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**Transcript of Meeting
of the Committee to Advise on Reassessment and Transition**

October 11 and 12, 2000

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Waldorf, Maryland
(301)870-8025

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A T T E N D E E S4 MEMBERS OF CARAT:5 NameOrganization

6 John Ehrmann

Meridian Institute

7 Mike McCabe

Deputy Administrator, EPA

8 Jim Aidala

Environmental Protection Agency

9 Susan Wayland

Acting Assistant Administrator,

10

EPA

11 Steve Johnson

Deputy Assistant Administrator,

12

EPA

13 Marcia Mulkey

Director, Pesticide Program, EPA

14 Jim Jones

Director, Registration Division,

15

EPA

16 Lois Rossi

Director, Special Review and

17

Reregistration Division, EPA

18 Carolyn Brickey

National Campaign for Pesticide

19

Policy Reform

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1 Bob Rosenberg National Pest Management
2 Association
3 Ed Snetsinger White Earth Band, Minnesota
4 Olga Moya Environmental Law Professor
5 Rob Hedberg Weed Science Society of America

6

7

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

8

MEMBERS OF CARAT:

9

Name Organization

10

John Rigolizzo Michigan Farm Bureau

11

Eldon Ortman Agricultural Research, Purdue

12

University

13

Jose Amador Director, Texas A&M Research and

14

Extension Center

15

Dave Whitacre Novartis Crop Protection

16

Cindy Baker Gowan Company

17

Steve Balling Del Monte Foods

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Tanya Bobo Makhteshim-Aghan of North

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| | | |
|---|-------------------|--------------------------------|
| 1 | Dan Botts | Florida Fruit & Vegetable |
| 2 | | Association |
| 3 | Jean-Mari Peltier | California Citrus Quality |
| 4 | | Council |
| 5 | Mike Carter | Wisconsin Potato & Vegetable |
| 6 | | Growers Association |
| 7 | Lori Berger | California Minor Crops Council |
| 8 | Mark Whalon | Michigan State University. |
| 9 | Mark Miller | American Academy of Pediatrics |

10

11 **A T T E N D E E S (Cont'd)**12 MEMBERS OF CARAT:

| | | |
|----|---------------|----------------------------------|
| 13 | <u>Name</u> | <u>Organization</u> |
| 14 | Robin Spitko | National Alliance of Independent |
| 15 | | Crop Consultants |
| 16 | Wally Ewart | Northwest Horticulture Council |
| 17 | Robert Kiefer | Chemical Specialties |
| 18 | | Manufacturers Association |
| 19 | Steve Rutz | Florida Department of |

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1 Agriculture and Consumer
2 Services
3 Paul Helliker Director, California Department
4 of Pesticide Regulation
5 Sarah Lynch World Wildlife Fund
6 Bill Lovelady National Cotton Council
7 Cliff Ohmart Lodi-Woodbridge Winegrape
8 Commission
9 Jay Vroom American Crop Protection
10 Association
11 Mike McGeehin Centers for Disease Control and
12 Prevention
13 Al Jennings USDA

14
15 **A T T E N D E E S (Cont'd)**

16 MEMBERS OF CARAT:

| 17 <u>Name</u> | <u>Organization</u> |
|------------------------|--------------------------------|
| 18 Terry Troxell | FDA Center for Food Safety and |
| 19 | Applied Nutrition |

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1 Therese Murtaugh Office of Pest Management
2 Policy, USDA
3 Richard Rominger Deputy Secretary, USDA
4 Valerie Wilson Tulane Center for Environmental
5 Research
6 Shelley Davis Farmworker Justice Fund
7 George Wichterman Lee County Mosquito Control
8 District
9 Erik Olson NRDC

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DAY ONE

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1 OCTOBER 11, 2000

2 P R O C E E D I N G S

3 - - - - -

4 MR. EHRMANN: I would like to welcome you to this
5 session of the Committee to Advise on Reassessment &
6 Transition, which is a subcommittee of the EPA NACEPT
7 Committee operating under the rules of the Federal Advisory
8 Committee Act. And I'll talk in a few minutes about a couple
9 of those procedures which we will follow today in terms of
10 public comment, etc.

11 I'm John Ehrmann from Meridian Institute and
12 service facilitator for the Committee. And what I would like
13 to do first is ask the Committee members who are at the table
14 to introduce yourself. If you're here as an alternate for a
15 formal member of the Committee, please identify the primary
16 member as well as yourself, so we can orient everyone to who
17 is represented around the table.

18 After we do the introductions, then I'll turn to
19 the co-chairs for some opening comments. Then I'll make a

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1 few comments myself about the agenda and how we want to
2 proceed over the next day and a half.

3 And with that, let me turn to Mr. McCabe to just go
4 around with introductions.

5 MR. MCCABE: Hi. I'm Mike McCabe, Deputy
6 Administrator, Environmental Protection Agency.

7 MR. AIDALA: Jim Aidala from the Environmental
8 Protection Agency.

9 MS. WAYLAND: Susan Wayland, Acting Assistant
10 Administrator, EPA.

11 MR. JOHNSON: Steve Johnson, Deputy Assistant
12 Administrator, EPA.

13 MS. MULKEY: Marcia Mulkey, Director of the
14 Pesticide Program, EPA.

15 MR. JONES: Jim Jones, the Director of the
16 Registration Division, EPA.

17 MS. ROSSI: Lois Rossi, Director of the Special
18 Review and Reregistration Division, EPA.

19 MS. BRICKEY: Carolyn Brickey, National Campaign

1 for Pesticide Policy Reform.

2 MR. ROSENBERG: Bob Rosenberg, National Pest
3 Management Association.

4 MR. SNETSINGER: Ed Snetsinger from the White Earth
5 Band, Minnesota.

6 MS. MOYA: Olga Moya, Environmental Law Professor.

7 MR. HEDBERG: Rob Hedberg, Weed Science Society of
8 America.

9 MR. RIGOLIZZO: John Rigolizzo, representing Jack
10 Laurie from the Farm Bureau.

11 MR. ORTMAN: Eldon Ortman, Agricultural Research.

12 DR. AMADOR: Jose Amador, Director, Texas A&M
13 Research and Extension Center, Weslaco, Texas.

14 MR. WHITACRE: Dave Whitacre, Novartis Crop
15 Protection.

16 MS. BAKER: Cindy Baker, Gowan Company.

17 DR. BALLING: Steve Balling, Del Monte Foods.

18 MS. BOBO: Tanya Bobo, Makhteshim-Aghan of North
19 America, Inc.

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1 MR. BOTTS: Dan Botts, Florida Fruit & Vegetable
2 Association.

3 MS. PELTIER: Jean-Mari Peltier, California Citrus
4 Quality Council.

5 MR. CARTER: Mike Carter from the Wisconsin Potato
6 & Vegetable Growers Association. I am here as an alternate
7 for John Wallendal, who is a potato producer in Wisconsin.

8 DR. BERGER: Lori Berger, California Minor Crops
9 Council.

10 MR. WHALON: Mark Whalon, Michigan State
11 University.

12 DR. SPITKO: Robin Spitko, National Alliance of
13 Independent Crop Consultants.

14 DR. EWART: Wally Ewart, Northwest Horticulture
15 Council.

16 MR. MILLER: Mark Miller, American Academy of
17 Pediatrics.

18 MR. KIEFER: Robert Kiefer, Chemical Specialties
19 Manufacturers Association.

1 MR. RUTZ: Steve Rutz, Florida Department of
2 Agriculture and Consumer Services.

3 MR. HELLIKER: Paul Helliiker, Director of the
4 California Department of Pesticide Regulation.

5 MS. LYNCH: Sarah Lynch, World Wildlife Fund.

6 MR. LOVELADY: Bill Lovelady, National Cotton
7 Council.

8 MR. OHMART: Cliff Ohmart, Lodi-Woodbridge
9 Winegrape Commission.

10 MR. VROOM: Jay Vroom, American Crop Protection
11 Association.

12 MR. MCGEEHIN: Mike McGeehin, Centers for Disease
13 Control and Prevention.

14 DR. TROXELL: Terry Troxell, FDA Center for Food
15 Safety and Applied Nutrition.

16 MS. MURTAUGH: Therese Murtaugh, USDA, Office of
17 Pest Management Policy.

18 MR. JENNINGS: Al Jennings, USDA.

19 MR. ROMINGER: Rich Rominger, Deputy Secretary,

1 USDA.

2 MR. EHRMANN: Dr. Wilson, do you want to introduce
3 yourself and then we'll turn back to Mr. Rominger.

4 DR. WILSON: Yes. I'm sorry to be late. I'm
5 Valerie Wilson. I'm from the Tulane Center for Environmental
6 Research in New Orleans.

7 MR. ROMINGER: Well, good morning, everyone. I
8 want to welcome all of you. I join Mike McCabe in welcoming
9 you here and having you all back to get to work today.

10 I want to salute all of the work that all of you
11 have been doing on this task here. I think we've have an
12 enormous job and you've put in a lot of time so far. I also
13 want to welcome our two new members to the Advisory
14 Committee. They have introduced themselves. Robert Kiefer
15 from the Chemical Specialties Manufacturers Association and
16 Dr. Cliff Ohmart from the Lodi-Woodbridge Winegrape
17 Commission. Welcome to the group.

18 We appreciate all the time and effort that you all
19 are putting into this effort. I think you can make a real

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1 difference in ensuring that these meetings are productive,
2 that we get to the table all of the viewpoints and all the
3 stakeholder viewpoints. And that's the way that we can move
4 this process along, by having all of you participating.

5 You know, in some ways we're counting down. It's
6 less than two years now of August of 2002, the next deadline
7 for reassessing the next 3,000 tolerances. So that means
8 that we share a full agenda that we have to tackle before
9 then, including the cumulative assessment.

10 But before getting into some of those
11 technicalities, I want to step back just a moment and make
12 sure that we keep looking at the big picture. So let's
13 always keep in front of us what we're about here. U.S.
14 agriculture already produces the safest, most abundant food
15 in the world. So our goal through FQPA is to make the best
16 even better.

17 Keep in mind, too, that nothing we do in
18 agriculture stands alone. President Clinton and the public
19 have raised the bar on the nation's food safety goals. From

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1 farm to table the subject and the science of food safety have
2 been elevated and are being addressed by our top research and
3 regulatory people in and out of government.

4 Starting at the beginning, of course, we've got the
5 FQPA here, the critical point. You know, I think it's a good
6 law, but it's also a tough law. USDA has committed to
7 working closely with EPA and Mike McCabe to bring the
8 agriculture viewpoint to the table. As you will remember,
9 Vice President Gore has made it clear that this process has
10 got to work for agriculture, now and in the long term.

11 Some of you go back with us to TRAC, so you know
12 well that a reasonable transition period for producers of
13 commodities at risk must figure into the process every step
14 of the way. So we want to thank you for all your guidance in
15 setting some priorities and stepping up to the plate here
16 again in helping us work through this part of FQPA.

17 Pest management is a top priority at USDA. And
18 that is reflected in some of the recent grant decisions that
19 we just made emphasizing pest management research. We've got

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1 a handout today that summarizes all the FY 2000 grants, and
2 we'll talk more about them later.

3 Because FQPA did impose so much uncertainty on
4 agriculture, and because the schedule that it sets is so
5 demanding, it is really critical that USDA and EPA work
6 closely together in moving this forward in providing the
7 cooperative work and leadership that is needed. It is
8 critical that we coordinate between USDA staff and the land
9 grant universities, the faculty there, that we work and
10 collaborate at all levels. Thanks to all the good work that
11 we've had here, I think we've already logged a good number of
12 successes.

13 The public participation process has been working.
14 It's involving more and more growers and I think resulting in
15 better decisions. This is the kind of input that we need if
16 we are to do right by the risk assessment process. When
17 required and when provided the opportunity, the agricultural
18 community has moved
19 quickly to help design some practical risk mitigation

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1 measures.

2 As a result of the accurate use information from
3 the land grants and from other stakeholders, we've been able
4 to take actions and reduce risk while still maintaining the
5 critical uses. We've been through most of the
6 organophosphates. I think the process generally has been a
7 success.

8 I want to recognize the collaboration between the
9 IR-4 program and the EPA Registration Division to ensure that
10 we do get some new tools available for some of those minor
11 crops. IR-4 has embraced some newer and safer technology,
12 and EPA has accelerated the registration of those minor crop
13 pesticides.

14 I want to thank Mike McCabe and EPA for their
15 partnership. This three way collaboration and communication
16 with USDA, EPA, the agriculture community and all of our
17 stakeholders is essential. There is no question this is a
18 tough process. Now I don't think we've probably seen a time
19 when everyone is happy. But I guess we probably don't expect

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1 that, either, because this transition process is going to be
2 tough and many times controversial.

3 But it is our goal to work so closely with you that
4 folks across the country do feel represented and feel like
5 they've been bona fide contributors to the process that
6 affects all of them so deeply.

7 So this continues to be a work in progress. We're
8 all learning and we greatly appreciate that you
9 are all here and the work that you are doing. So thank you.

10 Mike?

11 MR. MCCABE: Well, thank you, Rich. I appreciate
12 you being here and also the work that you've put into our
13 partnership and the expertise that you bring to this issue
14 and also to our implementation of FQPA.

15 It's a pleasure to be here. It's a pleasure to see
16 such a good turnout for this meeting. I think that we've got
17 a lot on our agenda, a lot to discuss, and I am hopeful that
18 it will be a very productive meeting. As you, I am sure,
19 have noted, it is a very full agenda. It's an agenda

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1 designed to discuss not only progress, but our process as
2 well.

3 I know that each one of you has made a commitment
4 to working through this process. Each one of you brings a
5 unique background, a unique perspective and a unique interest
6 to the process. And this really is a forum for you. It's a
7 chance to gain your insights so that FQPA can work better, so
8 that it can be implemented better, and that we can do better
9 from EPA's perspective and from USDA's perspective. So I
10 think it is important for us to be as open and honest as we
11 can be in this meeting and as forthright as possible, to
12 discuss what is working and what is not.

13 But I also would like to emphasis that CARAT is not
14 the only forum that we have. I have been impressed with the
15 amount of activity that we have put together over the last
16 couple of years, particularly in the period just since the
17 last TRAC meeting. We've had 13 technical briefings or
18 stakeholder meetings on organophosphates. We have four
19 scheduled in the future.

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1 We also have had meetings on production issues, on
2 rodenticides and other issues. We've had 16 USDA/EPA
3 conference calls on a number of pesticides. We have had
4 numerous meetings on worker protection, on spray drift, on
5 cumulative risk, on drinking water and the list goes on and
6 on. We have a number of issues and meetings scheduled for
7 the future.

8 We also have had just direct contact with
9 individuals. Your ability to access our experts that are
10 working on these issues, meetings that we have had together,
11 have added to our ability to understand better how FQPA is
12 being implemented and hopefully help you understand our role
13 in all of this.

14 As you can see, with your help and through various
15 stakeholder approaches, we have increased the transparency of
16 our decisions, and we'll continue to do so. We are committed
17 to doing that. We have expanded your role, the amount of
18 work that you do in helping EPA and USDA make tough but
19 responsible positions, on risky pesticides. And I think that

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1 with your continued involvement, with your continued
2 cooperation, we are going to make better decisions and make
3 good decisions.

4 The reviews that we have -- the scientific reviews
5 and the public comment process -- are really intended to help
6 ensure that we have a very rigorous system, a rigorous
7 scientific evaluation that is conducted on every pesticide,
8 and one that both you and the public in general can have
9 confidence in. We know that there are still outstanding
10 concerns, but I think that if you look at our accomplishment,
11 our track record, it tells a very positive story.

12 Let's look at the record. I just have a couple of
13 points to make here. First, our decisions have been based on
14 sound science. We have been refining the critical science
15 policies on which we base our risk assessments. Science by
16 its nature grows and evolves and new information is presented
17 almost on a daily basis. And we will continue to ensure our
18 decisions evolve as science evolves as we get more
19 information.

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1 We have created a transparent and open process.
2 We've been gathering all the critical information that we can
3 to help us refine our risk assessments, leading to what we
4 believe are the best decisions possible. We've been making
5 major decisions on major pesticides. We've been reducing
6 risks. And to my knowledge, the sky hasn't fallen yet.
7 Growers continue to have the chemical tools that they need.
8 American agriculture continues to lead the world in
9 productivity.

10 We're on track to complete our review of
11 organophosphates by the end of the year. CARAT, TRAC, PPDC
12 and the SAP are risk assessment, public participation
13 processes. And many other forums as the ones I mentioned
14 earlier provide for you and members of the public to
15 participate. We know that some of you would like more
16 opportunity and more public participation, and we look
17 forward to discussing that today. Clearly as we look out at
18 this market, I can
19 see a growing and burgeoning market for safer

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1 products.

2 As many of you know, more than half of our new
3 registrations are for safer chemicals. In fact, since 1996
4 EPA has registered a total of 105 new active ingredients, 66
5 of those have been for safer chemicals. Since FQPA, the
6 registration of new pesticides and new uses of existing
7 pesticides has given growers over 2,400 additional pesticide
8 uses for minor crops. On Section 18 emergency exemptions in
9 fiscal year 2000 alone, we issued 458 emergency exemptions.

10 Our work with the USDA has helped us move forward
11 on FQPA. USDA has changed the way that we do business. Rich
12 and his leadership, and USDA with their experts, have been
13 involved in every major decision. USDA is providing more
14 accurate data on what people eat, including the consumption
15 by children. USDA is providing real world data on pesticides
16 that growers use and how they are used. We work together to
17 avoid taking away
18 any critical uses. And that's just one of the ways
19 that we're working together on the transition for growers.

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1 But, as our agenda shows, over the next day and a
2 half we have a lot of work ahead of us. We must continue to
3 protect children. We must continue our focus on protecting
4 children. We have prioritized for review those pesticides
5 where children may be most exposed. We still need to do
6 better. We need to find more ways to increase the
7 availability of safer pesticides, which includes making
8 registration decisions faster and finding non-chemical
9 alternatives.

10 We need to start thinking long term to foster
11 broad, public participation in the cumulative risk assessment
12 process and to ensure timely completion of this scientific
13 work. We need to focus on the implications of cumulative
14 risk assessments and to plan for those upcoming assessments,
15 and the difficulty that cumulative assessment represents. By
16 early next year, we hope to have completed the scientific
17 foundation necessary to conduct cumulative risk assessments.

18 We're making some progress on transition, but there
19 is still much more work to be done. We must move away from

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1 the most hazardous pesticides in a planned, organized
2 fashion, while ensuring farmers have adequate pest controls
3 and techniques in their toolbox. As pesticide problems are
4 identified, we must act to protect public health and the
5 environment, but be sure decisions are responsive to the
6 needs of growers.

7 After the updates this morning, I look forward to
8 listening to the real world stories on transition. I want to
9 know what has worked in the field and what has not worked. I
10 want to hear your ideas and suggestions on how we can move
11 forward with the important work of transition.

12 As we work through the remaining tough issues --
13 and these are tough issues -- we must not lose sight of the
14 tremendous accomplishment and change that FQPA has brought.
15 I know that each one of you is committed to seeing FQPA work
16 and work well. I know that with your different interests and
17 perspectives you bring a wealth of information to this
18 meeting and to EPA and USDA in implementing FQPA.

19 I want to thank you for the time that you have

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1 taken today and tomorrow, but also the help, assistance and
2 time that you take throughout the year to help EPA implement
3 FQPA. And I look forward to working with you in the future.

4 Thank you.

5 MR. EHRMANN: Thank you both. Just a few comments
6 about the way that the agenda has been structured. And as
7 all of you know, we had the opportunity to distribute a draft
8 agenda to all of you 10 days or so ago. We got some very
9 good feedback on that agenda. The Department and the Agency
10 have worked to be responsive to that feedback in terms of
11 some modifications to the agenda, which are reflected in the
12 document you have in front of you.

13 This morning, as the co-chairs have referenced,
14 we're going to primarily spend time providing information,
15 both about the current status of reassessment activities,
16 registration activities, budget and a number of other
17 important issues of concern to the Committee, such as
18 cumulative risk, channels of trade and science policies.

19 So we've structured this morning to be a series of

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1 presentations. As always, we want to provide an opportunity
2 for questions and responses with the presenters of that
3 information. And then we also have provided at the end of
4 the morning about 45 minutes for open discussion on any of
5 the issues that are raised this morning as we go through
6 those various update discussions.

7 So I both want to encourage your questions as
8 people are going through their presentations. If you have a
9 question of clarification, let's get those in during the
10 flow. But we'll also have that opportunity at the end of the
11 morning for a more open discussion on any of the issues that
12 are of primary interest to you that you've heard through
13 those updates.

14 This afternoon, as was mentioned, we have several
15 presenters who are going to be providing information about
16 their experiences relative to transition. The purpose of
17 those presentations is not that those particular case
18 examples are the only stories that are out there or are going
19 to illustrate every possible scenario that might evolve

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1 during transition. Obviously that wouldn't be possible.

2 But we have tried to select some presenters who can
3 pinpoint some key issues. And then again on the agenda we
4 have left a good chunk of time for open discussion to really
5 try to distill out of those case examples, and all of your
6 collective experiences, what are the key issues relative to
7 the transition process that the Department and the Agency
8 need to be focussing on, and ask all of your help for ways to
9 address those issues that may be barriers or concerns or
10 opportunities relative to transition.

11 So we really want to have hopefully a good working
12 session among the entire Committee after we hear those
13 presentations to really distill out those key issues and get
14 your ideas about how the two agencies -- the Department and
15 the Agency -- can be responsive to those issues going forward
16 as the co-chairs have invited in their opening comments.

17 We'll do that for the remainder of the afternoon.
18 I would point out for the members of the public that we do
19 have a public comment period scheduled at 4:30. I'll do my

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1 best to kind of give you a sense if I see that time changing
2 at all. If you do wish to make public comment, I would ask
3 you to register your name outside so that I can calibrate the
4 time appropriately for the number of public comments that we
5 will have in that period late this afternoon.

6 And we will adjourn, as it indicates, no later than
7 5:15.

8 Tomorrow we'll start with a recap of key issues
9 that we have drawn out of that transition discussion, if we
10 haven't completed that this afternoon. And then turn to an
11 update on the drinking water issues, as well as the public
12 health pesticide activities, and then discuss the process of
13 the Committee relative to issues that may be appropriate for
14 work in between meetings of the CARAT.

15 And, again, have a public comment period at
16 approximately 12:15. And as I will today, I'll give folks an
17 idea of when that public comment will happen if we're going
18 to be moving from that time. And we'll again adjourn no
19 later than 1:15.

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1 We may wish to visit later today the start time
2 tomorrow. There has been a suggestion that maybe we could
3 start a bit earlier. But let's see how the day runs today in
4 terms of working through the agenda, and then we'll calibrate
5 that time before we adjourn so you'll know when we'll be
6 starting tomorrow.

7 As always, I'm going to do my best to both
8 recognize people who wish to make comments in the order that
9 you ask to be recognized, but I also again want to provide
10 some flexibility for people to respond to particular points.
11 This is a big Committee. As you know, there are a lot of
12 folks around the table, so it's impossible to optimize both
13 of those objectives at the same time. But please bear with
14 me and I'll do my best.

15 I don't believe we've had very many occasions in
16 the history of this Committee or the TRAC where someone
17 didn't have a chance to make a comment if they really wanted
18 to make a comment. So bear with me if I don't get you in
19 exactly the right order. But at times it may be useful to

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1 have folks have a chance to respond to someone else's comment
2 more directly to try to have more of a conversation. And
3 obviously the co-chairs will be entering the conversation
4 when they see fit in terms of helping to respond to your
5 questions or give you their sense of an issue.

6 Let me just say a word about the issue of
7 workgroups and group process. As most of you know, Meridian
8 Institute, our organization, was asked at the conclusion of
9 the TRAC to interview and talk to a number of the TRAC
10 members and make some recommendations to the Department and
11 the Agency about what kind of public involvement process
12 would be appropriate going forward.

13 At that time our recommendation was that the
14 Department and the Agency, in convening a new committee,
15 approach it in the following way. And that is, if there are
16 issues that arise during the discussion of the Committee that
17 seem to be appropriate for stakeholder involvement, and those
18 issues -- and there are not other fora involving stakeholders
19 of this kind of diversity addressing those issues, that it

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1 might be appropriate on an ad hoc basis to set up a workgroup
2 to focus on a specific issue.

3 So our suggestion was based on the TRAC experience,
4 based on the time and resources of the Department and the
5 Agency, based on input from all of you, and the fact, as both
6 co-chairs have indicated, there are a number of other fora
7 who are addressing issues related to the work of the CARAT,
8 that rather than having standing committees, it would be
9 better to have committees that might focus on those specific
10 issues, or arrange workshops or other opportunities for
11 public interaction, such as was done following the first
12 CARAT meeting with the technical workshop on cumulative risk
13 in the risk assessment process.

14 So I just wanted to remind the Committee of that
15 procedure. Obviously it's open to your input and exchange if
16 you have a different view. But that was the advice that we
17 imparted to the Department and the Agency based on a lot of
18 discussions with many of you who participated in the previous
19 committee.

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1 And I know the co-chairs, from talking to them this
2 morning, want to maintain an open ear to those kinds of
3 issues. And before we close tomorrow, we'll make judgments
4 about where they think that kind of process might be helpful
5 to the Committee going forward.

6 And with that, I will cease my opening comments.
7 Wally has got his card up. If there are any other opening
8 thoughts before we get into the various updates, let me know.

9 Wally?

10 DR. EWART: Yes, thank you. I just wanted to
11 follow up on what Rich has said about the fact that we are
12 here to advise and that we only have two years. It's a very
13 limited -- or less than two years. A very limited amount of
14 time to advise.

