feel at times we just lose the economic basis of all of this, and that how are we going to do this at the farm level? Thank you.

MR. EHRMANN: Again, I think people are doing an excellent job of listing a number of issues. Let's also remember we are most interested at this point in the issues that you think should be in front of the -- this committee, and you want to draw attention to for the work of the committee.

So, we're getting a good list here, let's keep on

that track. Jack.

MR. LAURIE: All right, thank you. I don't have the opportunity to reflect on the last meeting of the TRAC committee because I'm one of the new people around the table.

But I would like to, to some extent, second what Robin has said and what several others have mentioned, and just remind the group that we have to keep the farmer in the equation.

You know, I'm a farmer, I'm a family farmer, and I represent family farmers, and these folks are terrified of what is happening. And they're terrified because they don't understand it, they don't understand the science, they don't understand the process, and they're scared to death about what faces them next year -- what they will have available to use in their production tool kit.

It has been said a couple times that the financial condition of American agriculture is less than acceptable, and it's probably closer to the level that it was in post-Depression days than at any time since then.

And so, the same farmers who called, and wrote, and contacted the Congressional offices to support FQPA now find themselves calling, and writing, and contacting to say, what

do we do next?

They're terrified of transition. Yes, farmers are doing everything that they can -- and I can say that with a clear conscience today. I've watched farmers who two decades ago mixed pesticides with their hands now use all of the technology that's available to handle pesticides.

Farmers are doing what they are financially and technically aware of. What they can do, they're doing it today.

What they need is reassurance from EPA, reassurance from USDA that this whole effort supports the concept that they brought to the table in 1996. And Marcia and Jim, Al, you've all been in my state, in Michigan, and you've heard growers express these concerns.

And I encourage the effort be focused on the reassessment, on the process before we move forward too fast emphasizing transition. The farmers will transition, but they're terrified of being forced into transitioning to somewhere that they don't know what the end result is. Thank you.

MR. EHRMANN: Okay, Wally.

MR. EWART: I would like to echo the transition

part in terms of agriculture. Representing tree fruit growers, we feel like we've been transitioned all the time. That's the way farming goes because, unfortunately, we have weather, we have pests, we have disease. It's always in transition, so we have to respond to that.

So, there is nothing new about doing transition. The question is what kind of transition are you talking about? And I think in tree fruit growers, we've always looked to new tools as the solution, and that really is still the case. There is no real change.

But in terms of what we should be talking about here, I think the important thing is not to emphasize transition, but is to emphasize the reassessment process, the science by which the tools available to us are changing.

And that's really what I think is extremely important for us to continue to look at that. I think from the time of the last TRAC meeting until now, we've lost a lot of the transparency that we had. I think we've had the feeling in agriculture that the decision process has moved away from where we left it in TRAC -- at the end of TRAC.

And as we look at the decisions that have been made, I would like to echo the comments, we ought to look at

those decisions and the processes by which they were made because I think many of them -- although not all -- actually ended up with solutions that perhaps weren't the best for agriculture under meeting the standard.

In other words, if you meet the standard, there are different ways to meet the standard. Is meeting the standard that happened in those cases always the best for the agricultural crops?

And so, I think assessment of how that process works, the negotiation, et cetera, is really worthy of attention.

MR. EHRMANN: Okay. Adam, Jean-Mari, and Jose. Adam.

MR. GOLDBERG: Thank you. As a newcomer to this whole process, I just wanted to say that I appreciate the remarks this morning from the co-chairs regarding the fact that this is not an extension of the TRAC process, but a new panel with a whole new mission, and that transition is a reality and something that we need to be moving forward on.

And I think that the fact that farmers are concerned, are worried about the transition gives us a very important mission here. That's what we should be focusing in

on to help them make that transition.

It's not going to be easy, but it is necessary because of the FQPA. And as I said yesterday, it's not a question of what the high risk uses are. We know what they are. And it's not a question of what the alternatives are. We know much of that, as well.

It really is a question of how we get to that transition, and we are very interested in coming here, rolling up our sleeves, and reaching the solutions if everyone else is. So, I look forward to that.

MR. EHRMANN: Thank you. Jean-Mari.

MS. PELTIER: You know, since it's here, why don't we let Jose go first. I know what he's going to --

MR. EHRMANN: Okay, either way, that's fine.

MR. AMADOR: Well, that's real nice to have a young, good-looking lady to defer to me. John, I just want to add something before I make my statement on the situation of the farmers are frightened, which I think a lot of people know. But I'm a farmer of a sort. Some people don't look at me as a farmer because I'm the director of -- (inaudible) -- Station, but we do farm about 6,700 acres.

And in the lower -- (inaudible) -- Valley this

year, of all the farmers that I know -- at least the people that are my friends, people I go to church with, go to their wedding, everything else -- I know of only one crop this year is going to make money, and that was citrus.

There was no money made on grain sorghum. We're selling grain sorghum for about $3.50 a hundred, and we grow wheat and sorghum for cover crops, so, and the vegetables are not making money. So, the situation out there is precarious.

And what I would like to say, I know that the next item on the agenda is to talk about priority issues related to reassessment and transition.

We have talked a lot about reassessment, we talked a lot about transition. I think it would be good before we start that discussion if the Agency could tell us what they mean by reassessment, and what they have in mind for transition.

If they could explain, you know, just where the Agency stands there, so if we're going to be giving advice on these two issues, can they state fairly clearly, you know, what is it these two issues really mean?

MR. EHRMANN: Let me just say on that, that the two transition items in the afternoon, I think will be an

opportunity for the agencies to discuss that -- Agency and Department to discuss that, as well as the reassessment context in which that's taking place.

So, they will be making presentations to start off those discussions which, hopefully, will give you a sense of what you would like them to respond to.

MR. AMADOR: We had some comments on that yesterday, but I don't think everybody here was present yesterday.

MR. EHRMANN: That's right.

MR. AMADOR: So, I thought it might be good, you know, from the very beginning to see where we are because that's what we are called to advise on. And I don't know that everybody has the same understanding.

I think we need all to be on the same track. What transition means to somebody may not be what it means to somebody else, and I think it would be good if we knew what the industry really means by it. Not industry, but the Agency.

MS. PELTIER: I think it's interesting to be the very last person to get to say something, especially after a group like this that has since the formation of TRAC and our

activities together, has really gotten to be pretty sophisticated in the way it approaches the input side.

I would like to suggest that maybe the comments this morning fell into two categories. One is that I think there was an expression that there is a need to evaluate where we are in these science policies.

Several mentioned desire to look, not only at the consistency of the application of the individual science policies, but also the consistency of the application of the process.

And, certainly, of the three OPs that were mentioned earlier this morning, I think there are some questions in the minds of some of us about the consistency of the application, particularly of process. But on the other side of the equation, I think that we really do need to grapple with this issue of where we go from here. There was a meeting out in California a few months ago, and we talked about the use of this word, the T word -- the transition word.

And I think that a number of people have said it different ways -- there is a fear on the part of agriculture that when we start talking about transition, and that this

committee is talking about transition, that there is already a preordained, pre-decisional outcome that all the rest of these OPs are somehow out the window.

And I think that's not the position that the Agency has. I hope it's not the position the Agency has. But to use the word, transition, suggests that that's what the decision is.

And as we grappled with it in California, we came up with this idea -- actually, I have to say I like using the term, PMS -- but pest management strategic planning takes on a different tone, I think. And it suggests that growers are taking control of the situation and looking strategically at what our pest management challenges are going to be.

I was heartened by the comments by Shelley, and by Erik, and by Sarah of the recognition of the fact these aren't easy, pat answers.

Paul alluded to the fact that we have some real interesting things that we've discovered through the 30 years-plus that the citrus industry has been involved in moving from the traditional application of organophosphates, moving to release of beneficials.

And then some related problems that we've had --

with glassy wing sharpshooter, notably -- but certainly with other kinds of things, like the integration of insect growth regulators that many have heralded as the be-all-end-all move away from OPs.

We've discovered some real interesting problems in integrating those into our pest management system. There is some interesting things evolving on a commodity basis. This interaction between citrus, between almonds, between grapes, problems with Pierce's (phonetic) Disease, problems with where we are in glassy wing sharpshooter.

And I would think that this would be a terrific forum, if we really are interested in listening to each other about real world problems, it's an interesting way to take a look at what we've experienced since we're moving into the T word and what our experience has been.

On a more practical basis, some of the points I would like us to look at are how well is the priority system at EPA working, how well is it accommodating the need to move to new technology? Importantly, and Secretary Rominger raised this, where do we stand internationally?

We have looming in front of us some difficult challenges on post-harvest disease control. We know there

will be residues. The question is, will the international system -- with the Kodak (phonetic) system, will the system of the EU be able to accommodate us moving to those materials and still being able to market our products internationally?

I think I would like to take a look at what the interaction is between USDA and EPA, have an evaluation of the adequacy of time for USDA to provide comments.

And then from our perspectives, we have been trying to put together materials that we hope will be useful to EPA. First, we put together crop profiles. Now, many of us are in the process of putting together PMS plans.

This is expensive, number one. There is a question of whether the resources will be there to update these plans because if you're working on a plan that has the state of the art of pest management in citrus from three years ago, that's not where it is now.

And, you know, the question is, how are you using the documents? How can we make them more beneficial to you? And who is going to help us make sure these things are updated? And I think that's everything. Thank you.

MR. EHRMANN: Okay. I'm going to take Eldon, and Carolyn, and George, and ask the co-chairs if they have any

summary thoughts, and we'll go ahead and take our break. Eldon.

MR. ORTMAN: As a new member, I would applaud the work that TRAC has done to date and look forward to the new challenges that lay before this committee.

Representing a research organization science and science applied to policy, science applied to the individual assessments, and I certainly concur with examining the three assessments that have been accomplished and look at what we might learn with regard to science application.

I would like to add another dimension to the science and as it relates to transitions. Most of the new tactics, most of the new practices that we are looking at are going to be much more site-specific, pest-specific than what we have been practicing in the past.

There is a tremendous need for science undergirding of those technologies, those new practices. We should very well expect that those new practices, those new tactics will reveal other problems that we are not experiencing today with the current technologies.

Above all, we need to be very cognizant of the economic times out on the farm. These tactics -- many will

be more expensive. It's also very interesting that one of the other prime tactics is under great public scrutiny; and, in fact, may not be available, also based on public scrutiny.

Science is the basis for moving ahead if we're going to have a productive and a solid agriculture.

MR. EHRMANN: Thanks. Carolyn.

MS. BRICKEY: Yeah, I just wanted to say I appreciate being here today and seeing a lot of friendly and familiar faces.

I heard some interesting words around the table that attracted my attention. One of them was wine, so I hope that you're doing something, Jim, to fix this problem in California, and I would urge you to just --

MR. AIDALA: Every effort.

MS. BRICKEY: -- go right over there today. I also heard the word, inconsistency, and I wanted to respond to that a little bit, and in this way.

I think one thing we had to take into account when we look at what EPA is doing with the process that we outlined in TRAC is that the process, I think, has to be a little bit different when you're dealing with a chemical that has been, perhaps, in special review for years or been under

scrutiny for a long period of time versus a chemical that's newer and hasn't gone through as much of the scrutiny, and study, and research that another chemical might have gone through.

And I think that, perhaps, influenced the process with regard to the chemicals that EPA has evaluated in the last year.

I also want to say that I, of course, too, think that our job here is transition. I don't think that what we mean by transition is what Jean-Mari was fearing.

I think what we mean is let's get to the hard cases, try to figure out where they are, how they could be dealt with.

And I think what Wally was describing is the kicking and screaming process that usually occurs with these chemicals. And we've learned that the kicking and screaming process doesn't work very well -- not very equitable, not very scientific, and it doesn't always yield the most equitable results in terms of how farmers are affected.

So, I think we need to figure out a different way to deal with these chemicals than using that particular technique.

I would also say that some of the comments I heard around the table about the economic situation for farmers are -- it's a really sad and difficult reality; but I think, perhaps, Mr. Rominger, we should be up on the hill talking about the Freedom to Farm Act because we're really getting into some heavy economic issues in this discussion. And some of what we're doing here won't have a whole lot to do with that. Thank you.

MR. EHRMANN: George.

MR. WICHTERMAN: Thank you, John. Over the course of the last two TRAC meetings, I had asked if we could have someone from the Department of Health and Human Services accompany us here during this forum to see how they participate in this reassessment and transition issues affiliated with the group and with the mission.

And since our last TRAC meeting of October, HHS has appointed a designate, and that's the National Center for Environmental Health within CDC.

But I would ask the group if we could have them participate in the future regarding our public health issues and see how they fit into this equation along with EPA. Thank you.

MR. EHRMANN: Very good. Again, I think an excellent set of opening thoughts in terms of priorities for the committee. And, clearly, as we go through the discussions, if you have other items you want to add as we go through the transition, and public participation, and other aspects of reassessment discussion for the rest of the day, please add those to the list.

Let me turn to the co-chairs and see if they have any reflections at this point on what they have heard thus far. Mike, any comments?

MR. MCCABE: Well, I appreciate the comments, as well. It certainly helps me as someone who wasn't part of TRAC, and who comes to these issues from a position in the Agency where there was not as much emphasis in the regional offices. It was primarily the states that implemented the pesticide policies of the Agency.

And we certainly were aware of the policies that were being developed at headquarters and through FQPA, but it was not one of the regional focuses.

That doesn't mean that I haven't had an extensive education by the people on my right and behind me over the last eight months. And I think that it is clearly something

that I have pulled in under my position as deputy administrator to be responsible for.

But the comments that were made by all of you in this part of the session, I thought were helpful. It -- the comments are daunting in terms of the breadth of them, the extensive number of questions that they raise, and the long list of issues that could be discussed.

I think that we need to do focus, we need to make sure that we keep on track to focus on the toughest issues that we faced, on the hard issues and decisions that may be before the Agency and not get sidestepped by a general discussion about the FQPA purpose, about the requirements in FQPA for the Agency to meet what is -- as many of you have said -- a very tough schedule, a very demanding schedule, a resource-intensive schedule that is going to put pressures on us.

But they are pressures that were recognized before FQPA was written. They are recognized in the reality of having to implement FQPA, and it is important to get on with the job. Not that we have been dragging our feet on this. We have been adjusting to the requirements, and we are fully aware of the complicated nature of the decisions that we are

making.

Nothing has been preordained. We are evaluating and reassessing these chemicals in a responsible way. TRAC was able to help us put together sound science policies and procedures that we have been following. And we have a number of groups outside of this committee that are helping us with the implementation of the Act.

So, I think that we have highlighted some important issues, sorting them out, focusing on what we are going to focus our attention on -- not only today but as part of the next steps -- is going to be an important issue as we go forward.

I think that perhaps one of the most interesting discussions will come when we talk about next steps and the future because there is a lot on this list, and there is a lot to be done -- not only in the next two years but, certainly, before the end of this year.

MR. ROMINGER: I think we've heard a lot of good suggestions here this morning on issues that we need to address but -- with this committee -- some -- certainly some interest in a, kind of, a quick review maybe of the science policies and completing the science policies to see where we

are, get everybody up to speed on those.

But the realization that we're going to spend most of our time on the pest management strategic plans, that we do need get to the tough issues. And whether you call it transition or PMS, that's where we have to get the advice of this committee on how we're going to be able to accomplish it.

And I think that the realization by the group as expressed by quite a number of you that agriculture -- many folks in agriculture are not in the best financial shape.

And that so it is a challenge for them, but that means it's a challenge for us to come up with the strategic plans that will work and for agriculture out there, as well as the public health and household issues. All of those we have to address.

But it is a difficult situation that we're in. That's why it's going to take the best thoughts of all of you, and how we can develop good strategic plans under these circumstances. So, thanks for all your suggestions.

MR. EHRMANN: Let's take a 15-minute break. Look at your watch, add 15 minutes, come back, and then we'll pick up with the transition item on the agenda.

(Whereupon, there was a brief pause in the proceedings.)

(END OF TAPE)

MR. EHRMANN: Take your seats, please. Members of the public, take your seats, please. Okay, we would like to move to the item on the agenda that originally was labeled as the 1:15 item, USDA transition activities/pest management strategic planning.

And as you can see on the agenda, following USDA's thoughts on that general topic, then we'll have a short presentation by EPA, and, obviously, time for discussion, both during each of those presentations, following each one, and then as an overall summary discussion before we move to the public participation item.

Let me also remind folks from the public that if you wish to make public comment, encourage you to sign up outside so that we can calibrate the time appropriately for that agenda item.

And before I turn it over to the folks from USDA to move into the transition discussion, Mike wished to make a comment. Mike.

MR. MCCABE: I find one of the most useful aspects

of any meeting of this type to be the side conversations that you have. The opportunity to get to talk to folks offline, if you will, and I hope I can meet every one of you before the day is over.

But one of the things that I heard from a couple of folks in just the last couple of minutes is the concern that we may be trying to shut down any discussion of anything but transition.

I want to assure you that that's not the case, that's not our intention. I think as the list of items grew in our discussion before, there are a wide range of issues that should be discussed. I'm not sure how we're going to be able to discuss them all or in what context.

But on the issue of reassessment, by all means, that's something that can be discussed. But I want to emphasize, let's be focused, let's deal with what some of the specific concerns are that might have been raised since the last TRAC meeting, since the intervening months when EPA has been active on these issues.

Let's not just have a broad diatribe against reassessment or the whole purpose of FQPA. And I think that that really is where our focus is. Let's make this

productive.

MR. ROMINGER: I want to second what Mike has said that, you know, there is room for other discussion of other issues in addition to the pest management strategic plan. And, certainly, USDA with the help of a lot of you is going to be spending a lot of time on the risk assessments that we're doing in conjunction with EPA. So, you know, all of these issues are important to us.

MR. EHRMANN: Comment, Bill? Do you want to make a comment? No, yes? No.

MR. LOVELADY: I don't know how this fits into the agenda, so I -- but I think it is a response to your comment, Mr. McCabe, let's be productive and let's talk about things that have happened since the last meeting. To get quite specific, we have Diazinon coming up, which is a very hot topic, I'm sure. Are we looking at a process like we did before with the last three that were taken care of?

I'm trying to -- I'm really trying to be nice about this, but, regardless, people skirted all around these three chemicals that were talked about last year -- in the past year. And I'm going to be the bad guy, and I know that the last one was a voluntary, quote, unquote, decision.

But to many of us, it certainly appeared that politics reared its ugly head in these three chemicals that were worked on in this past year. And I don't think that's to anybody's advantage for that perception to be there. Can we look for that same type of process when we start talking about Diazinon?

We, you know, we -- where is the dividing line between reassessment and transition? This is something that is very important, and people skirted around the issue and made reference to it about consistencies and inconsistencies, but I'm just going to put it right out on the table.

The perception -- my perception and the perception of many people -- is that politics had far too much to do with these past three chemicals, and the process to the outsider certainly appeared to be thwarted, somewhat.

MR. MCCABE: Well, let me respond to that. I think the issue of politics playing a role in a decision like this is probably more emphasized by people who don't understand the process and, perhaps, who were disadvantaged by the decision that was made.

I can assure you that in making decisions on these substances, we have a very thorough, a very structured

scientific process, a review process which is firmly rooted in the science of the decision.

And politics doesn't play a role in that. Politics got this administration to where they are. This administration has a very strong record on protecting public health.

But that broad political mandate that came in with this administration eight years ago doesn't break down to little decisions where -- perhaps, with big significance, big impact -- doesn't break down to decisions like this where it's a political call.

You could say from a strictly political standpoint that this cuts both ways. That, you know, some people who might be pleased with a decision are offset by the people who are upset by a decision.

You've got to make these decisions on the basis of what you think is the soundest decision in favor of public health, in favor of the community that you serve.

And I really -- I must say that I'm quite concerned when I hear people say that these decisions are made on the basis of politics because they are not.

MR. EHRMANN: We had some -- several people in the

opening comments, I think, who made some suggestions about steps that might be taken to increase the understanding of some of the previous decisions.

And I think when we get to the part of the agenda this afternoon when we talk about next steps and, kind of, refine our agenda, we'll make sure we revisit that issue in terms of what the best way to proceed on that is going to be.

And I think that, at least in part, would address some of the issues that Bill has raised, and you've responded to, I think.

Let's go on with the part of the agenda that we -- that I introduced a few minutes ago, which would be this transition discussion. And I'm going to turn to Al Jennings from USDA to introduce the folks from the Department who are going to be speaking to these issues. Al.

MR. JENNINGS: All right, thank you, John. Well, this morning we're going to start on transition. We will not be able to get it all done before lunch, primarily because of time. But also, secondarily, one of our featured performers is not yet here, and I will talk about him in a moment.

But we're going to talk about pest management strategic plans, which used to be called transition plans.

And for all the very articulate reasons you heard earlier today, we are thinking of these as strategic planning exercises.

That may lead to transition or at least will answer that part of transition, to what? They are an exercise in thoughtfully looking at the pest management on a crop-by-crop basis and documenting the problems -- what's in the registration queue, what's in the research queue, and how do we get from where we are to some future pest management strategies for key crops?

So, we'll be talking pest management strategic plans or PMS plans. First on the agenda this morning -- I think we can get this one covered anyhow -- Steve Toth, who is an entomologist with North Carolina State University, one of our land grant partners, and he will talk about our crop profile project.

Those of you who are TRAC veterans will recognize that we did do some early discussions about crop profiles and where we were headed. They have matured, and Steve will bring us up to speed on where we are with that.

Crop profiles have many different uses and many different users. But right now, I think for the purposes of

this discussion, one of the most important uses is as a foundation, as a starting point for the PMS plans.

Following Steve's presentation -- and we'll probably wait until after lunch for this, but Wilford Burr, of my staff and the Office of Pest Management Policy, will describe the work that went into preparing one of the plans. And that plan should be here later on today out on one of the tables.

That strategic plan is for the Michigan carrot industry; and believe me, it's just a coincidence that we have a CARAT meeting and a carrot strategy.

It was not planned, but -- okay, we have that plan and then another recently completed plan for almonds. My notes here say California almonds, but that's redundant. I don't think they're grown anyplace else. Anyhow, the almond plan was recently completed, and it will be here, as well, I believe.

We obviously don't have enough time on the agenda to go into either of these plans in any great detail. However, we can certainly do that in the future if the committee thinks it is a reasonable thing to do with some subgroup.

Again, that's for later discussion this afternoon of where do we go with the committee from here? But we can certainly spend with you the kind of time you would like to to go into the details.

Our third presenter, the one who is not yet here, is named Larry Elworth.

UNIDENTIFIED MALE: He's here.

MR. JENNINGS: He just arrived. Sorry, Larry. I have to revise my comments. Well, some of you may recognize Larry. He is not a returning letterman from TRAC, but he is a graduate of TRAC. He has earned his letter all four years, I think but --

UNIDENTIFIED MALE: He's got post-TRAC stress syndrome.

MR. ELWORTH: I look at it as a dishonorable discharge.

UNIDENTIFIED MALE: So do we.

MR. JENNINGS: Well, Larry has moved to a higher calling. Anyhow, Larry will describe some of the work of his organization, the Center for Ag Partnerships, on a pilot project to develop a template for the process of PMS plans.