15 And our concern with the agenda that was initially
16 put out, and even currently with the agenda we have, is our
17 ability to advise, I think, is somewhat limited. And we are
18 going to talk about workgroups later. But I would say that I
19 think the ag community feels that the workgroups are a very

1 successful way to go into issues in the depth that is
2 necessary in order to find out what needs to be done and what
3 advice can be given.

4 And the reason I bring it up at the agenda level is
5 that as we move forward through the issues in here, we have a
6 lot of issues that we think should justify a workgroup and ad
7 hoc, perhaps, on that particular issue. These include
8 transition. We don't believe that it's sufficient to
9 actually have a presentation here and a discussion in order
10 to get the depths that we need. Cumulative is another one
11 where we feel like the issues are really too complex to cover
12 in this big of a working group to get to all the issues that
13 are there.

14 Other issues that have come up that are extremely
15 important that probably justify a workgroup would be in the
16 drinking water area, in the residential area and in the
17 occupational risk area. Those are all issues we think that
18 would be better served with workgroup exposure, followed by
19 bringing it back to this group, because in that way we

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1 believe that advice could be given.

2 We feel very strongly, as members of the ag
3 community, that we are here to advise. We aren't here just
4 to listen to the status, but we're here to advise. And so I
5 would like to bring that up with the agenda in hopes that as
6 these agenda items are presented that is really the intention
7 of the presentation.

8 MR. EHRMANN: Thanks, Wally. Comments at this
9 point? Jose?

10 DR. AMADOR: Yeah. We can follow what Wally said.
11 I think it would also be important to consider a working
12 group in education. I mean, how we're passing new technology
13 to the farmers to substitute, you know, the product that is
14 not available and the alternative to the farmer. I think we
15 really need to look at that.

16 And I don't know if we are doing enough to explain
17 what both the EPA and the Department are doing in this area.
18 I'm not criticizing that we're not doing enough. But this is
19 a critical issue that I think we need to take in mind.

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1 MR. EHRMANN: Thank you. Any other thoughts? And,
2 again, I think to both issues, as I mentioned I think the co-
3 chairs want to keep all of those options open as we go
4 through this session. And we'll discuss them on a case by
5 case basis and be clear by the end of the meeting tomorrow
6 which kinds of issues might be appropriate for the process
7 that you suggest, Wally.

8 Okay. If there are no other kind of opening
9 thoughts, let's then turn to the first item on the agenda,
10 which is an update on reregistration and organophosphate
11 reassessment process. And who else but Lois Rossi will
12 provide us the update.

13 Lois?

14 MS. ROSSI: Thanks, John. I am once again coming
15 to this advisory committee, as I did to its predecessor, to
16 present the status and the progress of the Re-registration
17 and Tolerance Reassessment Program, with particular emphasis
18 on the organophosphates.

19 For almost two years we have been following a pilot

1 process that was discussed at the TRAC. I have a handout
2 that I think is probably not in your packet. It's on the
3 table. The first page is the status for organophosphates in
4 the pilot process. It's a chart. And this will be helpful
5 as we go through the remarks.

6 On this one page, we present the status of the
7 organophosphates by the various phases that they're in the
8 pilot process. I am pleased to report to you today at this
9 meeting that all 39 organophosphates have entered the public
10 process. The risk assessment for DDVP enters Phase 3, I
11 think, officially today, making it the last organophosphate
12 to enter the public process.

13 This represents about over 70 assessments that have
14 been put in the public docket and on the Internet. Obviously
15 many of the OPs have had two assessments, a preliminary and a
16 refined. Hence you get to the number 70. Two
17 organophosphates, diazinon and malathion, are in Phase 4 with
18 technical briefings to begin Phase 5 in early to mid-
19 November.

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1 The majority of the Ops for which decisions haven't
2 been made are in Phase 6, the risk management phase. Twenty
3 to be exact, which we are currently working through. Of
4 particular note, you see listed under Phase 6 both azinphos-
5 methyl and methyl parathion, because while regulatory action
6 was taken on both a year ago, the full risk management
7 decisions have not been issued. The same is true for
8 chlorpyrifos, which is about to enter Phase 6 on the 16th of
9 this month.

10 We have issued decisions on 15 organophosphates
11 altogether. The majority -- well, actually all but one have
12 been done this fiscal year. We did sulfotepp last fiscal
13 year. You see 13 listed either as I-REDs, TREDs or REDs, and
14 two other decisions that were agreements to phase out the use
15 of the chemicals are listed under cancellations.

16 The organophosphates for which decisions were made
17 followed the pilot process, and the non-Ops -- five of them
18 which we made decisions on this year -- followed for the
19 first time an interim process designed to increase

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1 transparency and public participation. They had a Phase 1, a
2 Phase 2 and a Phase 3.

3 Since this is the first time that we've been using
4 the terms I-RED and TRED, let me take a moment to explain
5 these acronyms as we move to the next page of the handout,
6 which reviews the Reregistration and Tolerance Reassessment
7 Program and gives definitions of RED, TRED and I-RED. We had
8 to make these acronyms up because we were faced with
9 different kinds of decisions as we were going through the
10 tolerance reassessment process and the reregistration
11 process.

12 And you'll see in a very neat little box there what
13 a RED, a TRED and an I-RED are. We are using REDs. I think
14 everybody is pretty familiar with that. They are decision
15 documents for chemicals that are subject to reregistration,
16 which is everything that was registered before 1984.

17 The interim REDs we are calling for pesticides that
18 are subject to reregistration and also need a cumulative risk
19 assessment because they are thought to have a common mode of

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1 toxicity with other chemicals and we have not made the
2 cumulative determination yet. So they're interim
3 reregistration documents. They do everything a RED does in
4 the decision making, but they don't include that cumulative
5 assessment for the tolerances.

6 And then we came up with the TRED, because we have
7 some chemicals going through tolerance reassessment that
8 aren't subject to reregistration. They're getting their
9 tolerances reassessed under FQPA, but they were registered
10 after 1984. Some chemicals also which have had REDs done
11 prior to 1996 -- prior to FQPA -- also are in that position.
12 We're not going to issue another RED on those, because the
13 tolerances are really the only thing that needs to be
14 reassessed.

15 So a confusing set of acronyms, but they do stand
16 for the different status of the chemicals as we're putting
17 them through this reregistration and tolerance reassessment
18 process that is going hand in hand.

19 So what did we accomplish in FY 2000? We issued 19

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1 decisions. We issued six REDs. The REDs -- and they're on
2 the second page of your handout. The REDs we issued were for
3 the following chemicals: diclofop methyl, a non-OP but in
4 tolerance group number one in the tolerance reassessment
5 schedule; ethyl parathion, a final decision, an OP for which
6 an agreement was reached to phase out the use of a fixed
7 amount of this active ingredient over the next three years or
8 as soon as the supply is used up; temephos, an OP non-food
9 use mosquito control agent; terrazole, a non-OP fungicide in
10 group one; triallate, a non-OP in group one, and vinclozolin,
11 a fungicide also representing a phase out of all domestic
12 food uses except canola over the next four years. Those are
13 our REDs.

14 We issued seven interim reregistration eligibility
15 decisions -- I-REDs -- for the following six OPs: bensulide,
16 ethion, phorate, profenofos, propetamphos and tribufos, and
17 for one carbamate, oxamyl. These decisions are complete
18 except for the cumulative risk assessment.

19 And we also issued six TREDs for cadusafos, which

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1 was an OP import tolerance only for bananas; chlorethoxyfos,
2 which was registered post-1984, a corn insecticide;
3 coumaphos, which actually had a RED prior to the passage of
4 FQPA, but the tolerances needed to be reassessed so we went
5 back and did that; fenitrothion, one import tolerance on
6 wheat glutton, also was a RED that was issued pre-FQPA and we
7 went back and did the tolerance; mevinphos, no domestic use -
8 - the domestic use was canceled in 1991 due to worker
9 concerns, but there are import tolerances -- and the last
10 one, phostebupirim, a corn insecticide registered after 1984.
11 So you can see in those TREDs they're post-84 or they've had
12 REDs previously issued prior to the passage of FQPA.

13 The remaining pages of the handout provide a very,
14 very brief summary of these decisions. They give the current
15 uses, the risk areas of concern and the mitigation measures
16 that are part of the risk management decisions.

17 Reading through these 19 decisions, the very brief
18 summaries that we've presented on these next few pages, you
19 will see a full range of concerns and mitigation measures

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1 that we have had to deal with, reflecting certainly the
2 complexity of these decisions and the issues that are
3 associated with them. You will see risks of concern from
4 none to various dietary, occupational and ecological risks.
5 You will also see a full range of detailed risk mitigation
6 measures.

7 I would like to just highlight the full range of
8 these measures. I didn't go through an exercise in counting
9 them, because I tried and it's just too complicated. You
10 will see requirements for increased personal protective
11 equipment. You will see requirements for closed mixing and
12 loading systems. You will see prohibition of various
13 application methods. You'll see reductions in the number of
14 applications. You will see elimination of uses for specific
15 crop or residential uses.

16 You will see increased REIs. And I would like to
17 acknowledge and state that the work done by the Health
18 Effects Division in this area was an enormous effort to
19 review and utilize the very latest data produced by the

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1 Agricultural Reentry Task Force to give us the best
2 assessments based on the best available data. You will also
3 see buffer zones and you'll also see the phase out of a
4 chemical.

5 All of the decisions are being processed right now
6 for posting on the Internet and they'll be in the public
7 docket. And also they're being printed and will be prepared
8 for mailing to registrants.

9 As I said before, the pilot process was followed
10 for the OPs and a modified process was followed for the non-
11 OPs. This modified process, which I know has been a topic of
12 concern, was designed to allow the non-OP decisions far along
13 in the review process to reach a decision point so that we
14 could still continue to issue decisions and yet increase
15 public participation and transparency. Eventually all
16 chemicals will be following this six phase process, and our
17 goals will be able to be met as we move through time.

18 One important part of all of these decisions this
19 year that can't be seen by just looking at a status table is

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1 the additional outreach that EPA and USDA have adopted as
2 standard procedures. I am referring to the conference calls
3 that Mr. McCabe referenced in his opening remarks: calls
4 with USDA, calls that USDA held by themselves, calls with EPA
5 and USDA and closure conference calls. Many of these calls
6 have had representation by all stakeholders.

7 In the last fiscal year, since last October we have
8 had 13 technical briefings or stakeholder meetings on the
9 various OPs in various places in the country. We have also
10 held collectively with USDA actually far more than -- in
11 excess of probably 30. On some of these chemicals, we've had
12 several conference calls, and we also had closure conference
13 calls on all 19 of the decisions made.

14 Can we do more to increase participation and
15 transparency? Of course. But in the last two years, this
16 process has opened up the dialogue in discussions with
17 stakeholders that were never part of the reregistration risk
18 management decisions. Some other items that we also did and
19 that we have completed, we held a public meeting on the

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1 concept of production caps, and we issued in final the PR
2 Notice for managing occupational risks for the
3 organophosphates.

4 With respect to our overall progress in
5 reregistration and tolerance reassessment, for tolerance
6 reassessment we completed 121 decisions, bringing the total
7 to -- for those people who love numbers -- 3551 of our 9721
8 universe.

9 In reregistration we had another major milestone a
10 couple of weeks ago. I signed the 200th reregistration
11 eligibility decision. We have 177 to go. For those of you
12 who have been following the reregistration program since
13 1988, you know we started with a universe of 612.

14 **(END OF TAPE ONE, SIDE A)**

15 MS. ROSSI: -- by the way at this point in time.
16 They will be counted in the reregistration pot when we do the
17 cumulative.

18 What's next? Usually the first quarter of the
19 fiscal year is a slow quarter for us. It's not this year.

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1 From now through the rest of the calendar year, we're working
2 on issuing individual I-REDS or TREDs on the remaining OPs
3 and holding technical briefings on diazinon and malathion in
4 mid-November.

5 Much work and process has taken place on many of
6 these Ops that we're faced with making decisions in the next
7 two months or three months. And you see them listed in your
8 handout under Phase 6.

9 That concludes my remarks on the status of the
10 program. I would be happy to answer any questions that you
11 might have.

12 Thank you.

13 MR. EHRMANN: Cindy?

14 MS. BAKER: I just have one comment and then one
15 question, Lois. The comment is that I think that if you look
16 through -- and I didn't count them up, either. I just tried
17 to look through what you have here. A lot of the risk
18 mitigation is in the area of worker risk. And I think one of
19 the topics that Wally mentioned, and one of the topics that

1 we've mentioned, I think, at the last CARAT meeting -- I know
2 it was a topic during TRAC -- is this whole issue of worker
3 risk.

4 I know the Agency is doing a lot in terms of review
5 of the WPS right now. But I think specifically the issues of
6 reentry and some of the PPE that goes into place for these
7 worker risks is an area that people around this table could
8 provide a lot of input on in terms of work we've done and
9 experiences that I think the producers and others -- and I'm
10 sure Shelley has input on this. You know, all of us have
11 input, I think, in this particular area that would be
12 valuable.

13 I would think this is a prime candidate for a
14 workgroup type discussion, because I don't know that the
15 specific issues are being addressed through existing
16 committees. I also think that the crop profiles and the
17 strategic pest management plans don't address reentry issues
18 and worker issues. I think that they are becoming very
19 relevant in some of these registration eligibility documents

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1 that take place. So I would propose that I think that's one
2 area that really could benefit from a workgroup type
3 activity.

4 I'm going to think hard for an acronym for D so
5 that we have I-REDS, TREDs and DREDs. So I'm going to think
6 about that over the next two days and I'll come back with
7 one.

8 **(Laughter.)**

9 MS. BAKER: My question --

10 JIM: Developmental.

11 MS. BAKER: Huh?

12 JIM: Developmental.

13 MS. BAKER: There you go. See, I knew, Jim, you
14 could come up with one.

15 **(Laughter.)**

16 MS. BAKER: With TREDs we have to have DREDs or
17 something to go with that.

18 My question is, where is the Agency on probablistic
19 assessments for workers? I know it's been talked about. Is

1 that something that you guys are looking at and considering?

2 What is the status of that?

3 MS. ROSSI: I do know that the Health Effects
4 Division has looked at it. Margaret, would you care to
5 elaborate on that a little bit?

6 MARGARET: Yes, we are looking at it. We are --
7 we've just actually completed a plan of looking at
8 improvements in our ORE risk assessments. We are examining
9 PHE database. And you will hear more about that from us.

10 MS. BAKER: Thank you.

11 MR. EHRMANN: Okay. Bill?

12 MR. LOVELADY: Just a little follow up, a question
13 I would like about something that Cindy mentioned, these
14 issues here, these mitigations. Many of these are things
15 that have to be done out in the field.

16 And I have a question. How do -- how does the
17 Agency go about determining these things with input from the
18 grower community or from the worker protection groups, etc.?
19 What do you -- is there a process that you use to determine

1 that, or do you depend on USDA? Can you expand on that?

2 MS. ROSSI: Sure. I mean, when we're faced with
3 making a decision -- and in this case worker risk -- I mean,
4 we have a range of options. It's not an infinite range.
5 It's a finite range, actually. And we go through the
6 assessment and look to see which ones are feasible and which
7 ones would reduce the risk of concern.

8 And then all the outreach that we've been doing,
9 these conference calls and then working with USDA, we present
10 these type of mitigation measures and get an indication on
11 how they work. We also use Kevin Keeney's branch, the worker
12 protection branch, for help with these also.

13 But that is the major way we've gotten input on
14 this. I mean, that's been the -- primarily the substance of
15 these many conference calls that we've had.

16 MR. LOVELADY: Well, I would -- you know, I would
17 suggest that probably we could do more to work -- as
18 commodity groups to work with you. Because I know last fall
19 where there was a particular harvest aid product that I think

1 that the Agency kind of had some misconceptions about, and we
2 sponsored a trip out to the field for them so they could see
3 how it was not -- the assumptions were not exactly right.

4 And I just wanted to know how we could possibly
5 work closer with commodity groups and with worker protection
6 groups.

7 MS. ROSSI: Well, with that particular chemical, I
8 think the Cotton Council worked very close with us on
9 tribufos.

10 MR. LOVELADY: Well, I would offer that we will
11 continue to work with you on those things, and I hope that we
12 can expand our relationship.

13 MR. EHRMANN: I think this has been an ongoing
14 opportunity, if you will, for trying to figure out the best
15 way for those interactions to happen for people to be aware
16 of what's going on, so the Agency and the Department can get
17 in contact with a range of folks who are aware of the various
18 issues.

19 And it's one of the things I think we hope will

1 also come out of our transition discussion this afternoon.
2 What are the best methods for making sure the communication
3 is flowing in the best direction.

4 Steve, you were next.

5 STEVE: Thanks, John. Lois, I've had the dubious
6 pleasure of participating in these conference calls in which
7 we endlessly discussed every different use of every compound.
8 But there have been a lot of, I think, important corrections
9 in the way in which products are used in those discussions.
10 And in fact, I think it's been very valuable for a lot of
11 those sitting in on the conference call.

12 Is there any way that those who have offered advice
13 can find out if -- you know, get closure and find out that in
14 fact that advice is being heeded and included in the
15 assumptions?

16 MS. ROSSI: Well, my guess is maybe you can give us
17 some feedback on this. That is the purpose of the closure
18 conference call. At the closure conference call we present
19 what is going to go in the document. And at that particular

1 point in time, I think people have seen their input taken
2 into consideration. If that's not accomplishing that, then,
3 you know, feedback on that can help.

4 But that was the purpose of the closure conference
5 call.

6 STEVE: If further changes are proposed, do you get
7 back to the individuals who proposed them?

8 MS. ROSSI: Yes. I mean only on a couple have we
9 had open questions that came up at that closure conference
10 call, and we do close the loop on that.

11 STEVE: Okay. A second question --

12 MS. ROSSI: But those are held very late in the
13 process. I mean, like literally a day or two before
14 signature.

15 STEVE: It makes it tough to make any changes at
16 that point, obviously.

17 MS. ROSSI: That's right.

18 STEVE: My second question --

19 MS. ROSSI: That's why it's a closure call. That's

1 right.

2 (Laughter.)

3 STEVE: Second question, we've been looking at
4 individual OPs doing the I-REDS. In many cases on these
5 conference calls it's been discussed the fact that in terms
6 of dietary risk there are no concerns, that largely it's a
7 worker safety issue. So there isn't much discussion about
8 refining the uses, the timing of applications and those kinds
9 of things, yet that will become very important in cumulative
10 risk assessment.

11 And I'm wondering how are we going to have a
12 conference call on 37 different OPs and try to redefine and
13 re-refine that kind of information if it isn't done on the
14 individual?

15 So I guess maybe this is less a question and more a
16 statement that it is very important that we get those first
17 ones right, so that when the cumulative is done that we
18 aren't using data that is insufficient.

19 MS. ROSSI: We do have a few Ops -- and one that I

1 know right off the bat is cadusafos, which was based on
2 tolerances of 100 percent crop treated. And that is bananas,
3 so, I mean, that refinement will take place. And we
4 have said at these meetings that we realize some of the ones
5 that have passed the assessment at a lower tier -- tier one
6 tolerance field trials that fit into the individual cup
7 without needing a refined assessment or Monte Carlo or using
8 the PDP. We have said before cumulative we would have to go
9 back and refine them.

10 How we would have a conference call on 37 OPs, I don't
11 have the answer to that.

12 STEVE: Okay.

13 MR. EHRMANN: Okay. Let's go Jean-Mari, Shelley,
14 Bob and Jay.

15 MS. PELTIER: Thank you. My question is related to
16 the one that Steve asked earlier. Lois, I would say that the
17 conference calls, for my part, really I think have been a
18 very effective way to try to get our message across and to
19 help in refining the risk assessment based on our

1 understanding of the way the product is actually used in the
2 field.

3 But I guess we have the same problem that Steve
4 talked about, where we have thought that some of these that
5 now I see are in Phase 6 were somewhere further back in the
6 process. Questions that we thought were very much still open
7 in the risk assessments, we now appear to have reached
8 closure on.

9 So I guess my question is, when you do the closure
10 conference call, is that somewhere after Phase 6?

11 MS. ROSSI: No, it's in Phase 6. The only ones
12 that we've had closure conference calls on are the 19
13 decisions we've issued. If you're in Phase 6, we're still
14 working on it. So on this sheet, the ones in Phase 6 that
15 begin with acephate, those we're still working on. We have
16 not had closure conference calls on those.

17 MS. PELTIER: Those that are in Phase 6, do we
18 still have an opportunity to continue to refine the risk
19 assessment and the assumptions made in it?

1 MS. ROSSI: We are constantly refining the risk
2 assessment, yes.

3 MS. PELTIER: Okay.

4 MS. ROSSI: So the conference -- the closure
5 conference calls are literally right before the document --
6 the decision gets signed.

7 MS. PELTIER: And all of the ones that are in Phase
8 6, did they actually go through a Phase 4?

9 MS. ROSSI: They did.

10 MS. PELTIER: So there were technical briefings on
11 all of those?

12 MS. ROSSI: There were not technical briefings on
13 all of them. We didn't do technical briefings on all of
14 them, but I certainly could tell you which ones we did do
15 technical briefings on. But we have certainly had conference
16 calls on all of them. We've had technical briefings on a lot
17 of them.

18 MR. EHRMANN: Okay. Shelley?

19 MS. DAVIS: Well, I want to commend EPA for opening

1 up the process to the extent that it has. And I think that
2 this is a very big improvement. But I think more improvement
3 needs to be made.

4 For example, I'm interested that these conference
5 calls have been an opportunity to get input from the grower
6 community. But given the number of active ingredients that
7 involve significant worker risks, I feel compelled to wonder
8 aloud why there haven't been comparable conference calls with
9 workers.

10 Sometimes when I sit here, I do find that we are in
11 the same world, but we seem to live in two different worlds.
12 And one way that the experience is quite different is the way
13 workers experience the risks they face on the job. And the
14 practical realities of the risks workers face don't often
15 enter into this process.

16 And, you know, although we try to comment and
17 attend the technical briefings, etc., I feel oftentimes like
18 we are left out of the key conversations. And the absence of
19 calls with workers or worker representatives really to me

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1 highlight the fact that when push really comes to shove, the
2 worker's voice is not heard.

3 So this is, you know, yet another example to me of
4 when the issue is risk mitigation of worker risks, you
5 absolutely have to have workers in the mix.

6 MR. EHRMANN: Lois, comment?

7 MS. ROSSI: Well, I think Shelley's point is well
8 taken. I think we -- I did say we could certainly do better
9 in increasing public participation. We have included public
10 interest groups and invited them to conference calls on many
11 of the pesticides that -- the 19 that we made decisions so
12 far. The ones that we haven't made decisions, there still is
13 an opportunity. We have had participation by groups that are
14 concerned.

15 Many of the mitigation measures, as someone else
16 pointed out on these particular 19, have been for worker
17 risk. And I think only in a couple of occasions do we have
18 MOEs that are less than 100, and we strive for 100. So I
19 think we could certainly work out a process. These

1 conference calls are pretty extensive and we certainly can
2 work on that.

3 MR. EHRMANN: Bob?

4 BOB: Just two questions. And before I ask the
5 questions, I've got to tell you how impressed I was that you
6 gave that presentation without missing a beat despite having
7 spilled water on your notes.

8 (Laughter.)

9 BOB: I could not have done that.

10 MS. ROSSI: Most people did not know that, Bob.
11 Now I have it pointed out.

12 (Laughter.)

13 MR. EHRMANN: We're into transparency in this
14 Committee.

15 (Laughter.)

16 BOB: Besides the completion of the I-REDs for the
17 remaining OPs, what else do you see happening next year?
18 That's the first part of the question.

19 MS. ROSSI: Okay. Probably for this quarter we

1 will only be doing I-REDS. I think that's -- it's a very
2 tall order to complete these decisions. And we will not be
3 issuing any non-Ops before the calendar year.

4 We have a number of carbamates in the queue, and we
5 also have some of the carcinogens, again following the group
6 one tolerance. We will most likely be putting out a list of
7 our candidates. And they actually have gone out in our
8 report. I think we put out the candidates for 2000 and 2001
9 in that report. So the ones that we haven't done in 2000
10 obviously fall into 2001. But it will focus largely on
11 carbamates, the triazines and other carcinogens.

12 BOB: And then as far as the process -- I mean
13 presumably the OPs will be done at some point?

14 **(Laughter.)**

15 BOB: I just sense your relief at that. The public
16 participation process for the other compounds, I mean what is
17 that? Is there going to be a four phase chart for everything
18 else? How is that going to work?

19 MS. ROSSI: Well, we haven't issued the public

1 participation process in final yet, but we are about to. We
2 did put it out for comment last spring. We got some
3 comments. We looked at the comments and addressed them and
4 we will be putting that out.

5 What we're trying to do is start doing the six
6 phase process for a lot of the chemicals that were -- that
7 we'll be working on. It's an 11 month process, though, and
8 what we're faced with is going through the full 11 month
9 process. And that's if everything goes well in Phase 6.
10 That's assuming Phase 6 is only 60 days, and Phase 6 has
11 taken much longer than 60 days.

12 So for those chemicals that we have risk
13 assessments now, for example, are most likely to start going
14 through the 11 month process. But there will still be an
15 interim process to still move decisions along and meet the
16 reregistration goal. Eventually I think it will all be in
17 that process.

18 BOB: So if something is not an OP, there is some
19 public participation process that applies to it?

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1 MS. ROSSI: Exactly. And the ones that we issued
2 this year, we did Phase 1, Phase 2 and Phase 3. It was sent
3 to the registrant, we looked at error and we put it out on
4 the Internet for public view. And we would minimally do
5 that.