Then we would like to move on to an open discussion

with you, and we would especially like to know, as I said, how do we work in the future, where do we go from here? Again, what we're providing is, kind of, the basics.

I guess before I turn it over to Steve, I would like to stress to those of you who were at the session yesterday and got lots of bits and pieces of USDA programs, I want to stress that USDA's work and the work of our land grant partners, IR-4, the Ag community is really part of an overall organized plan to respond to the Food Quality Protection Act.

And, again, our plan has a lot of different components, but all of them are really working together towards the same goal, which is working with the EPA on risk assessments and risk mitigation, providing the kind of data that we can provide to assure quality risk assessments. And moving on then with crop profiles and then into strategic planning for the key crops.

So with that, let me turn it over to Steve Toth. Steve.

MR. TOTH: Thank you, Al. Appreciate the committee inviting me here to speak this morning and to talk about a project which I have been involved with for about two years -

- a little over two years now.

I think what I'll do is sit down because no matter where I stand due to the configuration of the room, I'm going to be blocking somebody's vision. So, I do have some -- a brief slide presentation this morning and would focus your attention back here.

The idea of crop profiles was introduced by USDA's Office of Pest Management Policy at the National Pesticide Impact Assessment Program Workshop in Sacramento, California, back in May of 1998.

At that time, they informed all the state liaison representatives of the Pesticide Impact Assessment Program, which is a USDA program, of the crop profiles and, sort of, sent them out to the various states to make them happen.

This process was initiated to meet the pesticide data requirements for the Food Quality Protection Act. And the crop profiles are under direction or organization of the Pesticide Impact Assessment personnel in the states.

They are produced by land grant university scientists, individuals from commodity groups, and other interested parties. And they're produced, sort of, on a state-by-state or territory-by-territory basis.

Well, the crop profiles themselves are documents that provide -- or intended to provide the complete production and pest management story for an agricultural crop.

They include information on actual pesticide use and usage for the crop -- not just simply what -- list of registered products but, also, really go over what the actual usage is in the individual state on that crop.

It has information such as the acreage treated, number of applications, rates used -- typical rates used, and that type of thing.

They are in narrative form, which allows the authors to really describe the pest management situation a little bit better. In the past, we've had to put numbers into tables, and the way insects, diseases, and weeds -- biological organisms don't always work that way.
So, there are -- I think the narrative form makes these documents much more useful. And they also follow a specific format, which I think makes it a lot easier to use. They are consistent across states and crops.

Well, the format of the crop profiles are listed on this particular slide. The first section is crop production

facts. It has the agricultural statistics for that crop in that particular state. It also discusses the regions. Many of the particular crops are grown in a particular region of the state.

It has a section for cultural practices. And then the bulk of it, it does have the insects and mites, the weeds, the diseases, the vertebrate pests, nematodes, plant growth regulators. It goes through all the various pests and their management -- the various alternatives to their management.

There is a section for online resources. This is usually links to other extension and research documents at the universities so that you can get further information, if needed.

The key contacts generally list the authors but also has other individuals that could clarify the crop profile or give additional information, if necessary.

There is a section for references, and then finally the date of publication and revision is on the crop profile. And we used to have that at the bottom of the crop profile, but we decided to move that to the very top of the crop profile.

The last two years have been mainly devoted to just getting the crop profiles done and available, but we're starting to get into a time now where we need to start revising the older crop profiles. And these will be living documents. The situations change as it relates to pest management, and there will be need to update and maintain these documents.

Now, I would like to talk about who uses the crop profile and how they're used. The first -- the target of the crop profile, primarily, was the U.S. Environmental Protection Agency. The crop profiles were provided to assist them in the pesticide tolerance reassessment under the Food Quality Protection Act. Also, the pest risk management -- pesticide risk management and mitigation plans for those pesticides that are of concern.

They are also used to fill gaps in EPA's crop matrices for pesticide use and usage. And, finally, to replace default or worst case assumptions used by the Agency in the absence of reliable data.

This is a chart from -- put together at Michigan State University, which shows default versus actual organophosphate use on Michigan tart cherries. And it shows

the pounds of active ingredients of organophosphates.

The white part of the bar represents the default assumption if you assume 100 percent of the acres is treated at the maximum rate, the maximum number of applications allowed by the label.

And the pink bars represent the actual pesticide use in those particular years based on survey data that were generated at Michigan State.

Well, the U.S. Department of Agriculture uses the crop profiles. They use it to evaluate and review EPA pesticide risk assessment and also proposed risk mitigation measures. They use it to develop the pest management strategic plans for agricultural crops, and that will be discussed later. They use it to identify critical pest management needs for U.S. agriculture.

If you look at the crop profiles for a particular crop, you can see where the weak spots are, I think, pretty readily. Also, the Department uses it to prioritize funding for agricultural research.

We also use the crop profiles quite extensively at the land grant universities. We use them to inform elected officials, college deans and directors, producers, commodity

groups, students at the University, and the general public about crop production and pest management for those crops.

We also use it to support special local need, 24C registrations, or emergency exemption requests. In North Carolina, the Department of Agriculture usually makes those requests, but they look to the land grant university to provide background information and supporting materials.

We also use it to identify and prioritize critical needs for research and extension activities in the state.

Crop profiles are also, I think, valuable to the agricultural producers and pesticide applicators, which are both clientele of the land grant universities.

They are used to obtain information on production and pest management practices that are typically used in the production of agricultural crops in the state.

They're also used to help producers and pesticide applicators become aware of existing alternative pest management practices, integrated pest management programs, and resistant management programs that are available for those crops.

I'll say a few words about the development of crop profiles. At the present time, we have more than 280. I

think as of this week, we're up to 291 at the last count. These have been completed by 40 states and three U.S. territories. We expect to have 300 completed by the end of this month.

These crop profiles -- the ones that have been completed -- represent over 90 agricultural crops. And we have a total of 523 that have been proposed by the various states and U.S. territories for completion over the next few years. So, we're, I guess, a little over halfway there.

Well, I think it's important not just to generate this type of information, but to make it available so it is in a very useful form.

The completed crop profiles were submitted by the land grant universities and commodity groups to the USDA's Office of Pest Management Policy. Wilford Burr is the individual that takes these. He goes -- has a brief review of the documents and then forwards them to me at North Carolina State University.

I have a graduate student that formats these documents into HTML and enters them into a Microsoft Access database. And this database is available on the Web as a searchable database.

So, you can search these documents by state, or territory, crop, and up to three keywords, which could be chemical, or a particular pest name, or a cultural practice, or however you might want to search that database. And it will give you a list of those crop profiles that have those keywords in it.

So, it does make the documents, I think, a lot more useful than just having a stack of papers sitting in an office somewhere. And, also, the entire database can be downloaded off the computer.

This is the Office of Pest Management Policy Pesticide Impact Assessment Program website. The address is at the bottom. You can also get this through -- get access to this page through the Office of Pest Management Policy website, which is on one of the handouts that's on the table outside.

But there is a box called, for crop profiles, which has a link to the database itself. It also has related information. It has the status list arranged by crops and state. So if you're interested in what crop profiles are scheduled to be completed in the future, you can access that information, as well.

And, of course, we have a box right next to that for pest management strategic plans. And as those are developed, we'll have links to that information, and it will probably be searchable, as well.

So, that's all the comments I had. I would be glad to try to answer any questions about this project.

MR. EHRMANN: Questions?

MR. JENNINGS: Well, Steve, I guess it was incredibly clear.

MR. EHRMANN: Hang on. Yeah, Deborah. Microphone, yeah.

DEBORAH: This question is actually addressed to EPA. Have you used them, and how have you used them?

MR. EHRMANN: Steve, or Marcia, or --

MS. MULKEY: Yes. They play some meaningful role in risk assessment because they are state-by-state and because our risk assessments cover a broader range.

They use pretty much the way the slide said -- to supplement our national estimates of things like percent crop treated, patterns in terms of rates, and so forth.

They're very useful in risk management because there you really need a more particularized understanding of

all the variations on the theme of use, and pest pressure, and -- so that you can do a more targeted approach to risk management.

And this process and things related to it help us to understand some very significant regional differences in the issues of the way pesticides are used. And I don't know if anybody from our team thinks we need to supplement that?

MS. ROSSI: Yeah, I mean, Marcia has covered the majority of the main things. I think we've found them extremely useful in getting more detailed knowledge when we're faced with making risk management decisions that may be different in different parts of the country.

I think that's the big use, but they have also played a significant role doing a reality check on the assumptions we use in our risk assessments.

MR. EHRMANN: Robin.

MS. SPITKO: Excuse me, just a quick question. If there is any attempt to attach economic figures in these crop profiles to the various technologies and the cost of the materials when they're being done?

MR. JENNINGS: I don't believe so. I haven't read

every one but, in general, we have not tried to focus on that. We've looked at trying to keep them with the science of pest management, and facts and figures, and --

MS. SPITKO: I think that's an important component that we need to really --

MR. JENNINGS: I think it's a very important component of, overall, the analysis and where we're headed with strategic planning.

But it's also something, as you know, that's extremely variable and hard to capture in a document that you don't have to revise every hour, depending on what the price of the commodity is.

MR. EHRMANN: Jean-Mari.

MS. PELTIER: All that is a great segue to my question, which is not how do we update it every hour, but how do we update it?

In our particular case, the citrus industry funded and created its crop matrix on its own, and it really does need to get updated at this point because there have been some pretty significant changes.

And I guess, how are we going to do that, how can we schedule that, and can we get help from NAPIAP to make

that happen?

MR. JENNINGS: I would hope to be able to get NAPIAP funding devoted to updates, maintenance. As you know, that program is changing because of the budgetary classification.

We moved from what used to be called a formula fund into a competitive grants process, which has slowed down immensely getting the money out this year, and it should be reborn with the regional centers as a concept. But, nevertheless, the same kind of work. We're providing the information flow that's needed and the infrastructure that we need to communicate.

So, hopefully, out of that will come some money for the upkeep, the maintenance, as well as some supplemental money that we're trying to get our hands on.

MS. PELTIER: John, can I ask a follow-up question? Is that one of the portions of the budget that is currently in either form, House or Senate, unfunded at this point? Is it something we need to be concerned about?

MR. JENNINGS: There is additional money for pest management in the 2001 President's budget, and I'm not quite sure -- Keith can probably talk about where we are with the

Appropriations Committee.

UNIDENTIFIED MALE: With the PIMAP (phonetic) Program, I think that there might be a very slight increase over our 2000 budget. It's about a $4.5 million program, it may have gone up to about 4.6.

The other funding that we've been looking to so it doesn't have to go through the 406 process, and it can be more of a direct cooperative agreement between any commodity group that wants to come in and work with us on the development of protocols or PMS plans is Al's budget, the $1.5 million increase that was in the President's budget for 2001.

And right now, I think we've only gotten report language in the House bill that increases Al's budget by $300,000. So, it is an increase which we appreciate but no where near $1.5 million that we're looking to.

MR. EHRMANN: Mark.

MR. WHALON: This is a general question -- I think I know the answer to this question, but I think for the record it needs to be asked. And that is, as you look at the crop profiles as they come in, and they identify research and implementation needs, are the resources adequate to address

those needs that are surfacing in crop profiles?

MR. JENNINGS: To address the research needs?

MR. WHALON: Research and implementation.

MR. JENNINGS: And then I'm looking at the strategic plans as laying out in a bit more detail those research needs, as well as the registration needs and the education/training needs.

The profiles really don't, I guess, establish priorities, and that's where we need to go with the plans. What are the priorities given all the needs?

Then we need to start looking at, is the research budget adequate? Certainly, the ARS and CSREES research component -- pretty excited about the plans and being able to get some focus based on grower identified needs. So, we think that's going to be a big plus.

MR. TOTH: I'll answer it.

MR. JENNINGS: I didn't answer that? I'm sorry. I wasn't trying to be evasive.

MR. TOTH: I think the reality is with crops at risk, and RAMP (phonetic), and PIMAP, we've got significant new funding, particularly with crops at risk and RAMP that we hope to build upon.

I think it's very safe to say that we will not fund all of the even excellent proposals that come in through PIMAP, crops at risk, and RAMP this year.

But, obviously, as we get better adjusted to these pest management strategic plans and working through the RFP process, I'm hoping we'll be able to get a better handle on what the resources are that we need.

And, you know, certainly, we're committed in our budget process to make the case for that funding.

MR. EHRMANN: Okay, Cindy and then David, and then John.

UNIDENTIFIED MALE: Another comment, I think here, John.

MR. EHRMANN: Oh, I'm sorry. Was there another comment?

UNIDENTIFIED MALE: Do you have a comment, Therese?

MS. MURTAGH: Oh, I did. One thing I would like to emphasize -- Steve mentioned of, you know, that these -- that the crop profiles, you know, were produced by the grower community working with the land grant universities.

And that is such -- and we're building on that. We're taking the crop profiles and launching the pest

management strategic plans.

So, Jean-Mari, and Wally, you know, Mark, as you worked on crop profiles, you know, you set the base -- the education base of your growers, of your commodity groups to talk about where they need to go and to tell them about FQPA, and what they need to do to get ready, you know, to plan for their own future.

So, I think one of the big advantages of crop profiles is pulling the producer community together to talk about their issues. Would you agree with that?

UNIDENTIFIED MALE: I think the crop profiles have played an excellent role of drawing the community that's most affected by these decisions together to address their future.

I think the discouraging thing, from my perspective, is the likelihood that we're going to be able to address things like this sharpshooter situation and in a timely way to actually mitigate the effects on the affected community. So, that's my issue.

MR. EHRMANN: Do you want to respond to that question?

MS. PELTIER: Yeah, I think Therese has really hit on something. For me, moving into this citrus industry anew

in the last year, it has been a great educational process for me, personally.

And, certainly, every time we've had to look at responding to a draft risk assessment, it has been really helpful to be able to go through and do it.

I think the one thing -- a couple things we didn't focus on in the first round of these crop profiles that I think as we've walked through these with Lois, we've seen we have a gap in our information.

And that is in the area of the amount of flexibility we have on reentry intervals, the amount of flexibility we have on pre-harvest intervals, the actual method of application.

It wasn't in the first round of crop profiles, and I think that's information that, for us, in terms of looking at mitigation strategies, we really need -- and didn't put together in that round.

The other component of it -- and I alluded to it earlier -- that we didn't look at in those that we've done -- some of us have done in California, is to try to look not only at what FQPA is doing but to try to look at what some of our other trading partners are doing in reassessment of MRLs.

And try to get an idea not only nationally where our vulnerabilities may be, but internationally and then within California, we have our own regulatory process. So, we need to try to keep on track of what CalEPA is doing with water and air reassessments and the Office of Environmental Health Hazard Assessment under Proposition 65.

So, we have a real complicated matrix that we've created on a pest-by-pest, pesticide-by-pesticide basis. That is another thing -- that it took an amazing amount of resources to put this together. To try to draw on all the existing databases to see who all is looking at this at this point.

And it's something that's not only useful to the citrus industry but would be of help to all of us in figuring out how we move into transition.

Keeping that updated is going to be monumental, and it's something that we as a citrus industry are doing for ourselves. But I think it's something that we need to look at bigger picture.

A lot of us could benefit from that information and maybe there could be other resources put together to put it all in one place, rather than having to cherry pick it all

over the place.

UNIDENTIFIED FEMALE: Actually, Jean-Mari hit on the point that I was going to hit on. I'll just reiterate that I know that these crop profiles take a tremendous amount of time from not only the commodity groups, but people like Rick Melnacode and other people in the land grant universities who work on them to put them together.

I'm extremely encouraged to hear both Marcia and Lois say that they're beneficial to them, as risk managers that they're looking at them.

But I would follow up on Jean-Mari's suggestion that as you're looking at these crop profiles and how to improve them and what to do differently, that putting in there information about the activities that go on in an almond orchard or a peach orchard, and why they go on, and why it's important to be able to thin, or do the other kinds of things that in reality happen are helpful to not only the commodity groups, but also to the agencies as they're making risk management decisions on them.

Cindy, you're right when we first initiated the crop profile project, our focus was on dietary risk assessment. But since then, we know that we have to expand

the crop profile, so as we take -- we'll have to take them to a next level.

MR. EHRMANN: Okay, David.

MR. WHITACRE: Going back to something Robin said early in the discussion for this session, and she asked the question as to whether the economics were worked into these databases or into the thinking having to do with the crop profiles, and the answer is no.

But my question maybe is a little bit out of context -- where are the economics considered and rolled in because it's an absolute central issue to have a successful transition.

This plays into that, but so do the economics. Where is that considered? Or if you want to talk about it later, it's fine, but it's critical.

MR. EHRMANN: Is that going to come up in a later presentation or --

MR. JENNINGS: No, I think we have to talk about that when we're talking about the strategic planning process.

MR. EHRMANN: Okay, so let's make sure we -- (inaudible) -- that when we get to the strategy piece. John.

MR. WALLENDAL: Yeah, I've got a basic question

about the crop profiles. When we're growing potatoes or -- I'm thinking about snap bean crop rate and all the -- as we get it in the ground.

The pest pressures vary from year-to-year. Is this data on the crop profiles an annual data? Is it an ongoing -- can we track how things are changing in transition?

If so, it's a very useful tool. If we're looking at it just on the annual basis and drop it, we've got decisions being made by USDA, EPA on specific pest pressures at specific times that will be affecting us decades from now. Where are we at with that?

MR. EHRMANN: Al.

MR. JENNINGS: Well, the profile tries to capture a baseline, a typical or, perhaps, an average. It is not a minute-by-minute, season-by-season guide or assist in pest management. That's kind of the job of the land grants and the extension service, you know, that day-to-day. You know, this is a snapshot. It's a starting point.

MR. WALLENDAL: Can it be used as historical data, though, to see our transition? Is that an answer that's online?

MR. JENNINGS: As we move on with updating, I think

you'll see the changes that Steve mentioned; and after a year or two, the information does age quickly. We'll see new pests, we'll see new pesticides, and we'll see old ones go out of the picture, so it will be -- they will evolve, you know.

MR. TOTH: Al, I might add from the State perspective, we are in the really getting towards the time to start updating these things. At least for North Carolina, I want to put in a process for doing it -- of reviewing them on an annual basis.

Now, that doesn't mean we have data to replace the data in the crop profile on an annual basis. Some, you know, we survey growers to generate pesticide usage information many times, but we don't do every crop every year.

NASS does surveys, and they will do field crops maybe every year; but fruits and vegetables, they alternate. So, we won't necessarily have information every year, but I do think they need to be reviewed and the latest information put in.

Also, the key contacts are listed there, so I would -- in the case where the data may be a little bit older, you can always contact them and get some input if you have a

specific question like, well, the crop profile says this, but this year maybe things are a little different.

And many times those specialists and researchers can give you some of that -- for specific questions, anyway.

(END OF TAPE)

MR. WHALON: -- a little bit because Al basically said it was my job to do that.

MR. JENNINGS: Isn't that your job, Mark?

MR. WHALON: And with a few exceptions -- potato leaf hopper, blue mold on tobacco, a few other exceptions -- there is very little long-range, year-to-year keeping track of pest pressures.

The producer community usually responds to what happened last year and, oftentimes, directs resources to what happened last year, which doesn't always happen next year. So, there is that major dimension of what happens at the land grants and how they respond.

In terms of long-term planning on pest pressure changes, that is one of the key issues, I feel, because it's an unintended consequence, in a sense, of FQPA, and something that we can't measure and that we don't know. And it's part of agriculture and has been historically.

But with those exceptions and a few others, there are no year-to-year changes, 20-year trends. Very few studies have been done like that.

MR. EHRMANN: Sarah and then Erik. Sarah

MS. LYNCH: Having been around when there was only one crop profile, which was almonds, I think, in California a year ago, it is remarkable the progress that you all have made in getting so many.

But it does underscore one of the issues I have, and I know how complex they are, so I hate to make the situation much more complex. But I do think that farmers are being shortchanged and, perhaps, shortsighted by the continual focus just on a pest management strategy because, really, crops are produced in a system.

And the whole system -- crop and pest management systems -- need to be seen together in their entirety, which is not something that is captured in the pest management profile, which is just really looking at how you manage disease, insect, and that kind of crop damage.

I think unless you are looking at in a systems approach, you're going to only address part of the problems that consumers and taxpayers are interested in with respect

to the way our food and fiber is produced.

And touching on something Jean-Mari said about some of the other forces acting on agriculture. It's not just FQPA. It's the Clean Water Act, it's state regulations, it's a whole host of forces that are moving together to try to say, you know, we have some concerns about the way our food and fiber is produced.

And are there ways that working -- looking forward that the pest management toolbox can be expanded and rearranged so that there are many more options available to growers other than just chemical tools?

And I think that by looking at it in a more systems approach, as opposed to a pest management strategy, you get there. You get there faster.

MR. EHRMANN: Erik.

MR. OLSON: I agree with what Sarah said. I had a question for USDA. I'm wondering what kind of outreach you do when you're putting together these profiles?

My understanding is you generally go to commodity groups. I'm wondering, is there proactive outreach done to try to reach the independent consultants and growers who emphasize biologically-based pest control methods when you're

putting these profiles together?

MR. JENNINGS: You know, generally, yes, and I will ask some of the -- Steve and some of the people who have actually put them together maybe to respond to that. You know, Jean-Mari, Wally, or Mark, in terms of what you've done and your experience.

It has been variable by state, but I think generally we've looked at that. Jean-Mari.

MR. EHRMANN: Well, I'll -- let me just say -- and we don't necessarily need answers from all those people you listed.

MR. JENNINGS: Just whoever wants to volunteer.

MR. EHRMANN: Let's get a couple to get a flavor of the responses, but --

MS. PELTIER: Just as a point of clarification, our team consisted of representatives who both are involved in the -- who run insectories and do beneficial releases.

But when we did our crop profile, we went on a pest-by-pest basis and talked about the overall picture of what we're looking at -- what biological controls are available, cultural controls.

We talked about some of our beneficial release

programs, and we clarified in it in those areas where there aren't any biological programs that are available. And so, we tried to cover the gamut in ours.

MR. WHALON: We did many of the same kinds of things for -- in Michigan for the ones that we've done. I would just add to that that we did use the independent crop consultants extensively in the development of ours.

MR. EHRMANN: Steve.

MR. TOTH: In North Carolina, we put together a committee to prioritize the crops that we needed profiles for. Then the dean appointed a committee chair, which was a research or extension specialist that worked with a particular commodity.

And that person put together the committee and was encouraged to include, you know, all of our clientele in the process. And, of course, that varied by commodity to commodity and, you know, you're dealing with individuals that, you know, do things a lot of different ways. So, you know, it varies a little bit, and I'm sure from state-to-state, things vary, as well.

UNIDENTIFIED FEMALE: Just as independent crop consultants, we were contacted by both via land grants and

U.S. Apple to work on the crop profiles, so -- and from my other consultant colleagues, we did feel satisfied that we were included very much in this program, so thanks for that.

MR. EHRMANN: On this point, Eldon?

MR. ORTMAN: Yes.