6 MR. EHRMANN: Okay. Jay?

7 MR. VROOM: I'm always fascinated by the experience
8 of deadlines, especially the sound when they go whooshing by,
9 and I'm reminded that I guess September 29th was the end of
10 the fiscal 2000 year for the federal government. I'm trying
11 to remember what was the identified RED goal for OPP for the
12 fiscal year, and of the 19 REDs that have been issued, when
13 do they issue for that total for fiscal 2000. And also when
14 did the closure calls occur?

15 I'm just sort of trying to get a better
16 understanding of, you know, how much grower and user
17 community satisfaction, you know, relates to the
18 participation in those closure calls. Just so we can
19 understand a little bit more about how you're having to deal

1 with deadline pressures and that kind of thing.

2 MS. ROSSI: Well, I probably can answer the first
3 part. I think if you want grower input, I think maybe USDA
4 should answer that.

5 But our goal was 20 -- 20 decisions. Those are
6 still -- our accountability has not gotten sophisticated to
7 I-REDS, TREDs and REDs. It's still REDs. So we didn't issue
8 20 REDs. We issued 19 -- a mixture and that was our goal.

9 MR. VROOM: Okay.

10 MS. ROSSI: And then, Al, do you want to say --

11 MR. EHRMANN: Al, do you want to comment?

12 MR. JENNINGS: Sure. If I understand your
13 question, it's how did we or how extensive do we get?

14 MR. VROOM: What kind of grower and other user
15 involvement occurred around these closure calls. And if
16 there were 19 total, including the TREDs and the I-REDS, when
17 did those closure calls occur and when were the REDs made
18 final?

19 MR. JENNINGS: I guess within the last two weeks of

1 the fiscal year we had a lot of the closure calls, but for
2 everyone of them there were earlier grower conference calls.
3 And the closure is the last phase after we've been through
4 the earlier ones.

5 Again, many of those happened in the last couple of
6 weeks. Lois, is that right?

7 MS. ROSSI: Closure calls did, yeah.

8 MR. JENNINGS: Closure calls did, but earlier
9 involvement was there.

10 MS. ROSSI: And many since the spring on many.
11 What Al and I have discussed quite a bit was USDA on their
12 own had conference calls with their constituents, with their
13 growers, on various chemicals. EPA did not participate in
14 them. And then we would have conference calls that would be
15 more open up.

16 But they weren't the first conference -- closure
17 conference calls aren't the first time that people are
18 getting together to discuss these chemicals.

19 MR. VROOM: I guess I was just thinking about the

1 arbitrary end of the fiscal year happening to be in the fall
2 when a lot of this activity is, you know, being pressured by
3 deadlines, because the government fiscal year ending happens
4 to correspond with the distraction of harvest for a lot of
5 those in the grower community. And I would think that that
6 might be something that from a processing --

7 MS. ROSSI: Well, I can say that we have had to
8 oftentimes extend the conference calls. We set them up for
9 an hour and the dialogue clearly was not going to be finished
10 in an hour. We extended them to an hour and a half. And on
11 many of them, we had 25 to 30 lines filled, and we were
12 always scrambling around to get other lines.

13 MR. JENNINGS: And on more than one occasion we had
14 farmers on their cell phones on their tractors.

15 MR. VROOM: That's a good use of technology.

16 MR. EHRMANN: Okay.

17 MR. VROOM: One other question. Lois, you
18 mentioned in passing that, you know, it's sort of the caveat
19 on some of the 19 because cumulatives have not been done.

1 And I think we're going to talk in detail about cumulative
2 later in the morning.

3 But my understanding is that some SAP members
4 recently expressed concerns about the use of certain data
5 appropriate for making aggregate decisions is not appropriate
6 for making cumulative decisions. And this is probably not
7 the right time to get into that. But just because I heard
8 the word cumulative, I wanted to at least register that
9 footnote.

10 MR. EHRMANN: Why don't we flag that and come back
11 to that when we talk about cumulatives.

12 Jim, you had a comment?

13 MR. AIDALA: Yeah, just to comment on the end of
14 the fiscal year rush, if you will. And you're right about
15 the power of deadlines which have good and bad about them.

16 First of all, it's nothing new to FQPA. But the
17 other thing is certainly the public reassurance, that we
18 actually about a month or so before look and see what is
19 likely to be done. In other words, it's not just sort of a

1 numbers game. Let's make sure we hit that number or target
2 or thereby. What do we need? What looks like we are able to
3 come to closure on -- come to a decision on.

4 And if not, if there are some outstanding issues or we're
5 waiting for some more information, the Department has still
6 got some work to do before they get back to us or something
7 or the other, we hold those off.

8 And we have that explicit discussion in the last,
9 you know, four to six weeks before the end of the year -- the
10 fiscal year -- in order to avoid any kind of we're just doing
11 this to make sure we, you know, if you will, check the box
12 before the end of the fiscal year. And that's an exercise we
13 have that we normally go through -- that we did go through
14 for this.

15 MR. EHRMANN: I'm going to take Robert and Steve on
16 hopefully quick points and then we'll move on to Jim Jones'
17 update.

18 ROBERT: Thanks. Lois, I had a quick question on
19 the public participatory process and your seeking different

1 participants in the closure conference calls. In the case of
2 chlorpyrifos, there was a voluntary agreement reached with
3 the active ingredient manufacturer.

4 And I know this can be a touchy subject, but to
5 what extent has the Agency tried to outreach to the end use
6 product formulators who are also subject to the decisions
7 that are being made here?

8 Because the decision did come as a surprise to
9 many, and since a decision had already been made, many of
10 these manufacturers did not have any recourse in this.
11 They've invested hundreds of thousands of dollars in ongoing
12 research and studies, product research and development, state
13 registrations, and now they're grappling with existing
14 inventories of products that are being canceled.

15 Is there a way outside of -- I don't know if you're
16 actually contacting the holders of these product
17 registrations of the affected chemicals, or to what extent
18 are you outreaching to these groups?

19 MS. ROSSI: Well, we are contacting them. We sent

1 them letters telling them what they had to do to comply. So,
2 I mean, there is an official process on that.

3 ROBERT: Now is that to the active ingredient
4 registrants or to the end user as well?

5 MS. ROSSI: It's to the end users.

6 ROBERT: Okay.

7 MS. ROSSI: It's a huge effort and we are doing
8 that. And we've taken a lot of, you know, phone calls and
9 handled it that way. What we are thinking in the future,
10 should an agreement or something like this occur again, that
11 the technical registrants also have voiced an interest in
12 getting to their customers. So it might be a little bit more
13 up front. But after the decision, we had a mail out and we
14 did a phone -- also did phone calls telling the end users
15 what needed to be done.

16 ROBERT: Yeah. And realize, of course, you know,
17 some of this are business decisions. It's the economic
18 realities and consequences that are being faced. Sometimes
19 the end use formulators end up losing out in this regard.

1 And so we want to try to find a way to preserve some of these
2 uses, you know, if it means to support some of the studies
3 that need to be done. And, you know, maybe that needs to be
4 talked about with some of the end use formulators and
5 registrants.

6 MR. EHRMANN: Okay. Jim?

7 MR. AIDALA: Yeah, two things. Once again this is
8 an issue that has dogged the program and again along with
9 FQPA. But obviously since it's a proprietary business
10 license of the registrant, end users -- basically it's a
11 customer relationship between some of your end users and up
12 the chain, and you need to rely on that.

13 Obviously you have a right also to call any of us
14 at any time to say, if you will, basically is what I'm
15 hearing from that chain the same information that others may
16 give too. And I think that's been one check that we hear
17 about is a good useful check in terms of, again, what's,
18 quote, really going on versus not. But we have to respect
19 that business license relationship we have as a regulator

1 with that regulated entity.

2 The other thing that happens, too, in terms of
3 anyone that wants to pick up before something is even
4 voluntarily canceled, in the '88 law they put in the 6F
5 notice, so that if somebody does want to pick up stuff, they
6 could. It's unlikely, frankly, as a small end user that
7 you're going to do that, but you have that right. It may be
8 a group that gets together, and usually that's more in the
9 agricultural arena more than in the structural stuff.

10 MR. EHRMANN: Steve?

11 DR. BALLING: Well, I apologize. I want to follow
12 up on this closure call thing again. My brain must still be
13 on California time. I'll try to jump start it with
14 Starbucks, but it didn't work. But Lois is talking right
15 now, so I'll wait.

16 I'm sorry. This closure conference call, they've
17 just been -- it sounds like they've just been occurring the
18 last couple weeks of September primarily?

19 MS. ROSSI: Well, on the five that we were able to

1 issue in June -- bensulide, cadusafos, chlorethoxyfos,
2 profenofos and one other one. On those we did the closure
3 conference.

4 DR. BALLING: Okay.

5 MS. ROSSI: They're done before they get signed.
6 Now unfortunately we have -- we tend to bunch up at the end
7 of the fiscal year.

8 DR. BALLING: Now none of those that are currently
9 on this Phase 6 have had a closure?

10 MS. ROSSI: No, because they're not closed.

11 DR. BALLING: And those people who participated in
12 the call, or had comments being made, would be invited?

13 MS. ROSSI: Right. That's what we typically use as
14 our list. If you made a comment on the --

15 DR. BALLING: And then you actually go through each
16 individual use and the assumptions made on each use at that
17 time?

18 MS. ROSSI: We go through the regulatory decision.

19 DR. BALLING: Okay.

1 MS. ROSSI: And, you know, if there is nothing
2 being done to sugar beets or something, we just say, you
3 know, there is nothing being done.

4 MR. EHRMANN: Dick? Oh, go ahead.

5 DR. BALLING: But even if you aren't going to make
6 any changes in the actual use on the sugar beets, there are
7 certain assumptions that go into the risk assessment that
8 might be altered based on actual usage, correct?

9 MS. ROSSI: Right. But that -- yeah. That
10 actually should have been addressed in the comment on Phase
11 5. I mean, these have already gone through.

12 DR. BALLING: Okay.

13 MS. ROSSI: These risk assessments have already
14 gone through two public postings. And the ones that we had
15 technical briefings on in the overview -- well, not just the
16 ones we had technical briefings on. The overview had this
17 chart that I -- you're probably talking to dietary risk. I
18 mean, I called the Monte Carlo chart that has what we used,
19 the percent crop treated and if we used D-TEX or whatever.

1 It's a table. And that is attached to the overview which is
2 posted in Phase 5.

3 DR. BALLING: Okay.

4 MS. ROSSI: And so we assume that unless we say
5 something has drastically changed that the Phase 5 risk
6 assessment is what's there.

7 DR. BALLING: But if there were comments provided,
8 then you would specifically address those?

9 MS. ROSSI: Yes.

10 DR. BALLING: Okay.

11 MR. EHRMANN: Okay. Let's go ahead and have Jim
12 make the presentation on the update relative to registration
13 activities. And then I think we'll take -- let's take a
14 break right after his presentation and we'll come back and
15 field any questions.

16 But let's go ahead and have the presentation before
17 the break. Jim?

18 MR. JONES: Good morning. I'm going to briefly
19 cover overall pesticide registration activity in OPP,

1 including antimicrobials and biopesticides, along with
2 synthetic chemicals, and then move on into some more detail
3 for the program area that I have responsibility for, which is
4 the registration of synthetic chemistries.

5 The Office of Pesticide Programs in fiscal year
6 2000 registered 22 new active ingredients. Two of them were
7 antimicrobial products, nine of them were biopesticides and
8 11 of them were synthetic conventional pesticides. Of the 11
9 synthetic compounds, six of them were reduced risk and five
10 were not reduced risk.

11 The new use picture, the Antimicrobials Division
12 does not generally register too many new uses, but they had
13 about a handful of them -- about five. The Biopesticides and
14 Pollution Prevention Division registered about 121 new uses
15 of already registered products. And the Registration
16 Division registered 234 new uses of already registered
17 products.

18 Those are sort of the -- excuse me for a second.
19 Broad numbers for the entire pesticide program -- I'm getting

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1 more specifically to the Registration Division which has
2 responsibility for synthetic conventional compounds. There
3 were two handouts that were provided in your packages that
4 you received, I think by overnight mail. In our desire to
5 give you some information prior to the meeting, we were
6 somewhat in a crunch because the fiscal year ended on Friday.
7 Well, for me it was Friday, frankly, the 29th of September.
8 And we had these packages out to you on October the 3rd, so
9 we did asterisk the FY 2000 numbers as our counts weren't
10 official yet. But the numbers haven't changed that
11 dramatically.

12 The first handout, which is CARAT document 2-1,
13 basically gives you a sense of what our conventional new
14 active ingredient registration productivity has been over the
15 last four years. Basically we've picked the period right
16 after FQPA. And as you can see, the 11 new active
17 ingredients registered this year are in the range of the new
18 chemical registration decision productivity of the last
19 several years.

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1 In terms of reduced risk versus non-reduced risk,
2 there is actually an error here. There were five
3 conventional non-reduced risk new active ingredient
4 registrations and six reduced risk. We actually this year
5 had an interesting situation where we revoked a reduced risk
6 candidate after we had completed the risk assessment. The
7 reduced risk determination was actually made based on a
8 presentation prior to our review of the data. In this one
9 situation, that reduced risk determination was revoked after
10 we had completed our risk assessment.

11 Thus we had six reduced risk new chemical active
12 ingredients, which actually now we have the Registration
13 Division has met its GPRA goal for 2002 of having half of our
14 new active ingredients being reduced risk.

15 And as you can see, the turnaround time in terms of
16 time to decision, the reduced risk time climbed a little bit
17 and the conventional non-reduced risk dropped a little bit.
18 That's partially because of this decision we made that moved
19 a reduced risk compound that had been expedited into the non-

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1 reduced risk category. But as you can see, our overall
2 turnaround times have been basically steady in between 22 and
3 30 months from submission.

4 For new uses, the productivity picture is I think
5 significantly brighter in terms of clear and consistent
6 increase in the number of new uses that we have approved over
7 the last four years. And actually if you compare the number
8 of new use registrations we did in FY 2000, which the final
9 number turns out to be 234 and not 225, it is significantly
10 above what we were doing right after FQPA. But perhaps more
11 importantly, it is significantly more than we were doing pre-
12 FQPA. We were generally doing between 125 and 150 new uses
13 before the Food Quality Protection Act, and we have managed
14 to increase that rather dramatically.

15 Of the 225 new uses that we registered last year,
16 163 of them were reduced risk and 39 of them were OP
17 alternatives. Of the 234, 129 of them, or slightly over half
18 of them, were IR-4 submissions, which is a significant
19 increase in our historic completion for IR-4 submissions.

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1 On the second page, you'll see the basic statistics
2 for the Section 18 program. And for those of you who have
3 been party to the CARAT and its predecessor the TRAC, you'll
4 remember that at the beginning of the initial TRAC meetings
5 there was a lot of focus on the Section 18 program and our
6 ability to make rapid decisions for the Section 18's. These
7 are emergency exemptions of critical needs.

8 And I think we basically got our arms around that
9 in FY 98, but I think it's worth noting that in FY 2000 for
10 the first time in the history of the Section 18 program, at
11 least as long as it's been in EPA's program, we exceeded our
12 internal goal of an average turnaround time of 50 days. We
13 averaged 44 days for Section 18's in FY 2000. And also
14 importantly, a total of 89 Section 18's that we received this
15 year we will not expect to get next year, because we
16 registered the use associated with that Section 18.

17 The second handout that you have, which should be
18 marked CARAT 2-2, is something that you've seen before. It's
19 basically just an update of our program in the Registration

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1 Division to move onto the market as expeditiously as possible
2 OP alternatives. This has been updated since we last met, as
3 we've registered a number of OP new chemicals since the last
4 CARAT meeting, as well as OP new uses. The alternatives, I'm
5 sorry. Alternatives for the organophosphates.

6 As we have discussed before, we give a high degree
7 of priority to organophosphate alternatives. We have
8 somewhat of a process that needs to go -- that you need to go
9 through for us to designate the compound as an OP
10 alternative. The process is a little more detailed and
11 information laden for a manufacturer than it would be for a
12 grower. But we basically do rely on the outside parties
13 indicating to EPA that they have an Op alternative.

14 We have denied OP alternative status to a couple of
15 uses where although it may have been literally an OP
16 alternative, we thought that there were compelling health or
17 environmental reasons to not grant it OP alternative status.

18 We have since FQPA registered seven new active
19 ingredients that are OP alternatives with dozens of uses, and

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1 we currently have pending four new active ingredients that
2 are OP alternatives and about three dozen new uses. For all
3 of those, both the new chemicals that have been granted OP
4 alternative status as well as the new uses, our plan is to
5 complete them and bring them to decision making within the
6 next 18 months. Over two thirds of them will likely be dealt
7 with in FY 2001 and the remaining one third will be early
8 2002.

9 A couple of other things that we've pursued over
10 the last year, one of them being something that has come out
11 of meetings such of this and other fora, understanding the
12 frustration in the user community with the lack of
13 experimental use permits, we have put together a strong
14 proposal that we're going to be floating in the next few
15 months to stakeholders that will hopefully open that up a
16 little bit.

17 Because we're basically doing EUPs with the
18 food use -- meaning setting a tolerance and meeting the
19 FQPA's safety finding involves trade offs that potentially

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1 affect new uses and new chemicals -- we're going to propose
2 to pilot something that is rather narrow.

3 It will be for already registered pesticides, so
4 there is not going to be a lot of core data to review. And
5 for compounds where we have already taken that compound
6 through an FQPA assessment, there will not be a great
7 assessment burden on us.

8 So we're hoping that if we pilot something like
9 that, we may get to the point of easing some of the
10 transition issues we've been hearing, not only at this
11 meeting but other fora, for growers who are getting a new
12 chemical with very little previous experience in the research
13 and user community as to how that compound may work and how
14 to actually make it work effectively.

15 So that is something that we'll be floating over
16 the next few months, and it would certainly be useful to get
17 some feedback as to what would be an appropriate -- what
18 would be an appropriate fora to do that.

19 Another area that we have pursued is something that

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1 we actually began when Jean-Mari was at CDPR, but have, I
2 think, brought it a little closer to fruition during Paul
3 Helliker's tenure. And that is CDPR providing the residue
4 reviews necessary to establish new uses. And we've basically
5 been working with CDPR, IR-4 and ourselves to identify IR-4
6 projects that CDPR can actually do the basic core data
7 necessary.

8 And we had our first pilot that we succeeded in FY
9 2000, and right now the current plan is for CDPR to take on
10 another two dozen IR-4 uses in FY 2000, which is another way
11 in which we can ultimately supplement our resources to
12 deliver on the petitions that we've got in front of us.

13 **(END OF TAPE ONE, SIDE B)**

14 MR. EHRMANN: -- suggested and take the -- well,
15 let me just see how many people want to make a comment. If
16 you have a question or comment, we might be able to get them
17 in. Just three?

18 All right. Well, let's go ahead and see if we can
19 go through these, and then we'll take a break.

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1 Carolyn and then Cindy and Wally.

2 MS. BRICKEY: I have several questions, Jim. I
3 don't understand what this pilot you were talking about will
4 do. What is it for?

5 MR. JONES: The frustration that we've been hearing
6 is that because now we do not do petitions in front of us in
7 the order in which they came to us. We do them in the order
8 that our system -- our priority system designates, which is
9 if it's a reduced risk or an OP alternative, they come first,
10 or the methyl bromine alternative, and then company
11 priorities.

12 And companies have been very reluctant to give a
13 priority to EUPs that are not crop destruct, because they
14 want to save their priorities for new chemicals and new uses.
15 They're more valuable to them. So there have not been in the
16 last three years many EUPs that are not crop destruct.

17 So what we've attempted to do -- and that's the
18 feedback we've been getting over the last few years -- is to
19 develop a proposal whereby we could not worry about there is

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1 no priority given to them and be able to establish a
2 tolerance for an EUP, limited to something in the range of
3 2,000 acres. But we want to limit it so that it doesn't open
4 it up to EUPs where there is a tremendous amount of data
5 necessary for us to review. Because if we're doing that, we
6 are not doing new chemicals. We are not doing new uses,
7 because the trade offs are directly against those kinds of
8 resources.

9 So we came up with a proposal that we've yet to
10 float that narrowly -- identifies a narrow -- a relatively
11 narrow list of compounds that we've done a FQPA assessment
12 on. There are no risk issues or environmental worker dietary
13 -- when I say -- I mean there is nothing even close to being
14 an issue for us that would allow us to go forward with
15 establishing a tolerance with a very little amount of work.

16 Like basically do a dress run using the tolerance
17 level and a percent crop treated, so that we don't end up
18 doing 40 EUPs, but also losing 40 new uses. We could do 40
19 EUPs and maybe lose a couple of new uses in the process.

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1 MS. BRICKEY: And what is the policy value of
2 doing increased numbers of EUPs?

3 MR. JONES: The user community, especially as it
4 relates to OP alternatives, have found that the OP didn't --
5 and I'm going to be, I'm sure, over simplifying this
6 -- as a broad spectrum compound did not require a tremendous
7 amount of sophistication in using it. You sprayed it and
8 they died.

9 The newer compounds have a narrow spectrum and
10 timing can be critically important. And so they're finding
11 as users that when a new chemical comes on the market, they
12 don't know how to use it yet.

13 MS. BRICKEY: Okay.

14 MR. JONES: And it takes them a couple of years to
15 sort of figure it out. And the EUP hopefully will provide
16 that information phase.

17 MS. BRICKEY: The more field experience?

18 MR. JONES: More field experience.

19 MS. BRICKEY: Okay. On your list here on CARAT 2-

1 2, it says how does EPA prioritize its registrations, and
2 then you have this list. Where do OP alternatives fit on
3 this list? Is it the bottom one?

4 MR. JONES: No. It's a reduced risk conventional
5 pesticide. And if it's an OP alternative that is reduced
6 risk as well, it goes just above it. If it's an OP
7 alternative not reduced risk, it just goes -- it goes just
8 below it.

9 MS. BRICKEY: So that would be like the top of that
10 second category?

11 MR. JONES: That's right.

12 MS. BRICKEY: And can you talk a little bit about
13 alternatives to methyl bromine that you've registered? What
14 they're for?

15 MR. JONES: We're not having great success here,
16 largely because there have not been a great number of
17 alternatives identified. We have had a handful identified.
18 They are very challenging compounds. They include other well
19 known soil fumigants, such as telone. We have one compound

1 that we're working with a potential registrant who may be
2 willing to support the data generation necessary for a
3 currently unregistered pesticide, but it is likely to be not
4 a real simple registration action.

5 So we have had a handful of expansions of labels
6 involving some herbicides -- halasulftruan (phonetic) for one
7 -- that have very narrow methyl bromide alternative
8 potential. And we have NRQ, a telone label expansion for
9 strawberries and tomatoes, and adazimet (phonetic). Adazimet
10 breaks down to MITC, another challenging compound that we're
11 going to be working on in 2001.

12 MS. BRICKEY: Okay.

13 MR. JONES: That's right. You've got two flumes of
14 phosphene gas that was registered a year ago.

15 MS. BAKER: I have to say one quick thing of
16 unrelated business. One thing that I have learned through
17 this TRAC and through CARAT is that Robin Spitko and I have
18 one thing in common, and that's that we both have only one
19 child, a daughter, about the same age, both named Emily. And

1 Robin's Emily is here today and it's her birthday.

2 And so I just wanted to say happy birthday to
3 Emily. I think it's an unusual way to spend your birthday,
4 Emily.

5 **(Laughter.)**

6 MS. BAKER: You should go out and see some of the
7 museums or something.

8 **(Applause.)**

9 MS. BAKER: But it's good that she's here. Jim, I
10 just had a couple of quick questions.

11 On the Section 18's, how many of those are repeat?
12 Is that included in those numbers?

13 MR. JONES: No. The majority of them are repeat
14 Section 18's, probably in the range of two thirds.

15 MS. BAKER: But of the 400 and whatever it is, some
16 of those are repeat?

17 MR. JONES: Absolutely.

18 MS. BAKER: Okay.

19 MR. JONES: About two thirds of them we had last

1 year.

2 MS. BAKER: Okay. And then on the California
3 harmonization, I can't tell you how thrilled I am that that
4 process is moving again. We actually had one of the first
5 products registered through that harmonization program four
6 years ago or whenever when it first started, and I think
7 that's an excellent harmonization.

8 I know I've heard the agency talk about
9 harmonization with Canada and their request for more
10 petitions that way. I think if the California harmonization
11 effort gets to the level that the Canadian harmonization
12 level is, you'll see lots of petitions come in from
13 registrants, because that's a high priority for us.

14 And then my last question I think probably -- I
15 don't know if you want to answer it or if, Marcia, you do.
16 But I'm just curious in listening to both Lois and Jim's
17 presentation, what is the split out in resources in OPP now
18 between registration and reregistration? What does it look
19 like?

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1 MR. EHRMANN: Steve or Marcia?

2 MS. BAKER: I'm sorry. Steve?

3 MR. JOHNSON: Yeah. We're both scratching our
4 heads to try to recall the numbers. Yeah, we're conferring.

5 **(Laughter.)**

6 MR. JOHNSON: I don't remember.

7 MS. BAKER: You can come back to me later. I'll be
8 around.

9 MR. JOHNSON: Yeah, that would be better to give
10 you what the number is.

11 MS. MULKEY: Yeah. I have a sense of it.

12 MS. BAKER: Okay.

13 MS. MULKEY: But I want to be --

14 MR. EHRMANN: We'll be coming back with their final
15 answer.

16 MS. BAKER: That's fine.

17 MR. EHRMANN: Wally?

18 MS. MULKEY: There's not that much --

19 MR. EHRMANN: Oh, I'm sorry.

1 MS. MULKEY: They're close enough to be more like
2 50/50 than 75/25.

3 MS. BAKER: Okay. That's what I was curious about.

4 MR. EHRMANN: Okay. Okay, good. Wally?

5 DR. EWART: I did have a question about methyl
6 bromide, but that has really been answered. I appreciate
7 that.

8 On the EUP process, what is the timing for being
9 able to have discussions on this?

10 MR. JONES: I mean, I think that we'll be ready to
11 share it to the public between -- by Christmas time.

12 DR. EWART: I shouldn't ask this, but could you
13 tell me what year?

14 **(Laughter.)**

15 MR. EHRMANN: An even numbered year.

16 MR. JONES: Our plan isn't that long.

17 MR. EHRMANN: Jean-Mari, last question before the
18 break.

19 MS. PELTIER: Mine is a quick one and an easy one,

1 I hope, too. On page two of CARAT 2-1 on the tallies of
2 Section 18's, is the section under Granted actually 389 and
3 not 289? I can't make the numbers out on mine.

4 MR. JONES: Yeah. That would not -- that does not
5 compute. We'll have our final Section 18 numbers out. That
6 doesn't look like the right number of granted.

7 MS. PELTIER: It's a typo or something.

8 MR. JONES: Yeah.

9 MS. PELTIER: My follow up to that was, we had had
10 pending, post-FQPA but also pre-FQPA, making some changes in
11 the way a Section 18 -- the justification for Section 18's,
12 including reduced risk criteria or resistance management
13 criteria, fitting into an IPM system.

14 Any further action expected from the Agency on that
15 this year?

16 MR. JONES: I don't believe this year we're going
17 to have much on that front.

18 MS. ROSSI: But I won't yell. We've been taking
19 department lessons.

1 **(Laughter.)**

2 MALE SPEAKER: Tax dollars at work.

3 MS. ROSSI: Yes. It's a shame it hasn't worked in
4 my case. We are actually, Jean-Mari, going to start working
5 in the new fiscal year on some of the other changes to the
6 Section 18 process that folks have been interested in. We
7 had a session -- actually I guess it was in '96 -- that RD --
8 Jim's folks -- ran. And so we'll get back to working on that
9 in the new fiscal year.

10 MR. EHRMANN: Okay. Let's go ahead and take a 10
11 minute break and we will reconvene. Thanks.

12 **(Whereupon, a brief break was**
13 **taken.)**

14 MR. EHRMANN: To provide a status report on various
15 budget related items that have been of interest to the
16 Committee, we have several presenters to provide an overview
17 of this material. And then we'll have time for a discussion.

18 The first is Al Jennings from USDA. Al?

19 MR. JENNINGS: Okay, thanks, John. At break I

1 handed out a piece of paper that summarizes the Department's
2 grants that are pest management related for FY 2000. These
3 are the ones that come through the Cooperative State Research
4 Education and Extension Service or CSREES.

5 And I don't have a lot to say about this, other
6 than I think it is a reasonably good summary of the grant
7 activities. And for those of you who are trying to add up
8 the columns, I did that last night and it's roughly 29
9 million dollars worth of pest management related grants
10 summarized here.

11 The program is described at the left. There are
12 several. The new ones in fiscal year 2000 are the CAR, RAMP
13 and Methyl Bromide Programs. The others have been around for
14 a while with the one exception, which is the IFAFS -- I F A F
15 S -- or the Initiative for Future Agriculture and Food
16 Systems, which was a one time program in FY 2000. It may be
17 resurfacing in FY 2001. We hope so. Anyhow, a portion of
18 that program was devoted to pest management and that is
19 captured here.

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1 The other thing I would point out is on the first
2 page, down near the bottom there are four under a program
3 called Centers. This is the old Pesticide Impact Assessment
4 Program that in FY 2000 our appropriation was changed from a
5 formula fund program with money going to each state to now
6 these regional centers, for which there are four.

7 They follow the old CSREES regional lines, which
8 are west, north, central, northeast and south. Although the
9 expectation and the requirement for the current centers is
10 over the next two to three years to come back to us and tell
11 us what is a more intelligent way of regionalizing this
12 program, we're looking for anywhere from 10 to 12 regions in
13 the future that will follow the agro/eco system. Not state
14 lines, but production areas.
15 So the program will be evolving into something that makes a
16 little bit more sense than the current geographic split.

17 I think that's about all I have to say, and I would
18 encourage you to take a look at the programs that were
19 funded. Generally I'm quite pleased with the way the grant

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1 process functioned. I should point out that this year
2 relevancy was a key part of the grant consideration in
3 addition to the scientific quality. So hopefully we have
4 targeted crops and pests and management systems that are high
5 priority.

6 If you have questions or want to talk more about
7 this after you've had a chance to digest it, I'll be around.
8 Of course you can ask questions now.

9 MR. EHRMANN: Yeah, let's take questions now just
10 on this part. Mark and then Carolyn.

11 MR. WHALON: Thanks, John. Al, I wonder about
12 -- as I look at these numbers -- and I haven't had a chance
13 to really put them away. But I'm wondering about if we
14 looked back over a couple of years, say, the dollars
15 allocated to pest management in USDA, say, pre-FQPA, and
16 since your budgets are set, what, one or two years in
17 advance? So we would be looking at '98 and '99 probably, or
18 '99.

19 I'm wondering what -- if we had a comparison or a

1 regression of dollars spent on pest management pre-FQPA and
2 post-FQPA what they would look like. Do you have any
3 estimate or thought on that?

4 MR. JENNINGS: Mark, I don't have a good handle on
5 the totals. Certainly contained within this budget are the
6 new programs -- the CAR, the RAMP and the methyl bromide.
7 CAR was funded at -- was that a million this year, 2000?
8 Yeah, one million in 2000. And RAMP was funded at four
9 million. And those are definitely new. And of course IFAFS
10 in here is new compared to the past. It was not funded in
11 previous years.

12 MR. PITTS: Mark, let me do this. I think that I
13 can call back to our budget office and probably working off
14 this cross cut at least get an aggregate number going back to
15 '96 to where we are. I'll try and get that done today so I
16 can give it to you tomorrow. Some of it just depends on how
17 busy they are.

18 MR. WHALON: That would be good, and I think that
19 would alleviate maybe or help point to some of the issues

1 that relate to the Agency's response to the need in minor
2 crops relative to change in the pest management picture.

3 The other thing that I was wondering about is the -
4 - as the Agency looks at the impact of FQPA, how would you
5 assess its prioritization of the importance of transition?

6 MR. JENNINGS: I'm not quite sure what your
7 question is, Mark.

8 MR. WHALON: Well, I mean among the priorities
9 -- among the priorities that USDA has, and what goals USDA
10 has, how would transition under FQPA shape up or compare?

11 MR. JENNINGS: To all the other funding?

12 MR. WHALON: Yeah.

13 MR. JENNINGS: Well, again, CAR and RAMP have been
14 specifically targeted at developing new pest management
15 systems, and to me it's a high priority. And I think if you
16 look through the projects that are funded, they are moving us
17 in that direction towards developing new management
18 techniques and tools or better use of the ones we have.

19 MR. WHALON: Is that published anywhere or set out

1 anywhere?

2 MR. JENNINGS: I think that we've tried to deal
3 with that issue through the RFP process. I can't speak to
4 whether or not the word transition is in there. But we've
5 tried to always make it clear that what we're looking for are
6 proposals that show that the particular commodity groups and
7 researchers are looking down the road to where they want to
8 be, and looking towards new tactics and new products and
9 putting a priority to those kind of programs.

10 And, again, trying to work a lot with CSREES on the
11 review panels and making sure that we've got sort of the
12 breadth of representation there of folks that are bringing
13 that into the discussion.

14 MR. WHALON: Yeah.

15 MR. JENNINGS: Again, I think if folks have any
16 recommendations on how we handled the process this time and
17 some things that would have been appropriate to have seen in
18 the RFP or something as far as how the EUP panel process
19 worked, I think we're certainly open to that. It's by no

1 means fixed.

2 MR. WHALON: I think it would be good in the
3 context of CARAT to see those priorities and where or how
4 FQPA is being addressed and what role it plays among the many
5 roles that USDA addresses.

6 My final question really relates to the panels
7 themselves and the process set out by the panels and the role
8 of crop profiles in that process. And my question is, did
9 having a crop profile accomplished influence whether or not
10 CAR or RAMP dollars were awarded to a particular program?

11 MR. JENNINGS: I think the crop profiles provided
12 good background information for the panelists. What may have
13 been more important is the availability of a pest management
14 strategy. Certainly if you look at this, I think there were
15 something like two million dollars here for carrots in
16 Michigan, that the researcher there attributes directly to
17 the development of that pest management strategic plan. So
18 it did provide the groundwork for the proposal development.

19 MR. WHALON: Yeah. Well, I'm just -- as a follow

1 up to that -- and I think that's really good. One of the
2 things that the CARAT Committee may be interested in is the
3 actual criteria used in evaluating these. What are the five
4 criteria and how they were weighed relative to the CAR and
5 RAMP grants as an information item.

6 MR. JENNINGS: Yeah. Those are available in the
7 RFPs -- the weighing factors. So we can get you the RFPs
8 from last year, if that would help.

9 MR. EHRMANN: Maybe that could be distilled out and
10 made available to the Committee.

11 MR. WHALON: Yeah, I think that would be an
12 appropriate thing to do.

13 MR. EHRMANN: Sarah, on this point?

14 MS. LYNCH: Yeah, just on this point. Al, could
15 you -- when you're doing that, would you also talk about the
16 panel. I know there were two components. There was the
17 science review part and then there was the relevancy. And
18 there was quite a bit of discussion and debate at the start
19 of those as to the weights that would be given to those two,

1 and I would be interested in having that as well.

2 MR. JENNINGS: Okay. I will get those to you,
3 along with the criteria, because the criteria do contain
4 weights as well.

5 MR. EHRMANN: Okay, great. Yeah, Jim?

6 MR. AIDALA: Yeah. Just a question for Mark or any
7 others familiar with or part of the land grant system. Are
8 you saying, you know, you start something in '96 or '97 and
9 the budget cycle -- what are you seeing as sort of the
10 impact? And maybe even from the private sector side, from
11 the companies and all. You know, is there more of a focus on
12 FQPA and what it means and how to get there? You know, how
13 does it affect your life in terms of somebody that is out
14 there dialing for those dollars?

15 MR. WHALON: I think that from the standpoint of
16 the land grants, I think there is a perception that it is too
17 little for the job to do -- for the job that needs to be
18 accomplished. And maybe that's always an issue there. I
19 think that the need for partnerships is accelerating and some

1 of that is happening.

2 From my particular view on what it takes to do
3 integrated science and get the fit of a system that works out
4 in the landscape, we're doing too little. And I would say
5 that as you look at -- as you talk to growers in particularly
6 and significantly affected commodities, there is kind of a
7 dull acceptance on their part as they move ahead and a talk
8 down resignation, if you would.

9 The issue of FQPA is not what it was 18 months ago
10 in the grower community, I don't think. It's more of a this
11 is happening to us and what are we going to do to survive.

12 MR. EHRMANN: Okay.

13 MR. WHALON: And that's probably not what you
14 wanted to hear.

15 MR. EHRMANN: Well -- and again, we may come back
16 to some of those issues when we get to this afternoon's
17 discussion if there are other views in response to Jim's
18 question.

19 Let me just say as it relates to the temperature in

1 this room, we don't want you just talking about vegetables.

2 We want you to feel like you're a vegetable.

3 **(Laughter.)**

4 MR. EHRMANN: But we're working on it. We're
5 working on it. Ms. Wayland?

6 MS. WAYLAND: This is just a comment.

7 MR. EHRMANN: Hang on folks. Hang on.

8 MS. WAYLAND: It's not a question.

9 MR. EHRMANN: Go ahead.

10 MS. WAYLAND: When I left the hill some years ago,
11 I remember that we had 17 programs at USDA that dealt in one
12 way or another with pesticides. And we were always talking
13 about how we needed to get that number down. And now I think
14 there is probably 40. And I think it makes it really hard to
15 translate to the public what you're doing.

16 So rather than talk to you about, you know,
17 changing programs or anything like that, I would like to
18 emphasize the value of really distilling this information so
19 people can understand qualitatively what you're doing. I

1 mean, I think it's important to be accountable for the
2 numbers, and I think you are. But, you know, to understand
3 what these different programs do and how they interrelate and
4 how the overall goals are being met for the Department is
5 really hard to discern.

6 I'm not trying to get you to do 50 pages of
7 paperwork. But just a little more editorial distillation up
8 front would really help.

9 MALE SPEAKER: Yeah. I think maybe one thing we'll
10 need to think about is reconvening folks and kind of going
11 through all of this. You know, initially with TRAC we went
12 through a very laborious process of explaining each one of
13 these line by line. And I know we've got a lot of new folks
14 around the table now.

15 So, again, I guess the other route that we need to
16 deal with is these are sort of line items over time. They
17 have evolved and taken a life of their own. And I think if
18 you look at the Department and our FQPA implementation, those
19 programs that we specifically are focussing on are going to

1 be things like IR-4, which has done a major overhaul to
2 support the FQPA.

3 MS. WAYLAND: Yes, it really has.

4 MR. PITTS: Al's office. And then basically crops
5 at risk and RAMP are really going to be the two programs that
6 we've really put in place to deal with FQPA. And to some
7 extent, also these centers that we're getting set -- the
8 regional centers. That is, again,
9 re-tooling the old PIAP system. But, you know, it's
10 something that the Department is trying to do there as well.
11 And then our data collection efforts.

12 MR. EHRMANN: Okay. Good suggestion. Robin?

13 MS. SPITKO: I hate to be controversial, especially
14 since I really do like USDA a lot and support you totally.
15 But a couple of years ago we talked about opening up this
16 grant process. And I know some of these grant programs are
17 open to the private sector. But I'm going through this list,
18 page after page after page, and with the exception of Larry
19 Elworth, there is not a single NGO funded on this.

1 MR. JENNINGS: Yeah, only PMAP -- Pest Management
2 Alternatives Program -- is the one that is open to the
3 private sector. Everything else is colleges and
4 universities.

5 MS. SPITKO: Yeah.

6 MR. JENNINGS: Fortunately or unfortunately. But
7 that's the constraint we work under from Congress.

8 MS. SPITKO: Yeah.

9 MR. JENNINGS: And again, let me just reiterate
10 that through the RFP process, what we've tried to make clear
11 is that we want to see proposals come in with grower groups
12 involved or other NGOs. So that was -- part of the criteria
13 was how open the proposal was to other stakeholders in the
14 RFP process.

15 MS. SPITKO: I totally agree with that. But there
16 is one inherent problem, I think, in the science review
17 process for the grants. Most of the people sitting on those
18 panels are land grant people doing the scientific review.
19 And I have some insight experience with that through the

1 National Alliance Independent Crop Consultants. And the
2 feeling is pretty strong that there is a prejudice against
3 grants for NGO people.

4 And I would just like to throw that out and let us
5 see if we can improve that. Because there are a lot of good
6 ideas in the private section, and often they are tied in more
7 closely with the growers and the problems that they are
8 actually experiencing.

9 So maybe we need more programs. You know, more
10 funding is always excellent.

11 MR. PITTS: Can I throw out an idea? Something
12 that we've toyed around with, but I can't recall if it
13 happened with the 406 money this time around. But with
14 things like Fund for Rural America and the initiative -- the
15 IFAFS program -- what we have typically done there is put
16 relevancy panels and science panels together in one mega
17 panel. So there is a lot of dialogue going on in the group
18 collectively and a decision is made, as opposed to a
19 relevancy review and then it gets shipped off to another

1 black box and something gets spit out.

2 I guess one thing, you know, that we're certainly
3 contemplating and I think we would like to move forward with
4 on the 406 money, which is the crops at risk and RAMP and
5 methyl bromide, is perhaps doing that of mashing relevancy
6 and science review panels together so there is an inner
7 process going on.

8 So that's just something we put out there for
9 people to consider and get back to us on.

10 MR. JENNINGS: Yeah. And if I could comment also.
11 Mark mentioned partnerships. And I think I would encourage
12 you and anybody else in the private section to try to partner
13 with the land grant system a little better. I think they are
14 probably more receptive in the area of pest management than
15 perhaps in other areas of basic research to getting that kind
16 of input.

17 Maybe Mark can speak to that or someone else from
18 the land grants.

19 MR. WHALON: I never turn down an opportunity in

1 that way. I think partnerships are absolutely key. And I
2 think we've seen some in the impact that these partnerships,
3 like the programs that have been in place recently from World
4 Wildlife and from the Pue Charitable Fund are good examples.

5 But I think there is also a history of partnerships
6 in the private sector, particularly with consultants. And
7 maybe later in the presentations when these people who are
8 really on the firing line make their transition presentations
9 that question should come up, because I think you'll find
10 that they have a very integrative look at how partnerships
11 work and actually do it in the field.

12 MR. EHRMANN: Okay. Let's go to Eldon.

13 DR. ORTMAN: Earlier today we heard several people
14 comment about new products, new tactics and new approaches in
15 pest control. Much was talked about with regard to the need
16 for those and that those are new technologies which require
17 additional education information.

18 As I perused the USDA and EPA budgets, I notice
19 significant increases in the regulatory process and virtually

1 zero or less than zero increases in education and pesticide
2 applicator training, for example. In some of the state
3 programs we recognize that the best regulatory approach is an
4 educational approach.

5 And I guess I would like to hear a comment or an
6 explanation of how the two federal agencies view this, and
7 how they might further consider what can happen in that
8 arena.

9 The second is a comment regarding partnerships.
10 Partnerships is recognized in the land grant system as an
11 important vehicle for getting a lot of good work done. I
12 just spent two days in Chicago in a partnership meeting with
13 a soybean group to look at problems that they are facing that
14 are new problems. We do this regularly in a fairly defined
15 fashion, and I think it is the way to approach these
16 problems.

17 But I'm very particularly interested in the
18 pesticide applicator training and this kind of partnership
19 development that doesn't seem to be seeing the investment

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1 that the regulatory process has.

2 MR. PITTS: The pesticide applicator training
3 program, I think we can walk through the budget in a little
4 bit here, which I'll do. But that has been a program that
5 has been grossly under funded by the Department, and I think
6 also by EPA as well, particularly as we move into these new
7 technologies that are going to be significantly more
8 complicated on top of an already complex system that folks
9 are dealing with.

10 We did attempt through our budget process, and have
11 attempted to do that historically through USDA, by having a
12 line item put in. We asked for one and a half million,
13 knowing that's not adequate as well, but it's certainly at
14 least trying to get things started.

15 We did get a couple of calls from the hill this
16 time on it, and I think we were hopeful it was one of the
17 things that was going to get funded. And it looks like that
18 ultimately did not prevail. But let me also say that part of
19 this whole FQPA effort for USDA has been kind of building on

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1 what our successes are and going back and catching up on the
2 things that didn't quite get funded, as well as we follow up.

3 We have got these grant programs in place, and we
4 were very happy to see not only these grant programs
5 sustained, but in most cases added on. In the next budget
6 process, I'm certain what will be happening is, you know,
7 we'll continue to try to increase funding for these
8 competitive grants programs, but then also go back and
9 revisit with additional focus on energy and those areas where
10 we still need to build on.

11 And I can tell you from the Department's
12 perspective two things that we really feel strongly that are
13 going to need to be emphasized in this next budget process.
14 It's going to be Al's office, getting it fully funded. We
15 basically had more requests coming in to work on pest
16 management strategic plans than we were able to do. We
17 basically ran out of money and had to shut down travel and
18 working with grower groups to do strategic plans, which I
19 think was unfortunate, because it's critical to getting your

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1 foot in the door on these competitive grants.

2 And then the pesticide applicator training program.
3 I think over the next couple of months we're going to want to
4 do some intensive work on where we want to see this program
5 go and look at it being more than a one and a half million
6 dollar program.

7 DR. ORTMAN: One comment to that. As you talk
8 about working with grower groups and so on, I would suggest a
9 significant partnership with the land grant system. We have
10 many grower group meetings in which we could partner and have
11 this as part of the topic. I think there is excellent
12 opportunity to work collaboratively, and I would encourage
13 that to continue to build.

14 MS. MULKEY: Let me add a little bit to Keith's
15 answer on certification and training.

16 MR. EHRMANN: Sure.

17 MS. MULKEY: It is true that the overwhelming bulk,
18 if not all of the funding for that, has been through EPA's
19 budget, and that it has been a steady state.

1 There is a potential opportunity, because we have
2 completed the reassessment of the certification and training
3 program, and we have a number of very comprehensive,
4 sophisticated ideas that have come out of that. That was a
5 partnership reassessment that involved the states and USDA.
6 And that is completed and we're ready for the implementation
7 phase. And that offers opportunities not only to have a
8 dialogue within the Executive Branch and with the Congress
9 about funding, but other kinds of reforms and enhancements
10 and so forth that can make that a more effective program.

11 But I think we're increasingly aware that that is
12 now a mid-20th century program with 21st century needs.

13 DR. ORTMAN: When, where and how will that
14 information be made available to the system at large?

15 MS. MULKEY: Is the report public, Anne?

16 MS. LINDSAY: Yeah. There is already, actually,
17 information out about the recommendations from the assessment
18 group. It's on a web site whose address I cannot remember.

19 MR. EHRMANN: Maybe we can get that for folks.

1 MS. LINDSAY: Yes.

2 MS. MULKEY: Yeah, we can get that.

3 MS. LINDSAY: And we would actually love to talk
4 with you about some of your thoughts.

5 MR. EHRMANN: Let me ask the folks who have their
6 cards up. We've got two more presenters on these budget
7 issues to handle the broader kind of budget situations both
8 for USDA and EPA. So if your question goes to larger budget,
9 I would ask you to hold it until we have those two
10 presentations, because it may get answered. If it goes
11 specifically to what Larry was describing in terms of the
12 grants program, let's take it now.

13 Jay, is yours on --

14 MR. VROOM: Yes.

15 MR. EHRMANN: Okay, go ahead and then Steve.

16 MR. VROOM: In the context of partnership, both
17 centrally here in Washington at USDA and then out among the
18 land grants, how are we formally or informally networking
19 with the registrant community? I'm thinking specifically

1 about the significant amount of research that private
2 companies fund at many land grant institutions, that which
3 has been destroyed by night garden or felons and otherwise.

4 But have we looked at those kinds of partnerships
5 and could we -- is there an opportunity for us to maybe gain
6 some connectivity there with ongoing research that the
7 private sector has at the land grants that could mesh with
8 some of what you've got going on here or add to it?

9 MR. JENNINGS: Yeah. I think the partnership with
10 the registrant community certainly is there, particularly
11 when we're looking at new delivery tools. I think, again, we
12 are not investing in the standard chemical efficacy and that
13 sort of work that you folks have funded quite well for a
14 number of years, but innovative use of the existing
15 chemicals. I think this is high priority. And certainly as
16 far as I can tell, you're there at that level.

17 MR. VROOM: Okay. So you don't think that we're
18 missing any opportunities by not having some formal group of
19 company representatives organized to do interface?

1 MR. JENNINGS: I think it may help to, you know,
2 sit down and talk about that.

3 MR. VROOM: Okay.

4 MR. PITTS: In the spectrum of what's going on and
5 where everyone fits in. Certainly, I would be happy to do
6 that.

7 MR. VROOM: You know, I can think of some examples
8 of where, you know, people in company headquarters don't know
9 that people in their regional organizations have funded
10 certain, you know, minor research activities with university
11 X or experiment station Y.

12 And so I'm sure that we're missing some
13 opportunities there with the private sector support that is
14 already there at the land grants.

15 MR. PITTS: And I think you're probably right in
16 that sense that in general we're all going through the effort
17 of trying to figure out how to incorporate other stakeholders
18 in general.

19 MR. VROOM: Yeah, good.

1 MR. PITTS: And I think that we had made that
2 effort to make sure that industry, as well as grower groups
3 and NGOs, are part of the panel review process. I think also
4 part of what we're trying to do with this whole
5 regionalization effort is move some of the money out to those
6 regions and have grant decisions made out there. Hopefully
7 by moving it out from D.C., it helps bring in people from
8 those communities that are going to have a higher awareness
9 of what's going on in those regions.

10 So that's certainly part of the game plan.

11 MR. EHRMANN: And quickly, Steve, Dave and Robin.

12 DR. BALLING: Well, Keith, I think you've just
13 answered my question, which I'm very pleased to hear the
14 answer. We've got about four million going to these regional
15 pest management centers. Right now most of that money is
16 oriented toward crop profiles and pest management strategic
17 plans. And, you know, you still have another whatever
18 million dollars of other programs.

19 You do, then, have a sense that the funding

1 decisions are going to be moving out toward those regional --
2 and I assume the future is the agro ecological regions, that
3 the decision will be moving there? Because that's the way
4 you're going to get the partnerships and the value grassroots
5 approach.

6 MR. PITTS: And again, that's the intent. It's
7 something you've got to move into. And I don't want to give
8 anybody --

9 DR. BALLING: False hope.

10 MR. PITTS: -- false hopes about what we did with
11 these regional centers. Again, it was not a new infusion of
12 cash. It was basically capturing an existing pot of money
13 and basically using it to get these centers set up. So
14 basically that base funding that we've got there is going to
15 sustain the system that Al has to depend on when he's asking
16 for questions about a risk mitigation or a risk assessment
17 issue.

18 But our hope is over time to take things like crops
19 at risk and RAMP and move those out in the regions, and

1 hopefully enhance their funding as well and let more of the
2 work go on out there.