MR. EHRMANN: Go ahead and then we'll go to Rob.

MR. ORTMAN: Crop profiles are an excellent development. These are baseline documents. If we are going to create living documents, we need to remember what was said about the citrus industry, and what it has cost the State of California to do that.

Yesterday, we heard from the NASS group what it costs to do surveys. That is a major requirement if we're going to move to living documents.

MR. EHRMANN: Okay, Rob.

MR. HEDBERG: I wanted to revisit one of the early points, and Marcia alluded to the fact that one of the impediments to use of the crop profiles in risk assessment is that they're state-by-state versus national coverage. Yesterday, we heard about the NASS surveys, which I believe target about 80 percent of the actual production.

So, my question would be for Al and Therese. Is

there an effort to capture 80 percent of the production or some significant portion of the production in these crop profiles so they can be more effectively used to reflect the nation versus the states and be more useful to Marcia and Lois?

MR. JENNINGS: Yeah, it's a different level, and I guess the question is, can you aggregate a number of these?

Early on in this process, we let the states choose which crops were most important to them. I think as we start seeing the second phase of -- increasingly, we're going to get more and more, and they will represent a large production percentage.

MS. MURTAGH: Also, you know that we're creating the regional pest management centers, and they will be formed this fall. And in the RFP for the centers, one of the charges is that they produce the crop profiles, among other things.

And I believe as the centers mature and their boundaries are established based on crop production regions, that you'll see movement to the crop profiles addressing the boundaries that the centers set up.

UNIDENTIFIED MALE: I guess, Rob, too, we do have

the NASS data that does play into the whole risk assessment discussion. And even if it's not going on, I'm certain because the NASS data is broken out state-by-state, there can be some cross-checking done between the NASS data from a survey and the more narrative discussions in crop profile.

MR. EHRMANN: Jamie.

MS. CLOVER-ADAMS: I would just be really interested in the answer to that question, especially from EPA, because I would be willing -- in the State of Kansas, we paid -- the State Department of Agriculture paid for the crop profiles and the extra surveying we did.

And if we could get to a point where, you know, if 80 percent is the magic number, Lois, for knowing and then being able to aggregate on a state-by-state basis, I would be willing to lobby my colleagues that the State Departments of Agriculture step up to pay for those.

But I want some inkling of whether or not if I go out and put my neck on the line like that, that you guys are going to be able to use the data, if I can convince my colleagues to pay for it.

MS. MULKEY: Well, we have tried to use all use data, whether or not it was nationally aggregated, using the

same methodology, and so forth.

But, obviously, the closer it comes to meshing with other data sets, following the same methodology, the more useful it is.

So, there has not been any use data set that we haven't been able to find some use -- the California data, which are the most comprehensive use data available, we make constant use of, and including for crops that are not exclusively grown in California

Shari, does somebody else over there want to say anything more specific to this point? We certainly could work with you offline more specifically.

SHARI: We use whatever we can get our hands on.

MS. CLOVER-ADAMS: I guess I'm asking would it be useful if, for example, the Midwest secretaries got together and said, we can pick the six states that grow the most wheat, and we're going to make sure that you have crop profile data from those states?

I mean, if we can get together and provide you with data on, say, 80 percent of the production, is that -- if we get together and then make our choices based on you being able to aggregate and feel like you have a national

perspective on wheat, or corn, or beans, or those kind -- is that useful, I guess, I'm asking?

MS. MULKEY: I would encourage you, if you contemplate something like that, which is welcomed conceptually -- very welcome -- I would encourage you that you work with the technical experts at USDA and at EPA that would help assure that if you did embark upon it, you would maximize its usefulness to us.

And we may also identify some other possible users that you would be interested in knowing about before you proceed.

MR. EHRMANN: It seems that there are several pieces of this in just this -- in this first presentation and discussion that might be useful to think about.

I mean, first, we've got the process of what information goes into and is compiled in these crop profiles and this kind of information. And I think that gets to what Jamie was just -- and several others have suggested in terms of the nature of those inputs -- who is being talked to, how does that work, who gets contacted?

And, obviously, all of you represent folks from various perspectives who could have very valuable inputs to

that.

So, the kind of generic suggestion that -- specific in her case but to make that more generic, assistance that could be provided from all the various perspectives around the table to help get information to the Agency sounds like it would be very welcome after a dialogue about what form that information needs to be in, et cetera.

Second, is what form is that information presented in once it is assembled? And you've had, I think, a pretty detailed review of what is currently in the crop profiles. It sounds like USDA and the Agency are very open to your thoughts about other ways of presenting this information, other issues that ought to be present. We've had a couple suggestions about that when these comments are made.

Then there is the issue of how does this information get disseminated? Who is it that has access to it? Who knows about how to access it? How does the Internet web-based approaches work? Are there other ways to do that?

And the issues around how often it's updated and, kind of, what is the robustness of the information as it goes through time?

And then there is a fourth piece, it seems to me,

that is also -- how is this information perceived, which is, obviously, a combination of the first three.

But one of the things that, you know, as somebody who has been sitting up here facilitating discussions on these issues for over 10 years -- I won't say exactly how much over it -- the notion of how the pieces of this fit together -- who talks to who about what, how are -- Jean-Mari had some excellent insights earlier about how the word, transition, is being perceived by different communities.

One of the toughest things I think that the Agency and the Department grapples still with is how to get this information out, how is it perceived, does it help people make decisions, does it scare people unintentionally? How is it packaged, who delivers those messages, what is the timing of that?

I think those are all issues that, regardless of where you are in terms of how quickly or slowly you think transition should proceed, that this committee can really provide some very helpful advice to the Department and the Agency about.

Because you're the ones who interact with your constituents, who are the folks who are going to react one

way or the other to information.

So, all those pieces of this -- what information is collected, how is it packaged, how is it organized, how often is it updated, who disseminates it, and how is it perceived when it's disseminated, and how can that be done in a way that is useful to the users -- I think are all issues that your input is going to be extremely helpful on to the Department and the Agency.

And we'll hear more about other pieces of that, obviously, as we go forward. I know that we're -- we've just been back in our seats for an hour, but based on the flow of the presentations that are upcoming, I think it would work the best to go ahead and take our lunch break at this point.

I would ask you to be back in an hour, rather than an hour-and-15 as is indicated on the agenda, so we can get started again at 1:00; and we'll pick up with other aspects from USDA. Thanks.

(Whereupon, a lunch recess was taken.)

(END OF TAPE)

AFTERNOON SESSION

(1:00 p.m.)

MR. EHRMANN: Okay, folks, we would like to get started so we don't take you too long into a Friday afternoon. Let me again remind folks here from the public --

public observers, if you wish to make public comment, please sign up outside so we can fit you in.

Also, let me just -- in terms of our timelines for the afternoon, we have a -- the schedule originally called for a break at 2:30. Mr. Rominger has to leave the session at 3:30, so what I would like to do is go until 3:30 before we take the afternoon break so we don't -- so we can take full advantage of him being here to be in the meeting and not spending time on a break while he is still able to be with us.

So, we'll go until 3:30, and then we'll take our 15-minute afternoon break, even though that may mean we've got a little more time before the break than after. I think that's the most efficient way to proceed, given his need to depart for travel.

What we're going to do next is continue with the USDA presentation and discussion on their transition activities and pest management strategy planning activities. Then we'll move to comments from EPA on that same topic area.

Then we'll move to the public participation process for OPs, which will be presented and then discussed with EPA

staff, primarily, but, obviously, also, the Department.

And then we will talk about ideas about proceeding, next steps, et cetera, for the committee in terms of topics schedule, and I know the folks up here will have some ideas that they will want to suggest to you at that point based on what we've already heard, and what we'll hear in the rest of the afternoon. And then we'll have public comment and closing comments.

We'll see how the day goes in terms of that 5:00 ending time. My guess is we might be able to end a little bit early, but I don't want to truncate the two to three discussions that we're about ready to have.

So, let's see how that goes. By the time we take the afternoon break, we'll certainly have a better sense of our closing time. And with that, let me turn it back to Al and his colleagues for comments.

MR. JENNINGS: Okay, I would just point out the almonds are courtesy of Chris Hines (phonetic) and the Almond Board. Not to mention the strategic plan from the Almond Board.

Okay, I'm going to ask Therese to introduce Wilford and the rest of the afternoon here for us.

MS. MURTAGH: Oh, well, I think most of you know Wilford Burr. We were fortunate to have both the Michigan carrot and the California almond -- I guess it's redundant -- just the almond plans completed this week. And while you were at lunch, I put copies at each person's place, in addition to Chris' almonds.

Wilford would like to talk to you today about the Michigan carrot one. Wilford was part of that meeting, along with many other people who are listed in the book.

Now, when we sent the book down to our print shop to get reproduced, I think that they have been dealing in biotechnology too much at the Department because these carrots do look bioengineered; however, they are not.

UNIDENTIFIED MALE: But they're very suitable for Christmas.

MS. MURTAGH: They're Christmas carrots. So, let me introduce Wilford Burr.

MR. BURR: Thank you, Therese. To add a little lightness before we get started --

MR. EHRMANN: Wilford, just pull the mike a little bit closer, thank you.

MR. BURR: Is that close enough?

MR. EHRMANN: That should be good.

MR. BURR: To add a little lightness, and just in case there were some diamond experts here or some jewelry people here, I do have some rough cut diamonds, and you're all welcome to take one as a souvenir of this.

The man that sold them to me on the streets said that they were a one-carat diamond, but because they are rough cut, we had to add a safety factor, so they're really only a tenth of a carrot. But you're still welcome to take as many as you would like.

UNIDENTIFIED FEMALE: Humor.

UNIDENTIFIED MALE: USDA humor.

MR. BURR: In addition -- well, there was vandalism in the neighborhood last night, so in addition to that, I also brought carrots to go along with the carrot pest management strategic plan.

UNIDENTIFIED MALE: For the CARAT?

MR. BURR: For the CARAT. And this was intentional. And to take everybody's tastes into consideration, there is a bag of organic and a bag of regular. The organic was 20 cents more than the regular, so pass these around, and these can --

UNIDENTIFIED FEMALE: Are they Grumway (phonetic) carrots?

UNIDENTIFIED MALE: These are California carrots. I want to point that out.

UNIDENTIFIED FEMALE: Are they Grumway carrots? That's right, I don't want any if they're not California carrots.

MR. BURR: Michigan is not ready to pull their carrots out of the ground yet, but, so, we had to -- but they're here, and you can share them -- and to the carrot industry.

Getting down to business, I mean this sincerely when I say I have had the pleasure to work on and to facilitate probably over a dozen of these pest management strategic plans now across the country.

And each meeting is different. I gave up trying to have a set format, and I just, kind of, go with the flow when we go to these meetings because the people that are at them set the tone for the meetings.

They have evolved. Many of you were at the TRAC meeting last fall where we introduced the Southeast apple, and at that point, it was called transition plan.

And if I accidentally say, transition, I apologize. It's just kind of a habit, but when I say transition, think PMSP plans and stuff.

But they have involved -- the one on the apples in the Southeast was just on insects. It strictly dealt with current things that were going on. It didn't deal with priorities for research, priorities for regulatory actions, and priorities for education and training.

Since then, many of the meetings have also covered diseases, insects, weeds, and nematodes. So, we're trying to get the whole spectrum of pests involved in these pest management plans.

Just think how hard it would have been to say -- instead of carrot, to have to say, cara -- pm -- sp, if it was C A R A P M S P, it would have been much more difficult, so, anyway --

UNIDENTIFIED MALE: Where are you going with this, Wilford?

MR. BURR: I'm not sure. Stick with me here. Dealing with the individual commodities, Michigan has really stepped forward, along with California and North Carolina, to really set a tone for these meetings.

And I wish that Mary Hausback (phonetic) from Michigan State and Lenae Jess (phonetic) could be here today because they were instrumental in setting up the carrot one in Michigan.

The workshop was held on March 1 and 2. Most meetings had been taking a day to day-and-a-half to complete everything that needs to be done.

And as you can see, the report has been released in time for this meeting. And I have intentions of getting it on our website, and you saw the blue box that said, pest management strategic plans.

I hope to get the carrots, the almonds, California peaches -- and there is one other one that I can't think of right now -- up on the website; hopefully, by the end of next week.

So, they will be there, people can look at them and provide comments. Also, that there will be a checklist for people who want to put on a pest management strategic plan meeting. And it will be, here's the things that we see you need to do, who you need to invite, the preparation for that meeting. And it will be just called, kind of like, the pest management strategic plan checklist. So, that will also be

on the website soon.

The meetings tend to be very technical. I think some of the growers and some of the researchers that attended these meetings were surprised at how technical the meetings turned out to be.

The people that were invited, first off, were the growers. In Michigan, that included representatives from the fresh market -- carrots and the processing carrot producers.

It also had to reflect regional differences because in Michigan they have mineral or sandy soils where carrots are produced, and they all have muck soils. And the pest management techniques used on those systems are considerably different at times.

So, the growers were there representing those. Michigan Farm Bureau was involved right from the start and had some very good ideas and thoughts that they told Mary and Lenae. They were included in the planning.

Michigan State University -- we had entomologists, plant pathologists, weed scientists, nematologists. We had people from the Michigan Carrot Commission. We had crop consultants.

We had Margaret Jones (phonetic), who is the

regional FQPA Ag Initiative part-time person for EPA out of the Chicago office, and her presence there was excellent. She could answer some of the questions that the growers had about the regulatory process and what was going on. It also provided her a huge opportunity to learn about carrot production and all of the intricacies involved in there.

So, Margaret played a very important role at that meeting. And we've tried to include somebody from either the region or the national EPA at every meeting that we've held. Sometimes we get somebody, sometimes we don't.

In advance of the meeting, there is a tremendous amount of organization that needs to be done. You have to decide where to hold it. The Michigan carrot people had a problem at the last minute, and they had to move it. One of the processors was going to host the meeting, and there was some discontent with that. So, at the last minute, they had to change to the Kellogg Center in Michigan, and that created some problems, but it went off very smoothly.

Not only do you have to decide where to hold it, you have to decide when to hold it, and the timing on this is critical. And timing for the -- particularly for the growers and the processors is -- you have to set the schedule around

them. If you can't have them at the table, there is not much point in having the meeting.

Luckily, all of the ones that we have done -- including Michigan carrots -- there were crop profiles available for, which provided background information. And Mary Hausback and Lenae Jess were able to take the information from the crop profile and write a draft version of the PMSP plan.

So that when we got to the meeting, it was simply a matter of projecting the plan on the screen, having everybody look at it, add comments, take things out. And when we were done, we basically had the document finished except for fine tuning.

The most boring part of the meetings, and the tedious, and the things that we do first are the efficacy tables. And for those of you who aren't aware of what efficacy tables are, it's a table across the top, we list pest-by-pest the pests that occur on that commodity.

And down the left-hand side of the table, we list all of the pest management techniques that are used to control that pest. We start off with identifying the OPs, the carbamates, the synthetic pyrethroids. We go into

cultural techniques. We talk about pheromone traps, sticky traps -- just about anything that has been tried to control these pests.

And the group, as a whole, sits down and rates these techniques against each pest. It takes a long time. This probably takes up the bulk of the first day of the meeting, and it's extremely difficult sometimes to get consensus, but the growers have the final word.

If somebody has said, well, you can use Malathion to control this pest on carrots, and the growers had tried it, and it had failed miserably, they were more than willing to stand up and say that does not work for us here.

So, it was very much a give-and-take process on the efficacy tables, and I think we ended up with a very informative support document for the PMSP plan.

After going through the individual pest control measures, we move on to the future possibilities. This used to be called pipeline, and we don't use the word, pipeline, anymore. Pipeline, to some people's mind, denotes something coming in and something coming out, and that's not necessarily the case.

So, we have changed it to either non-registered

products, or products under development, or something like that to take the pipeline word away from things. So, we got a P word and a T word that we can't refer to.

Anyway, the information for this comes mostly from IR-4. Not only the projects that they have going on at the moment, but in conversations that they have had with registrants about what the registrant is looking at for future activity. So, it's one step beyond just what IR-4 has on the ground as ongoing projects right now.

The last thing we do when we're going through this pest-by-pest exercise is that we identify research, regulatory, and education needs for each pest. This is where the researchers play an important role. It's where the crop consultants play an important role because they know what is needed. And the farmers also play an important role to identify what they think is needed.

Sometimes there is a big difference between what the farmer thinks is needed and what a researcher thinks is needed. But particularly in the case of carrots, the two groups were very, very close in what they thought was needed for future research, regulation, and education. So, that was kind of a pleasant surprise at the carrot meeting.

After we get through all this, we usually go out because it's late afternoon, and we have lunch somewhere. And we have a couple beers, or in the case of the California wine grapes, they made sure we drank wine. And that's a bonding process that seems to be as equally important in the production of pest management strategic plans because you get to talk people about things other than just a pest-by-pest thing, and you get to discuss the production of the thing, how it relates. You get to talk about export-import stuff. All these different issues that you may not get to during the course of the meeting.

So, it's very important to have this social hour after the meeting, and I'll leave it like that.

The final step -- and that usually takes anywhere from one to four hours -- is to sit down and put individual disciplines aside and try to come up with an overall list of priorities for the industry.

In this case, the carrot industry did that, and you can see that -- I think it's on Page 3 and 4 of the document. It's real easy to have an entomologist -- and me being an entomologist, I would like to see all research dollars go towards insects.

The plant pathologists kind of feel the same way about their diseases. And who knows why, but weed people would kind of like to see everything going towards weed control and management.

But during this final step of the meeting, everybody puts their disciplines aside. And the first people that I ask, what are your priorities, are the growers.

And I couch it in terms, well, if I had $5 million to write you out a check right now, what would you like to see done? And they are very frank and honest, and they talk about the things that are needed.

Then the researchers, the processors, the PSAs, and everybody else involved, kind of, joins it, and it, kind of, builds upon that original list. And what you see on Pages 3 and 4 is what we ended up with in the carrot pest management plan.

Lessons learned -- it's very important to have these documents reflect the growers' opinions. It's important to have the growers' support, and the growers having a feeling that they actually had a part in the process.

And I have received hundreds of compliments for

USDA for running the meetings this way -- to include the growers, and to listen to the growers, and to actually write down what they say so that when they see this document, they can say, this is what I said.

And that seems to be critical, and I think it's a critical step to make this whole process successful at all.

Another take-home message -- it's not easy. It's extremely technical, it's complicated. It doesn't matter whether it's an orchard crop, or a carrot crop, or whatever -- it's a complicated process to produce a crop.

What I'm learning is that you can't change one portion of the system without having an effect on another part of the system.

And all of this needs to be taken into consideration when you're looking at a pest management plan. You can't just pull something away without having something put in its place -- be it chemical, non-chemical, cultural. Something has to be there. It has to be cost effective, and it has to be something that the growers are willing to use.

Educational process is very important. In every meeting that I've had, the educational aspects of new technologies that becomes available. Teaching growers, PCAs,

crop consultants -- everybody -- what to expect, how to use new tools. It's a critical part of the whole process.

And last, it is a living document. Obviously, if you have a glassy wing sharpshooter priority this year, and next year somebody comes up with some way of controlling it and taking care of the problem and eliminating Pierce's Disease, that priority will drop off the list, and that will leave space for another one.

So, they are living documents. I'm not certain yet of the process for updating. It is a new process. We started this just under a year ago, and we're still learning. It is evolving, and I guess I would say take the carrot one home, take the almond one home, look at it. Send me comments, send my office comments. I am willing to -- I'm shooting in the dark on this.

The first one was play-it-by-ear, and I did, and it has kind of been going that way ever since. And it has evolved, and it's good, I think.

So, any questions now? We as an office will be glad -- or our department will be glad to entertain those. If you have comments, you can send them to me, or you can

send them to the people that actually wrote the document, and they will get them to me.

MR. EHRMANN: Comments, questions? Mark.

MR. WHALON: Just one comment. I've discerned from Wilford's presentation what the problem is with TRAC and CARAT. We don't have any California wine, and we don't socialize afterwards.

MR. BURR: I'm waiting for hops. I would love to do a hop one in Washington, but they haven't seen the need yet.

MR. EHRMANN: Other comments? Other comments on that piece? Okay, Al.

MR. JENNINGS: I guess we're ready to move on to the next phase of this. Do you want to show the slide of what is in -- been working? Just the crops we've been working on. Everything except the two Wilford just talked about are in process. Do you want me to use a mike, or can you hear me?

MR. EHRMANN: Yes, stick to your --

MR. JENNINGS: Sorry, it's just this is the list of done and almost done strategies.

UNIDENTIFIED FEMALE: Or almost started.

MR. JENNINGS: Oh, this one is almost started, okay.

MR. EHRMANN: What is your guess about when those on the screen would be done -- I mean, in round months?

MR. JENNINGS: Wilford, what's --

MR. BURR: Ten years, whatever. The ones that are now in the draft stage -- it's the review process that seems to take the longest and to get everybody's buy-in, and back-and-forth, and incorporate the comments takes the most time.

I would say for the most part, half of them that we've got done can be on the Web probably by October.

MR. EHRMANN: Okay.

UNIDENTIFIED FEMALE: And, certainly, some are much more difficult than others. Where you have a lot of regional differences and a lot of pests. You know, a lot of different needs, it could take a lot longer.

MR. BURR: The small fruit ones represent grapes, blueberries, and brambles in the Southeast. And I think it was Virginia, North Carolina, South Carolina, Louisiana, and maybe Alabama that was involved in those meetings. So, that will take even longer to review and get comments back on, but the meeting has been held.

MR. EHRMANN: Gabrielle, do you have a question or comment?

MS. LUDWIG: Yeah. As someone who works with California crops, when you say carrots or asparagus, you're talking about certain regions, right?

MR. JENNINGS: Yes.

MS. LUDWIG: I mean, I would just like that to be clear that what works in Michigan or what are the concerns in Michigan are not the same. I'm just clarifying that point.

MR. BURR: A very important point, yes. Each one of those represents a specific state. Or, if like in the small fruits and the sweet potatoes, and possibly cranberries will represent a region.

MR. EHRMANN: Okay. Al or Therese, whoever.

MS. MURTAGH: Well, Wilford, if you would pass the microphone to Larry Elworth, we would like Larry to share with you what he and his Center for Agricultural Partnerships has been working on.

I believe it was a number of months ago, Larry, that you began working with our office to do a pilot project on pest management strategic plans.

MR. ELWORTH: Thanks, Therese. Let me just also

clarify the -- one of the reasons that was suggested at a meeting on Wednesday for the change from PMS plans to -- from transition. And someone who had had a couple of children, explained the difference in childbirth between transition, where you're utterly out of control, and PMS, where you are in control.

That was pointed out as the reason for changing this. I think there are some people in agriculture that resonates for. I also want to know, can I get my parking validated, John?

MR. EHRMANN: Absolutely.

MR. ELWORTH: Thank you, okay. I'm not a member of this committee, you know.

UNIDENTIFIED FEMALE: Careful, Larry.

MR. ELWORTH: Our job at the Center is to augment and support the work that USDA has already established through a pilot project, primarily working with major -- with large area crops -- tree fruit, primarily apples, pears. We're trying to work with the eastern peach industry and the citrus industry.

Our job really has three parts to it. One is to work with these groups in developing plans primarily with

those groups, and our responsibilities are both to help facilitate the meetings and work with the grower groups and the other parts of the industry.

But also to coordinate the work that's being done by individual groups so that as this process moves forward, each of the groups that are working on this has the benefit of what is happening within other commodity groups.

It has been especially helpful in tree fruit where the apple and pear industry have seen the work that they're doing, been able to compare notes and learn from each other.

The other part that we're doing is documenting this process. What we've been asked to do is to come up with a template for both the process and how to go about doing this, but also a template for these documents.

This process, as Wilford knows, works better when people have a clear idea of how these plans are going to be used, how to structure them, and how to communicate about them.

And, finally, we're going to prepare a report for USDA on this entire process with some suggestions on what we learn in working with grower groups as to the best way to work in the future to expand this effort or maybe to work

more effectively -- both in updating these plans -- but also in providing other grower groups the opportunity to work on them.

I would say one thing that I think Wilford said is absolutely important. This effort depends on the energy and foresight of the commodity groups in the industry. Without that, USDA, our Center, nobody could make this happen.

Since we're working with larger groups, our job is as complicated as Wilford's, but maybe more so. We're working with larger groups that have multiple states, multiple re-growing regions within the states.

So, in many cases, some of the crops we're working with, the crop is grown in 35 different states, all the way from high desert to the humid Southeast.

So, there is enormous differences in the pest problems in those areas, differences in the pesticides that are used, and differences in the sorts of problems that the growers face.

In addition, we're working in many cases with multiple varieties, multiple markets, and keeping the differences in the way people market their fruits in mind is especially important.

The way that growers -- processing growers raise their crops is markedly different from the way that growers manage pests for fresh market, much less for people that are growing for direct markets. And all of that needs to be kept in mind.

Typically with the crops that we're working with, there are a large number of players. Not only multiple players within the industry in terms of handlers, processors, crop consultants, there is enormous variation across the country. In some places, the land grant university is critically important. Another place, ARS is the primary source for research.

In some cases we're dealing with well-organized industries. In some cases, like the eastern peach industry -- although its geographic scope is fairly large, there is not a strong organizing group for that.

In addition, because of the variation within these crops, we're dealing with multiple external issues. We're dealing with pricing that varies across the country for fresh and processed product. We're dealing with crop and weather disasters.

In the tree fruit industry, there have been

regional disasters already this season that have caused people to lose their entire crops.

We're looking at introduced pest problems that exist in some parts of the country, don't exist in others. We're looking at trade problems. As Sarah pointed out earlier, we're looking at other regulations. California is looking at a multiple set of regulations that have an impact on pest management.

And we're also dealing with multiple organizations within each of these industries. There are a lot of different organizations that need to be involved.

So, it's important for us in trying to extend the work that USDA started to keep all of these variables in mind. We really have to keep them in mind from the beginning. If you start a process that doesn't keep in mind the complexity here, you leave something behind and make a big mess, which, so far, we haven't made a big mess.

Let me just offer real quickly some of our observations about the process so far in our work. One is that the size of these industries, the scope of the pest problems have really created a complex -- but also very time-consuming process.

Secondly, that due to the time it takes, you need more than one meeting. I think in cases where Wilford has been able to wrap this up, go from the analysis to coming up with some consensus on the problems, that's the most effective way to do it. But getting a large group of people together is not a simple thing to do given the complexity of the task.

Third, it's absolutely essential, to my mind, that there be a person or persons in an organization that shepherd this process through from beginning to end, partly because it takes a lot of follow-up.

If you let a bunch of researchers leave the room or growers leave the room, they're going to have a lot more to do when they're out of the meeting. And keeping them in the loop, giving them a chance to really substantively follow up and review documents is real important.

In addition, it's critical that every key group and key perspective be represented for both positive and negative reasons. If you don't represent what is happening in the industry, all of the marketing sectors, all of the growing regions, you run the jeopardy of really leaving a key part of the industry unrepresented in these plans.

In addition, if there are some key people that aren't involved from the beginning, they can really -- because of their dissatisfaction -- really make it difficult to continue the process. It's real hard to bring people in after the fact. It's important to have them there from the beginning.

Timing is really important on this. As we suggested, we've been working for a few months. As most of you from Ag know, you've got a limited window when you can get everybody in a room for any period of time -- for a day or two.

That window is complicated by grower meetings and industry meetings, but you really have a four or five-month window in which you can do it.

Some of the efforts that we started -- because we didn't start until after the first of the year -- really are still needing additional review from people who are in the field, who are running their operations, harvesting crops now. And whatever we do in this in the future really needs to consider that timing from the beginning.

In addition, I think one thing that Wilford mentioned, these crop profiles are incredibly valuable.

Having that analysis beforehand really gives the people in the industry a lot of the base information that's absolutely important to doing this.

And, finally, is -- well, let me just say one other thing about the crop profiles. John and I were talking during the break after lunch. When there were meetings back with the keystone dialogue way back on food safety, one of the things that people identified back then was the need for good information, and good information that was relevant, timely, and comprehensive. And these crop profiles get us a lot closer to that, and it's really a quantum leap forward, and I think makes the work that goes on in these planning sessions really, really a lot easier.

Finally, as many people have said, these have to be living documents. We've got pests coming in, pests going out. We have resistance showing up. We have phytol-sanitary concerns showing up for people exporting their crops. And we have pesticides that are coming on the market, and pesticides that are being restricted in this process.

So, it's really important that there be a process in this to make sure that we can update these plans.

Finally, I'll leave you with an observation on our

experience so far. The drafting of these plans is important, not just for the information that comes out of it, but also for the process of strategic thinking that these plans give growers a chance to do.

I mean, growers are dealing with a lot of problems right now, not just FQPA. And they've got some opportunities. If they can identify them, they can move on. But for industries to move with the kind of pressure that we have with some of the short time frames we have to make changes, this kind of strategic thinking is really important.

When other groups have had a chance to really think through the problems, think through their current situation, identify their key problems and needs, and also to determine their priorities -- that thinking by itself is worth the price of admission.

In addition to doing what I hope it will do in the larger context of what USDA has started is setting a real foundation for the work that USDA, the grower groups, and the rest of the industry has to do in dealing with FQPA and everything else that's going on.

We're glad to play a small part in this and provide another piece of the puzzle. And, I guess, turn it back over

to Al and Therese.

MR. JENNINGS: I guess just questions and comments at this point.

MR. EHRMANN: Jack.

MR. LAURIE: I've just got a comment. The things we talked about this morning about perception of the grower community as to what this whole process is about.

I want to compliment USDA on these -- this kind of a document. Now, the strategic plan and the crop profiles are the kind of effort that growers develop confidence in, and I think that's what we've got to do to bring that grower community to the table.

So, you know, you did a heck of a good job in putting this together. This helps, sort of, deal with some of the fears that we talked about this morning.

You know, somebody mentioned the politics and the way the growers feel that this whole process is politically driven. And over the lunch hour, I dug out the announcement on Dursban that was made a couple weeks ago, and this is what scares growers.

When the announcement by an administrator points out that it's the administration that's announcing this to

improve safety for all Americans from the health risks posed by pesticides, well, we don't talk about the benefits. And that's really what we're supposed to be talking about.

And then we go on several times in this announcement to talk about the administration's involvement. Not anything about the industry's involvement in supporting, and making efforts, and investing money to do this kind of work.

You know, the whole process of reassessment, I think, has to be based on the integrity and these kinds of efforts. And that's where you will bring the grower community to the table.

You know, there was a question after the talk on crop profiles this morning about -- to the Agency, how and do you use these profiles? And the response was, well, yes, they help support our assumptions.

Well, you know, I guess then the question is, what if they don't support your assumptions? What then becomes of -- who wins in that discussion?

And then I would just close out with a concern in the Dursban announcement, it's describing Dursban, and it says it belongs to a family of older riskier pesticides

called organophosphates, some of which date back 50 years or more. The time has come to review these for safety and to eliminate them if they pose an unreasonable threat.

Well, that concerns me. I'm over 50, and I don't want to be eliminated because I pose an unreasonable threat. Some things that are old can still be useful.

MR. EHRMANN: Erik and then Jay.

UNIDENTIFIED MALE: Anybody under 40 want to respond?

UNIDENTIFIED MALE: Because you can tell, everybody who is over 50 was applauding.

MR. OLSON: I guess I have some narrower comments. I wanted to find out what USDA's view is as to what the goal of these strategic plans are, our goals are.

And also ask what issues you're looking at because I've just paged through these -- I hadn't seen them before -- but are you looking pretty much -- it appears that you're looking, sort of, chemical-by-chemical, pest-by-pest for these particular crops, rather than, sort of, taking a more picture look at it.

And maybe I'm missing something, but what do you think the goal of this is? Are you looking specifically at

any particular risk? Do you look at worker risks? Are those considered when you're evaluating this? That's my first question, and I had a follow-up question.

MR. JENNINGS: Well, these are not really risk assessment documents. The idea is, what are the major pests that are driving the pest management programs that we're seeing in the field -- in carrots, for example -- and what are the critical needs? Where is that list of control options relatively short? Where is it likely to break down with the loss of an OP or a carbamate -- the things that are on the agenda for review?

Does that answer your question? It's not driven by any particular risk endpoint so much as what are the pests, what are the tools, and where do we need to bolster those tools or fill in some gaps in the tools?

MR. OLSON: Well, I guess part of the question is, I guess, well, I'm looking at the carrot one, for example. I was pleased to see that you had invited some Gerber (phonetic) growers and some folks that had moved away from some of the hard chemicals. I'm wondering, are organic growers invited to these meetings?

MR. JENNINGS: Generally, yes. Wilford, can you

speak to the involvement?

MR. BURR: We have left it up to the individual organizer in the state as to who gets invited, and we have a list of people that we suggest get invited.

Primarily, it's up to the person organizing it, but we do ask for grower representation that represents the full spectrum of growers in that state, be it organic to full non-organic, or whatever the opposite of organic is.

So, yes, the opportunity is there. Nobody is excluded because they do something a certain way.

MR. OLSON: But is there, like, affirmative outreach to growers that may not be active in the trade association for the state or something?

MR. BURR: Well, it's hard to say for carrots because there aren't that many carrot growers in Michigan. So, the choices there were probably easier than they would be for carrot growers in California. I'm not sure how to answer that question.

MR. OLSON: What about apples in the Southeast?

MR. BURR: Apples in the Southeast, we had -- again, that was the very first one -- we had only a couple growers. One had been an organic apple grower, and he

explained the problems that he had had as an organic grower.

So, that was in the conversation; but, again, that document was the first one, so it has evolved since then and would probably include more of that stuff.

UNIDENTIFIED MALE: I would like to comment a little bit on that. May I respond?

MR. EHRMANN: Sure.

UNIDENTIFIED MALE: I wasn't at the carrot meeting, but the tart cherry and upcoming apple meetings and the process that went into the Michigan portion of those.

In the tart cherry meeting, one of the pre-meetings for that was what is called the think tank. That think tank had 125 people at it representing a broad spectrum of people in the industry, primarily alternative. People who are interested in alternative production systems.

And they were represented when Wilford came to the state, and we put together the strategic plan for that tart cherry document, which isn't completed yet. It's still in the review process.

The apple one -- and by the way, Gerbers was there and Todd DeKriger (phonetic) was there. And also the field consultants who handle 95 percent of all of the Gerber

acreage were there. So, it's a pretty broad thing.

In the case of carrots, I think that they had about almost 40 percent of the growers who grow carrots --

MR. BURR: Yeah, that's right.

UNIDENTIFIED MALE: -- in the state were there. I don't know that there are any organic carrot growers in Michigan.

MR. BURR: I don't believe there are.

MR. EHRMANN: Dave.

MR. WHITACRE: Yeah, I guess the first question I'm not sure was answered, which was what do you view as the primary goal of this? Is it to, sort of, take a look at the whole system, or is it to do, sort of, a pest-by-pest, chemical-by-chemical evaluation?

MR. BURR: Our thoughts on a production system for any given commodity is that it's driven pest-by-pest, so that's the approach that we take.

How do we see these being used? In many ways, the same way the crop profiles are used. We see that the identification of research needs to be a big aid to USDA to, kind of, direct future funding.

We see the research -- and maybe some of the

information in it -- as information that registrants can use to identify niche markets that may not have known existed.

We would hope that EPA would look at the regulatory priority list; and if any of those products -- should they be chemical products, I should say -- if they're at EPA, that maybe there could be some kind of priority to get them registered.

For researchers, if there is pheromone work, or trap work, or something like that identified as research needs, that people would take up on that and apply for grants and get more into the research areas that are dictated by these transition plans -- PMSP plans, sorry.

MR. EHRMANN: Jamie.

(END OF TAPE)

MS. CLOVER-ADAMS: -- she says that her almond strategy already is being put to work in the state. They are using it to drive their own research programs and, also, I believe that they qualified for an alliance grant in the State of California before the document was completed. But because of the thinking that went into it, they were able to apply it and qualify for an alliance grant.

So, we see that there are multiple uses for them.

These are the first two. I know that our office will be talking both internally within USDA and outside of USDA to promote the plans and, also, get feedback on them.

If they're not presenting the type of information that people need, we would like to know how we can best do that.

UNIDENTIFIED MALE: And are NGOs or farm worker groups invited to these?

MR. EHRMANN: Wilford.

MR. BURR: What was the question?

MR. EHRMANN: Are NGOs or environmental groups, worker groups invited to the workshops?

MR. BURR: I think they have been, yes.

UNIDENTIFIED FEMALE: Yes. The wine grape meeting, that was --

MR. BURR: They all start running together. Some have, some haven't. That's the best way I can put it.

MR. EHRMANN: Okay, Bob.

MR. ROSENBERG: John, can I make a point of personal privilege?

MR. EHRMANN: Certainly.

MR. ROSENBERG: I'm angry. Erik said he just

leafed through this stuff, and something happened here that upsets me an awful lot and that -- I have an enormous respect for most of the people I come in contact with at EPA.

And what happened here just now was Erik was not just leafing through stuff, he was handed a document by an EPA employee that was annotated. And that's what he read from, and it has got me -- it upsets me because I've seen that happen before where EPA employees have leaked stuff to the media, leaked stuff to environmental groups.

All we've asked for in this process is a fair and a responsible process; and if it produced an end result that was unacceptable, that's fine.

But when those kind of games go on, that's totally unacceptable. And for you to expect us to have confidence in that process when we see those kind of things going on is, from my point of view, totally unacceptable.

MR. OLSON: Can I respond to that?

MR. EHRMANN: Yeah.

MR. OLSON: I was not reading from an EPA document. I was reading from my notes that I had written down, so --

MR. EHRMANN: Bob, I think there are a number of occasions that we've all -- everyone here has from time to

time talked to people on the sidelines, had different conversations, informed themselves, talked to their constituents about issues they ought to raise, talked to people from various constituents represented in the room, including the agencies, including congressional staff, including people from the public.

The people at the table are representing both their direct interests and are free to get information and exchange ideas with whoever they want.

I guess I'm -- you know, I want to follow up on your concern, but I also want to be clear about what it is --

MR. ROSENBERG: John, I don't agree with that point. It's okay, you know, to have process. But in the course of a public meeting when an EPA employee, who is responsible for ensuring that there is a fair public process, annotates a document, has talking points, and hands it to a member, and says, I can't say this, but you say it, that's wrong.

And for that to be defended is, to me, unconscionable, and it's indefensible, and I'm telling you I think it's totally unacceptable.

MR. EHRMANN: Well, maybe somebody from the Agency

wants to respond. But I'm not defending, I'm just trying to understand what it was.

MS. MULKEY: I don't think we understand what -- anything about this, so, we can look into it.

MR. ROSENBERG: Well, I'll be glad to talk about it later.

MR. EHRMANN: Okay.

MR. PITTS: I would like to just say something about how we are approaching these plans. It's -- we've been working at this a while, and really what we're trying to do is make it aware to the community at large that we're willing to provide a service and trying to coordinate these kind of discussions.

So, ultimately, it comes down to a grower group making the decision that they want to do this kind of work. And for us, it doesn't matter if it's a conventional grower that wants to come in and do it or an organic, for that matter.

If a group wants to sit down with us and work through this process or do it on their own and have a template, that's the kind of service that we're willing to provide.

And, hopefully, we'll reach a point in our circumstances where we're able to cover every one of those requests. At this point, we're having to turn a lot of people down that would like to go through this process.

But, again, we feel like it's very important that -- both Wilford and Larry emphasized is that it does need to be grower driven, and it's going to be up to them to decide who they want to have in those meetings.

MR. EHRMANN: Okay. I had you next on my list, Bill, but are you -- you put your card down?

MR. LOVELADY: Are you talking about me?

MR. EHRMANN: Yeah, you had your card up before.

MR. LOVELADY: My question was answered.

MR. EHRMANN: Okay, great. I just didn't want to -- Jean-Mari, you were next, I think.

MS. PELTIER: I wanted to respond in a couple of ways to something that Erik raised. You know, I think a lot of us came to this business about 20 years ago. Some of us aren't over 50, but we've been in it 20 years, Larry. And I'm not tired today, okay?

Anyway, I think there was a -- I think, Erik, 20 years ago would have been legitimate in saying, asking every

time if organic growers were included because let's all face it, in the old days, guys would say, the person down the road that's farming organically is hurting my orchard, and everything that he's not treating is ending up in my orchard, and it's a problem.

And there was that attitude, I think. But I think that has changed a lot as more and more people are moving, and that's becoming more mainstream.

There are a lot of guys who are farming at various points along the spectrum of integrated pest management. Some are using more biological control than others, and I think the lines have really blurred a lot.

That's perception number one, but perception number two that I think we not -- shouldn't walk away from here with is this idea that every organic grower really wants to share all this information he has got, but it's the doggone conventional farmers who don't want to let them.

People who have developed these techniques, like Tom Pavich and Steve Pavich, who used to be on this committee, they have done that at their own expense; and they're not real interested in sharing all the details of how they have found that they can farm organically or farm with

reduced inputs.

So, I think there is this perception that conventional guys don't want to talk to the organic guys, and the organic guys are dying to share it all. That is really not reality. That's the point, number one, to I think where Erik's questions were going.

One other thing I would like to respond to that I would like to see come out of these PMS plans is the idea of what are some of the overarching questions? Like we talked earlier about to what extent are all of us who are putting together these PMS plans coming to the conclusion that we've got a problem at the international level? That's something that we need to be able to provide input to you as an agency on.

To what extent are we finding that the fact that the EUP process has really closed off, and the extent to which that's stymieing our ability to look at alternative control measures? That's something that from a policy standpoint we would like to be able to bring to the agencies.

So, on top of this being a useful tool for the grower community, we would like to take a look at how these things together -- and those of us who are all working on

these are able to see overarching issues that the agencies -- whether it's USDA or USEPA -- can take a look at and address.

MR. EHRMANN: Jay, you were next. Go ahead.

MR. VROOM: As I look at this bakers' dozen of crop strategic management plans, it occurs to me that what the Department and the Agency have accomplished here in working together and with land grants probably presents us with some of the most complete, kind of, overview of IPM practice, kind of, walking that talk that we've got anywhere nationwide in the way of databases.

And just -- I was trying to remember -- I think it was in the 1990 Farm Bill that there was a required mandate of some percentage of the U.S. acreage that needs to be IPM by some date certain, and I can't remember when, but maybe Larry who is old enough and was around the Department earning a paycheck at that time, can remember.

MR. ELWORTH: That wasn't the Farm Bill, that was an administration initiative in '93?

UNIDENTIFIED MALE: Ninety-three.

UNIDENTIFIED FEMALE: Ninety-four.

MR. ELWORTH: Ninety-three.

UNIDENTIFIED MALE: You wrote it.

UNIDENTIFIED MALE: It's 2000 and I --

MR. ELWORTH: 2000, I'm sorry, 2000.

UNIDENTIFIED MALE: It was 2000, this year, 75 percent was what I thought.

MR. PITTS: We've got Harold Krable (phonetic) here if there is -- right now, we're doing -- we've got the NASS survey that will be going on this year, and we'll be able to evaluate where we are in that process.

I think one thing that we had -- and a handicap with IPM and whether it was being met or not was actually having a departmental definition, which was one thing that --

UNIDENTIFIED MALE: I'm sorry, Keith, having a what?

MR. PITTS: A definition within the Department about what --

UNIDENTIFIED MALE: Okay, well, there is a definition -- either in the '90 or the '96 Farm Bill -- of IPMs, so I think that's -- that would be one standard. But I don't know if anyone over at Congressional thinks --

MR. PITTS: Well, we also have a departmental definition I'm happy to have Harold explain.

UNIDENTIFIED MALE: Any guess as to, you know, are we plus or minus 50 percent in reach of that target using some --

UNIDENTIFIED MALE: Care to address that, Harold?

MR. KRABLE: We'll be making a report at the end of this year when we get the NASS survey in and will be above 50 percent. In some critical crops, it will be above the 75 percent; and in others, we won't. And that's as far as I'm going to get.

UNIDENTIFIED MALE: No, that's a reasonable guesstimate and maybe this isn't all relevant entirely to FQPA. But one of the things that I've, kind of, been troubled about is that as an industry, I think for registrants we've fought really hard to try to get reasonable definitions about what IPM means in the Farm Bill and other places.

And yet, I think we probably come up short in terms of the registrant behavior, the follow-on in that regard. And so, I don't know, Harold, if it's possible to add an analysis of the NASS study or do some other anecdotal look at what is the contribution of the registrant community in pursuing this important goal of accomplishing more thorough

and regular IPM practice.

And I'm especially troubled when I look at how much better I think agriculture does in that regard in places like Europe where they have gone beyond IPM.

And I regularly am reprimanded by my European colleagues because they approach it with an integrated crop management approach, which assumes IPM at the baseline but goes a lot farther in terms of a more comprehensive environmental, kind of, footprint approach.

And so, I, you know, I would like to suggest that at least on behalf of industry registrants that we can do better in that regard, and there are some ideas that have been floated that from a voluntary standpoint could get us walking that talk a little better.

But given the fact that we have a 2000 mandated goal for the US, maybe it's an opportune time for us to have -- maybe not in this context but in a sidebar somewhere -- another look at that and look at how registrants could be more supportive and practically involved in the process in the U.S. market.

MR. EHRMANN: Okay, what I would like to do is take -- I'm sorry, yeah, comment on that?

UNIDENTIFIED MALE: I'll just talk to you later about it.

MR. EHRMANN: Okay.

UNIDENTIFIED MALE: John, could I respond real quickly on two points?

MR. EHRMANN: Yeah, yes.

UNIDENTIFIED MALE: One is IPM is a big part of this -- of the discussions I've been involved in. It's not the only topic.

And the other observation that -- a point of information, I would add, is that part of that goal from the administration was also an attempt to indicate that the Department is going to evaluate its results in terms of change practices in the field in both research extension and any other programs.

So, it wasn't just setting a goal, it was setting an indicator for what the Department wanted to see as a result of its efforts.