3 MALE SPEAKER: And certainly our goal is to get
4 more money out to the regional centers.

5 MR. EHRMANN: Dave?

6 DR. WHITACRE: A perusal of the titles for the
7 folks that have gotten grants indicates two things to me.
8 Number one, that the areas covered are probably areas where
9 work is needed. And the other is that there are quite a few
10 new types of activities under investigation compared to what
11 you would have seen four or five years ago: new tools, new
12 ways of thinking, new thoughts and new approaches.

13 The question is, I also see some old things on
14 here. You can't tell much from the titles. But the question
15 is, how vigorous is the challenge process during the
16 deliberations as to what does and what does not get granted
17 as to on the topic of projects that have gone on before and
18 projects that are really unlikely to produce the results
19 wanted?

1 In other words, methods that really have been done
2 before and tried and they're unlikely to produce results. Is
3 that challenge process vigorous, or how does it work? And a
4 short answer is fine.

5 **(END OF TAPE TWO, SIDE A)**

6 MR. JENNINGS: -- sure what goes on in those
7 individual discussions. Therese observed one of them, at
8 least. Maybe you can respond.

9 MS. MURTAUGH: If you notice that the first column
10 under program, if it's a congressional gift or
11 whatever --

12 MALE SPEAKER: Earmarked.

13 MS. MURTAUGH: Yeah, earmarked, excuse me. There
14 is no challenge. However, for the other programs there was a
15 relevancy review. And, sir, I believe that the relevancy was
16 25 out of 100 points. I think that's correct. Perhaps more.
17 But it was a significant amount that if a program was not
18 judged as being relevant, it was very difficult for it to get
19 through the scientific evaluation with enough points to be

1 funded.

2 And as Keith said, the discussions are going in the
3 direction of increasing the number of producer
4 representatives on the panels and having a single panel with
5 more producer representatives, so that the relevancy and the
6 need for the project gets higher consideration.

7 I think that there have been a number of changes
8 that USDA believes are very needed, and you should see them
9 with the next round of proposals.

10 MR. PITTS: And I was looking at -- with all of
11 these grants with reporting requirements put in place and for
12 the longer term ones, there is an evaluation process that
13 goes with those grants, which is something that we've been
14 working very closely with CSREES and reviewers to make sure
15 there is follow up on getting those reports in and that some
16 kind of an evaluation happens with them as well.

17 And I think to date, because these programs are so
18 new, the only ones that we've really had a round of
19 evaluation on on how these grants work are the PMAP programs.

1 And I think if you want to get copies of some of those, we
2 can certainly pull those together just to give you a sense.

3 MS. MURTAUGH: Also, Dave, as more pest management
4 strategic plans are developed, we're hoping to tie the grant
5 programs into that planning effort, so that those plans can
6 document the need.

7 MR. EHRMANN: Mark, did you --

8 DR. WHITACRE: What I heard was that some are
9 challenged vigorously and some aren't.

10 MR. EHRMANN: Can we move along? Did you want to
11 make a comment on this, Mark?

12 MR. WHALON: I just want to comment to Dave's
13 thing.

14 MR. EHRMANN: Okay.

15 MR. WHALON: Having served on numerous regional IPM
16 committees and on -- not on CAR or RAMP. But on other
17 competitive grants within USDA panels and boards, etc., the
18 thing that I can tell you is that the most significant
19 scrutiny in the process are these relevance criteria. If you

1 don't meet one of those relevance criteria, you're out before
2 you're in. So the relevance criteria are crucial, and how
3 they're weighted are crucial.

4 And then the final cut -- and this is where the
5 sting really is. You may have dollars to fund nine or 16 or
6 22 or whatever it is, and you might have 90 or 50. And more
7 than half of those are relevant and targeted and appropriate,
8 but for one reason -- a very small reason -- they're knocked
9 out. And that's the truth of the competitive process.

10 MR. EHRMANN: Okay. There are some other issues I
11 want to get through before lunch, so quickly Robin and Dan
12 and then we're going to move on.

13 MS. SPITKO: Mine is just a really quick procedural
14 question about the partnership process. The land grant --
15 when you partner with an NGO, the land grant still has to be
16 the submitting organization, right? I mean, there is no way
17 that the NGO can be the principal investigator, so that all
18 the funds are still controlled and disbursed by the
19 university system? Is that correct?

1 MR. JENNINGS: Right. The institution that wins
2 the grant is responsible for managing the money. But, again,
3 passthroughs and subcontracts are perfectly acceptable from
4 the federal level. It depends on your relationship with the
5 educational institution.

6 MS. SPITKO: But even if the program was -- and the
7 grant was proposed by a private sector person and they were
8 the primary person in the process, it would still -- the
9 university person would win the grant and administrate it,
10 right?

11 MR. JENNINGS: Right.

12 MS. SPITKO: Okay.

13 MR. EHRMANN: Okay, Dan?

14 MR. BOTTS: Just one quick comment that goes to
15 Dave's comment as well, and specifically on the methyl
16 bromide issues that are in there. Just to give you some
17 appreciation for the complexity behind what is listed in
18 there, there is a single project in there that we were
19 involved in in stimulating the process of putting the grant

1 proposal together.

2 We didn't put the grant proposal together. We
3 brought the researchers together. It has one person's name
4 on it and one person's title at the end, but that actually
5 represents 11 different research projects in the state.

6 And as far as relevancy goes, we screened out about
7 20 other proposals before that project was ever put together.
8 It goes into the mass at USDA where the review was. You see
9 a big number over there, \$350,000 for that particular
10 project. The initial request that went in, which we had cut
11 to the bare bones, we thought, was \$520,000 to get those 11
12 projects done.

13 So you're sitting there starting off at the very
14 front going back to those very same researchers, who had put
15 together what they thought was a bare bones project, and
16 saying, all right, you've got to take another 25 percent off
17 the top. Can you do your project at those levels? And then
18 there are some other issues relative to overhead being taken
19 out and some other things and how that is calculated and

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1 other issues.

2 My comment relative to this is that this is a
3 little misleading. It looks like -- if you looked at these
4 numbers alone, it says there is \$350,000 on the ground in
5 research on methyl bromide in Florida on alternatives
6 relative to this funding level.

7 And we're appreciative of these dollars. It
8 exactly translates to the direct cost of the research itself.
9 About 10 to 20 percent of that is actual dollars hitting the
10 ground to pay for the field level research. The rest of it
11 is eaten up in overhead and salaries and those kind of things
12 which are built into the process.

13 Now we've got to have it, but the numbers tend to
14 be a little misleading as far as what actually translates to
15 getting the information back that we can go out to the
16 growers with and help solve the problems.

17 MR. EHRMANN: Okay. Let's go ahead and have Jim
18 and Keith give some additional overall budget information and
19 then we'll have time for a few more comments.

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1 Jim or Keith?

2 MR. PITTS: Okay. I'll tell you, let me just wrap
3 up here.

4 MR. EHRMANN: Why don't you go ahead. Yeah.

5 MR. PITTS: I think we've kind of touched on the
6 issues. I think if the folks have questions, this is a two
7 pager. It got thrown together last night by our budget
8 office. It's where we think we're coming out for the FY 2001
9 conference.

10 Let me just make a couple of edits here. On the
11 column that says 2000 Current Estimates, the first column on
12 the first page, there are zeros across there. If you could
13 put in 35.845. That's what that should add up to.
14 Somebody's spreadsheet wasn't working well.

15 MR. EHRMANN: Say that again, Keith.

16 MR. PITTS: 35.845.

17 MALE SPEAKER: That's the total at the bottom here
18 where there are all zeros.

19 MR. PITTS: And if you go to the second page, again

1 that first column, I was a little bit deflated when I saw
2 this as well. But the first column, 2000, that number should
3 not be 45.896. It should be 81.741. So basically what
4 looked like it was close to our doubling of an IPM budget
5 here, it's really about a 7.2 million dollar increase between
6 what our actual 2000 budget was and what it looks like we
7 have.

8 MR. EHRMANN: Okay.

9 MR. PITTS: Again, I don't want to de-emphasize our
10 happiness about seeing some increases in critical programs.
11 But again, it's not a doubling of our IPM research budget.

12 A couple of things that are non-research related
13 are just we were able to get full funding for the pesticide
14 data program, which is quite helpful. FSIS, our Food Safety
15 Inspection Service, was also given some additional funding to
16 help with meat samples, which will be sent into PDP for
17 analysis.

18 We also did get an increase in the National
19 Agricultural Statistics Survey, and that increase mainly is

1 going to reflect adding some minor crops in existing fruit
2 and veggie surveys, and also putting nursery and greenhouse -
3 - they're going to start nursery and greenhouse surveying.
4 That's going to help that program continue. So that was
5 another key add on.

6 Another thing that is not reflected in this budget
7 is the Initiative for Future Food and Agricultural Systems, a
8 120 million dollar program, which there has been some
9 question about whether or not that would continue. In the
10 conference that 120 million dollars is there, and again
11 that's going to be an internal discussion within the
12 Department and outreach on stakeholders about how that money
13 should be spent. But I think considering where we are with
14 FQPA and IPM related issues, you can anticipate seeing some
15 of that funding warded off for IFAFS as well.

16 And those of you that follow --

17 FEMALE SPEAKER: I'm not clear on that, Keith. Is
18 this 120 million in new money?

19 MR. PITTS: It's 120 million in addition to this.

1 The last time when we met we talked about the initiative for
2 future food and agricultural systems, which is a competitive
3 grants program that set up mandatory money. Not a
4 discretionary account.

5 The appropriators in the past have tried to put a
6 limitation on us using that money, and what they have done in
7 the past two years is, quote/unquote, made a mistake and let
8 us rollover a previous year's money into this year. So what
9 we've been able to do is capture 120 million dollars in
10 mandatory spending.

11 And this past year the Secretary, working with
12 stakeholders and CSREES, cut out this 120 million dollars in
13 the different categories. Some of it went for biotech type
14 work. Some went for nutrition work. Some went for good
15 agricultural practices for pathogens on crops. Some went to
16 natural resources, with a component of that being IPM
17 programs, some of which were funded in this chart here. So
18 that money is also going to be available to the Department
19 over the next fiscal year to get out, so there will be an RFP

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1 process.

2 I should also just indicate to you that in the past
3 that has been a program that has been broadly available, even
4 to the private sector to apply, and it looks like there has
5 been a limitation put on it, that it's only available for
6 land grants this next fiscal year. So that is a giant change
7 in the program.

8 And I guess the other issue, those of you that
9 follow the national resource initiative, that I think it took
10 a little bit of a cut in the conference. I think we ended up
11 at 106 million dollars for the next fiscal year, which is a
12 13 million dollar reduction of the FY 2000 level and 44
13 million dollars less than what the administration requested.

14 MR. EHRMANN: Okay. Sarah?

15 MS. LYNCH: Keith, in this -- do you have any
16 information on the funding for organics in here? I mean, in
17 terms of thinking about programs related to responsibilities
18 -- USDA responsibilities under FQPA. And we're talking about
19 alternatives to pesticides.

1 Wouldn't we want to be looking also, or thinking
2 about perhaps some relationships between that research and
3 how it might actually help provide some of these
4 alternatives? I mean, organic agriculture has demonstrated
5 pretty successfully that you can actually farm without
6 synthetic pesticides.

7 So there might be some solutions there?

8 MR. PITTS: Yeah. Again, we have other tools
9 available to us. And I think probably what we'll due for is
10 another workshop with USDA and stakeholders and talking about
11 where all these programs are and where they need to head.
12 That is something that I'll get set up.

13 And we were just talking, too, about pesticide
14 applicator training programs. We're committed to doing some
15 kind of workshop there within the next few months as well,
16 once we get these regional centers up and running.

17 But I agree with you. And again, this was a rush
18 job --

19 MS. LYNCH: Sure.

1 MR. PITTS: -- to just tease out some things. So
2 it doesn't fully reflect everything the Department has
3 available to it.

4 MR. EHRMANN: Okay. Jim, do you want to do the
5 EPA's?

6 MR. AIDALA: One clarification. Keith, is the 2001
7 budget the President's budget request? It's listed in the
8 second column.

9 MR. PITTS: Yes. That would be what we requested.

10 MR. AIDALA: Okay. And then just sort of a
11 conclusion, that means you requested 108 and appear to be
12 getting 89?

13 MR. PITTS: Correct.

14 MR. AIDALA: And then you can crosswalk -- just
15 what I'm doing. Cross walking those important two columns to
16 kind of indicate where, shall we say, congressional
17 priorities lie.

18 And with that segue, our budget is not as well
19 along in the process. We hope to have a budget. We are

1 going to the Senate I believe this -- maybe this week, I'm
2 told, just from reading the newspapers like everyone else.

3 But in our President's budget request we did
4 request 121 million for the Office of Pesticide Programs, and
5 that represents paying for 936 positions, just to give some
6 sense of scale. About 75 million of that is for FQPA
7 activities, and in that arena we did have an eight and a half
8 million dollar increase in our request. Of the eight and a
9 half million dollar request for, again, FQPA activities, that
10 was about one million dollars for ag partnership initiatives,
11 two million for the screening and testing program required in
12 the FQPA for endocrine disrupters, an additional one million
13 for registration of safer, reduced risk pesticides, an
14 additional three and a half -- or about three and a half
15 million dollars for tolerance setting and reassessment under
16 FQPA, and about almost a million dollars for the partnership
17 environmental stewardship program and for IPM.

18 So basically the point is those are the activities
19 that I just ticked off that were the ones that got some

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1 increment within the President's budget, which, again, kind
2 of -- it is this time of year where the President tends to
3 get more of his way than other times of the year in the
4 appropriations budget cycle. And we are told that we're
5 doing pretty well, but, again, if we don't have it, we don't
6 see it and obviously it's up to Congress at the end of the
7 day to see what we have.

8 And that's about it on our budget per se. There
9 are a couple of other issues sort of very related that I
10 would like to raise. One is, again, we know an issue for
11 many folks has been fee for service. We continue to have
12 some discussion about fee for service with obviously the
13 regulated community. Obviously with hopefully just a few
14 days left in the session, it appears unlikely that anything
15 is going to happen there this year.

16 Two issues that are more important. We do have any
17 FQPA a requirement to issue a rule to recover all of our
18 tolerance associated tolerance setting associated activities.
19 That rule was proposed. We were prohibited by the

1 appropriations bill last year from making the rule final.
2 We're riveted in the current CR. It appears likely we'll be
3 prohibited in the current fiscal year bill.

4 Meanwhile, OMB has seen in its wisdom to set aside
5 -- to offset our budget by seven million dollars in
6 anticipating some revenue stream from that source -- from the
7 rule on implementing the tolerance fee provisions of FQPA.
8 It's not clear what -- and we hope that has been taken care
9 of again as we see the bill. But, again, otherwise that's a
10 seven million dollar shortfall in this program, which is
11 rather significant for these sets of activities. If we're
12 made whole, then obviously that's something that we would --
13 that we are working toward and hopefully we'll get.

14 The other thing is that under current law the
15 maintenance fees, which was set up originally in the 1988
16 amendments, is 18. Over time it's been 14 to 16 million
17 dollars in maintenance fees. There is a revenue stream
18 coming in to support review of older chemicals -- older
19 pesticides. That authorization to collect that fee expires

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1 at the end of 2001 -- the end of fiscal year 2001.

2 That shortfall represents what we use to pay about
3 200 to 220 positions in the program of, again, 930 or 940
4 positions. That is a significant shortfall. Obviously
5 that's something that we need to address as we go into the
6 next budget planning cycle. But that shortfall would be
7 critical if we ended up having to -- again, have to make up a
8 14 million dollar difference in this program.

9 That's it in terms of a quick summary.

10 MR. JOHNSON: Do you want to respond to some of the
11 EPA split?

12 MR. EHRMANN: We have other information. Nothing
13 like a break to get the real data about the question Cindy
14 asked before.

15 MR. JOHNSON: Cindy, the split is, of the 936 FTEs
16 or people that Jim referred to, about 60 percent are
17 supporting reregistration and tolerance reassessment and
18 about 40 percent are supporting registration.

19 With regard to the contract dollars, if you will,

1 contract and grant dollars of 121 million, taking off 13
2 million dollars for state grants, 10 million dollars for
3 certification and training, worker protection grant contract
4 activities, the pesticide and environmental stewardship
5 program and , some international work -- so basically taking
6 off somewhere between 25 or so million, the remainder of
7 that, the split, is 55 percent of those contract dollars are
8 going to reregistration and tolerance reassessment, and 45
9 percent to registration.

10 MS. BAKER: Thank you.

11 MR. JOHNSON: So that will give you some sense.

12 MR. EHRMANN: Thanks, Steve. Steve?

13 MR. RUTZ: Jim or Steve, just a quick question on
14 the state cooperative agreement funding. Can you briefly
15 outline what the 2000 budget had it in for state funding
16 versus what is requested in 2001?

17 MR. JOHNSON: Steve, it's a study state, so about
18 13 million.

19 MR. EHRMANN: Okay. Any other questions for Keith

1 or Jim on the broader -- as you can tell, obviously the
2 numbers are fresh and evolving at this point. So at this
3 point, you know as much about the budget issues as anybody
4 else in terms of what is emerging from the congressional
5 process.

6 Shelley?

7 MS. DAVIS: There was a recent GAO report -- I'm
8 trying to remember the date, maybe July -- that was critical
9 of the EPA's oversight of state enforcement of the worker
10 protection standard, and money figured into that. And I was
11 wondering if that report figured into your budgeting?

12 MALE SPEAKER: I'm glad you guys have that, because
13 we were just looking at the letter writing to Congress about
14 that just this morning.

15 MR. EHRMANN: Go ahead.

16 MS. MULKEY: Well, we have, as you probably saw
17 immediately, answered that report in part by saying that we
18 think it raises some issues that are legitimate and of real
19 concern to us.

1 We had already announced that we had underway a
2 major reassessment of the worker protection rule and its
3 implementation. We're conducting it jointly with our Office
4 of Enforcement and Compliance, and that's proceeding this
5 year. Out of that reassessment may very well come budget
6 initiatives as well as other things.

7 But our short term focus in responding to that
8 report, and of our own initiative, is to focus on
9 understanding more fully what the implementation picture is
10 like and where the issues are. Our Enforcement Office is
11 conducting some very comprehensive looks at some selected
12 states and regional approaches and so forth.

13 So we are in the beginning phases of responding to
14 that report and to the issue.

15 MR. EHRMANN: Okay. Just in summary, it sounds
16 like there were a number of, I think, very useful
17 suggestions, particularly in response to Al's presentation
18 about how to describe and package the information relative to
19 all the various grant programs. It strikes me -- you know,

1 these descriptions obviously are kind of from the source of
2 the money out. But for those who are receiving that
3 information, it's still a lot of different subsets and units
4 and categories and etc.

5 So I think Keith's offer to develop a workshop
6 opportunity to kind of lay all of this out and maybe look at
7 ways of organizing it would be very helpful, as well as kind
8 of pulling all the pieces into that, as Sarah and others
9 suggested, so people get an idea about the big picture in
10 terms of all the different types of funding.

11 And we'll come back to that tomorrow in terms of
12 specific follow up. But that's a suggestion that I get a
13 sense people would find very helpful to have that kind of
14 written information, but also an opportunity perhaps to have
15 that kind of discussion in a group setting about all the
16 various pieces. And by then, obviously, we'll have some more
17 certainty as to these final numbers on both the USDA and EPA
18 side.

19 Let's go on, then, to the updates that we've

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1 scheduled in the next part of the agenda relative to several
2 issues that I know are of interest to the Committee. And
3 kind of keep track of the time. We may reserve one or two of
4 these until after lunch.

5 But let's go ahead with the cumulative risk
6 presentation. And Vicki, where are you?

7 MS. DOYLE: I'm --

8 MR. EHRMANN: You're not Vicki.

9 MALE SPEAKER: Beth Doyle.

10 MR. EHRMANN: Beth Doyle is going to do it.

11 MS. DOYLE: Yeah. I'm filling in for Vicki
12 Dellarco today. We share joint responsibility for the
13 development of this paper. She was not able to come.

14 Okay. So I will quickly go through this update. I
15 want to touch on three points. Where we are as far as
16 developing our risk assessment methodology. I'm going to
17 touch on the public comments that we've gotten on our draft
18 guidance document, our September SAP meeting which just
19 finished, in which we reviewed the hazard and dose response

1 portion of our upcoming case study, and our next steps.

2 Can I have the next slide, please. Okay. We
3 issued an announcement of availability of our draft document
4 on June 30th, and we asked for public comment about the
5 content and approaches that were outlined in that particular
6 paper. Ten commenters responded. There were a fairly varied
7 number of other government agencies and some industry groups
8 and public interest groups.

9 Next slide, please. There were a number of major
10 points of agreement with us as far as what we had put in the
11 document. Generally the comments indicated that we were
12 following -- we were ready to take an important step forward,
13 that we were following sound science principles in developing
14 our approach, and that we needed to continue to consider this
15 a work in progress. In other words, we think this will be
16 developing for years to come as the science grows.

17 Next slide. The public comments that we got
18 focussed on the need for greater discussion and clarification
19 of the points that we tried to make in our document. A few

1 of them are highlighted on the slide. Generally we felt that
2 we had not explained adequately or clearly enough what
3 approaches we were using or how we planned to proceed.

4 Next slide. We sought public comment through this
5 public participation process and also a formal peer review
6 process.

7 Next slide. The public comments that we got from
8 public interest groups urged us to move ahead. They felt
9 that our process was developing rapidly, that we had
10 sufficient data. They also urged us to be as inclusive as
11 possible in all of our assessments.

12 Next slide, please. The industry comments tended
13 to focus on other areas. They were concerned about lack of
14 data. They had comments that, again, we had not adequately
15 represented what our approach was intended to be, and they
16 pointed to the need for a better developed case study that
17 would allow them to understand how we planned to work with
18 data. We plan to go forward with that case study in December
19 to the SAP -- a completion of it -- so that they will have

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1 that information available. They also agreed with us on a
2 number of points, that we should try to not mix highly
3 refined data with screening level data.

4 Next slide. Our next step forward in publicizing
5 our process and in trying to seek peer review and public
6 comment is to go to -- was to go to the SAP in September of
7 this year with our pilot hazard assessment. We wanted to get
8 feedback on our approach. We wanted to get feedback on our
9 handling of data. And we were responding to the SAP's
10 specific request that we come back with a more detailed case
11 study, so that they could evaluate what our discussions --
12 our general discussions and our guidance document were
13 describing.

14 So in that case, we went back with a 24 chemical OP
15 assessment where we demonstrated how we would work with the
16 existing data in order to get that feedback and to allow
17 public comment.

18 Next slide. Generally the SAP felt that our
19 approach was good. They were complimentary about our ways of

1 putting together data. They thought our criteria for working
2 through the data were appropriate, and they agreed with much
3 of what we proposed.

4 They did have suggestions -- a number of
5 suggestions -- on how to tackle problems that we had been
6 grappling with. We posed to them a number of questions and
7 they were able to provide us with pointers which will help us
8 to refine this case study before it goes final.

9 Next slide, please. One of the -- some of the
10 specific cases that they pointed to, they offered suggestions
11 on our modeling -- modeling of our dose response. They gave
12 us improved ways to deal with the data. We are pursuing
13 those now, although we have not yet completed our
14 modifications.

15 They told us that they thought our use of our data
16 should continue to be transparent and that we should deal
17 with it carefully, but they actually encouraged us to go
18 farther in using surrogate data. Where we had absence of
19 data for one chemical, they thought that we should be able to

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1 look across the class to extrapolate to others. And they
2 encouraged us to be more forthcoming with default assumptions
3 where we had a lack of data, as long as they were based upon
4 sound science and could be defended.

5 Next slide, please. As we go forward with trying
6 to develop the document, as we go forward to take the rest of
7 the case study forward to the SAP, we plan to take an
8 exposure component in December. At that time we will respond
9 to the SAP's request for a more detailed case study that was
10 posed to us in December, and demonstrate how we will work
11 with that, the residential and dietary components and water
12 components of the data.

13 Then in early 2001, based upon feedback from both
14 public comments and the SAP, we hope to go out with a revised
15 guidance document or seek further comment as needed.

16 Thank you.

17 MR. EHRMANN: Comments? Questions? Cindy?

18 MS. BAKER: Beth, what exactly are you guys
19 planning to take in December? Is it a case study with the 24

1 OPs that have -- that you have PDP data for? What do you
2 have in your parameters for what you're going to take to the
3 SAP in December?

4 MS. DOYLE: We're going to use the same -- because
5 we haven't finished addressing the September comments, we're
6 going to work with the same hazard data set that we took in
7 September. And then we will work with other data -- other
8 exposure data, the monitoring data, for instance, residential
9 exposure data, water data as it is available -- to
10 demonstrate how we would approach using this information if
11 we were going to do a cumulative assessment comprehensive.

12 MS. BAKER: And I know you guys are looking at
13 several different models with Lifeline and Cares and
14 Calindex. What are you taking to the SAP, all three of
15 those? I mean, obviously all three are not in the same
16 stage, so what method are you taking?

17 MS. DOYLE: In this particular case, we're planning
18 to go forward with Calindex. We want to focus on the data,
19 not on the models for this particular assessment. We are

1 trying to ask the SAP to comment on our guidance document and
2 not the differences between the various models.

3 MS. BAKER: And then just kind of as a follow up,
4 what is the time line then for the Agency for this? I mean,
5 you take it in December to the SAP and then what?