MR. EHRMANN: Okay, let's take the cards that are up, and then we'll move to the -- that was your last presenter from USDA?

MR. JENNINGS: Yes.

MR. EHRMANN: Then we'll move to the EPA discussion on the same set of transition issues. Carolyn?

MS. BRICKEY: Yeah, I just wanted to say that I appreciate USDA making the presentation and making this effort, and I do think what you've heard are all across the spectrum, all over the table, is a need for comprehensiveness.

And maybe the development of these early plans will now give you an opportunity to incorporate a more comprehensive approach in the next ones you do.

MR. EHRMANN: Okay. Paul.

MR. HELLIKER: Well, to follow on that item and to deal with some of the points that Erik raised, the way that I look at these plans -- and I think they're extremely valuable tools, but they're only one piece of the puzzle.

And that, you know, we have a whole other range of issues that we're dealing with from spray drift, to backpack sprayers, to illness reporting that we have a host of other constituents that we rely on for more information, and it all pertains to the same risk management activities that we're involved with.

So, I'm not sure that these documents where the

audience that generates these is really the comprehensive aspect that some of us are asking for.

But, you know, when it comes down to it, the regulatory agencies -- we in EPA and the other state agencies -- I think view these as just one element in the overall scheme of what we're trying to achieve.

MS. BRICKEY: Well, I was referring to the comprehensiveness of the plans themselves.

MR. EHRMANN: Okay, Rob and then Mark.

MR. HEDBERG: I had more of a specific question for Larry, but I did want to preface it by complimenting Wilford and Larry and everything they've done. I think it's an incredible accomplishment.

For Larry, next week the Science Advisory Panel is going to be looking at the triazenes (phonetic) in herbicides, which are used on probably 50 million acres of corn in this country.

And it seems like it might be a race between getting a strategic management plan and the results of the reassessment of the triazenes out.

So, I wanted to ask, how long do you think it will be before we have a strategic plan, pest management plan for

a major crop like corn?

MR. ELWORTH: Well, I'm going to answer since you asked me, but it's not entirely up to me. The -- for the major crops, it has been -- as you know, FQPA for the major crops in some cases have been a real key issue. For other of the major crops, FQPA hasn't been -- biotech issues have really -- biotech issues, trade issues, water quality issues have predominated on the agendas for most of those organizations.

UNIDENTIFIED MALE: Let there be light.

MR. EHRMANN: And then there was light.

MR. ELWORTH: To answer the question, I don't know -- I mean, I'm a contractor for USDA, so if USDA says, go talk to the corn people, we'll talk to the corn people.

It's partly a combination of initial discussion between the commodity group and USDA, and then the USDA to me. But I think that's highly appropriate. It's not entirely just an FQPA issue.

In fact, some of the commodities that we've worked with -- and I'm sure for Wilford, as well -- they haven't wanted just to focus on FQPA. They want to look at the whole -- all the pressures their systems are working on.

So, I think it would be very welcome if Therese and -- or Wilford told me to work on it. I think it would be great.

UNIDENTIFIED MALE: In answer to the corn question, as soon as there is some corn crop profiles that we could use as a basis, all it would take was a phone call to me, and I would go to wherever the corn people wanted to have a meeting and put on a meeting. So, it's kind of --

UNIDENTIFIED MALE: Harold, let's talk a little bit about corn because we are -- this meeting is focusing a lot on FQPA and this effort. And, obviously, where we are in FQPA is primarily dealing with a lot of minor crop issues.

However, because of the IPM targets we have, we do realize we've got responsibilities to deal with things like herbicide management, and we do have a project that we've investing a lot of time in in regards on corn, soybeans.

MR. EHRMANN: Okay, Steve.

UNIDENTIFIED MALE: Why don't I just -- okay, it's working now. We'll make it work one way or the other.

A couple of years ago, we started looking at major crops as drivers for pest management. In terms of the 75 percent goal, obviously, if you're going after acres, you

better go after the top four crops, or you don't have a chance of getting there.

So, what we've done is provided some funding to -- just going through the University of Nebraska, we're working with 22 states to impact corn, soybean, cotton, and wheat in terms of decision-making processes, mainly in wheat management, but they can also be extended to other pests, as well.

These are computer-based decision support systems that get out to farmers, to decision-makers, county agents, consultants, distributors, and dealers in terms of making decisions about weed management and corn. Looking at it from an economic perspective, an environmental perspective, a sociological perspective in making best choices.

Obviously, there are going to be transitions in the major crops, as well. And in order to accommodate grower decisions as they should be made, we've got to get help out there.

We are at the stage now where we are distributing these decision support systems out to users. They are being used. There are some 1,700 copies of these computer programs

out now, and they're increasing as we go along. So, we have not been standing still on major crops, either.

MR. EHRMANN: Okay. Mark.

MR. WHALON: I just wanted to respond to Erik's comments from the standpoint of inclusiveness. I think he makes a couple relevant points, and that is that are organic growers included, are NGOs invited, are farm worker organizations invited?

I think these are important issues and to try to get good representation in one of these meetings is a challenge.

I just would like to comment on the two that I've been involved in in Michigan relative to the organic community. Jim Cohen (phonetic), who is the president of the Michigan -- (inaudible) -- Society, is an organic grower. He has been invited to an apple meeting; and as far as I know, he is coming.

I just also comment on Jim's situation this year, he doesn't have a crop. He does not have a crop. I was in his box two weeks ago. He had severe problems with thinning, severe problems with fire blight. He doesn't have a crop this year.

He also had -- of the fruit that he had on the trees, he had about 90 percent damage from plumchiculio (phonetic).

In terms of the tart cherry process, the think tank group represents 100 percent of the organic growers in the state, and they were involved and had representatives there.

And the Eastern Michigan Environmental Action Council is about the most active environmental group in the state. To my knowledge, they weren't invited, and that's an oversight. I think that in the future, that's a -- but the comment I have is, is that one of the things about inviting environmental groups and NGOs, a lot of them regionally don't have an interest in this issue.

So, even -- they're not involved, and they haven't been involved. In the case of the tart cherry meeting, though, the Leland -- (inaudible) -- Water Council was there -- a representative of that group because they have been involved, and they have been involved for a long time. So, they were there.

So, the other comment I would like to make is one that makes me pretty uncomfortable, and that is that in the field of unintended consequences of FQPA, are the economic

consequences to those growers to show up at this meeting.

At the tart cherry meeting, Wilford, we had 6 -- 58 people at that meeting. And I estimate that just in the direct costs, there was $18,000 spent on that meeting. Not counting the indirect costs for those people being off-farm and off-job and including the independent crop consultants, et cetera.

Pretty significant impact -- unintended impact of this meeting process that isn't counted, that I know, in any way that probably ought to at some point. Because when decisions are made in Washington, they have ripple effects that go all the way through this nation, and they're very costly.

MR. EHRMANN: Okay, let's --

UNIDENTIFIED MALE: John, can I --

MR. EHRMANN: Oh, I'm sorry, I didn't see you. Do you have a -- that point or -- oh, okay, yeah, go ahead.

MS. MOYA: I'm Professor Olga Moya with South Texas College of Law, and I'm a farm worker representative. I grew up as a migrant farm worker and have a lot of experience in pesticide regulation, and now I teach in all kinds of environmental law areas.

I just want to add to the point here that, traditionally, all kinds of organizations don't get involved in various issues until they get ultra informed on the value that they can add.

And if farm workers or other non-governmental organizations are not involved in this process at this time, it's because of that. They have had other priorities in the past. They may still be overwhelmed by those priorities, and until you invite them, one, and, two, sit down at the table with them to show them how this ought to be their new priority moved up on their list and the value that they can add to these meetings, then you're right, they're not going to come.

But first you have to invite, educate, inform, and make them feel like they're going to add value to the discussions.

MR. EHRMANN: Good. There -- and I would say, too, just being in the business of convening things and bringing diverse parties together, I've seen it work in all different directions.

I mean, I know there are meetings that are being held on alternatives that traditional growers don't feel

comfortable coming to -- and for the very reasons you're mentioning.

So, I think it goes in all directions. It isn't just one direction or the other. It does take special kinds of efforts in terms of outreach, and resources, and a number of the issues that have just been touched on to get a group that really represents the kind of diversity that I think everyone has indicated is going to be beneficial for these kinds of meetings.

It doesn't happen just because the door is open. You've got to -- and, again, it goes both directions. I mean, it operates in all kinds of different ways.

So, there are some good suggestions I think have been given about how to encourage more of that. Yeah, Bill.

MR. LOVELADY: Just a quick comment, John. I think that the discussion that we've had here about the work that USDA has done, I just can't let it pass without saying that I think that this is one of the strong points of this whole process that we have had -- this TRAC process and now the CARAT process -- is the tremendous increase in the contribution of USDA, and I think it adds a lot, and I compliment them.

I just didn't want to let it pass without saying that. We appreciate it.

MR. EHRMANN: Good.

UNIDENTIFIED MALE: And, John, I would just like to follow up on that. We've been talking for -- well, eight years that I remember and maybe longer about the need to get more money in these programs.

And while I don't think anybody would argue that the money we have in this is anywhere near enough. The Deputy and the Department deserve a lot of credit for getting something like 15 million-plus more dollars into this particular effort on FQPA.

And that's, again, a quantum leap beyond where we were, and I think the Department really deserves credit for doing that.

MR. EHRMANN: Okay, let's move to EPA's perspectives on the transition issues. And who is going to introduce --

MS. MULKEY: Kathleen and Jim Jones (phonetic). I should probably introduce the folks who -- Kathleen Knox (phonetic) is associate director of our Pesticides and Pollution Prevention Division.

And in that capacity, she takes the leadership role within our office for a number of the projects that you'll be hearing about today, and then she helps coordinate with the other folks in our office who work in that.

Jim Jones most of you have met, but some of you haven't. He's director of our Registration Division. And in that capacity, handles the registration of -- or the decision-making on registration of conventional pesticides. And his focus will be on the new compound registration activities.

MS. KNOX: Thanks, Marcia. I wanted to start with the EPA programs and partnerships that we feel are helping implement FQPA in the field.

The first one of these we actually created specifically for the purpose of dealing with FQPA. In 1997, we realized that not the least of our problems were communications issues, that the word really wasn't getting out. There was confusion. Farmers, states, et cetera, were not really sure what was going on with FQPA.

So, the Office of Pesticides Programs created what we call the Regional FQPA Agricultural Initiatives. And we started it as a pilot. We put one, basically, full-time

position in each of four pilot regions. And, in addition, gave them each $200,000 extramural money that they could use.

The criteria for this program were to strive to be -- and I'm actually quoting these from a letter that was written to the regions at the time -- to strive to be proactive, rather than reactive, as we implement FQPA.

To coordinate and augment existing activities of the Pesticide Environmental Stewardship Program, the IPM initiative, and related projects.

To focus on use, usage, and residue information for minor crops, and to include measuring and monitoring in indicators.

As we started this, it appeared to be successful, so we put in a budget initiative for this year, Fiscal Year 2000, requesting a staff position for each of our 10 regions and requesting a million dollars to expand the initiative overall.

Fortunately, we got the money; but, unfortunately, we didn't get the positions. So, we've continued to support the four regional staff positions and only recently have actually allocated the money to the other -- the additional six regions.

We hold monthly conference calls to try and keep track of what is going on. Included in those are people -- Al, or Therese, or some of their staff members, Pat Chimino (phonetic), usually sits in for the minor use team. We try to use this as an opportunity to, again, build a stronger network to really improve communications.

With the addition of our other six regions into this program, we've -- we're exploring ways to try and get all 10 regions together in one place so that we can actually talk about what we want the new regions in the program to accomplish.

And, actually, so that those folks can help really learn from lessons from the four pilot regions. So, we're trying to figure out a way to do that. It's a little hard geographically to get everybody in the same place.

In terms of results to date, the four regions -- I'll just explain them as I go along -- Region 4 is headquartered in Atlanta. It's the southeastern region of the state. And they have initiated joint education activities with their USDA extension staff and farmers in each of their states.

They have encouraged adoption of organic

enterprises where feasible. They've worked with the Delta Farm Project, and they have directed Region 4 Pesticide Stewardship Committee.

The Region 5, which is Chicago, the upper midwest that Michigan is part of, has held conferences on children's health, worked on transition meetings for major commodity groups.

Wilford mentioned Margaret Jones. She is our regional FQPA Ag coordinator in that state. They, basically, have done a lot of working with Michigan State University, with the Michigan Department of Ag, and with the Office of Pesticide Programs on residue data, and bridging data, et cetera.

And also have participated in the Wisconsin Pesticide Use and Risk Reduction Program, which, again, is another organization with a lot of partners.

Region 9, our western region, Laurie Anthrop is here today in the back. She is our regional Ag initiative coordinator in San Francisco.

And over the years, they have worked on design and coordination of an FQPA California grape partnership, and that's what the University of California Sustainable

Agricultural Research Extension Program with USDA, with NRDC -- they worked with the State of California to help organize the pesticide use reporting work group and have continued to work on some ongoing biologically integrated farming systems demonstration projects.

The northwestern region, Region 10, out of Seattle has worked on commodity-based approaches to transition for nine different crops. They have established with Washington State University, an advisory board of pest consultants, researchers, and industry to identify weak links in current IPM programs and also to provide alterative pest management strategies. And they have funded 10 biological control Pacific Northwest projects.

Many other things have gone on. What we view as the success factors of this regional initiative is the cooperative efforts really at the ground level working with growers, working with a lot of other interested parties -- universities, state departments and agencies -- just a wide variety -- environmental groups, depending on the project.

The ability to build these networks and to share information to, basically, promote and grow trust between the organizations, to facilitate interaction between organic

growers and conventional growers, trying to find common ground, trying to, again, improve communications.

We look forward to having the other six regions in the field, and we hope that we can facilitate that.

The rest of our -- the projects that I'm going to talk about -- they're mostly partnerships, and they fit perfectly within the realm of transition from FQPA implementation, but they were actually begun at different times for different reasons.

We have a very strong public, private partnership with the American Farmland Trust on IPM implementation projects. There was a paper left at your seats during the lunch break, written by the American Farmland Trust that explains the entire program, some background, and talks about the specific projects.

I'll mention just a couple of them. They're actually projects that Larry Elworth's group is working on. I know that Sarah and World Wildlife Fund are involved in some.

But just to mention a couple, working on pears in Yakoma, Washington. It's -- this partnership is in its third year. Del Monte is involved. Snowkissed (phonetic) and

Washington Horticultural Association now have over 2,000 acres enrolled and have reduced OPs and carbamates by 30 to 50 percent.

One of the ways that these partnerships are made stronger is by groups like Del Monte and Snowkissed, which are actually underwriting grower risk.

Apples in Michigan, again, partnership includes Michigan State University, Gerber, and others. Again, objectives -- specific objectives to reduce overall OP use.

Potatoes in Wisconsin, this is incorporating market-based incentives to create premium prices that are returned to the growers. Partners include World Wildlife, Wisconsin Potato and Vegetable Growers, University of Washington. Again, they're targeting specific reductions in OP use.

Several others -- one that's a little bit different is the Neuse River Watershed in North Carolina. Again, it's one that Larry's organization is working on. It deals with reductions in nutrient levels and in pesticides. It focuses on weed and nutrient management -- a real concern of loss of soil-applied herbicide.

So, there is a wide variety of programs, projects.

You'll find them in this paper. You can find more detail.

The third thing I would like to mention is not just an agriculturally related program. In '96, there was pollution prevention research grant money available in the Agency. Half-a-million dollars, we, basically, in our program bid for it.

And rather than distribute it to the regions by a formula or a 10 percent per, created a competitive grant program, and this is with full regional cooperation.

To date, the program has funded 53 projects -- basically, pesticide risk reduction, risk mitigation programs, outreach, education, IPM in agricultural and urban settings.

The interesting thing is that it is a competitive program run by the regions. Regions do the reviews of the projects, make a first cut. Those are funded, then any additional projects are put in to bid for the remaining money.

So, it's not just agricultural, but it does actually function ground level, same kinds of cooperative groups as the others.

The Pesticide Environmental Stewardship Program is

a voluntary public, private partnership -- again, committed to reducing risks from pesticides in agricultural and non-agricultural settings.

It was created in, I think, 1994. Presently, we have over 130 partners and supporters. Some of those folks are actually on this committee, and some are in the room.

The partners, when they join the program, agree to submit a pesticide risk reduction strategy and also to submit annual reports on their progress.

There is a grant program that's run by the National Foundation for IPM Education that provides seed money for selected projects. It's not intended to be long-term funding, so the idea is to help partners, supporters, other grower groups get things started in the field, or do some technology transfer, or some education and outreach.

The last thing I would like to mention is that EPA has been in partnership with the USDA, CSREES, Sustainable Agriculture Research and Education Program, or SARE, since 1991.

And while this, again, started way in advance of FQPA, the funding that EPA provides is matched -- usually doubled -- by SARE funding, and the intention is to reduce

agricultural pollution from both pesticides and nutrients. In a three-year time frame, '96 through '98, the funding was also matched by IPM funding.

So, the program intends to increase knowledge about, help farmers and ranchers adopt sustainable practices that are profitable, environmentally sound, and good for communities and society, in general.

And those projects, again, tend to be -- they're definitely on the ground. A lot of small programs are funded in a wide variety of the regions of the SARE program. So -- and Jim is going to talk about the registration of alternatives.

MR. JONES: Thanks, Kathleen.

MR. EHRMANN: Shall we take -- let's take any comments or questions on --

MS. KNOX: You want to do them now?

MR. EHRMANN: Yeah, just because it's, kind of, two different aspects.

MS. KNOX: Okay.

MR. EHRMANN: Comments, questions? Yeah, Jean-Mari.

MS. PELTIER: I would just like to make one quick

comment, and Steve is, unfortunately, out of the room. But you went over one point real quickly, and having been involved in contract negotiations with growers and processors before, I would like to just publicly commend Del Monte and Snowkissed for the leadership they took in actually underwriting grower risks.

That's -- as far as I know -- unprecedented and a tremendous incentive for growers to adopt these programs.

MR. EHRMANN: I'm glad he didn't get to hear that so he doesn't get a big head or anything. We'll tell him you said that. Yeah.

MS. MOYA: You may have addressed this, but what is keeping the other EPA regional offices from becoming more active in this area? I mean, you mentioned some spot programs here and there, but it doesn't seem like a highly integrated EPA program throughout the regions.

MS. KNOX: Well, the first program I mentioned are regional initiatives. We started as a pilot just to see whether it would work. The four regions were the regions that expressed interest.

Coincidentally, they are also the regions with the highest percentage of minor use crops grown that fit within

the program.

As I said, we try -- we have tried to get additional funding and positions to expand it. We got the money, we didn't get the positions.

Each of the regions does have staff that works on pesticide issues. Obviously, it's better if we have a full-time person who can devote their entire job, but this year we didn't get those positions. I think it's still in the budget -- or at least in a request for 2001 -- and we're hopeful that we'll get those positions.

But in the meantime, we do have representation from those six. They have started participating in our conference calls. And so, we're trying to find a way to get everyone together in person at least to, sort of, kick off the --

UNIDENTIFIED MALE: Professor, if --

(END OF TAPE)

UNIDENTIFIED MALE: -- offices together in the meeting out West, and this, along with other FQPA issues, are some of the things that we're going to be discussing. We're devoting two days to agricultural issues.

MS. MOYA: Is there a possibility that if you don't get a position, that you might be able to authorize the state

agencies to use that money when they have positions to -- because they do a lot of IPM as it is.

MS. KNOX: Well, the money that the regions get actually goes out to whoever, and they can do competitive, or they can work with existing partners.

Region 5 has worked with Michigan State University and the Michigan Department of Agriculture. So, those are the kinds of interactions that are actually going on with the money. So, the money does go out to states, or groups, or within the state.

UNIDENTIFIED MALE: Just a real brief follow-up with that -- that residue program that started three years ago now, Kathleen, in the region was initiated by an MDA, Michigan State University, EPA initiative.

And I just want to point out that Farm Bureau has been involved in that, Extension has been involved in that, and a whole array of commodities have contributed dollars for that program.

So, it's a very cooperative thing. I think where we're at on residues in a minor crop state like Michigan, though, is is that is a drop in the bucket for what really needs to be done.

MR. EHRMANN: Okay, any other comments at this point? All right, Jim.

MR. JONES: All right, thank you. I'm going to be talking this afternoon from Paper Number 12, which is in all of your packets. And, basically, another part of EPA's pest management strategy or transition, whichever term you want to use, involves the expediting of alternatives to organophosphates and the registration process.

That is the name of the -- that is the title of the paper, Paper Number 12, Expediting the Alternatives to the Organophosphates.

And I'm basically talking here about synthetic conventional pesticides as opposed to biopesticides or other transgenic or other kinds of compounds.

The -- a lot of discussion early about priorities, why does EPA prioritize, why does the Registration Division prioritize?

Well, we have more applications with us than we can handle at any given time, which means you have to make choices -- which ones are you going to do first? That's setting priorities.

So, we have come up with a system to set

priorities, and we originally did this in 1997. We did it through a notice and comment process; and you can see, sort of, the beginning of your paper what our initial priorities were after taking public comment.

Alternatives to Methyl Bromides being the top priority. Reduced risk pesticides coming next. USDA, EPA vulnerable crop pests combinations, followed by minor uses, trade irritants, and then other registrant identified priorities.

That is basically the order in which we were making choices amongst the many applications we have as to which ones we would do first.

In FQPA past, in the summer of '96 -- by the spring of '98, actually, we had come to the conclusion that it would probably be a smart thing to consider expediting alternatives to organophosphate pesticides in an effort to ease transition, help people with pest management strategies, even though we weren't using that term at the time.

And so, we proposed at that time to include alternatives to organophosphates in our ranking. And, basically, we proposed to include them right below reduced risk pesticides.

And that is right now where we are in terms of the order in which we are doing our work. So, when we're choosing amongst applications, currently an alternative to Methyl Bromide due to the phaseout under the Clean Air Act is that it gets the first choice, followed by reduced risk pesticides, followed by alternatives to organophosphates.

If there -- an alternative to organophosphates also reduced risk, it would trump a reduced risk pesticide that is not an alternative to organophosphates.

Basically, to give you a sense of the, sort of, the scope of the situation, we have with us about right now about 35 new active ingredients for which we are -- at this point, planning on which 18 or so we're going to evaluate in the fiscal year -- in Fiscal Year 2001. And we are going to use this priority system, this way of making choices about which ones to go first.

How do you become an OP alternative? We have come up with a process that relies on our Reduced Risk Committee, an already standing group of people -- interdisciplinary people we have in the organization.

And we ask for petitioners. It can be a registrant, but it doesn't need to be a registrant. It can

be a user community, or a public interest group, or private citizen where they come in, and they, sort of, walk us through a variety of the disciplines that we're concerned about -- human health, ecological effects, and environmental -- (inaudible) -- do a little comparative risk work.

It is somewhat of a burdensome process, and I think that's one of the things we may want to explore and get a little feedback on.

Manufacturers use it. Others typically have not. Manufacturers generally have the resources available, and they have the most to get out of it, and they have generally invested in it.

We have on occasion -- and I think as a matter of fact, Dr. Balling over here approached us in an informal way with an OP alternative, and he presented a compelling argument that we shared with our experts in the area so that we weren't going to be duped -- not that Steve would ever try to dupe us --

MR. BALLING: I wouldn't do that.

MR. JONES: -- to get a priority. We found his arguments very compelling, and so, we moved up the compound that his users were looking to use because it was an

alternative to an organophosphate.

So, we have found ways that are not particularly burdensome for registrants to use this process to get a compound identified as an OP alternative.

We have been able to bring to registration OP alternatives in a significantly faster time frame than for non-OP alternatives, and you can see some of the time frames there for new chemicals and new uses.

Right now, we have four OP alternatives new chemicals that are -- that have not been registered, that as we've designated them as an OP alternative, and we're working on them.

All of them are very much in our sights. They're being worked on. Two will come up for decision-making in this fiscal year, meaning in the next three months; and two will be up for decision-making by the end of this calendar year.

So, at that point, come January, I may be in the position where all of the new chemicals that are OP alternatives have already, hopefully -- unless something comes up in the review -- been registered.

We have about 100 new uses. This is adding a use

to an already registered pesticide of the 700 or so pending new use applications -- have been designated by EPA as OP alternatives. And most of these will be scheduled for completion within the next 18 months.

The next couple of pages, basically, walks you through the compounds that have been registered as OP alternatives, and the following page describes the pending OP alternatives.

I do want to clarify that these are compounds where we have been presented a compelling argument and have chosen to expedite a product because of its OP alternative potential.

There are situations where -- I can think of two examples where an actual potential OP alternative is not on one of our lists even though it's pending with us. One is that a company made a case, and we did not find that when you compared the risks between the compound that they were seeking expedited review for with the OPs, it didn't look to be less risky.

Now, that's a judgment call. You may have been looking at a carcinogen or a compound that had developmental effects against an OP, which has a different effect

cholinesterase inhibition judgment calls for judgment calls that we're -- we have been making.

There have been a couple situations we have a compound that may well be an effective alternative to an OP where we did not -- chose not to expedite it. It just meant it stayed in the -- in our queue and whatever other -- what other priority that it may have been given by the registrant.

And the other area, which I think probably includes a fair number of insecticides, are applications we have where no one has stepped forward and said, I want to make a case that this is an OP alternative.

Either the manufacturer has not, for some reason, or a grower group hasn't approached us, or USDA, or some -- anyone else.

And so, there are a couple of ways in which we can have an OP alternative in-house; and, yet, we have not expedited it.

I'm concerned about that latter group about how we can, sort of, flesh out applications that are in-house that actually are OP alternatives. It is just that no one has approached us about expediting the review. I think we need to work on that a little bit.

I do -- I did want to speak to the EUP issue. We have -- after listening for several years to the user community, who is very frustrated -- the registrants are, as well. The user community has expressed a rather compelling reason to us about their frustration about the lack of EUPs -- a certain kind of EUP.

This is an EUP which has a tolerance, meaning that you can use the pesticide and then sell it -- sell the product that you've treated, as opposed to what has not been really a problem for us has been experimental use permits where you agreed as a user to destroy the crop, meaning you couldn't sell it in -- you couldn't move it in commerce. People couldn't ultimately eat that.

But the basic issue that we have struggled with is that EUPs where you have to set a tolerance, the tolerance setting process is a rather expensive one.

We're dealing with a fixed pot of resources. It's a zero sum game doing certain types of EUPs with tolerances will trade off against doing new chemicals or registering new uses of chemicals. And that we have felt that the better choice has been to focus on getting permanent labels for pesticides.

However, in some discussions we have had -- the user community -- we have come to get -- we have come up with a proposal that we have begun to float and will likely in the next three to six months float in a more public way -- even more public than this -- with a little more participation, as well, whereby pesticides that have already had a tolerance established under FQPA.

That means that pesticide is registered, obviously, and it has had an FQPA assessment. We would be willing to do food use, EUPs -- setting a tolerance with them for that subset of pesticides, which we feel we can do without significantly trading into the number of new uses and new active ingredients that we're going to be doing.

We've talked a little to some members of the user community about this and have had some conversations with a couple of registrants about it and will likely be doing something -- if not a workshop, a proposal and a PR notice in the next three to six months, I said.

So, we're hearing the problem on the EUP situation where, hopefully, we have the solution that's not the total solution I think that some are hoping for, but I think it's a partial solution to a compelling problem that still preserves

our ability to maximize the number of new chemicals and new uses that we're able to register that meet the FQPA safety finding.

And that is, basically, what we in the Registration Division are doing to ease with pest management strategies or transitions, whichever word you want to do as it relates to organophosphates.

MR. EHRMANN: Okay, Mark.

MR. WHALON: Jim, I just have a couple comments relative to this pending OP alternatives list. And I'm a member of the Technical Advisory Committee for U.S. Apple, and although I wasn't at this meeting, Larry Goots (phonetic) sat in for me.

But we were a little bit surprised to see Indoxacarb, and Methoxyfenozide, and Thiamethoxam still on this list, given your comments to that committee because of, apparently, a neurological problem, maybe, with Indoxacarb, and a persistence problem with Methoxyfenozide, and a carcinogen problem with the last one.

So, I think it illustrates a couple things. One thing is, is that the -- what we've invested in Michigan State University and in the commodities in Michigan looking

at these as pending OP alternatives, if they're knocked out in the end for these reasons, we've just invested a whole lot of money and time of people in these compounds.

And it points, I think, to a real issue that I tried to mention earlier, and that is, is that we're in such headlong pursuit of OP alternatives, that there are consequences in this system that we don't see short-term, that we're only going to see long-term.

And I'm not faulting you in any way addressing any of these issues. I'm just using this as an illustration that an alternative isn't always an alternative, and the time frame that we're forced to go through here puts those of us that are public partners -- and, also, the private sector folks who are contributing to this research to get these, especially in the minor crops where there isn't the economic drive on the part of the industry to get these registrations, we're being frustrated in this process.

And these three compounds were the go-to compounds for us in apples in the Midwest. And if they get knocked out, I don't know what we're going to do.

MR. JONES: I can say, Mark, that Methoxyfenozide was registered about two weeks ago on applies. Indoxacarb

and Thiamethoxam are scheduled for registration decisions this summer.

I don't think I really should speak any more to them as they're unregistered pesticides, and I could go to jail or something if I did, but -- at least not today.

MR. EHRMANN: Steve and then Carolyn. Steve.

MR. BALLING: Well, it isn't often you get a chance to compliment EPA -- not because they don't do good work but just by the nature of the job, it's difficult.

And I did want to make mention -- when we first broached the subject with Jim about replacing some organophosphate compounds on green beans in the Midwest, it was December.

And he said, well, when do you need them? These are the list, actually, already, but it didn't look like they would come out until the end of the year, possibly even spring of the following year.

And we said, well, June 30. He says, oh, I can't do that. But he sat down and worked with us and with the -- with his crew, and the registration came out, I believe, the 28th of June. So --

MR. JONES: Friday, I'm sure.

MR. BALLING: It was tight, but we were able to replace about -- well, more than 20,000 pounds -- or 20,000 gallons of organophosphates -- primarily, Methyl Parathion -- with that registration.

So, it was a big deal. And I understand that we can't be jumping things to the top of the list all the time, or Jay will have a conniption. But it really -- and Cindy. I won't be sitting next to her next time.

MR. EHRMANN: Oh, yeah, you will be.

MR. BALLING: But it really -- it really made a big difference. It really was huge, and it was much appreciated.

And then I would also like to say, sort of secondarily, that this issue of trying to find some solutions to EUPs is very important, and I'm pleased that you may think you have an answer because we can't do a crop destruct on the size of the acres. That we need to start looking at these new compounds and this whole transition process.

When you're trying to move to new compounds, you just can't take them off the shelf and replace them chemical-for-chemical. It's just not possible. So, that EUP thing would be of great value. Carolyn.

MR. EHRMANN: Carolyn, and then Jose.

MS. BRICKEY: Yeah, I just want to say, also, that this presentation about what you've been doing with OP alternatives is really impressive.

And I just wanted to ask just for clarity's sake, you're talking about four that you are looking at between now and the end of the year. Are they on this list down here that says pending?

MR. JONES: Oh, I'm sorry, Carolyn, the -- there are four new chemicals that are -- will be likely -- decisions will be made before the end of the calendar year.

The rest of them are new uses to existing -- already registered pesticides. So, yes.

MS. BRICKEY: Okay, so there are four on here that are new chemicals, and the rest are new uses.

MR. JONES: That's right. Acetamiprid, Indoxacarb, Milbemectin, and Thiamethoxam are new chemicals. The rest are new uses to already registered pesticides.

MS. BRICKEY: Okay.

MR. JONES: Most of them relatively recently registered pesticides -- most of them.

MS. BRICKEY: Okay, thanks.

MR. EHRMANN: Jose.

MR. AMADOR: Jim, I just want to second what the other people said. I think it's commendable, you know, the effort you're putting on it.

But in order to put this in the proper perspective -- at least for me, I'm not an entomologist -- but of the 100 that have been identified as an OP alternative, could you give us a sense of what percentage are as effective as the OP they're replacing; and how much are more effective; and what percentage are less effective than the one we had?

Because I think that's a critical issue that I know that you're dealing with it all day, but, I mean, I don't have a feeling of what percentage.

MR. JONES: I'm sure I can't answer to the degree that you would like it to. I think as we all know that most compounds that are going to be alternatives are not going to be nearly as broad spectrum, and I think that that applies to the alternatives, as well.

And I think that the other common theme we hear is that the -- they have much more -- you know, there are sophisticated learning means involved because they're not going to be as broad spectrum.

Some of them, I think, are considered to be rather

effective -- very effective alternatives of equal or potentially greater efficacy because you may have some resistance problems going on with the OP.

Then there are others, I'm sure, that are less so, but I don't think I could really speak to, you know, giving a general statement about are they -- you know, what percentage of efficacy are we going to get. I think it's a mixed bag.

MR. AMADOR: John. Will Mark or some of the other entomologists care to comment on that? You know, I don't mean to put it in front of you. I don't mean to put it in front of the spot, but, I mean, I like to get a sense of, you know, where are we going?

MR. WHALON: They're really not the same. You're talking apples and oranges. OPs are broad spectrum. Most of these are rifle shots.

So, in some cases, they are -- in a few cases, they are direct replacements, like Steve is talking about. But in most cases, you're talking about a very significant economic change. You're talking about use patterns that change, and you're talking about the requirement of additional information to make them useful in a system.

Sarah is not here, but she would, I think, agree

that in her experience in the Wisconsin system in the potato system there -- or maybe John can address this -- but it is a system.

And so, when you start playing with a piece of it, it has effects -- ripple effects all the way through. So, and some of those are long-term, and you can't figure them out a priori.

So, that's how I would comment -- that it's an increase in complexity, it's an increase in economic often. There may be some other benefits in terms of environmental side effects and some natural enemies that you can take advantage of that may reduce and mitigate some of that economic problem.

But in most of those situations, we don't always know that up front. In the case of mites, for example, it may take -- mites on apples -- it may take three years to figure out what the exact consequences of that change is on mite predator populations, et cetera.

So, these things are long-term, they're very dynamic, and they're very information intensive to get these changes going.

MR. EHRMANN: John, did you want to comment on

that?

MR. WALLENDAL: Yeah, in response I'll just give you an example. Spinozad on tube potatoes, it's used to control potato -- the potato color -- potato beetle.

It is very targeted towards that beetle, but when we illuminate the OP alternative or the pyrethroid alternative, we've got to address aphids, we've got to address leaf hoppers, and other pests.

That increases our scouting costs. It is a residual effect. It means that it's not as long-term lasting, so we've got to go out there two or three times to catch that hatch that may be not timed -- it's spread over time. So, there are some increased costs in there.

Now, the other direction is we talked about the natural predators. We've got those at -- (inaudible) -- so we may not have to address that aphid problem later on, which is a real problem for us.

So, the answer -- I agree with Dr. Whalon is -- is it's a mixed bag out there. What I see is when we run with these alternatives, it means extra management in the terms of the farmer.

MR. EHRMANN: Okay.

MR. WALLENDAL: Because it's not broad spectrum.

MR. EHRMANN: Jay.

MR. VROOM: I just wanted to remember at this point to compliment the Department and the Agency for the entire book that we received in advance, despite the fact that there were some empty tabs that got filled in at the last minute here.

But I think it's the best effort that we've seen over the course of, now, three different advisory committees that really get into this condensed, sort of, summary information that most of can absorb. So, I didn't want that to go unsaid.

On -- Jim, on the OP alternatives list that you've got under Page 2 on Tab 12, the -- is there anywhere available a matrix display of these compounds that would show what other priorities also might have been part of the cumulative effect of moving these through?

In other words, were two or three of these also reduced risk, minor use, trade irritant registrant priorities -- Marcia is tired of me -- hearing me talk about the proliferation of priorities, and how in the world can you make sense out of any of this?

And maybe -- but, obviously, some of this does make some sense. And these were more -- I'm sure some of these were more than just OP replacement priorities. But do you have that on the Web or anywhere?

MR. JONES: Yeah, all of them had some registrant priority provided to them, some rather high.

MR. VROOM: Yeah.

MR. JONES: And some less high that came -- became higher because they were an OP alternative.

MR. VROOM: Mm-hmm.

MR. JONES: But we could provide you that kind of a matrix.

MR. VROOM: I think that would be, you know, valuable to everyone around this table and all stakeholders who are trying to figure out, you know, how we assess the progress that we're making and do the priorities make some rational sense?

Another question would be, separately, in FQPA were additional incentives for registrants to add minor use labels to their new active ingredient applications -- and do you have a summary of how many products have benefitted from that -- the additional exclusive use periods that were -- I

forget, there was a year for two extra minor uses or something like that -- or direct us as to where we could figure that out?

MR. JONES: I don't believe -- we have, certainly, increased our registration of new uses, but we have not -- I don't believe -- tried to do an evaluation of -- have we, Anne?

ANNE: We haven't done it yet.

MR. JONES: Okay.

MR. VROOM: Okay.

ANNE: (Inaudible) -- one of the --

MR. VROOM: Okay, but one of my fears is that the registrants have forgotten that that incentive is out there, perhaps.

ANNE: I think there may be some truth in that.

MR. VROOM: Okay.

MR. WHITACRE: Could I make a comment on that, Jay?

MR. VROOM: Yeah.

MR. WHITACRE: Novartis hasn't forgotten it. You know, we spend a great deal of time trying to find out how to work those minor crops in. And, Jim, I think we've done a pretty good job.

We've deliberately done it, we've done it with a broad range of folks that kept us giving input -- some from outside the company.

And, frankly, I think it's something that was very smart on the part of the Agency, and it's a very great change from what was done five years ago.

And I think -- I can't speak across the board, you'll have to do that -- but I know from the standpoint of what would have happened had it not been there, Novartis has registered a number of minor crops, numbering in the dozens, that may not -- would otherwise have been -- come through at this point.

MS. MULKEY: Let me point out two factoids. One, Jay, if you look at this list, under status, you can see which ones are also reduced risk, just from this list.

MR. VROOM: Mm-hmm, right.

MS. MULKEY: And the others that Bob Holm (phonetic) told me today that in this year's research, our strategy for IR-4, they're up to 80 percent of the use chemical combinations they're working on are reduced risk.

So, that, then, is an overlap between the minor use priority and the reduced risk priorities. So, those are at

least two elements of this.

MR. VROOM: Great. My last, kind of, minor question here, you know, what Jim presented is you've referred to USDA, EPA vulnerable crop pest combination priority -- does that directly tie to the crops at risk list that USDA talked to us about earlier?

MR. JONES: Yes, that's exactly the link to that.

MR. VROOM: Okay, thanks.

MR. EHRMANN: Okay. Wally.

MR. EWART: First of all, I would like to compliment Jim on the table and also the information on the EUPs. It's extremely important for most minor crops in trying to move to new materials to know enough about them.

And, frequently, we've been put in the position where we don't know enough about them, and so, that's one of our concerns about EUPs.

And it really does jeopardize two things. One, both the active ingredient that is being used by a grower and also future active ingredients that are offered to him because if we get materials that are ineffective that are touted as alternatives based on the fact we don't have enough field knowledge, that hurts the ability in the future for

people to take risks to use a new material or a new system. So, that's really, you know, it's very important.

I think the other thing I was going to say was it is good that in the situation we have now we are finding these materials coming faster. We appreciate all the registrants moving them up and using the minor crops, as well as major crops, on the labels.

And that has presented us -- the problem that, you know, at last we're probably as fast as other parts of the world in getting these registrations -- that raises an international issue that Jean-Mari has touched on about Code X (phonetic) -- the fact that we can't get a Code X tolerance; therefore, we are stymied in our international markets.

And so, we have this barrier of when we have a new material, we look at it, and if it's not registered in Europe, if it's not registered under Code X, or the Code X tolerances are used in some of our primary markets in southeast Asia, we can't use the material since we export more than 35, 40 percent of out tree fruit crops.

And so, that's another part of the equation that you have to realize registration in the U.S. isn't the only

barrier to implementation of the new material.

MR. JONES: If there is a position in Rome that you're aware of, Wally, just send it my way, and I'll -- no, skip it, just teasing. Code X is in Rome, that's humor.

MS. MULKEY: Well, actually, there is, sort of, a non-joke answer. Steve may want to --

MR. JONES: We all -- we, like, Marcia was going to give the choke answer. Yeah, Wally and Jean-Mari, we're certainly aware of the, sort of, dilemma, which is, sort of, unique that our -- the speed at which we're now registering these compounds has now created an international scene that they're not able to keep up with our pace.

I hope this is recorded for everyone, but it is an issue, and it's also -- and I think as was described earlier, it also creates the issue of when we take a tolerance off the books, there are also some, you know, the Code X implications, as well.

We are working on a number of fronts to try to come up to address that issue. There is a concept that's being discussed and floated, which you all are, I think, very well aware of. But the concept of an interim MRL, and that is just one approach that may afford an opportunity.

There is actually a meeting next week, and a number of these options are going to be discussed. And we're certainly trying to look at, you know, what's a way of addressing it?

And so, the interim MRL is one that has been suggested. There may be some other ways, too.

MS. MULKEY: We may be able soon to give a more comprehensive report about some of the other efforts we have underway involving technical work sharing, and information sharing, and just a range of things that we're trying to do that are both short and longer term to try to address this.

UNIDENTIFIED MALE: Or you could always slow it down over there in Jim's shop. That would solve the problem.

MR. EHRMANN: Dave.

MR. WHITACRE: Jim, kudos for the thought and approach to dealing with EUPs. It may not be a gigantic thing, but I think it can be helpful in some areas.

But I wanted to mention, also, a sibling issue and one that suffers from the same reality, which is too few resources available to do these detailed tolerance reviews. And that is with the time-limited tolerances that were

cleared before FQPA or shortly after.

And from time to time, we get into difficulty with those. They expire. It puts the grower at risk. We stop selling. And it may need some similar mouth-to-mouth resuscitation. And I know the resources are short, but I just mention it because it can be important.

MR. EHRMANN: Okay, Jean-Mari.

MS. PELTIER: Just a quick follow-up point on the Code X issue. Just of those that are alternatives to OPs that are registered for the citrus industry, Spinosad still doesn't fully, I believe, have a Code X MRL for citrus.

Imidacloprid won't even be considered -- start to get into the process until Year 2001. Buprofrizen (phonetic), another material that we're looking at as an alternative to OPs, has a Code X MRL only on oranges. And Acetamiprid, I don't know, I'm not familiar with that material.

But, so, of those, those are ones right now at this point that we are running into a certain degree of vulnerability because we're shipping them into international markets without an existing international MRL.

The Fruit and Vegetable Agricultural Technical

Advisory Committee on Trade two weeks ago met and endorsed this concept of creation of an interim MRL process based on a national review. So, that is progressing.

I would like to raise one other question, though, for Jim. In the evolution of this priority list, I think this -- it's a very good idea that you moved alternatives to OP up the list, but I would suggest that at maybe at this point, we need to start thinking also in terms of B-2 carcinogens -- alternatives to carcinogens because the next step down the road and the place that we're really looking is in this area of post-harvest disease control.

And how we get through this process of working with the registrants to not be afraid to get a product registered that's used post-harvest, you know, it's a real dilemma. It's not an area where there is a lot of money. It tends to be an -- in fruits and vegetable crops -- it tends to be an area where risk -- (inaudible) -- gets used.

And it's an area where we're looking at real problems because, once again, as Sarah pointed out, as I talked about earlier, a lot of these materials are up for review, not only here at EPA, but at -- in California by OWEHA (phonetic) and internationally.

So, we're looking for alternative post-harvest disease control materials, and I think we've got real problems looming there.

MR. EHRMANN: Thanks. Okay, any other comments on any aspect of the -- yeah, yeah, go ahead, Al.

MR. JENNINGS: To those who don't know him, I would like to introduce Bob Holm (phonetic), the head of our IR-4 Program just to say a couple words about the registration process from his perspective.

MR. HOLM: Well, we appreciate the opportunity to be here. I'm executive director of the IR-4 Program headquartered at Rutgers University in New Jersey.

And those of you that don't know it, we're the partnership program between the USDA and the land grant system to register crop protection solutions on minor crops.

And, basically, what you normally talk about minor crops are fruits and vegetables, and we really say about everything except corn, and soybeans, and cotton, and small grains. So, basically, a lot of the FQPA issues that we've been discussing.

We've taken the initiative the last five years as part of our strategic plan to shift away from what we call

the FIFRA 88 response to re-registering older products to looking at the newer chemistries in the pipeline.

And we've done this several ways. We've gone to registrants like Novartis and the other companies and asked them to partner with us at an early stage and develop minor crop strategies on their compounds so that -- and doing them at the same time as major crops.

So, we're -- maybe we're part of the problem in getting the registrants encouraged to do this and using our parties at the EPA to help support those.

And as Marcia said, we've gone from 13 percent of our projects that we reduced risk in 1996 to 80 percent this year. So, we've done about an 180-degree turn.

The other thing we've done that we're very proud of -- and Jim can take a lot of credit for -- is what we call the EPA IR-4 Technical Working Group.

And we meet quarterly with Jim, and the Registration Division, and Margaret Stasikowski and her folks in the Health Effects Division to see how we can more effectively and efficiently register these crop protection tools on minor crops.

And our pre-FQPA average on clearances between '84

and '96 was 100 per year. We got 313 last year. We're over 200 this year, and we hope to break 300 this last quarter with Jim's group.

And we've done this because we've been creative in the way we've been dealing with the Agency. We've been up-front in the projects we're working on. We work with them on the selection of petitions that we put together. We've done some things like summaries on our petitions that have aided in the review process.

We've created some different initiatives like products with Spinosad on super crop groupings to use surrogate data between crops to get crop grouping registrations.

And the tangible part of that was in the Federal Register January 12 of this year where 165 Spinosad clearances were granted by the EPA.