6 MS. MULKEY: As you know, this is something that
7 you -- we have been absolutely open about.

8 MS. BAKER: Right.

9 MS. MULKEY: And everything we know, you know. And
10 obviously we now know -- have some sense of what we will do
11 in December as a result of having gone through September. So
12 we will have some much better sense of the next step as we
13 prepare for and go through December.

14 MALE SPEAKER: Cindy, there is some fear that
15 before the end of this administration we're going to pop out
16 a cumulative use assessment --

17 MS. BAKER: I know you're not going to do that.

18 MALE SPEAKER: No, we're not going to do that.

19 **(Laughter.)**

1 MALE SPEAKER: So lay to rest any concerns.

2 MS. BAKER: Yes.

3 MR. EHRMANN: Jay and then Bill.

4 MR. VROOM: So is there any kind of range of idea
5 of where and how you would go about validating the various
6 computer software models? And would that be the same SAP
7 that had just met?

8 MS. DOYLE: Actually, one of the discussions we've
9 had at several of these particular series of SAPs is that
10 it's really not possible to validate in the strictest sense
11 these models. They're too complex. There are too many
12 inputs.

13 What we're actually thinking of doing is comparing
14 them to bio monitoring data as it becomes available. And
15 this is true for all of the models as we go forward and look
16 at them. We will certainly compare them internally and see
17 if they're giving us consistent answers. But in a larger
18 sense, we're looking to processes such as N-Haines to give us
19 a total exposure against which we compare.

1 MR. VROOM: Well, cumulative risk assessment,
2 exposure is only one component.

3 MS. DOYLE: That's correct.

4 MR. VROOM: I don't understand how you go back to
5 one component to validate a very comprehensive cumulative
6 risk assessment output. I don't understand that at all.

7 MS. DOYLE: For cumulative in particular?

8 MR. VROOM: Yeah.

9 MS. DOYLE: Again, as I said, you cannot truly
10 validate these in the sense that you can never follow each
11 piece through to its final completion. We can take pieces of
12 them, look at those, and see how they reflect what we're
13 finding.

14 MR. VROOM: Yeah.

15 MS. DOYLE: That includes the predictions about
16 particular chemicals. Also we can look at incidence data.
17 But our validation process will be piecemeal and indirect.
18 We certainly can't do a comprehensive study.

19 MR. VROOM: Okay. And you said you would look at

1 the relative outcomes from two or more software models?

2 MS. DOYLE: Uh-huh.

3 MR. VROOM: I think you said internally. Does that
4 mean that that would not be revealed in a public forum?

5 MS. DOYLE: No. I meant actually that we were
6 planning to assign people to work on it. As far as the
7 outcome, no, there is no secret about it. We have worked
8 with all comers as they have approached us as far as
9 development of these products and also as far as our
10 evaluation of them, and we hope to continue that.

11 MR. VROOM: Okay. I had asked the question earlier
12 prematurely about my understanding that at the recent SAP
13 meeting that some of the members discussed concern about
14 certain data being useful and valid for aggregate risk
15 assessment, but not appropriate for the cumulative process.

16 Could you explain that a little further?

17 MS. DOYLE: Yeah. I heard that and I was puzzled,
18 and I had checked with a couple others. And I did not hear
19 that. That was not the sense that I got at the SAP at all.

1 So I really can't --

2 MR. VROOM: Okay. Well, let me come back and see
3 if I can give a little -- give you a little more detail
4 about, you know, what the basis of my understanding on that
5 was, and then we can talk off line about that.

6 MS. DOYLE: Okay.

7 MR. VROOM: Great.

8 MS. DOYLE: Yeah. There's also the point that we
9 don't have a written report yet, so we don't know what the
10 formal deliberations will be.

11 MR. VROOM: Okay, thanks.

12 MR. EHRMANN: Okay. Bill?

13 MR. LOVELADY: I'm not sure if my question is the
14 same -- somewhat the same as Jay's. You went through this
15 pretty fast, but I think there was one part in there that the
16 SAP said default assumptions could and should be used if they
17 could be defended as based on sound science.

18 Is that correct?

19 MS. DOYLE: Yes.

1 MR. LOVELADY: How do you go about defending an
2 assumption on something like this?

3 MS. DOYLE: Well, I think you look at the source of
4 the assumption, for instance. An assumption as we're using
5 that term is information taken from the literature. It's
6 taken from secondary sources that are not particularly
7 chemical related. It's an assumption in the sense that we
8 have culled through the literature or gone through what data
9 we have in house and tried to come up with what we think is
10 the best synthesis of that data.

11 So the extent that we can support based upon
12 reference the source of that particular value, I think that's
13 how we would defend it.

14 MR. LOVELADY: Of course as you well know, over the
15 last couple of years one of the big controversies that we
16 have grappled with as a committee is default assumptions, and
17 by their very nature, it makes me very uncomfortable. I
18 mean, who is making the default assumptions and what is the
19 criteria for them?

1 MS. MULKEY: I may be helpful. I think that part
2 of the difficulty is that this term has a lot of baggage
3 around it. For example, in the dietary risk assessment that
4 you saw, we have however many it is, 3,000 different
5 consumption data points. We make an assumption that that is
6 representative of the entire population. So there are
7 assumptions necessary no matter how much data you have.

8 And I think the question here is, when is it okay
9 to rely on the data we have. And the scientists use the term
10 default assumption in a wide range of situations. So what
11 you really have to ask is, in any given situation where we're
12 drawing an inference, it's another way of saying we're
13 drawing an inference from what we know to something we have
14 not actually measured.

15 And sometimes we're drawing it from a very rich
16 body of information, but you still have to make a leap to the
17 universe, just like PDP data. We draw the inference that
18 those data represent all of the samples that could have been
19 taken. And we think of that as working from data and not

1 from assumptions, but there is an assumption inherent in
2 that, too. So I think some of this is just the way the
3 language is used.

4 And the real question is in any given situation, is
5 it appropriate and scientifically sound to draw an inference
6 from what we know and to use that inference to go to the next
7 step.

8 MR. LOVELADY: Well, that is part of the scientific
9 process, and I know that. It's just that it makes you very
10 leery that unnecessarily conservative assumptions can be made
11 when there really is no need for them to be.

12 MS. MULKEY: And that goes to the question of what
13 is the reasonable and right inference. And one of the
14 reasons why we're engaging with the scientific peer reviewers
15 -- and this was a very richly drawn together panel in terms
16 of expertise -- is to help us reach the judgment. Is this a
17 situation where we can reasonably draw an assumption -- or
18 make an assumption and draw an inference from what we know,
19 and then is the inference we've drawn to the assumption we've

1 made itself reasonable.

2 And that goes to the question is it overly
3 conservative or is it insufficiently conservative. Are we
4 putting at risk the public health because we're not
5 conservative enough. I mean, you have to worry about both
6 tails of that question, obviously.

7 MR. EHRMANN: Okay. David?

8 DR. WHITACRE: Thanks, Beth, for the update. To me
9 it's clear you've got some stakeholders saying that you need
10 to move ahead and make decisions. You've got other
11 stakeholders saying there is a lack of data and how can you
12 come to conclusions. I mean, all right, that's unlikely to
13 change.

14 But this cumulative risk thing -- and I've said
15 this before others have said it -- is really complicated.
16 It's going to take longer than we originally thought to make
17 it work. It's going to be an iterative process. As you
18 begin to lay it out and test it, as you're talking about
19 doing now on a continuous basis going back to the SAP in

1 December, as that happens and as certain ideas gain validity,
2 you're going to find out more and more that you need certain
3 kinds of data.

4 And we can conjure up now, even pretty clearly what
5 some types of data are. But one of the problems we have is
6 that the best data in the world that addresses the wrong
7 question are not very useful. So I guess this is an appeal.

8 As soon as you can, point the direction toward the
9 kinds of data you would like to see developed that you don't
10 think you have. We've talked previously about DCIs. I mean,
11 that's an old way of doing things. It worked very well.
12 Maybe there is not time for that, okay. Maybe there is,
13 great.

14 But my appeal is, let's not wait for these
15 differences just to keep resurfacing and resurfacing. As
16 soon as EPA can give some guidance to the folks that generate
17 the data, or need to generate the data, give that sheet.
18 Give those ideas a direction and pin it down to the degree
19 you can. And if it's not a data call in, give it what you

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1 can, because people, I think, in the industry will develop
2 data, but they don't want to develop the wrong data for the
3 reasons that I said.

4 So help is needed here. It ain't easy, folks. I
5 know that. We all know that. But if you can give us some
6 directions and show where for either --

7 **(END OF TAPE 2, SIDE B)**

8 MR. EHRMANN: Okay. Erik?

9 MR. OLSON: I guess I wanted to follow up on a
10 point that was asked about before. What does EPA view as
11 sort of the next step? You'll go through this SAP review in
12 December. You have something coming out shortly thereafter,
13 I gather, in response in part.

14 But when do we get to a final cumulative risk
15 assessment, and when would we then move from that to action?

16 MS. MULKEY: Well, as we take the tool or the
17 approach through the science peer review, as soon as we feel
18 that we have enough of a useable tool and have articulated it
19 clearly enough, and have had it adequately reviewed, we can

1 then begin to use it.

2 And as you can see, it has matured very
3 significantly. We are through the hazard side of that and
4 have taken it twice to the SAP. We've gotten some feedback.
5 I think we think we have basically one more iteration of the
6 hazard side and that no further -- we're sort of ready to
7 finalize that.

8 The exposure side is lagging a little behind that.
9 This phase that we will take in December is very rich in
10 exposure side information, and we believe it may be far
11 enough along that we can combine them with a complete
12 approach shortly after the December meeting.

13 But obviously as we prepare for it -- because we
14 are working -- we are devoting enormous resources to this
15 real time. And we're not ready to go to the December meeting
16 this week. We hope to be ready in December. So as that
17 matures, we are optimist that we will have a useable tool.
18 It will still be an iterative process. It will still be
19 something that can mature further. But we have something

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1 that can be used to conduct a risk assessment.

2 Now you said final comprehensive. You know, those
3 are big, heavy handed words. It might be a preliminary risk
4 assessment. Undoubtedly it would be in the process sense.
5 It might be a partial risk assessment. But our hope and
6 expectation is that we'll have a tool that we can use in that
7 time frame.

8 I don't know how to say it more specifically. We
9 don't have a hidden, you know, schedule that we're not
10 telling you about. Any of you. You know everything we know
11 about where we are in this process. We are completely
12 transparent on this. We don't have any internal documents
13 that are other than getting ready to be made public in the
14 near term.

15 MR. EHRMANN: Okay.

16 MS. BAKER: John, can I follow up on that real
17 quick?

18 MR. EHRMANN: Yes, sure.

19 MS. BAKER: Marcia, I think one of the big

1 questions -- and I'm not trying to push you guys to this at
2 all, because I'm not in any huge hurry for you to get there.

3 **(Laughter.)**

4 MS. BAKER: But after you do this, you know, the
5 real 64,000 dollar question is, okay now what. You have this
6 preliminary cumulative risk assessment. Do we now go into a
7 process like we've done with the individual chemicals where
8 you have a cumulative technical briefing and we talk about --
9 and I'm not being facetious. I'm being very serious. And we
10 talk about, you know, where the uses are and where the
11 drivers are, and then we have conference calls about risk
12 mitigation.

13 I mean, do you see that similar kind of a process
14 as taking place?

15 MS. MULKEY: We definitely envision a public
16 process. And I think, you know, one of the open questions
17 is, what form should that take. What kind of -- but it will
18 be informed by everything we've learned through the
19 individual chemicals. There are obviously some key

1 differences. You don't send it out to a registrant for error
2 correction, for example.

3 MS. BAKER: Right.

4 **(Laughter.)**

5 MS. MULKEY: Sort of by definition. You know,
6 short of sending it -- we could post it on the web for error
7 correction, I suppose. And so forth. So there are a lot of
8 dynamics like that that obviously will have to be different.
9 But I think that -- and again, that's something our thinking
10 is maturing on and there is an opportunity for input on.

11 MR. EHRMANN: Jim?

12 MR. AIDALA: And the kind of things sort of your
13 ideas are the same ones we're kicking around. I mean, how do
14 you do it. What makes sense. Again, it's nonsensical to say
15 there is a registrant only phase --

16 MS. BAKER: Right.

17 MR. AIDALA: -- since there is not a registrant.

18 MS. BAKER: Right.

19 MR. AIDALA: Also, it depends on what the peer

1 review process says. This is good. This is directionally
2 correct. This is bad or whatever. I mean, that makes a
3 difference in how you think you've got to address those
4 things.

5 Also, what then -- assuming the process is all
6 straightforward and the numbers are there, what are the
7 numbers. For example, if the numbers are X versus Y versus
8 25X, that may make a different kind of calculation on that.
9 I mean, that's all part of what -- you know, part of it
10 depends that we have to have the approach before we can know
11 exactly what some of the options are to do with it.

12 MR. EHRMANN: Robin, did you have your card up
13 before? No?

14 MALE SPEAKER: I had mine up.

15 MR. EHRMANN: Oh, it was you. I'm sorry.

16 MALE SPEAKER: And I put it down, because my
17 question was, when do we know when we've arrived. And it was
18 the same thing.

19 MR. EHRMANN: Okay. Rob?

1 MR. HEDBERG: Just more of a comment than a
2 question. But having been at the Science Advisory Panel, I
3 think that you're projections are maybe overly optimistic,
4 because I didn't hear a great deal of confidence in the
5 models. And where they are, I don't feel that the panel said
6 they had had an adequate opportunity to review the models,
7 and they were even talking about integrating some of the
8 three models together.

9 So I know that some people would like things to
10 move fast, but I didn't have a high level of confidence that
11 things can move that quickly based on what the panel said.

12 MR. EHRMANN: Okay. Jean-Mari?

13 MS. PELTIER: A follow up to the question that
14 Cindy raised and, Marcia, your response to it. I think that
15 -- I know that we're sitting now and I'm talking and keeping
16 us away from lunch.

17 But I think that this issue is the most critical
18 probably that the agencies face. And the implementation and
19 the way we weave our way through implementation of this area

1 of cumulative risk is probably one of the most critical ones
2 that you're going to have faced.

3 And I would suggest that this is one of those
4 areas, John, where you need to have a bookmark for us to set
5 up a working group to talk about how we get everybody around
6 the table to talk about implementation. How we talk about
7 the impacts on the user community, and what all the rest of
8 those questions might be. And you folks would be able to
9 scope out those questions that maybe some of us could provide
10 input on process wise.

11 So I would suggest that this is when we need to
12 bookmark for a working group.

13 MR. EHRMANN: Okay. So flagged and we'll come back
14 to that when we have that discussion.

15 Let's go ahead and have the presentation, if we
16 can, on channels of trade, since we're not scheduled for
17 lunch until 12:30, from Jack and Terry. And then we'll see
18 how much discussion there is on that and decide whether we do
19 the discussion before or after we take a lunch break.

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1 But, Jack, why don't you go ahead.

2 MR. HOUSENGER: Okay. I thought before I gave the
3 update I would refresh everybody's mind as to what the
4 channels of trade provision is. When FQPA was passed in
5 1996, it contained a provision that basically required the
6 Agency that whenever a pesticide registration on a food use
7 was canceled, that we would go ahead and revoke the
8 tolerance, and that the revocation would occur within 180
9 days of the last legal application of the pesticide.

10 Under another provision of FQPA -- and this is
11 408L5 in case you have a copy of FFDCA -- any food treated
12 prior to the cancellation may continue to be marketed as long
13 as the pesticide application was lawful. That is, as long as
14 it was applied in accordance with the label and it occurred
15 within the legal time frame.

16 This is referred to as the channels of trade
17 provision or safe harbor provision.

18 FEMALE SPEAKER: Is there a document for this or
19 not?

1 MR. HOUSENGER: No. This is just an update. In
2 1999 all fruit uses and most vegetable uses of methyl
3 parathion were canceled because of dietary risks of concern
4 that the agency identified in its refined risk assessment
5 that was released as part of reregistration and tolerance
6 reassessment. It is one of the first chemicals -- pesticides
7 -- to go through -- to be subjected to the channels of trade
8 provision. The last date which methyl parathion could be
9 legally used was December 31, 1999.

10 In June of this year -- June 2nd -- we proposed to
11 revoke the tolerances for the corresponding food uses with
12 methyl parathion that we had canceled. The Agency had
13 delayed issuing the proposed rule in order to coordinate the
14 timing with the release by FDA of its guidance document on
15 how the channels of trade provisions would be implemented.

16 The proposal to revoke tolerances allowed for a 60
17 day comment period on the proposed revocation, as well as
18 sought comment on any alternative approaches for avoiding any
19 potential problems to commerce or trade caused by the

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1 revocation. We received no comments on the latter issue, and
2 we received nine comments -- or nine commenters commented on
3 the first issue, including the Minor Crop Food Alliance, the
4 National Food Processors Association, California Pistachio
5 Commission, El Fadichem (phonetic), Almond Haulers and
6 Processors, the EU and Chemy Nova, a registrant of methyl
7 parathion.

8 Many of the commenters raised similar issues. The
9 first was whether tolerance revocations for use is
10 voluntarily canceled or subject to the same 180 day time
11 frame as required for risk based cancellations. The
12 commenters argued that Congress did not intend for this
13 provision to apply to voluntary cancellations.

14 A second issue was that not all uses contributed to
15 the dietary risk in the same way and therefore only those
16 that contributed heavily should be included in the
17 revocation. For instance, the dietary risk resulting from
18 some of the vegetable uses of methyl parathion were
19 insignificant compared to the risk by some of the fruit uses,

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1 and consequently those vegetable tolerances shouldn't be
2 subject to the revocation.

3 And finally, the European community requested that
4 the timing be postponed -- the timing of the revocation be
5 postponed until the JMPR CODEX review of methyl parathion,
6 which was scheduled for the fall of 2000, in order not to
7 give the appearance of an emergency action.

8 We're currently working to finalize our document
9 and hope to have it ready for signature in the near future.
10 I'm going to turn it over to Dr. Terry Troxell of FDA to give
11 an update of where they are in preparing their final guidance
12 on the channels of trade provisions.

13 DR. TROXELL: Yeah. I'm from the FDA and we're
14 here to help you, of course. Yeah, we have the task of
15 enforcing the tolerances and also refereeing this channels of
16 trade and pipeline issue.

17 We put out a guidance on June 2nd and had comments
18 by August 1st. You know, the short of it is basically that
19 the proposed guidance that perishable produce should be in

1 compliance with the revoked tolerances. You know, for
2 example items such as lettuce. All other products, whether
3 they're racks or processed, we would start the compliance by
4 January 1st. It applies to imports and domestic equally.

5 Basically the problem in this situation is that
6 frozen foods -- the pesticide degradation is kind of frozen
7 in. It doesn't degrade, so you've got a problem there. We
8 expected that generally the racks would be okay by January
9 1st of 2001.

10 Okay. Anyway, we got four comments: NFPA, Apple
11 Processors, Nouse (phonetic) Foods and the American Frozen
12 Food Institute. Several lines of comments were processors
13 need more time than January 1st to compile records so they
14 can provide that -- you know, that showing that the product
15 was treated before the deadlines. Concern about the burden
16 of proof of no residue for multi ingredient foods, such as
17 the cranapple juice issue, where cranberries still have a
18 tolerance and apples do not. They suggested the burden
19 should be to establish a likely source of the methyl

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1 parathion.

2 They requested that FDA should specify the method.
3 Also a concern about retailers rejecting food residues and
4 accepting the burden of proof. And several other similar
5 types of comments.

6 We have heard the comments. And while we do not
7 have a document that is in final clearance, since the time is
8 drawing short, we do want to signal our intention to allow
9 six additional months for processed foods only
10 -- not the racks, but for processed foods -- until July 1st.

11 We've hit a snag. We will not be publishing -- we
12 do not anticipate publishing concurrent with EPA, because of
13 the paperwork issue. A notice should be going out by OMB --
14 a second notice. We've already put one notice out, but
15 apparently for some reason we need to do a second notice on
16 collection of information notice. And, again, OMB will
17 publish it. The comments will go to OMB. It's a 30 day
18 comment period, and OMB will make a decision in another 30
19 days on allowing the paperwork. So that brings us to about

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1 mid-December, and we'll try to finalize the guidance ASAP
2 before the first of the year.

3 So basically that's where we're at.

4 MR. EHRMANN: Comments? Dan?

5 MR. BOTTS: As the signatory for the Minor Crop
6 Farmer Alliance comments on the methyl parathion tolerance
7 revocation issue, Terry, I thought we had submitted comments
8 as well to the FDA guidance document. I know they were
9 drafted. I signed them and they were submitted. I don't
10 know where they fell out in your process.

11 But you have heard our comments over and over and
12 over again relative to the potential downside of having the
13 type of tolerance revocation when uses have been out there
14 where residues may pertain mainly from a burden of proof
15 standpoint on the two prong test for the channels of trade
16 requirement on the other side.

17 We still stand behind the comments that we've made
18 in the past. I would reiterate, though, that one of our
19 biggest concerns relative to the proposals both by the Agency

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1 and by FDA are the precedents that they would appear to set
2 for other compounds other than methyl parathion. Not that
3 we're totally uncomfortable with the process you laid out or
4 the scheme that you laid out or the concerns that were raised
5 and how you address those for the specific compound methyl
6 parathion.

7 But if this becomes a process that every other
8 compound has to follow in the identical manner as the
9 precedent that has been set out, it's going to create
10 tremendous problems in the use of products that would have
11 been legal or the movement of products through trade
12 channels, not only in this country but internationally.

13 DR. TROXELL: Well, I think it's pretty clear that
14 -- I mean, this guidance document is only for methyl
15 parathion. You know, we thought we might receive comments on
16 the general application of such a channels of trade. But as
17 far as my understanding is, it really has not addressed that,
18 and I don't believe we have a formula to deal with that in
19 general.

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1 The food system obviously, as you know, is
2 extremely complex, and to try to march one's way through that
3 complexity in the channels of trade is extremely difficult.
4 And it's not going to be an easy situation if we get into a
5 situation where we need to basically say you've got to show
6 us. And that's basically what the law says. At some point
7 producers need to -- processors need to show us that the
8 pesticide was used in accordance with the registration before
9 the revocation.

10 So we're in a very difficult position of trying to
11 do this. And it takes a lot of resources, I know, on the
12 processors' and producers' side, but also consider that it
13 takes tremendous resources on EPA's part to try to deal with
14 this. And we haven't received additional resources to do
15 pesticide work for years. And our staff continues to dwindle
16 because of that.

17 So we really -- we're really hard pressed to deal
18 with this kind of complicated channels of trade issue. So
19 the next one that comes through, we'll try to deal with it as

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1 best we can and see if we can find some general workable
2 theme as we go down the road.

3 MS. MULKEY: Dan, it might be helpful to note that
4 this is not the first one, that we actually did this with
5 propargite. We, you know, proposed a revocation. It was
6 within the 180 days. We had worked with FDA. They
7 articulated -- I can't remember exactly how. But they
8 articulated the approach that they were going to take in
9 terms of time lines.

10 Similar to methyl parathion, but it was
11 particularized to the situation with propargite. We gave
12 them information about what we thought was its shelf life.
13 We worked with the registrant. So whatever worry you have
14 about precedent, this is not the first one.

15 MR. BOTTS: I appreciate your comment, Marcia. But
16 I also would say that in that case we weren't provided the
17 notice that that had taken place or the conversation. And
18 unless we participated on a conference call, I would assume
19 on propargite where these things would have come up would

1 have been discussed and detailed.

2 We did get a federal notice on methyl parathion and
3 had an opportunity to comment. And our comments went beyond
4 just methyl parathion. I think it still applies in
5 propargite, because you've got the same issues on
6 establishing that a product was used legally in a time frame
7 that was proposed by your -- by the rule.

8 And there's a two prong test that is almost
9 impossible at the grower level to meet. And just for the
10 regulatory agencies to ship that over and say well, the
11 processors have to prove it to us, that doesn't make it any
12 easier for us to deal with. And you're taking value out of a
13 product that was legally used in a crop that was legally
14 grown. Because what's going to happen is that product is not
15 going to be able to be sold unless you have that proof.

16 MR. EHRMANN: Steve?

17 STEVE: Well, again, back to the general comments.
18 I reviewed both the Minor Crop Farmer Alliance and MFPA
19 comments, and they were intended to be general, precedent

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1 setting type comments not specific to methyl parathion.

2 But more importantly, I would like to know has FDA
3 changed its opinion on the cranberry/cranapple concept where
4 cranberry would still allow methyl parathion residues. Do
5 you still have to go back and try to prove that?

6 DR. TROXELL: No, we're making adjustments on that.
7 We'll also be specifying them at the -- okay. So we're
8 making adjustments.

9 STEVE: Okay, great.

10 MR. EHRMANN: Wally, Erik and then we'll take our
11 break. Wally?

12 DR. EWART: One of the areas that I think is very
13 important is the fact that we talked about different forms of
14 a commodity as they are processed, having different retention
15 times and half lives for the pesticides. And so both the
16 crop and the pesticide have their particular residue profiles
17 or curves of decay, and therefore it makes it very difficult
18 when you -- you know, when there is generalization to
19 actually have these things fit.

1 I mean the points Dan has raised, I agree with
2 completely, that the burden of proof is very difficult. But
3 then you get beyond that and it turns out that the burden of
4 proof is probably going to rest on a very few commodities and
5 the process by which you do that is difficult. Like the data
6 isn't there for every commodity, except that if you look in
7 PDP, for instance, and compared different commodities, you're
8 going to find the treated commodities, that might have had
9 the same treatment levels or even have the same tolerance,
10 have different residue levels after treatment.

11 And unfortunately, you know, that data isn't always
12 generated with a decay curve by the registrant, and the
13 commodities can't afford to go forth. And all the registered
14 materials we have are going to go through this process.

15 So I think it is really important that this
16 flexibility between products is looked at.

17 MR. EHRMANN: Okay. Erik?

18 MR. OLSON: I guess I had a follow up question to
19 Terry. At least as I understand what the law says, six

1 months after the agency cancels a chemical, the tolerance
2 revocation has to be put into effect. Am I right about that?

3 DR. TROXELL: Right.

4 MR. OLSON: And then after that, according to the
5 channels of trade provision, it must be shown to the
6 Secretary that to the Secretary's satisfaction that the
7 residue was present as a result of a lawful application and
8 so on.

9 And what I hear you saying -- am I correct to hear
10 you say that you're now saying that a year and a half after
11 the cancellation you will still be just assuming up front
12 that it was a lawful application for processed foods if you
13 find parathion in it?

14 DR. TROXELL: Yes, for processed foods.

15 MR. OLSON: And that is without any individual
16 showing? It would simply be assumed by FDA without any
17 specific showing?

18 DR. TROXELL: If it was packed prior to July 1,
19 we're basically saying for a matter of practicality, we are

1 expecting that -- we're assuming that it was in compliance
2 with the requirements. There is no way for us to
3 realistically referee this complex system of commerce.

4 You just think about the problem you have. You have
5 thousands of foods at different stages of the system. And
6 while industry has a lot of paper and is moving to electronic
7 methods to keep track of what came from where and possibly
8 could determine when the pesticide was applied, the fact is
9 the foods get commingled in production and there isn't any
10 realistic way to crisply separate these out.

11 So we're trying to make a practical cut. Processed
12 foods will be -- frozen foods, to my understanding, will be
13 in commerce four or more years after the last use of the
14 pesticide under the legitimate registration. We're basically
15 taking care of the overwhelming usage that would show up in
16 the raw agricultural commodities within the first year within
17 perhaps two months of the cancellation of the tolerance.

18 Now we're allowing a little additional time for the
19 little remaining that might occur. Basically your cooked

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1 foods are not going to have anything in them. And it's your
2 frozen foods that will trap the residues and that's where
3 it's possible that there could be some difference between --
4 you know, you could have something from this summer's crop
5 showing up next spring.

6 But that's the situation. There's no way for us --
7 if we're going to utilize our resources, there's no way for
8 us to practically deal with this unfortunate problem.

9 MR. OLSON: So it's sort of a default assumption
10 that it was applied legally. There's no -- I guess I wonder
11 whether that is really consistent with what the statute
12 envisions, which is a showing to the Secretary's
13 satisfaction, but perhaps we can debate that at a later
14 point. I don't want to stand between us and lunch.

15 MR. EHRMANN: Okay. Let me just summarize in terms
16 of our time frame. Let's take an hour for lunch. We'll come
17 back, pick up the science policy update and then move to the
18 transition presentations and discussion, or if there are any
19 other overall just comments on this morning's discussion.

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AFTERNOON SESSION

7

MR. EHRMANN: Okay, let's get started, please. We

8

have one item that we did not get to from this morning's

9

agenda that I would like to start with. And that's the

10

update on the -- we had the update on the cumulative policy,

11

but there are other science policies working their way

12

through the system that Bill Jordan will provide us an update

13

with.

14

We'll take any questions and comments on that, and

15

then I will introduce to you the way we want to structure the

16

afternoon agenda and introduce the various presenters who

17

have been kind enough to join us for this afternoon.

18

But first, Bill, science policies.

19

MR. JORDAN: Thank you. I'll be talking from a

1 document that was mailed out to folks. It's labelled CARAT
2 2-4 and it looks like this as you flip through your paper.

3 While you're looking for it, I'll tell you that
4 some of us were puzzling over another policy question. And
5 that is, whether Robin Spitko's daughter would be celebrating
6 her birthday with a carrot cake.

7 (Laughter.)

8 MS. SPITKO: Can I say that five minutes in here
9 was enough for her.

10 (Laughter.)

11 MR. EHRMANN: Notice she's not here any more.

12 MS. BAKER: Could you hold up again what 2-4 looks
13 like? Okay, thank you. I think we're missing the first
14 page.

15 MR. JORDAN: You may be missing the first page. I
16 think there are extra copies around out on the table.

17 MS. BAKER: I think only that one page.

18 MR. JORDAN: Okay. It's two pages and, Cindy,
19 we'll get an extra one for you.

1 We've already heard about some of the reasons why
2 today is special. I want to offer another reason. About two
3 years ago when TRAC gave a recommendation for EPA to become
4 more transparent about its science policies, the TRAC
5 identified a number of different topics on which we should
6 issue papers, take public comment and then revise our
7 policies in light of the comment.

8 And today -- there were 19 of those papers. And
9 today the last two of those 19 were issued for public
10 comment. So the document that you have taken out indicates
11 papers number 18 and 19 are expected in mid-October, and you
12 can now change that to issued on October 11th.

13 So that completes the original 19 papers, issuing
14 them for comment. And like the rest of the papers, these
15 will be open for public comment for 60 days. And at the end
16 of that time period, we will be working to review the
17 comments and issue the papers in revised form for your
18 edification

19 We've done a lot more, though, than just issue 19

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1 papers and get comments on them. We have actually, I think,
2 for ourselves here at EPA, found it a very, very useful
3 process. In the course of reviewing comments, we have gotten
4 a lot of helpful input from the broad range of stakeholders
5 who have taken time to comment on this.

6 And we have finalized eight of the 19 papers,
7 including some fairly difficult complex science issues,
8 including the policy for nondetects. How we'll handle those
9 data points. Threshold of regulation. How we'll deal with
10 data relating to cholinesterase inhibition by
11 organophosphates and carbamate pesticides, our 99.9 policy.

12 All of these things are things that I think the
13 science policy documents that have come out are much better
14 for having gone through the public comment process. And at
15 least the sense I get, is that while everybody may not
16 exactly agree with where EPA has come out, they think that
17 EPA's policy positions are clearly articulated. They're
18 rationale. They're defensible. They're grounded in sound
19 science.

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1 And when we've had to deal with issues that are
2 beyond the ability of science to answer the questions
3 definitively, we've been clear about why we've done what
4 we've done. And I think that's credit to the many topnotch
5 scientists in EPA who have been working on these things, and
6 also a credit to the value of the public comment process.

7 The document that you have in front of you lists
8 the expected dates for the rest of the papers. And the rest
9 of this year is going to be a busy one. There are eight more
10 papers that are scheduled to be out. Two in October dealing
11 with what we call de-compositing or pesticide data plan,
12 Monte Carlo. In November we'll have, we hope, four more
13 papers, two of which will deal with our application of the
14 FQPA safety factor or 10X as it is sometimes called, and two
15 papers dealing with aggregate. And then in December to close
16 out the year, we've got underway a lot of work on the
17 residential papers, two of them, again, and we hope to have
18 those out in December.

19 With those eight papers issued, we will have done

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1 substantially all of the science policy documents in just
2 about two and a quarter years. It will leave the two that
3 are being announced today, which deal with drinking water
4 issues -- and I don't want to say they're unimportant, but
5 they are less important than what we have dealt with in the
6 other papers -- and the cumulative.

7 So by the time that we get around to revising the
8 cumulative risk assessment guidance, we will have in place,
9 we hope and expect, the full range of the science policy
10 papers that the cumulative paper builds on.

11 In addition to that we have, as I've said before,
12 found the process so valuable that we've chosen to put
13 additional papers through the science policy process. And on
14 the second page, you'll notice that there is paper number 22
15 relating to how EPA uses use related data in its risk
16 assessment and risk management decisions. That paper, too,
17 is being issued today in its revised form, and the
18 announcement appears in the Federal Register. It will be up
19 on the web site either already or very shortly.

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1 We're working also the remainder of this year to
2 issue the last two papers listed there, number 25 and number
3 26, relating to drinking water. These are very significant
4 papers, I think, in that they are going to represent the next
5 step forward in how our risk assessments will deal with
6 estimating residue concentrations in people's drinking water.
7 And you'll hear some about that tomorrow when Denise Keehner
8 and folks from the U.S. Geological Survey, USDA and the
9 Environmental Affects Divisions make presentations about our
10 drinking water.

11 And having read drafts of those papers, I can tell
12 you that it represents some really significant and important
13 scientific advances and will, I think, bring a new level of
14 refinement and understanding to our ability to estimate both
15 aggregate and cumulative exposure, and therefore the risk
16 assessments.

17 I need to say one more word about paper number 21.
18 It is listed there. This is the early assessment policy for
19 organophosphate pesticides to be determined. As we've

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1 struggled with trying to figure out what our policy is here,
2 it's proven to be a challenge. And we've tried various ways
3 of sorting things out.

4 And my hunch is that this one is going to get
5 rolled into and thought about as we look at the public
6 comments on the cumulative risk assessment guidance, since in
7 effect what this is doing is trying to figure out a way to
8 sort out those uses which are relatively speaking less
9 significant contributors to the overall risk assessment. And
10 therefore we can fairly, easily and quickly -- well, it won't
11 be easy. But it will fairly straightforwardly identify which
12 ones we can say are not going to be a significant influence
13 on the size of the overall risk, and therefore we can treat
14 probably and approach differently from a risk management
15 point of view.

16 So look for the cumulative risk assessment
17 guidance, as Beth Doyle indicated, sometime early next year.
18 We got, as she said, about ten sets of comments. We've
19 already started to analyze those. We have a finite amount of

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1 resources to deal with, both review of public comments and to
2 do the preparation and work for the Scientific Advisory Panel
3 meeting in December. But to the extent that we can continue
4 to make progress on that, I think we will be in good shape to
5 have something the early part of next year in the form of
6 revised risk assessment guidance.

7 **(END OF TAPE THREE, SIDE A)**

8 MALE SPEAKER: Bill, are any of the other science
9 policy papers expected to go back to the SAP for review? I
10 believe it's being planned that the residential SOPs were
11 supposed to go back in December. I wanted to know if that
12 was going to happen or if that's going to be maybe early next
13 year.

14 MR. JORDAN: We've continued to take pieces of our
15 work to the Scientific Advisory Panel. For example, last
16 month we took to them the technical part of the drinking
17 water treatment paper, and we'll be talking to the SAP in
18 December about the cumulative risk assessment and
19 particularly the exposure piece. The feedback that we get

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1 from the SAP there will certainly influence how we write the
2 cumulative risk assessment.

3 As part of that, we're going to be talking about
4 the residential use of pesticides and the contribution that
5 that use makes to the overall cumulative exposure. So I
6 fully expect that the Panel will have comments on a
7 residential assessment that is likely to influence both
8 cumulative risk assessment guidance and it may also affect
9 the residential risk assessment standard operating
10 procedures, although I'm hoping that we'll be well along the
11 road to having wrapped up that in light of the public
12 comments and it will really be more focussed for the
13 cumulative.

14 I don't know of any other plans at this point for
15 taking materials to the SAP, but I'm sure that this list of
16 issues is so broad that some of these things will come before
17 the SAP again.

18 MR. EHRMANN: Steve:

19 STEVE: Bill, is anything else anticipated from a

1 science paper perspective in the occupational area dealing
2 with exposure assessment?

3 MR. JORDAN: So far I have not heard that we made a
4 commitment to do that. And I've heard people ask for us to
5 do that, but I don't think that we made such a choice yet.

6 MR. EHRMANN: Okay. Yeah, Marcia?

7 MS. MULKEY: You heard Margaret mention briefly
8 when she answered a question this morning that this is an
9 area where we're doing a considerable amount of work on
10 refinement. We're looking into what kind of public process
11 we need to engage, whether some kind of workshop or whether
12 some kind of dialogue with relevant stakeholders.

13 And obviously a science policy paper is a
14 possibility. So when Bill said we didn't have one planned,
15 it's true. We don't have a science policy paper planned.
16 But we do have significant work in this area and process in
17 mind.

18 MR. EHRMANN: Okay. Any other comments about
19 science policy paper status or content?

1 Okay. Any other comments reflecting on anything
2 from this morning's updates that you didn't get a chance to
3 ask because we were kind of moving up against lunch there?

4 Okay. And as always, if issues -- we always try to
5 reserve some time near the end of the overall agenda if other
6 questions come up. So if you have other thoughts overnight
7 about any of the issues related to the updates that you've
8 heard up to this point, you know, we'll provide an
9 opportunity to table those tomorrow if there are any.

10 Yeah?

11 MR. MILLER: Mark Miller from American Academy of
12 Pediatrics.

13 MR. EHRMANN: Yes.

14 MR. MILLER: I know when I go back to my
15 environmental health committee this weekend and report on
16 what's going on here that the question will come up, well,
17 how is this all being implemented for protection of children.
18 And I would like to have an update of the status of how often
19 an FQPA factor is being actually implemented and what is the

1 status of developmental neurotoxicity testing to date.

2 I recently saw a presentation that Sue Makris
3 (phonetic) gave and looked at the first ten chemicals that
4 had the full developmental neurotoxicity testing done, of
5 which six or 60 percent found new most sensitive endpoints
6 which were essentially qualitatively different than would
7 have been predicted by testing on adult animals.

8 And with such a small number of compounds tested,
9 to have 60 percent of them, you know, change the picture
10 entirely, it doesn't leave me with a great deal of -- it
11 leaves me with some concern.

12 So what is happening with developmental
13 neurotoxicity testing at this point?

14 MS. MULKEY: I think in order to provide the kind
15 of updates that you've been receiving on these other
16 topics, we would need some lead time to plan for that and
17 that might be a good suggestion for an agenda item for the
18 next meeting.

19 What we can do is look to see whether we have some

1 useful accessible written materials already in hand that we
2 could share. We might even be able to do that overnight. If
3 not, we might could do a mailing on that.

4 MR. MILLER: Yeah. It might be interesting to have
5 Sue's presentation available.

6 MS. MULKEY: Well, I'll look into what the sort of
7 form is. We have done a number of reports about the safety
8 factor, about the developmental neurotoxicity data call in
9 and other things. So we'll see if we can provide something
10 that is of any use to you overnight. But if not, I recommend
11 we take this as input on agenda planning.

12 MR. EHRMANN: Okay. Oh, yeah, Bob?

13 BOB: Is this the part of the agenda called CARAT
14 feedback and discussion?

15 MR. EHRMANN: Yes. That's what I said. Anybody
16 else who has any comments about this morning.

17 BOB: Got you. Well, I'm going to regret saying
18 this, and this probably isn't the right time.

19 MR. EHRMANN: It's a good time, Bob.

1 BOB: Let me just start out by saying -- let me
2 start out by saying that this morning -- and I mean this as
3 sincerely as I know to say it -- everything I heard was
4 useful and informative. Much of it was challenging. Much of
5 it was provocative. And almost none of it is why I agreed to
6 serve on this panel.

7 And I had understood this process to be one of
8 stakeholders coming together and advising the agencies on the
9 things that we think are problematic for us. There are a
10 couple of issues which are extremely problematic for the
11 folks that I represent, and I'm sure there are others at the
12 table who would feel the same way. I know that this morning
13 Wally had mentioned workgroups, and maybe we'll have a
14 discussion of workgroups.

15 We had a discussion of workgroups at the tail end
16 of the last meeting. And I had sort of understood that
17 between that meeting and this meeting, we would actually --
18 perhaps that would evolve into some kind of a plan.

19 I have the sense that we're getting another update

1 and not really interacting, and I guess I'm bothered by that.
2 And I think that for me, at least, it would be very useful to
3 somewhere, whether it's now, later today or tomorrow, to have
4 a discussion about this process and how this process ought to
5 best work to address the concerns and needs of the
6 stakeholders and the agencies. And I don't feel that that's
7 happening.

8 MR. EHRMANN: In terms of how the agenda is laid
9 out, that item is at 11:45 tomorrow morning. But as Wally
10 has already, I think, appropriately noted, there has been an
11 ongoing interest in determining whether issues would be best
12 and most appropriately dealt with by workgroups.

13 And when we had our briefing this morning before we
14 sat down here with the co-chairs, they assured me they're
15 going to be listening carefully for those issues and want to
16 bring that discussion to bear tomorrow in that time frame
17 specifically about which topics and how that process should
18 proceed.

19 So that's what I'm understanding from the

1 co-chairs at this point. At least maybe that goes in part to
2 answer your question, but let ask them to comment.

3 Mike?

4 MR. MCCABE: Yeah. I think, too -- I mean the
5 agenda has been developed in a way so that we are going to
6 have, and we have had, some discussion and updates on some
7 topics that we found people constantly come back to us on.
8 You know, the cumulative risk, channels of trade and the
9 registration or organophosphates schedule. I mean, these
10 were all things that people said that they wanted to hear
11 about and talk about. And I think that we have had some
12 discussion.

13 That doesn't mean that we've touched on everything
14 that people wanted to bring up and that we can't do that
15 certainly in the segments of the agenda either later today or
16 tomorrow when we have time for that or, you know, in side bar
17 conversations, too.

18 BOB: Well, my only response to that would be this.
19 And I won't even mention the word residential exposure.

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1 **(Laughter.)**

2 BOB: Unless you're from New York and you run your
3 words on like I do. Something like cumulative exposure, I
4 really got to believe it warrants more than a 15 minute
5 discussion. You know, my personal experience is this. I've
6 sat through a lot of TRAC meetings, PPDC meetings and now two
7 CARAT meetings. They've been useful. I think they have
8 accomplished a lot. I think the Agency has accomplished a
9 lot. No question about it.

10 I think the hallmark of what the Agency
11 accomplished in the TRAC process was (a) the development of a
12 process and (b) the development of science policies, both of
13 which, I think, advanced the implementation of FQPA
14 immensely. Both of those were the byproduct of workgroups
15 and not just open discussion amongst an awful lot of people
16 without adequate time to really get into the topic.

17 And, again, I appreciate the opportunity to be a
18 part of it. I appreciate the discussion that has taken
19 place. I just doubt that 15 minutes on, you know, cumulative

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1 risk assessment is an adequate forum for that topic.

2 MR. MCCABE: I would agree. And, you know, we have
3 other mechanisms in place, whether we need something else, or
4 whether we need something that is a workgroup or looks like a
5 workgroup, or whether we need, you know, additional CARAT
6 meetings structured in some different way. I mean, that's
7 open and we can certainly talk about that.

8 BOB: I appreciate that.

9 MR. MCCABE: And I think that part of the advantage
10 of holding it off until a little bit later in the processes -
11 - I mean, I've already written notes down on what I've heard
12 people say as things that they want identified in workgroups.
13 And I've got five things right now that people said, and I'm
14 not sure that we need five workgroups. But let's see what
15 else comes up over the course of the discussions that we're
16 having.

17 MR. EHRMANN: Dan?

18 MR. BOTTS: Yeah. This goes back to a couple of
19 items that were discussed earlier this morning, and I belayed

1 in raising my card late enough this morning not to fit into
2 the break. And one of the questions is relative to the
3 public process that was discussed at length relative to the
4 reregistration process and some other things.

5 Recognizing the conference calls and those
6 activities have represented a significant resource drain.
7 Not necessarily resource drain, but resource allocation from
8 the people in the Agency. I would like to say we really
9 appreciate the effort and where that has taken us. Those
10 were developed almost as an interim process as we went
11 through.

12 Has there been any thought to stepping back and
13 looking at the type of input those conference calls have
14 generated? Is there a better way than having the process be
15 almost an ad hoc, even though it's a more formal ad hoc than
16 it was when it first started, so that we don't get surprised
17 or get calls the day before a conference call or a closure
18 conference call is scheduled to try to arrange?

19 I think the mere comment that we got 30 telephone

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1 lines coming in, I would argue that on a lot of these calls,
2 if everybody knew that the call was taking place, you would
3 need a lot more than 30 calls -- or lines that come in. I
4 think that's an indication that there is a real desire to be
5 involved. A real desire to formalize a process in a little
6 more detail.

7 There was a notice of rule making or proposed rule
8 making on the public comment participation process. I might
9 have missed something, but has that -- have the responses or
10 the comments been collected on that and compiled, and is
11 there a projection for when that particular notice is going
12 to be responded to formally by the Agency for us to look at?

13 That's the first question. I don't know who needs
14 to answer that.

15 MS. MULKEY: Well, I'll take a crack at it in Lois'
16 absence. She could have handled it. And she can supplement
17 it.

18 Basically one of the lessons we learned from the
19 OPP process is that people were generally not taking much

1 advantage of the public comment, the Phase 3 and the Phase 5.
2 With 60 days, people were not engaging, and they were really
3 waiting until these conference calls that we were conducting,
4 which was late in the process. So one of the lessons we
5 learned is we needed to do these conference calls earlier in
6 the process.

7 So the proposal that you're discussing on public
8 process that we put out did contemplate more discussion of
9 that type earlier in the process during Phase 5 -- at the
10 beginning of Phase 5 -- and those kind of things.

11 So, yes, we are learning lessons from them and
12 trying to work into an earlier, more useful engagement. And
13 that was in the proposal. Lois said it. You may just not
14 have heard it. We have received all the comments on that
15 process. We have addressed them and we're very close to
16 being ready to formalize that process.

17 MR. BOTTS: But it will be formalized and published
18 in the Federal Register?

19 MS. MULKEY: That's the process. That's correct.

1 MR. BOTTS: Okay.

2 MS. MULKEY: It's not a rule, but, yes.

3 MR. BOTTS: As a process. That's the part I missed
4 this morning.

5 MS. MULKEY: Right.

6 MR. BOTTS: And I apologize. The other issue goes
7 to the occupational issue. I appreciate you all are working
8 internally on the process and the procedures and some other
9 recommendations relative to how to do the risk -- the
10 occupational risk assessment.

11 Having been on the receiving end of what we loosely
12 termed black box science to get to the numbers that were
13 showing up in some of the technical briefings relative to
14 MOEs even with protective clothing and other engineering
15 control equipment, we requested the ability to come in to the
16 Agency, and for one particular compound walk through the
17 decision process of how the numbers were actually started
18 from ground zero through to the end of the process.

19 Unfortunately I had to leave in the middle of the

1 presentation. It went on for a little more than the two
2 hours we had scheduled. That would be -- that type of
3 presentation would be of tremendous benefit to a workgroup
4 that is looking at addressing how this risk assessment takes
5 place and how this process could be better refined to really
6 get to the level of a probablistic risk exposure, rather than
7 being a tiered analysis which is currently on the table.

8 And I would suggest that if we do go to a workgroup
9 format, that would be a very good starting point to take one
10 of the products that has already been through the technical
11 review and walk through that process where everybody sees how
12 the decisions have been made.

13 MR. EHRMANN: Okay. Bill?

14 MR. LOVELADY: Yes. So just -- I agree with some
15 of the things that Bob said, that there has been some very
16 good information imparted this morning. And we certainly
17 appreciate it.

18 But I think that -- I think we would be remiss in
19 not saying that there are a number of us who felt like when

1 we saw the agenda that it was more of an update type of
2 agenda. And we feel like that if we do get to the -- it's
3 going to take some workgroup participation to get to the real
4 nuts and bolts of some of these issues.

5 So I think Bob is absolutely right. We have good -
6 - good update information is being given to us. But we're
7 somewhat missing what we all felt like that we were supposed
8 to be doing, which was advising the Agency and the
9 Department.

10 MR. EHRMANN: Jay?

11 MR. VROOM: Yeah. I would like to agree with what
12 Bob said, and the way he said it I thought was very clear.
13 And as I went back and looked at the ten pages of single
14 spaced notes and summary from our June 22 and 23 meeting, it
15 really jumped out at me, because there is only one place that
16 I could find in those ten pages of even a passing kind of
17 obtuse reference to the fact that CARAT members were in the
18 room.

19 Which, again, is not to say that the information

1 that was provided was bad. But we just didn't have the kind
2 of interaction that I believe, as Bob referenced, going back
3 in time that we experienced over two or three TRAC meetings.
4 And that had to do with when the Agency and the Department
5 were, you know, bold enough to say, you know, that TRAC
6 members needed to step up and take some responsibility of
7 doing some homework in advance.

8 And we did. And it wasn't just, you know, a single
9 member of TRAC taking an assignment. But, you know, we
10 volunteered and we had a small group that took on sometimes
11 an overnight assignment, you know, that we would come back
12 and try to bring two different points of view forward and
13 have some contrast. And that helped the debate.

14 So I don't think this is a message -- and, Bob, I
15 don't intend to speak for you or further interpret your
16 comments. But I don't think this is a -- you know, you're
17 doing the job the wrong way. It's just you've got to share
18 the burden with us, and I think that makes for a richer kind
19 of process that, you know, ultimately the Agency and the

1 Department may choose to accept or accept partly or totally
2 ignore. Fine. But that part of the process, I think as we
3 have moved forward in the last few months, has been lost.

4 One question I wanted to ask specifically back to
5 Mike's opening remarks. You referred to the CSFII as an
6 example of the success. And we agree. That's the food
7 consumption study. But I believe that has been de-funded or
8 eliminated at USDA and you're looking to transition that or
9 merge it into the N-Haines process.

10 So I wondered if at some point we could come back
11 to that.

12 MR. MCCABE: Yeah, we can come back to that. It is
13 not being dismantled. We are joining forces with
14 N-Haines as a cost saving, because we did not get funding for
15 a stand alone survey.

16 MR. VROOM: Yeah. Is there anything we could do
17 to fix that at this point in terms of those of us who are
18 outside of government and can legally lobby the Congress
19 before the appropriations process is finished?

1 MR. MCCABE: Well, I think the commitment is there
2 to join forces with N-Haines, simply because it makes more
3 sense to consolidate federal efforts. And it will provide
4 more information in terms of the relationship of diet and
5 health. I guess the question is getting enough money into
6 the consumption part of that
7 N-Haines survey now to get the information we need.