So, we're really very proud of the initiative. Marcia on down, have supported it, and we really appreciate the openness of the Agency to work with us in a very much of a partnership environment to get these new tools registered.

Obviously, it's one thing to register them. It's another thing, as people have been pointing out, is to how to

integrate those into systems. And, obviously, that's part of the PMS plans.

But we feel, first, you have to have the tool and have it registered and then the determination on its uses is up to the community.

But we appreciate all the support that we get from this group and, certainly, from our funding parent, and appreciate Secretary Rominger mentioning our important role. And we certainly look forward to continuing to participate in this process in the next few years.

MR. EHRMANN: Okay, I think -- any other comments on transition issues or strategy issues? I think this has been a rich conversation with a lot of good perspectives and some seeds laid for future discussion by the committee.

Let me turn to Assistant Secretary Rominger for some -- for his closing remarks since, again, he is going to have to leave us in a few minutes.

MR. ROMINGER: Thanks, John. Well, I think we have had some good presentations on the crop profiles and the pest management strategic plans. And we had some good questions and some good suggestions, though, that as we move forward on these, we'll be able to do an even better job in the

preparation and the working on those plans.

The questions were asked on how these are used, and what are the goals for the plans? So, I will give you my perspective, I guess, and I think a lot of it has already been mentioned.

But, certainly, a big part of the benefit is getting the grower community, the researchers, the agencies, and any others who are interested sitting down and talking about their crop, and what they're using now, and what their challenges are, what their problems are, what they're facing.

And then working together in assessing what the alternatives are and pointing out the research needs. Right off the bat, they come up with a list of research needs.

But I think as a consequence of looking at the pesticides they're using and possible cultural practices, other possibilities, they are looking at the whole system more than many -- maybe many of them have before. And maybe some of them for the first time are seeing the possibilities for other alternatives, whether it's bio-controlled or whatever it might be.

But they also come up to then what are the new registrations that might help solve some of their challenges?

So, but, basically, their information -- they provide information that's necessary for making better risk management decisions for better transition strategies. They're not the whole picture, as Paul pointed out. There is a lot of other information that goes into making those decisions, but these are critical needs, critical information that goes into making a much better risk assessment by the agencies.

So, that's how I see these plans -- the benefits of these plans. I think they're just really a quantum leap forward in what we're able to provide.

I would just -- I would add that we've heard your concerns around the table on issues that you think need more attention by CARAT, by the Agency and the Department.

We talked a little bit at lunchtime and since then about what might be some of the options, but we're waiting to hear your discussion on how you think these could best be handled, whether we're talking about work groups or talking about a session like you had yesterday before the next CARAT meeting.

So, there are, you know, there are some ways that

we can, I think, address the concerns that you're talking about. And by the time you finish your discussion, I think we'll have some -- the rest of the folks here will have some ideas on where we go from here, and we'll be working out those then to get details.

But for myself, thank you all for -- those of you who are veterans -- for coming back again. And for you new folks, welcome and thanks for all the time and effort that you're about to put in on these efforts.

MR. AMADOR: John --

MR. EHRMANN: Yes?

MR. AMADOR: And thank you, Mr. Secretary, for the intricacies of taking this process. I mean, the continuity you bring to it, the interest you express, and the knowledge that you have is a tremendous asset. So, we thank you.

MR. ROMINGER: Thank you.

MR. EHRMANN: Let me suggest that we take a 10-minute break, and then we'll come back with the public participation presentation and discussion of next steps, public comment.

MS. BAKER: John, can I say one --

MR. EHRMANN: Oh, yeah, sure.

MS. BAKER: I'm sorry, I have to leave in a few minutes.

MR. EHRMANN: Okay.

MS. BAKER: And before these folks get away, the public participation process discussion is next. And one of the things I wanted to do was commend EPA for the two -- at least the two technical briefings that we were personally involved with that were held outside of Washington, DC.

I know those took a lot of resources on the part of the Agency. I think they were extremely effective. They allowed people who aren't in Washington, DC, who have a lot of input into what goes on in terms of how these products are used, and the impacts of what happens, and what risk mitigation should go forward.

And I just didn't want to get out of here without making sure that I made the point that I think those were very valuable -- not only to the stakeholders who use it, but the California Department of Pesticide Regulation advertised the one that we held in Sacramento. I know EPA Region 9 also advertised that.

And so, in addition to just having the growers there who were impacted by these two particular products that

were discussed in Sacramento, there was also an opportunity for farm workers and other activist groups to come to a place where they typically couldn't get to Washington, DC.

So, I think that's an important part to keep in the process, to continue to try to outreach to those people who can't get here all the time. So, thank you.

MR. EHRMANN: Thank you. Okay, a 10-minute break. We'll ring the bell.

(Whereupon, there was a brief pause in the proceedings.)

(END OF TAPE)

MR. EHRMANN: Friday at 4:00, the crowd is thinning. We'll find out who the real --

UNIDENTIFIED MALE: Who really wants to talk about FQPA.

MR. EHRMANN: Okay, why don't we go ahead and get started? We do have a number of folks who -- given the Friday afternoon of this -- need to -- either have already had to or will be soon having to head out.

Let me turn to -- I know Jay is one of those people, so I'm going to give him a moment to make a couple comments before he has to leave; and then turn to Lois for

the introductory comments on the public participation process. Jay.

MR. VROOM: Thanks, John. It seems like there is no one directly representative of the turf and ornamental industry at this table, and I know you've done a terrific job of limiting and trying to get balance here.

But some way, we might -- just as a footnote -- think about how we could keep their interests represented. I think that would be helpful.

I wanted to go back -- I guess it was before lunch, Bill Lovelace's remarks and Deputy Administrator McCabe's response. And I would maybe just offer the suggestion that I think both of them are right -- could be right, and I believe are correct in that there -- I mean, honestly, we all know there are politics associated with pesticides. I mean, they're just inextricably linked.

But at the end of the day, you know, I respect where Mike is coming from in terms of the decisions are made in the context of the best available science.

But we all know that timing and process do get shoved back and forth around, you know, political considerations. And timing oftentimes is as important as the

substance of the decisions.

And so, back to my offer earlier to help assist with a work group that might try to get the facts laid out as we would analyze fairly, and openly, and transparently the first three OP decisions in the context of the science policies that are evolving and are those that are resolved and the SAP policy inputs.

There is a lot of good things happening, a lot of open-ended issues, and I would hope that some kind of a matrix approach where in a smaller work group kind of setting we could get a lot of that on the table -- could help us all better understand what kinds of precedence have been established -- either with intent or inadvertently -- and which issues remain open and evolving.

And, you know, I'm always reminded that we should all be careful what we wish for, but the investment of time that we make in these processes, I think, have been very, very rewarding and valuable. So, thanks.

MR. EHRMANN: Okay, Bob, comment?

MR. VROOM: I just wanted to maybe go back to what I had said earlier and apologize to some extent for a little bit of an outburst. I just want you to know that I spoke

with Steve and Jim during the break, and they provided a satisfactory explanation. And I wanted you all to know that from my point of view, the matter is closed.

MR. EHRMANN: Thanks. Okay, Lois, why don't we go to the presentation, and then we'll have discussion on the public participation process?

MS. ROSSI: Okay. As many of you know, EPA and USDA has been using a pilot process now for the OPs -- going through tolerance reassessment and re-registration for 22 months.

For those new to CARAT, or those who have been -- were on TRAC, and for those of you who are familiar with the OPs, and those who may not be as familiar with the OPs, the pilot process was a six-phase process that EPA and USDA tested on the OPs.

Tab 15 in your notebook gives you the printout on where these OPs are in the six-phase process, and it's also available on the Internet.

It was developed in conjunction with the TRAC and focused on increasing transparency of our risk assessment and risk management documents and our decision-making processes and enhancing the public's opportunity to participate

throughout the process.

The phases alternate between EPA phases, public phases, and a registrant phase. Phase I was a registrant phase where they actually get to review the risk assessment for errors.

Phase II, the Agency looked at the errors and corrected them before the Phase III, which is the first time a preliminary -- and, now, even preliminary is a thing of -- a term of the past. The risk assessment gets posted on the Internet for a 60-day public comment period, and that's announced in the Federal Register.

Phase IV is the phase that the Agency and USDA use to look at the comments that were received on the risk assessment and make revisions and refinements.

The fifth phase was actually the release of revised or refined risk assessments and related documents to the public, and it initiated another 60-day public participation period focused on risk management. For many chemicals, that phase was kicked off with a technical briefing.

Risk management comments and ideas during this phase were usually received by EPA during meetings and conference calls, as opposed to written submissions through

the docket. Minutes of meetings and conference calls were recorded and are placed in the public docket.

And the final phase, VI, is when EPA develops the risk management actions and announces the decision in what is being called an Interim Re-registration Eligibility Decision Document, or an interim reg, or the acronym, even, is IREDD.

I believe in the last 22 months -- almost two years, it will be two years in August -- we have made an enormous amount of progress on the OPs through this pilot process.

To date, we have released to the public for comment preliminary risk assessments for 38 OPs -- that's the risk assessment that was announced in a Phase III -- and refined complex risk assessments for 27 OPs.

So, all together, a total of 65 risk assessments were released -- those are not -- some have -- some chemicals have two -- a refined and a preliminary -- in 22 months.

We have held 16 technical briefings and five stakeholder meetings. And as Cindy Baker mentioned before she left, we even did some of these around the country, namely, in Sacramento and in Pasco, Washington. And we did a stakeholder meeting in Tifton, Georgia, on Acephate. We did

one in Orlando on Ethion, and we did technical briefings on the mosquito sides in Orlando, also.

We have in our process one OP still in Phase II, where we're looking at the comments. Two in Phase III, three in Phase IV, five -- four in Phase V, and 23 that are currently in Phase VI -- 23 that we are looking at making risk management decisions right now.

And five decisions we have issued, or at least one was recently signed. Bensulide, Cadusafos, Chlorethoxyfos, and Sulfotepp were decisions that were issued, and Profenofos was assigned last week.

These are posted on -- three of them are posted on the Internet right now -- Bensulide, Cadusafos, and Chlorethoxyfos.

We have also had a number of conference calls that we have participated in, as well as we have initiated in. USDA has organized many conference calls on the OPs and even the non-Ops, and we've been doing that for the last 10 months.

And on the five decisions that we have issued, we have had closure conference calls where we have had a full range of stakeholders participate in those closure conference

calls. They basically announce the risk management decision prior to the document actually getting signed.

We have had to as a program grapple and take on many difficult science issues. We've had to invent internal processes, and the expanded stakeholder access to our risk assessment documents has been accomplished through our Internet website.

At the last TRAC meeting that was held in October, EPA and USDA proposed a modified public participation process that would replace the pilot being used for the OPs.

We approached the TRAC with a proposal because the pilot process had been tested by that time for over a year, and it was time to take steps to adopt the final process.

We proposed to shorten the overall process and include several stakeholder participation enhancements. EPA and USDA proposed these changes based on our experiences with the pilot.

The process received mixed reviews from the TRAC and other stakeholders we spoke to, so EPA and USDA developed a new proposal after considering all comments and our own thoughts about our experience with the OP pilot process. It is this redesigned process that we proposed in a Federal

Register on March 15 of this year. The proposed public participation process puts together the pilot -- public participation process and the modified process that we proposed to TRAC. It retained the six phases and much of the structure of the pilot process and incorporates considerable enhancements to public participation, including that we would apply this process to all chemicals going through re-registration and tolerance reassessment.

Specifically, four points that it concentrated on were increasing the communication with stakeholders prior to initiation of the process, more up-front work to assure that any risk assessments that were done were based on the best available data.

The addition of conference calls and meetings with stakeholders throughout the process, of course, which would be docketed.

The lengthening of the public participation phase, and the release of risk management proposals to the public at the beginning of Phase V. Typically, in the pilot process, Phase V was just the risk assessment and did not include risk management proposals.

A special emphasis again was placed on activities

that would take place prior to Phase I before the start of the process to ensure that we had the most complete and accurate set of information available.

The process also emphasized the involvement of other federal government agencies besides USDA, such as HHS. EPA has extended itself to include them in the process.

We have had several conference calls with the Center for Disease Control about chemicals of interest to them, as well as we had a meeting with them in Atlanta several months ago.

In the proposal that we had in the Federal Register, we asked if the process should be used beyond the tolerance reassessment and re-registration for organophosphates and be applied to all pesticides.

The proposal also makes it clear that EPA will continue to use risk management decisions on certain uses of a pesticide at any time before or during the public participation process if such an action is warranted by high risk levels identified in the risk assessments.

While EPA may exercise this authority at any time during this process, the Agency makes -- will make efforts to keep affected stakeholders and other federal government

agencies well informed and involved in the decision-making process through meetings and conference calls, as appropriate.

The comment period on the process closed on May 15. There was a slight extension given. We received about 15 comments from a diverse range of -- representing a diverse range of opinions.

Many commenters from all stakeholder groups voiced support for the following items -- increased and enhanced EPA, USDA activities in the months prior to the start of the process, including stakeholder meetings and conference calls; and releasing to the public general pesticide use and usage descriptions and the schedule of the pesticides entering the process; and discussions with pesticide registrants and stakeholders about the submission of data and the data submission schedule.

Secondly, there was a lot of support expressed for the technical briefings and the stakeholder meetings. Third, there was support for the release of risk management proposals for the -- in the public comment period in Phase V. And, lastly, the enhanced public role for USDA and HSS.

In addition, there was general support for using a

public participation process for all pesticides scheduled for tolerance reassessment and re-registration.

We did receive opposing views on several topics. For example, some expressed wanting a longer public comment period, while others did not.

Some supported allowing registrants an opportunity to identify errors in the risk assessments in the beginning of the process, while others strongly opposed it.

And, in fact, there were strong positions voiced about how the whole process was too short, while others claimed the whole process was too long.

From these comments, we believe that the six-phase process we proposed is basically on the right track, and we're in the process of finalizing that Federal Register notice.

The last part of the notice also proposed that we use -- proposed an interim process that could be used for non-OPs right away for those scheduled for the tolerance reassessment and re-registration development in 2000 and possibly even in 2001.

The interim process was proposed so EPA could meet its regulatory schedule for tolerance reassessment and re-

registration and, yet, maintain some public participation process and transparent process.

The interim process is a condensed version of the OP pilot process and parallels the pilot in principle and extends the pilot's significant benefits because it adheres to the goal of transparency by releasing risk assessments and risk management documents to the public docket and the Internet website.

And the first -- the non-OPs that we're doing this summer in the re-registration program, the risk assessments on the chemicals, Trialate (phonetic), Terazol (phonetic), and Oxyemil (phonetic) are scheduled to be posted next week as part of this interim process for non-OPs.

It also adheres to the goal of increased stakeholder consultations by offering significant opportunities for stakeholder input, especially through meetings and conference calls.

While there is no formal public comment period being proposed on these chemicals, the Agency will accept comments on the risk assessments and commits to looking at ones that -- and considering ones that are submitted within the first 30 days after the posting.

And, of course, the re-registration eligibility decisions that will be issued on these pesticides will have the normal public comment period.

In closing today, I feel that we've learned a lot from our experience with the OP pilot process over the last two years. The process has provided a framework for stakeholder participation and a chance for all to be involved and participate.

We learned that an open, transparent process has benefits to the Agency's decision-making process. And EPA, together with USDA, has taken many steps to make transparency a real thing.

The process was documented -- a process with documented phases alone gives some degree of predictability in the process the Agency will use to make these decisions and allows for participation.

There were transaction costs on all stakeholders' parts. I mean, there has been a lot of energy expended on the part of stakeholders to read these assessments and comment on them, as well as on the part of the Agency and the Department.

In our documents in order to be transparent and

have people have an understanding of the assessments so that they can fully participate in risk management, we realized that our documents needed to be clearer and easily understood.

We have performed -- we have provided summaries, overviews, charts, tables, graphs, technical briefings to assure a common understanding of the assessment.

The public meetings, the many technical briefings that, by the way, we did all of those meetings in the course of a year. The first one we had was May 19 of last year, and it was Azinphos methyl.

So, the 16 technical briefings, in addition to the five stakeholder meetings were held within a year -- and the conference calls and numerous meetings that are docketed.

We have also had, on occasion, meetings where various stakeholders have come together to discuss a chemical, rather than meetings with just, maybe, where one stakeholder group is represented.

And the posting of the status of the OPs on the website assures that people will know where the OPs are in the process.

We are actively, again, working on Phase VI of the

risk management on 21 OPs right now. We're working and consulting with USDA, and commodity groups, and other stakeholders on risk management decisions, particularly to address non-dietary risks as these chemicals go through the re-registration and tolerance reassessment process. And that is -- those are my remarks.

MR. EHRMANN: Okay, comments, questions. Steve.

MR. RUTZ: Wait a minute, got the wrong one there.

MR. EHRMANN: That's all right, you're still Steve.

MR. RUTZ: I just promoted myself, how wonderful. Lois, first of all, I would really like to thank you and your staff for the visits to Florida and all the wonderful information you've provided us.

One thing that, sort of, comes to mind in listening to what has been said today is did the state lead agencies for pesticides regulation, sort of, serve as the Agency's foot soldiers when it comes to enforcement?

And one particular concern I have is when the Agency, for whatever reason, determines that it's necessary to truncate the process and eliminate some of those public participation steps and implement some sort of mitigation to

deal with whatever the risk issues are.

That the states -- at least in the instances we've had so far -- have been, sort of, out of the loop, but we're faced with figuring out, you know, the enforcement issues, and channels of trade, and existing stocks, and some of these other things, sort of, after the fact.

And I would just like to see or hear if the Agency has any particular thoughts about how we might address that.

MS. ROSSI: Well, actually, as recently -- I think we have heard that comment and are sensitized to it. And as recently as even I think today, we have -- are contemplating having conference calls on some of our decisions with states and making sure states know about the conference calls that we do have. And that might be one way to incorporate that into the process.

MR. EHRMANN: Okay. You have a comment, Marcia?

MS. MULKEY: I might add, it is very difficult to figure out exactly when a matter is ripe enough for us to talk about it because your interest is at a very high level of detail, as you know.

You know, we go in, you're going to deal with the issue this way or that way, and even what the options are.

Often, the time between when we know enough about that to talk meaningfully about that, and when the matter is concluded can be very short.

So, we struggle. We actually had discussions in connection with Chlorpyrifos about how best to engage in that discussion and when to do it.

And we, obviously, have not found a perfect answer. I can only share with you that it's not as if we're blissfully unaware. It's more difficult than that.

MR. RUTZ: But we would like to continue to work on that, if we could.

MS. MULKEY: We would, too.

MR. EHRMANN: Okay, Rob.

MR. HEDBERG: I would just like to say that I think one of the biggest things and best things that came out of the TRAC process was the public participation and the openness that everybody gained from all of the efforts you put into making the process available and accessible.

I realize there are a lot of costs involved with it, but I also think, as a comment, that the decisions did move along fairly quickly if you look at how long it takes the public participation process from some of the land

management agencies on some of their decisions. So, I think it is an efficient process now.

I did want to ask a question relative to the three T products you mentioned that are -- am I correct that you are going to use an interim process for some products this summer until the rule is final?

MS. ROSSI: Yes, yes, the -- for the non-OPs, we're using an interim process this summer.

MR. HEDBERG: Is there a list of the products which would be under this process available?

MS. ROSSI: We published recently a status report on pesticide re-registration. And in that, it lists the candidates.

Now, as far as the ones that we're actively working on right now that we do believe we'll be able to make a decision this summer on, it's -- of those candidates, it's Trialate, Terazol, Molinate (phonetic), possibly Vencoslin (phonetic), Oxyemil, and Propargite (phonetic).

And those are -- like I said, three of those are getting posted, I think, June 28.

MR. JENNINGS: And if I might add, we've had conference calls on, I think, all of those, haven't we, Lois?

MS. ROSSI: Yes.

MR. JENNINGS: Involving the user community?

MS. ROSSI: I'm not -- I don't think we've participated in all of them. You've had them, though, yeah.

MR. JENNINGS: Okay.

MR. HEDBERG: Good. I guess my major concern is there are a number of major herbicides that could conceivably come under this interim process. And I would say that we would like to make sure that we have full opportunity for a full process with any of the major products.

So with that said, are there -- do you anticipate any major herbicides coming in before the process is finalized?

MS. ROSSI: Well, I think the process will -- the interim process on the non-OPs may continue for a while just so that we can keep on our re-registration tolerance reassessment schedule.

But at some point, we will be able to phase in the six -- I mean, we have to finalize the process first -- it hasn't even been finalized -- and then begin to phase it in to the extent that we can.

The balance is between keeping a production schedule of making some decisions and trying to have a public participation process.

MR. JENNINGS: And, Rob, we will add you to the list for any herbicides that are coming up that we're going to have conference calls to talk about risk and mitigation, those sorts of things. But we'll add you to our list to routinely notify.

MR. HEDBERG: Yeah, I think, you know, any of the scientific societies -- whether it's Vital Path (phonetic) Society or entomology -- should also be added if -- for the respective -- (inaudible).

MS. ROSSI: I mean, generally, the way we're following it is the carbamates are coming up next. Several of these ones that I mentioned are carbamates, and the carcinogens -- the B-2 carcinogens are coming up next.

So is classes according to our priority of perceived worst first or potential worst first, I should say. That's how it goes.

MR. HEDBERG: Mm-hmm. I guess I would encourage that, also, if there is something that is a major use -- these products you mentioned, at least to my mind, are

relatively minor use. But if there is something that becomes major, I think we really have to subject it to a full public participation process, even if the rule is not finalized.

MS. ROSSI: Mm-hmm.

MR. EHRMANN: Okay, Gabrielle, and then Wally.

MS. LUDWIG: I have to agree with what Rob just said, that the public participation process -- at least from my perspective as a grower representative -- is one of the best things that came out of TRAC. And I -- the amount of effort that Lois and her staff puts into it is rather mind-boggling.

My question to you, Lois -- I guess it's on a couple of levels. One is -- I have several questions -- one is what is the quality of the comments that you're getting? What would you like to see? What are you getting? What are you not getting? What works? What doesn't work, given that we are the ones submitting comments?

MS. ROSSI: Well, the quality actually ranges. I mean, we oftentimes have gotten -- and I've said this before, I think, in TRAC meetings or in speeches -- we've often got a lot of data real quick because of this process.

Data that allows us to refine risk assessments that gets more towards the right route of exposure, things like that.

So, we've got -- we get data in. And then I think, you know, under the general category of how these pesticides are used, what it's used on, the activities recently have been focused on activities in the field.

The whole worker risk has been a focus of a lot of these assessments because many of the individual OPs are, dietary-wise, are fitting into their risk; but there are worker risks, and there are ecological risks.

And because they're all in re-registration and not just tolerance reassessment, we are looking at worker and ecological risks.

So, use patterns, application methods, acreages treated -- all those types of things allow us to make the risk assessment more specific to that chemical rather than using default values.

MS. LUDWIG: And the other question I have is, how does -- when the comments come in, how do they get disseminated to HED or to EPHED (phonetic)?

MS. ROSSI: That's an internal secret. No, what

happens when the comments come in, is the chemical review manager, who is assigned to the chemical within the Special Review and Re-Registration Division, looks at them all, catalogs them, and lets us know, basically, what types of comments are coming in -- us being the management.

And then, they manage the team, basically, these chemical review managers. They manage the multi-disciplinary team or the toxicologists, the residue chemists, the -- (inaudible) -- chemists, the ecological scientists, and so on. And those comments then are given to the team to look at and to review.

MS. LUDWIG: Can I make a comment on that?

MS. ROSSI: Sure.

MS. LUDWIG: Because one -- and this actually goes at a larger issue that I do think it would be worthwhile to talk about the occupational risk assessments in public.

Lois has been trying very hard to do that, but in terms of providing comments, understanding that, and getting consistency.

But my other issue is one of I'm -- having reviewed various of these risk assessments, I'm not seeing always the same things in each risk assessment, especially on the

occupational side. And more frustrating is each time it's a different group of people that does it -- the compound.

And so, when you've explained, well, this is how we do it in almonds to this group of people, you turn around and you have to do it all over again.

And so, having been on several of these conference calls or these things, a lot of the same things get said over and over again.

And I'm just saying there is something there that I think a step back to get that more unified within that information flow somewhere better distributed across everybody who is involved with those risk assessments would be very useful.

And whether we do it here -- personally, I think that would be useful because I think that was the other big benefit of TRAC was going through that dietary risk assessment helped the Agency be much stronger and more coherent in where they stood on those issues. That's just a comment I wanted to say.

MS. ROSSI: I think that's a fair point. I think, you know, it's a function of the number of people, the number of chemicals. But as stuff becomes routine and information

becomes more standardized, I think you'll see that improving, too.

MR. EHRMANN: Okay, Wally, and then Ray, and Erik.

MR. EWART: I also would like to follow up with ditto comments on thanking Lois and all the people who spent the time going on the road to come to the agricultural areas. I think it was very valuable.

Unfortunately, it's very difficult to have growers understand what's going on in Washington, DC, even though we all understand, of course, what's going on here.

But, anyway, by bringing this technical briefing to the growers, I think it was very educational and gave them an awareness of the complexity of what everyone is dealing with and all, so it allowed them to discuss some of the things that they do.

The problem is always the problem that the theoretical, or the default, or the risk assessment doesn't jive with reality, and that gives a jarring blow to a grower's sense of security.

And so, to follow up on what Gabrielle said, there is the concern that when you have a review of one chemical, and we've actually had a chance to get input into correcting

some of the things that where assumptions made that weren't correct about the way we use chemicals.

You come to the next chemical, and we've got a different set of assumptions that are made are also aren't the correct ones, but it seems as if the process has to go through again.

I realize it's a different set of people and all that, but I think it would be valuable and save you time if there were some way of shepherding that information so that, you know, you've got three or four chemicals coming up, are the people doing those reviews aware of what just happened in the process for the last two or three?

And I think all of us would feel better, and that we don't feel like we have to go over that ground every time, but it seems like it's almost necessary.

And, so, that's one concern. And I realize that in the big picture, that's just another time resource, but I think you would get to much better information if you could do that.

MR. EHRMANN: Okay, Ray.

MR. MCALLISTER: Yes, I'm Ray McAllister, sitting in for Jay Vroom as the meeting winds down today. I would

like to make several comments about the public participation process.

Many of you will recall that in the summer of 1998 when this participation process was first proposed, that our industry was highly skeptical about it and very nervous.

But since then, I think we've come to realize some very great benefits from it -- from having the process open, explained to us, to our customers, to our allies. And I think it has brought a great deal of benefit in making the whole process more transparent.

We are concerned about some deviations from the pilot participation process that we've seen over the last year-and-a-half that have been perceived as unfair.

And I think, perhaps, the evaluation of the major decisions that have been made in the recent months, as suggested by Jay earlier today, might be a place to take a look at those and offer some more detailed comments.

Through our participation in the implementation working group, we've submitted detailed comments on the proposal for altering or revising the public participation process. I'm not going to repeat all of those, but just a couple of key highlights.

One concern is that telescoping the data submission and review into a relatively short time period that's defined by the public participation process can put quite a strain on all involved -- those who are preparing and submitting the data, as well as the agencies who must review it.

And we might want to look at a way of calling in that data very early in the process so that there is time to think about getting the right data available and time for the agency to review it thoroughly.

We're opposed to the interim public participation process. It lacks adequate comment -- public comment -- opportunity. We don't believe there should be -- there should have to be an interim process between the public -- or the pilot process and what becomes a final or more permanent process.

We believe that all compounds evaluated up until the time that a refined process is put in place should take advantage of the pilot public participation process.

And, finally, I think it's entirely appropriate -- and we would strongly urge the EPA and USDA -- bring a final draft of that public participation to this group for review in a subsequent meeting or possibly in a subcommittee or a

conference call meeting before that time.

MR. EHRMANN: Okay. Erik.

MR. OLSON: I had a question about, really, Phase VI, I guess, and what it means and perhaps focus mostly on worker risks for Azinphos methyl and Chlorpyrifos, both.

And I think for some other chemicals there have been significant worker risks identified that -- at least in our view -- haven't really been dealt with.

And I'm curious as to when we would expect some kind of final decisions on worker risk issues for some of these?

MS. ROSSI: On the decisions that -- on the five that I said we closed on -- those were addressed. You haven't seen them yet, but you will see that they were addressed when they're posted.

Azinphos and Methyl Parathion are still in Phase VI. We haven't issued final interim REDs on those. And we're again on schedule to try and do these by the end of the calendar year.

MR. OLSON: So, that would -- the interim RED would address the worker risk issue.

MS. ROSSI: It does.

MR. EHRMANN: Okay, any other comments for the Agency on this process? Thank you, Lois. I'm going to -- the next item on our agenda has to do with next steps and options for how the committee might meet in the future and function.

And what I would like to do is ask Mike McCabe, our co-chair, to share some thoughts about that and then have reactions to those to give us a starting place for that discussion.

MR. MCCABE: We have been talking -- Rich Rominger and everybody up here have been talking about what the next steps are. We've had some conversations with folks out in the hall.

And what we're currently thinking about is that a good time for the next session of CARAT would be in the early autumn, probably the first part of October -- to have a meeting then.

What we'll be doing is working to develop a specific agenda after we've had an opportunity to think about what we've heard today, to absorb some of the viewpoints that have been raised, and to look over the list that has come up in the last two days.

One approach that we are considering would involve a one-day work session on several of the specific reassessment and transition issues where you've identified a need for further discussion and further information that you need from the government.

This would be followed by a CARAT meeting the next day built around an appropriate agenda, and it could feature discussion of certain key focused issues that are important to you, important to the committee.

So, that would be the next CARAT meeting. In order to address the committee's interest and involvement in other critical reassessment issues and to involve CARAT and their participation in some key policy issues, we thought it would be useful to conduct a technical briefing workshop on cumulative risk assessment.

EPA expects to publish its proposed science policy on cumulative risk assessment next week, and that will begin a 60-day comment period. Now, what is the most effective and useful way of getting CARAT involved in that?

In July, I think, EPA can host a session to explain the proposed policy and answer questions about it. We would hope that this would assure full and robust public

participation in what is clearly a very important science policy issue.

This would be valuable, not only to EPA, but I think to the members of CARAT and the public in general. And what we will do is work with USDA to maximize the participation of CARAT members in that July workshop.

So, we will be rolling out more information about that. It can be -- it will be coming up pretty quickly, so we want to make sure that we get as much information to you as soon as possible.

In general terms, I think that it's important to note that in addition to cumulative risk workshop briefing, the next CARAT meeting, those formal activities that are part of CARAT -- it's important to remember that there are lots of opportunities existing and potential for your participation with EPA and USDA.

We want to hear you on the important issues you're raised. You make an important contribution, and we value that contribution.

As part of our follow-up to what we've heard today, we're going to make every effort to use the existing mechanisms like notice and comment procedures and other

advisory committees, as well as consider new means, new forums to provide opportunities for you to further engage, and comment, and contribute to discussion on a full range of the issues that have been identified.

I also think it's important not to forget -- as a number of you have illustrated through some comments and anecdotes -- that EPA and USDA welcome additional information and input from individuals and organizations at any point in the process.

We have heard from many of you. We have met with many of you on many of the issues that were discussed today, and we'll continue to do so.

This is not the only ability you have to contact EPA, to contact USDA. And we are not about to walk out of here and say goodbye, see you in October. We value your contribution, and we will continue to seek you out, as I'm sure you will continue to seek us out.

So, this is part of the process that we're engaged in. These are important issues. These are complex issues, and we need you, and you need us. So, we are going to certainly continue the relationships that we have built.

I throw the options out for next steps on the

October CARAT meeting -- the possibility of cumulative risk assessment briefing and the workshop that can come in July.

(END OF TAPE)

MR. EHRMANN: -- from USDA have some additional -- (inaudible) -- and then we could -- some activities that you were contemplating--

UNIDENTIFIED MALE: On top of --

MR. EHRMANN: No, you first. Who wants to talk? Grab the mike, somebody.

UNIDENTIFIED MALE: The boss leaves, and we don't know what to do. The boss discussed -- we discussed this with the boss. I would like to hear how before the next CARAT meeting we can get a smaller group together of interested people to give us some feedback and some guidance on where do we go with crop profiles and, perhaps more importantly, the pest management strategic planning effort?

Certainly, you've got a couple of documents there that we think are pretty much final, but we still certainly would appreciate any comments, advice, you know, for the next iteration. As these things evolve, what do we need to look at that's not there?

But I would like to get some exchange going on

those two items, certainly before fall -- October, September, November -- whenever that is. So, any ideas, advice you have on that, I would appreciate.

UNIDENTIFIED MALE: Let me just suggest a couple things. I think as far as the work on the pest management strategic plans, that a good time would probably let us get past this grant-making cycle so we can, sort of, have a post mortem on PMAP and Crops at Risk, and RAMP, and how those were managed by the Department through their review and selection process.

And also how plans where they were a component of a submission -- or the lack of them in some cases -- because it is a bit of a new concept in this whole process of how they came into play in helping to shape the decision-making process with the panels.

And I think most of that grant-making cycle should be done in July, correct?

MR. JENNINGS: Decisions will be made in a few weeks. Whether they will be announced, I don't know. Some delay between panels and actual announcement.

MR. EHRMANN: Comment?

UNIDENTIFIED MALE: Yeah, I wanted to comment from

FDA's perspective. There was a lot of concern about the channels of trade, guidance, and how we might -- how we are going to go about implementing the FQPA provisions on that.

I do want to emphasize that we have an FDA process, and it's imperative that comments come into the FDA process on channels of trade, and we very much want to hear what you think will work and won't work.

But I think we're even more anxious to hear solutions because we've beat our heads against this one, and there isn't a simple solution. And I like nice, neat mathematical solutions, and this one sure doesn't conform to that approach.

So, it's important that you get your comments into FDA's docket, into FDA's process. Thanks.

MR. EHRMANN: Thank you. David.

MR. WHITACRE: Mr. Deputy Administrator, I'm -- as you were talking, I was thinking in terms of the proposal about next steps.

I think the proposal to have a day meeting in which there is a interactive workshop or approach before the CARAT meeting can work if it's mainly an information download.

If there are things going on that really need to be

understood and a ramp built up to the next day, if, in fact -- and so, maybe for the next meeting that makes sense.

But in the TRAC meeting, we also -- or TRAC process, we also noted something else. That where there were -- what I will describe as thorny issues that had very strong views on either side that were being worked through, the workshop approach or the breakout group approach worked because people could spend more time.

And then there was a waiting period, perhaps, of a bit longer before the meeting, so things could, sort of, settle out, or steep, or whatever the right word is.

So, I'm not sure exactly what is on the agenda the next time, of course, and none of us know exactly. But, perhaps, that you could, sort of, let the format be dictated by what is going to be considered.

Just one thought -- the idea about a workshop for cumulative may be very good and a critical one. I think in some ways cumulative risk assessment is going to be the centerpiece of FQPA. It's going to be the toughest one, and it may not be sorted out for a long time. But a lot of work that has gone into it by a lot of people in this room and elsewhere, it would be a good thing to do.

But I think I would suggest something else, but before the implementation of whatever comes out of the post notice period, that maybe the next CARAT meeting could be set before that implementation begins.

The one final small comment -- the -- a good thing happened this time. Well in advance of the first CARAT meeting, there was a Federal Register notice that touched on some of the topics that was -- that were going to be covered. I thought that was a good thing, and I would suggest that you do it the next time.

In fact, I would suggest that you, sort of, expand -- not sort of -- expand on the probable constituents that would -- will go on the agenda or may go on the agenda. So, make a little bit longer list. We may talk about this, these are the general areas, so you're not pinned down, but let people think about, maybe, what is most important for that time.

I found that useful, I made some notes, and it was helpful. So, I would do that again. Thank you.

MR. EHRMANN: Okay, Bob did you have a comment? I'm sorry.

MR. ROSENBERG: Yeah. I was wondering -- the USDA

idea on putting together a -- (inaudible) -- maybe an offline workshop or briefing. I wondered whether the Agency wouldn't entertain the idea of a less formal workshop or briefing on non-dietary exposure?

And the reason I say that is there is a bunch of folks out there, people like golf course superintendents, and lawn care operators, and tree care guys, and a whole lot of other people who are not agriculture.

And I know it's not a core issue for a lot of folks here, but there hasn't been as much discussion publicly about those ranges -- that range of issues except for a couple of science policy papers that were highly technical, and some brief discussions that we've held in the TRAC process, and then probably the discussion that occurred in the Chlorpyrifos technical briefing.

There really hasn't been an opportunity for the, you know, the non-dietary exposure community to buy into this process or to try to understand it and, you know, for what it's worth -- you know, maybe I know as much as anybody, and I don't know much at all.

And there is a lot of folks out there that know little, and I think it would be something that would be

valuable to the Agency.

UNIDENTIFIED MALE: Bob, I think that's part of Mike's last statement -- that there is any number of other ways -- formal, informal, semi-formal -- that we try and do all of the things that it takes to do our job.

And I think in that spirit, obviously, some kind of public thing -- whatever that noun should be -- is appropriate.

I mean, the residential exposure task force probably has a dog in the fight and all the rest. And where are we now? Where are we going? Where are the assessments, as Lois, sort of, you know, dinged everything, but, okay, some of those are more residential or non-ag uses than others, and all that.

I think that's appropriate. So, I think it's just a matter of figuring out the best way to respond to your basic point, and we can do that, so --

MR. EHRMANN: Jamie.

MS. CLOVER-ADAMS: I would just ask for the sake of budgets that if you know you're going to have a meeting in October, that we set the date at least 30 days out so those of us who have to travel don't have to spend $1,200 on a

plane ticket.

And the other thing I wanted to comment, I liked the book, and I would appreciate getting that, also, in advance so that I have time to read it and think things through before I get here. I can provide better advice if I've had time to think things through. Thanks.

MR. EHRMANN: Yeah, both very good suggestions. Certainly on the first one, the dates will be set well in advance of the time frames that we dealt with -- had to deal with this time, given the formation of the new committee.

So, we'll do -- and I know the Agency and Department would do that -- and also in the materials. And appreciate the other feedback on the materials in terms of the format that was used. I think that will help give guidance for what should be prepared for the next meeting. Mark.

MR. WHALON: Actually, I have a comment for Eldon Ortman in his absence.

MR. EHRMANN: Okay.

MR. WHALON: And then I have a couple things I would like address. Eldon wanted me to speak to the PMSP documents, and his comments are these. First, he wanted to

say that PMSPs were discussed as if there were tactics and apparatus strategies on the shelf in all these cases for OP replacements.

And he agrees that in some cases they are there, but it's not true in all cases and, certainly, is not a generalizable statement that you can make broadly.

It's not a matter of substitution, i.e., plug-and-play. It's a matter of transition over a continuum. And I agree with him on this. You need to identify the potential tactics, and evaluate them, and demonstrate, and educate, and implement; and it takes a long time to do that.

So, his concern is, is that how can the land grant partners of the USDA in the process of implementation of these realize the capacity to serve its constituency in this process when the resources -- people, time, funds -- are declining and have declined?

Maybe that will be filled by the NGOs. Maybe it will be filled by Larry Elworth, but I doubt it.

So, that needs address, and that bridges into what I would like at some point in CARAT to address. And that is the unfunded mandate and the unintended consequences of this piece of legislation on the partners to EPA and USDA. Not

only on the commodities and land grants, but there is some shared in EPA regions, for example, or NGOs.

So, until we actually look at that -- and maybe this is where the appropriate economic assessment comes in -- I would like that on a document -- on the docket sometime. That's a crucial issue.

MR. EHRMANN: Yeah -- (inaudible).

MR. PITTS: Mark, we hear what you're saying. We've had a lot of discussion about the infrastructure issue, and we got into it a little bit with the pesticide applicator training program.

I think that that isn't going to be the be-all and end-all, obviously, but we do realize that on top of the program we've got in place now, we need to enhance that.

But PAT is an area that the Department has not given adequate attention to, and I think that, one, we see a little bit a ray of hope in our budget up on the Hill that we will see some funding there.

But I do think as far as trying to rebuild that capacity, that is going to be something the Department is very much focused on, and it should be reflected in our 2002 budget that we send out.

UNIDENTIFIED MALE: I just rejoin -- I think it's larger than that, Keith, and I know that you realize that. Someplace, at some time, we -- I mean, we are going to move ahead with these strategic plans for specific crops. Well, what about the strategic plans to back-fill for the transition?

MR. EHRMANN: Okay, Rob, and then Ray, and then we'll summarize. Yeah, Rob.

MR. HEDBERG: Just because I haven't heard it mentioned yet, I think that we might also want to consider a one-day work session or work something relative to the drinking water issues.

We've got four science policy papers expected in the near term, and I think they might not be as important as cumulative risk. But I think they're going to be some drivers of major decisions, and it would behoove us to discuss them in detail.

MR. EHRMANN: Okay, Ray.

MR. MCALLISTER: Earlier we suggested the formation of a work group to look at evaluation of the major OP decisions as one potential work group topic. And the pest management strategy plans, crop profiles mentioned by Al

might be another topic for a work group, and you haven't mentioned anything about formation of work groups. How do -- is that something you're considering, or how would we handle that?

MR. JENNINGS: It is something that we are considering. We'll look at some of the suggestions that have been made, and we'll be getting back in touch with you.

MR. EHRMANN: And I think there is, kind of, three methodologies, if you will, that I think the Agency and the Department are thinking about.

One is -- and these aren't in order of priority but just, kind of, working back from the meeting -- one is the kind of approach that was used yesterday and Dave referenced in terms of a day before sessions to educate, inform, brief.

Depending on the nature of the issue, that may make the most sense. It also, obviously, has some resource savings issues for both the Agency, the Department, and all of you in terms of the folks who are traveling.

And so, that's one kind of methodology. Second is the idea of workshops, briefings that, I think, the cumulative idea that Mike shared is -- would fit that model.

Where there is a key issue that the Department and

the Agency want to make sure that CARAT is both informed about and has an extra opportunity, if you will, to provide input into. And then the third is the possibility of some kind of work groups.

One thing we did -- we at Meridian did recommend to the Agency and the Department based on our assessment of TRAC was that there seemed to be a desire among a number of people to not have, quote, unquote -- and this doesn't mean this is the way it has to go but just to give you the sense -- that there was a -- folks were not as excited about the idea of standing work groups as they were around the idea of creating a group to deal with a specific issue, which I think is more, perhaps, in the context that Jay was suggesting for the item you mentioned.

So, I think those are all different options that the co-chairs would like to reserve the right to think about, and then we will get back to all of you in the near future with some kind of communication that lays out these dates for October meeting, kind of how these things are going to be proceed.

If there is going to be a workshop in July, obviously, get those dates to you as soon as possible so you

have the big picture of what is going to happen between now and then.

MR. JENNINGS: It's not only a content issue. It's a resource issue, too. And how it fits into the overall workload of the agencies and the resources that we have. And these are all good suggestions, they're all important, but we also have to put them in the context of everything else we've got to do.

MR. EHRMANN: Jean-Mari, comment? You need a mike there?

MS. PELTIER: I apologize for leaving the room, and if this has already been raised, let me apologize. But I do think there were at least one other subject that was raised that maybe would make sense to have as a discussion component or part of a workshop.

And that's the area of worker exposure and the worker risk analysis. I'm familiar with the way the California Department of Pesticide Regulation assesses that, but I think it has been something of a question mark for us and, once again, an area where we in the user community would like to be able to work collaboratively on reducing risks and coming up with mitigation strategies.

So, I think as a first shot, we need to understand more about how the Agency is using it, using default assumptions, the plans for use of the information from the Reentry Task Force, and some more of those detail kinds of things.

MR. EHRMANN: Okay. Let's go to -- well, we just have one person who has signed up for public comment. So, let me see if that person would like to make those comments, and then I'll turn it to Mike for closing thoughts.

Andy Amanis (phonetic) -- there he is. Just tell us who you are with, please, and --

MR. AMANIS: Good afternoon, I'll be brief. I'm Andy Amanis with Mocshugon (phonetic) North America. I'm speaking on behalf of the Chemical Producers Distributors Association, an association with over 90 members which supply crop protection compounds, homeowner products, copper products, and earth adjutants.

CPA views the CARAT process as going a long way to implement sound science, making the process transparent, and involving stakeholders, and providing transition strategies. We would urge that you include non-ag, as well.

As EPA moves forward on implementing the tolerance

risk assessments -- tolerance reassessment, we would suggest that it takes its time to involve and protect minor uses.

EPA is commended for providing CARAT a copy of its update on cancer guidelines. We would suggest that be added to CARAT's agenda so that it could be included in the tolerance reassessment process. Thank you.

MR. EHRMANN: Thank you. Anyone else wishing to make public comment? Okay, Mike, closing thoughts.

MR. MCCABE: I'm not going to take too much time because I know people are eager to get out. And for those of you who have stayed until the bitter end, thank you. Thank you for your contributions today and for your contributions in the future.

This is an important process for us. It's an important committee. Secretary Rominger and I both feel that it is something that is not only important to our agencies but important to us individually. That's why we are taking the time to not only spend today with you, but to commit to another meeting in the fairly near future.

And to ensure that our agencies hear you, that we make CARAT an important part of our process, that we integrate it into our process, and that we use it.

As I said earlier, these are complex issues. These are issues that have significant impacts, not only for the user community, for agriculture, for the public, but for the environment, in general. And we need the best minds. We need the best people that are in the field to help us with these decisions.

I, again, want to thank you for being here, for the investment that you've made, and that you will make, and I look forward to working with you in the future. Thanks.

MR. EHRMANN: Thank you very much. Travel safely. We'll be in touch.

UNIDENTIFIED FEMALE: May I ask one question? Is there a Charles Franklin (phonetic) in the room?

MR. EHRMANN: Charles Franklin in the room? But they know who he is.

UNIDENTIFIED FEMALE: He left his IRS letters here.

(Whereupon, the meeting was concluded.)

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