8 MR. VROOM: Okay.

9 MR. MCCABE: So any amount helps.

10 MR. VROOM: Right. Back to the first point. As an
11 example, as I understand the next presentations are going to
12 be on some transition examples of crop specific perspectives
13 and experiences. And I think that's a good example of the
14 way to handle this, and I look forward to those
15 presentations.

16 But from the agenda and the advance materials I
17 assumed that the government -- you know, either EPA or USDA -
18 - were making those presentations. And so my expectation --
19 and I may be wrong -- is that these presentations will be

1 more one dimensional than if you had reached out and tapped
2 maybe a cross section of folks on the CARAT to at least feed
3 into what the presentation will be or give a different view
4 or whatever.

5 So just a different way of adding a little more
6 texture to those approaches for advance participation and put
7 the burden on us. That's all.

8 MR. EHRMANN: And let me just note that we do have
9 time on the agenda tomorrow to continue this discussion about
10 the process. And actually we do have some folks who have
11 come for that presentation you just referred to, Jay.

12 So I want to take the cards that are up, but try to
13 summarize this and then get to that part. And then, again,
14 we'll come back to these issues about moving forward in the
15 kind of ways that have been suggested.

16 Bob and Cindy?

17 BOB: Okay, thanks. I, too, had jotted down some
18 comments from the presentations this morning that I wanted to
19 follow up with.

1 During Beth's presentation there was, I guess, some
2 comments on the cumulative. There was some concern raised
3 about mixing highly refined data with screening level data.
4 And this does get to that residential exposure issue.

5 One of the questions I have as we've gone through
6 the aggregate so far, is how are the residential portions of
7 the aggregate exposure assessment currently being handled in
8 the absence of chemical specific data. My concern here is
9 that the Agency has been using the default assumptions found
10 in the residential SOPs instead of actual data that is
11 basically intended for screening level assessments, but
12 they're being used in some of these risk mitigation
13 decisions.

14 I thought the intent of the SOPs was to use them as
15 screening level and then to determine whether more data or
16 higher tier exposure assessments are needed. But it seems to
17 be that they are actually being used in some of the decision
18 making.

19 I noted in the chlorpyrifos technical briefing that

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1 the residential SOPs were used to assess seven of the nine
2 homeowner handler scenarios and used to assess five of the
3 nine post-application scenarios. There were some studies --
4 nine chemical specific exposure studies submitted from the
5 registrant, but they were used to assess one out of the nine
6 homeowner scenarios and four out of the nine post-application
7 scenarios.

8 So the question is, many of these scenarios
9 resulted in margins of exposure that were unacceptable. And
10 I'm going, unacceptable based on what, actual data or
11 conservative assumptions? And, you know, where is there
12 opportunity to provide this missing data, so that we can have
13 a more refined risk assessment in this process?

14 MR. EHRMANN: Marcia?

15 MS. MULKEY: Well, the residential exposure
16 analysis for chlorpyrifos was highly refined. And while
17 there was use of the SOPs, there was a lot of refinement
18 within that analysis. And frankly, there are a lot of places
19 where we moved from an earlier more conservative approach to

1 one that's -- I think you could debate about whether it was
2 sufficiently conservative in a lot of instances.

3 So I think if we drill down into the details of
4 that analysis, you will not see a highly conservative
5 analysis that was relied on for that. And in fact, there was
6 a great deal of engagement with the registrant and others.
7 And that is the only situation to date where we've relied on
8 an analysis for a final regulatory decision. So I think our
9 expectation is that when we are dealing with risks of concern
10 for residential exposure, we will refine to the maximum
11 extent practicable.

12 The registrant for that compound had apparently
13 believed for a long time that it was appropriate and
14 necessary to generate a lot of data about the residential
15 exposure, and indeed did do so. And that option, of course,
16 is available to any and all registrants with residential
17 compounds. And that registrant clearly made a choice to
18 generate a great deal of data, and they made choices, I
19 guess, about places not to do so.

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1 I will tell you that the chemical specific data
2 they generated did not in every instance reveal significantly
3 lower exposures than other methods of analyzing the exposure.
4 And in fact, in some cases I think it went the other
5 direction, that it turned out to be higher exposures than our
6 process would have estimated.

7 So I just don't think that serves as an example of
8 a crude, over conservative residential risk assessment.
9 We're all concerned about what we do if we
10 -- you know, the weaker our data are and we appear to have a
11 problem. But I just don't think we have any experience to
12 date that is evidence of, you know, reliance on overly
13 conservative assumptions in making regulatory decisions.

14 BOB: A related question. We've had the emphasis
15 on the conservative -- or not conservative. On the default
16 assumptions. Yet providing registrants with validated test
17 methods and guidance to develop some of this data, that's
18 still a missing piece.

19 I had brought this up during the TRAC meeting about

1 the Series 875 Group B post-application exposure monitoring
2 test guidelines. That's still a draft guideline, and that's
3 what the registrants are supposed to be using to help
4 generate some of this necessary data.

5 Is there any indication when this may become
6 finalized and publicly released?

7 MR. JORDAN: I have some information that you asked
8 about on the break and I was able to talk with folks in the
9 Health Effects Division to get some further insight and where
10 things stand.

11 For the last year or two our resources in the area
12 of residential risk assessment have been focussed on the
13 residential standard operating procedures and dealing with
14 those -- as you know, we've been to the SAP several times on
15 that subject -- and working through the large amount of
16 information that we've been getting on individual chemicals,
17 as well as working with task forces that have been generating
18 data such as the Indoor Residential Joint Venture, the
19 Agricultural Reentry Task Force, which also has some data

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1 that are relevant here.

2 So we haven't worked on those guidelines, as you
3 know. But this year's work plan for the Health Effects
4 Division does include that as one of the priority work
5 projects. They are meeting to see how information from the
6 resources going on by our Office of Research and Development
7 on exposure methodology could be used in improving that.
8 We're also planning to get together with experts in trade
9 associations who are familiar with it to see how that can
10 play out.

11 And when those meetings are complete, we'll have a
12 better sense of what kind of schedule is realistic for
13 getting the guidelines developed. But it's definitely an
14 important priority for this year and we'll move ahead.

15 MR. EHRMANN: Thank you. Cindy?

16 MS. BAKER: I'll try to make mine quick, since you
17 reminded us that we have this on the agenda tomorrow. But I
18 didn't want to lose the thought that I think that Bob raised.

19 The difference for me in the way that the

1 workgroups worked during the TRAC process versus what we're
2 doing now in the CARAT process, is we were actually able to
3 dialogue with one another, rather than just getting, you
4 know, an update from you and responding to that update,
5 unusually in a small amount of time. You know, we got the
6 information a couple days before the meeting. We looked at
7 it. We listened to the update. We tried to respond.

8 But in the workgroups, I think we actually reached
9 consensus on some ideas that I wasn't sure it was possible
10 that we could reach consensus on. And I think that dynamic
11 may play out in a group like this. At least there was
12 benefit from all of us hearing our different perspectives and
13 discussions about where those issues are.

14 I think it would be -- it would reduce the workload
15 on both USDA and EPA to have those workgroups go forward,
16 because rather than you guys -- I know there is a tremendous
17 amount of resources that you guys expend putting together all
18 this information for us and presenting it, and other stuff
19 isn't getting done while you do this, which is not in any of

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1 our interest in that respect.

2 If we were to talk about those things and
3 essentially report out to the full committee, similar to the
4 way that we did in CARAT, I think it's a more efficient use
5 of our knowledge base. I mean, all of us have different
6 experiences through FQPA implementation that I think are
7 valuable to share amongst each other as well as with you
8 guys. So I think there are benefits that way.

9 And my last comment just is to this public process
10 question that Dan raised and, Marcia, that you responded to.
11 I think that a lot of the reasons that people didn't
12 participate in Phase 3 and probably still don't is that the
13 risk assessments have changed dramatically from when that
14 process was started. Early on they were very much
15 preliminary risk assessments. There wasn't a clear
16 opportunity for people to comment and a specific opportunity
17 to comment.

18 And I think now the things that are coming out are
19 much more refined when they come out, and it's clearer what

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1 kinds of comments that you need and in what areas. I mean, I
2 think we've all learned through that process.

3 And so I think the desire has probably increased on
4 the part of stakeholders in participating in that process now
5 that they have a better understanding of how they participate
6 and in what areas they can actually contribute information
7 that does make a difference in how the risk assessment goes
8 forward.

9 MR. EHRMANN: Okay. And again, we will pick up on
10 these issues specifically about the process of the CARAT's
11 workings tomorrow when we come to that item on the agenda.
12 If you have other thoughts overnight, obviously you'll have a
13 chance to share those in the morning as well.

14 Let me turn to the afternoon agenda item, which is
15 kind of divided into several pieces, and introduce to you how
16 this is going to run. The Department and the Agency have
17 spent a lot of time leading up to this meeting talking to
18 some of the CARAT participants, as well as outside folks that
19 they interact with around these transition issues, and have

1 asked some folks to come in and make some presentations about
2 the current experiences as it relates to transition issues to
3 try to put some case example reality to this discussion.

4 And I'll introduce those folks in a second who are
5 going to do that. What we're going to do is have two kind of
6 types of discussions. The first is going to deal with wine
7 grapes. The second with peaches. We have a variety of
8 presenters who are going to talk about a range of experiences
9 with peaches.

10 Then following those two sets of presentations, I'm
11 going to ask a couple of the CARAT members, Sarah and Steve
12 Balling, to say a few words from their perspective about kind
13 of how they see this and try to help tee up a discussion for
14 the full CARAT relative to what are really the cross cutting
15 kinds of policy issues and management issues that the Agency
16 and the Department could use guidance on and some fresh
17 creative thinking about how to address.

18 So the idea here is let's hear about some specific
19 examples. As I said this morning, that doesn't mean these

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1 cover the waterfront in terms of everyone's experience. They
2 were picked by talking to a lot of folks who have been
3 working on these issues. Listen carefully to the kinds of
4 issues that you hear raised in these presentations that might
5 be generalized to other scenarios.

6 Then we'll have a more general discussion about
7 what some of those themes and opportunities are, so hopefully
8 the CARAT as a whole can provide some advice to the
9 Department and the Agency about how to address those issues
10 that may be problematic, or those opportunities that aren't
11 being fully explored that might be based on these
12 experiences.

13 This discussion will take us through the rest of
14 the afternoon. To the extent we don't get finished with the
15 open discussion part, you'll see we have reserved an hour
16 first thing tomorrow morning to come to these issues. So
17 even though we're running a little behind, I think we'll have
18 time for these presentations, some discussion and then we can
19 have more discussion in the morning, which I would probably

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1 anticipate.

2 The first presenter is our new Committee member,
3 Cliff Ohmart, from Lodi-Woodbridge Winegrapes. Cliff is
4 going to walk through this case study as it relates to
5 grapes. Then we'll take some questions of clarification or
6 comments. Try to reserve your broader based comments until
7 we hear all the presentations. But any clarification we'll
8 take, and then we'll move to a series of presenters on
9 peaches, who I'll introduce when we get to that part of the
10 agenda.

11 MR. MCCABE: John?

12 MR. EHRMANN: Yes, Mike?

13 MR. MCCABE: Would you tell the presenter that it's
14 customary to provide samples of whatever --

15 **(Laughter.)**

16 FEMALE SPEAKER: Yeah, yeah.

17 MR. EHRMANN: Pre-processed or post-processed?

18 MR. OHMART Sarah can tell you about that.

19 MS. LYNCH: Yes, yes.

1 MR. OHMART: At the last meeting I brought samples.
2 Now this is a whole other issue, but it's involved with how
3 you ship wine around the country, and there's a lot of work
4 to be done there, too. So I was not able to bring any
5 because of the laws and whatever.

6 **(Laughter.)**

7 MALE SPEAKER: I'll talk to our transportation
8 department about that.

9 **(Laughter.)**

10 MR. OHMART: Well, we're definitely shifting gears
11 now, especially after listening to the previous discussions.
12 So using an automotive metaphor, I will try to use the clutch
13 properly so I don't grind too many gears.

14 Being new to some of you, I thought I ought to give
15 a little bit of a background of myself, just so that you
16 won't say things like how can he stand up and say things like
17 that.

18 To start off with, I did my graduate work at
19 Berkeley and I was fortunate to be trained by some of the

1 people that helped develop the IPM concept, like Messenger
2 and Huffica (phonetic) and Robert Vaninbosh (phonetic) and
3 Cal Tech Reony (phonetic). And then I went off and I
4 actually worked as a research scientist for CSIR in Australia
5 for about 13 years doing a lot of basic insect and plant
6 interaction research. So I sort of did the publish and
7 parish routine.

8 And then I came back and worked with some
9 colleagues in an IPM company in Chico, California, where we
10 worked developing IPM programs for growers of walnuts,
11 almonds, pistachios, prunes and a little bit of citrus. We
12 worked with some apples in central Washington. The company
13 oversaw about 30,000 acres of orchards.

14 And going through that was a real eye opener to me,
15 especially knowing somebody like Robert Vaninbosh. If
16 anybody had a chance to cross paths with him, I was pretty
17 amazed at what I saw when I actually started working with
18 growers. And so that's one of the things that has really
19 made a big impression on me.

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1 And so I want to start with just a couple of
2 thoughts. Now this is not meant to be provocative. It's
3 more -- I don't know how many of you that are interested in
4 IPM implementation, but an article was written recently by
5 Les Ale and Dale Batrell (phonetic) called the Illusion of
6 Integrated Pest Management. And basically -- and it was in
7 an on-line journal, Issues in Science and Technology.

8 And I've been waiting for someone to actually come
9 up with something that I felt for a long time. And that is
10 the level of IPM implementation as envisioned by the original
11 proponents is not practiced very widely. And all I'm saying
12 that for is that these are the things that I think about all
13 the time. Why aren't we seeing more of what maybe should be
14 happening out in the field.

15 And that's really at issue in terms of our program
16 at Lodi. Because I think some of the reasons that I've seen
17 is, for one thing, I don't we necessarily need a better
18 mousetrap for everything. What I see us doing, at least --
19 and this is strictly at the growers I work with. But what I

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1 see out there is we're still playing catch up. We're trying
2 to get growers to try things that we've known about for 20
3 years. And so we don't necessarily need new things in every
4 system.

5 The other thing is I think one of the keys. And I
6 use the word implementation. We don't use the word
7 transition at Lodi. But I think one of the keys is how we
8 deliver that information to growers and how we interact with
9 growers. And I think we've all done a really poor job of
10 getting that information out to growers for the last 50
11 years.

12 And then also I think we need to -- at least I
13 personally feel when I work with growers that unfortunately
14 IPM is not as much related to science and technology as it is
15 to human behavior. I would like to say that IPM is not
16 integrated pest management. It's more like integrated people
17 management.

18 And so I think to develop more successful programs,
19 we need to keep some of these things in mind. So very

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1 quickly I want to run through what we've been doing at Lodi.
2 And Lodi is starting to get quite a reputation for its
3 program, and I don't think it's really related to as much
4 what we're doing as how we're doing it. And so I'm not going
5 to be talking a lot about what we're doing, but how we're
6 doing it, and I think you'll see what I mean as I go through
7 this very quickly.

8 To do this, I need to tell you, if you're not
9 familiar with the Winegrape Commission, what is it, because
10 it has a lot to do with the success of the program. Well,
11 it's a local marketing order where California is divided up
12 into crush districts to keep track of the grape crop.

13 And our district is Crush District 11. And back in
14 1991 the growers got together and said we want to form a
15 local marketing order. And once it was formed, everybody
16 that grows winegrapes in the district has to be a member. So
17 it's democratic to start with, but after that it's
18 autocratic? I don't know. But then every five years, the
19 growers vote to continue.

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1 The funds for the Commission come from assessment
2 of the grape crop, and it's about 80,000 acres of winegrapes.
3 And for those of you that -- you know, everybody hears about
4 Napa and Sonoma, but Lodi is the largest winegrape growing
5 district in North America. We are the leading producers of
6 these varieties that you see here. It's a farm gate value of
7 about 250 million dollars. So there are a lot of grapes
8 there, and I can see why you're wondering why I didn't bring
9 any with me.

10 **(Laughter.)**

11 So what are the primary goals of the Commission?
12 To me, it's a perfect example of growers saying, you know,
13 we're going to control our own destiny. We want to drive the
14 bus. We don't want to be at the back of the bus or actually
15 waiting on the curb.

16 And so these growers decided we have to market our
17 grapes. We've got to show people that we're different from
18 Napa and Sonoma. How do we do that? We'll form a
19 Commission. So the prime function of the Commission is

1 promoting the district to winegrape buyers in particular.

2 But they also felt like some of the research that
3 was being done was not meeting their local needs, so they
4 decided to fund some of their own research. And then lastly,
5 which is what I'm going to talk about, some of the more
6 progressive growers said, you know, we can see these
7 regulations coming down the road. We want to be ahead of the
8 curve rather than behind the curve, so they decided to form
9 the program.

10 So I like to look at the IPM program as a series of
11 stages, and this is sort of I, personally, what I go through
12 when I think about how to craft what we're doing there. And
13 the first stage is grower outreach, which is primarily
14 education. So in other words, we're trying to get
15 information out to growers.

16 And then the second stage is what I term field
17 implementation, where we're actually working with individual
18 growers out in the field one on one. I think this is one of
19 the -- I like to say the --

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1 **(END OF TAPE THREE, SIDE B)**

2 MR. OHMART: -- the average grower to do some of
3 these things to be moving down the road transitioning, if you
4 will. And this is a tremendous challenge. And we've
5 developed a tool that we've just finished working on called
6 the Lodi Winegrowers Workbook, which I'll talk about.

7 Of course you need to evaluate -- particularly if
8 like us; we've been successful in getting some outside grant
9 money -- how are you doing with your programs. So we do it
10 in various ways. I don't have time to go into it. But we've
11 got detailed analyses of some of the field implementation
12 projects. We've got 60 vineyards we monitor, which I'll
13 mention.

14 Also, we've done a district wide grower survey in
15 1998 that was -- it was accurate within plus or minus 5
16 percent of the whole Commission. So we can actually look at
17 growers' attitudes. And of course there are problems with
18 surveys, but if you don't do it, you'll never know anything.
19 Also, it looks at the practices they're doing out in the

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1 field. And then finally this Lodi winegrowers workbook is
2 actually an evaluation tool in itself.

3 So the characteristics of the grower outreach
4 program, one of the problems I see with working with growers
5 -- a group of growers -- is you're working with a whole
6 continuum. And so our outreach program is directed at the
7 entire membership, and it's to try to appeal to everyone,
8 both conventional growers and very progressive growers and
9 everybody in between. And that's a real problem, because
10 it's like developing one thing that everybody is going to
11 like. There is no way you're going to do it, but you've got
12 to think about that.

13 Also, we emphasis farmer to farmer education. If
14 you ask a grower what is the most important source of
15 information, they're not going to say -- well, our survey
16 anyway said -- other farmers. That's their first important
17 source of information, so we try to take advantage of that as
18 well.

19 Another one is getting farmers together just to

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1 talk and really improve things. So one of the things we do
2 for our grower outreach, we're a pretty elaborate program.
3 We have monthly breakfast meetings, where we have people come
4 and speak about integrated farming topics, and half day
5 research seminars twice a year, where we have about five or
6 six speakers and then you talk about wine.

7 One of the things about working with wine is what
8 do you do to get people to come to the seminars? Offer food
9 and wine. And it's great. Two hundred people in a room
10 drinking and eating, it's really fun.

11 Field days. Growers like to get their hands on
12 things and see things happening. So we have a couple of
13 those a year. We get very good turn outs to these. I think,
14 again, part of it is related to this framework of the
15 Winegrape Commission. We'll get two to 250 people at a field
16 day. Two hundred and fifty growers. Monthly breakfast
17 meetings we'll get 80 to 90 growers.

18 And then this program which I can't go into, but it
19 was a lot of fun literally going around, getting growers to

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1 invite their neighbors. Five or six of them that come over.
2 We sit down and talk about well, what is this thing called
3 IPM, anyway.

4 And then we have a newsletter. In the survey, 94
5 percent of the growers read the newsletter. And of course
6 the newsletter is geared toward integrated farming topics.
7 It's a very powerful tool.

8 And not to be outdone, we have our own web site.
9 We actually post some pest numbers on a weekly basis that
10 we've monitored to what is actually happening out in the
11 field.

12 Okay. So what is the demonstration, the field
13 implementation part of it? If you want to know what this
14 fellow is doing, he's actually -- it's actually an amazing
15 slide. He's doing leaf pulling. And you can't see it from
16 where you are, but the leaf is actually in the midair. The
17 guy I work with works for a long time to capture this on
18 film. A very important part of winegrape growing is doing
19 leaf pulling.

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1 So one of the focuses of the field implementation
2 is to work one on one with growers and pest control advisors.
3 In California our consultants have to be licensed and they're
4 called PCA's, which I was for seven years. Well, I still am
5 one.

6 And implementing specific strategies. And these
7 areas provide what's called lighthouse vineyards, where
8 people can come and say oh, well, that's what you were doing.
9 Well, what did the wine taste like after you did that. That
10 kind of thing.

11 And of course documenting inputs, which I clicked
12 obviously too fast. Very quickly, we have 43 growers
13 involved in this part of our program. They manage about 40
14 percent of all the acreage in the district. So we're really
15 reaching out to a fairly large number of acres.

16 But we're not working with just big growers. We've
17 got a whole range in there from someone with six acres of
18 grapes to somebody with about 8,000. Sixteen PCAs consult
19 with those 43 growers, so, again, we're involved with them

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1 very intensely. And there are 60 vineyards in the program,
2 about 2,300 acres.

3 We look at 12 month management plans. We do weekly
4 monitoring of pest numbers. This is my big thing. If I when
5 I die see every grower actually writing the numbers down of
6 the pests in their fields, I'll die happy, because they don't
7 do that. And everything is data driven nowadays, but
8 unfortunately pest management out in the field, as far as I
9 am concerned, is not data driven and we really need to do
10 something about that. So we make a big effort providing
11 an example program of what growers can do. And then of
12 course tracking everything that happens in those vineyards.

13 Just to give you an idea of what we talk about when
14 we talked about IPM, weekly vineyard monitoring. Now I'm not
15 talking about satellites up in space, and I'm not talking
16 about airplanes and things. I'm talking about getting out of
17 your pickup truck and going out and saying, ho ho, there we
18 go. And that is very important. As a personal -- my
19 experience with working with growers is that that just didn't

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1 happen out there, and we need to really stress that.

2 Coupled with that is when do I do something. We
3 have a very poor handle, in my opinion, knowing when to do
4 something out there. Now certain pests we have a very good
5 idea, but a lot of them we don't. And so again I think it's
6 very important. Of course, we do see the use of high risk
7 chemicals. Cubacoping (phonetic) is a big thing we
8 recommend.

9 Leaf pulling? What that's all about is you
10 literally are taking leafs from around the bunch and that has
11 a multitude of effects. It's an ideal IPM technique. It
12 improves wine quality -- winegrape quality. It improves the
13 atmosphere in the canopy, so there is less likelihood of
14 fungal outbreaks. They've got great data to show leaf
15 pulling is as effective as any fungicide application, and it
16 also reduces leaf harbor mite numbers as well.

17 Using beneficial arthropods, adding compost --
18 because we're not only focussing on pest management, but
19 input reduction. Things like making sure when you do add

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1 fertilizers that you need to. Come on.

2 Pre-emergent herbicide use is our big challenge.
3 We're not using organophosphates on grapes. But pre-emergent
4 herbicide is something that we really have to do some work
5 on, because it's a very standard practice. Things like
6 simazine.

7 Drip irrigation is important for reducing inputs.
8 Also it's very important for getting high quality winegrapes.
9 And using a party mildew bottle, and of course you can't
10 forget the Owl boxes, predator control of some of the
11 vertebrate pests we have.

12 So let's very quickly now get to my last component,
13 which is the Lodi winegrowers workbook. How do you go from a
14 core group of growers to working with everyone? And I think
15 that's a very big challenge, as I mentioned already.

16 You've got to have something that appeals to a
17 whole range of growers. Of course we need to encourage
18 sustainability. We need to provide educational information.
19 Growers are hungry for information. They really are. And so

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1 when you do something, you need to satisfy that hunger.

2 I think we need to challenge and stimulate growers.
3 They're not just open vessels to pour information in. They
4 are people that really want to be stimulated. And I think
5 once they are, they get really involved.

6 We need to address the whole farming system. One
7 of the things I think we have such interest in our
8 winegrowers workbook is its not just looking at pest
9 management. It's looking at what they're doing, which is
10 growing quality winegrapes. And pest management comes along
11 with that. You know, we as pest management people think that
12 people live and die with pest management. They don't. Most
13 growers wish that pests would just go away so they could
14 focus on growing good quality crops. And with winegrapes
15 it's really what counts.

16 We need to be able to measure what we're doing out
17 there, and we also need to provide possibly a certification
18 system. There was a little bit of talk this morning about
19 well, how do we verify who did what. This is going to become

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1 more and more important when it comes to using pesticides out
2 in the field, I think. So we need to have some kind of a
3 certification system.

4 We also need to help growers provide recognition
5 for themselves in the market place. Growers are going broke.
6 And how can we help that? We can help them go directly to
7 the marketplace.

8 So now you're probably expecting superman to come
9 flying through that door saying I will solve all this. And
10 actually I think this winegrowers workbook -- I actually have
11 a copy here, if people are interested in looking at it.
12 That, I hope, addresses not some -- if not some of these
13 issues, all of them.

14 So very quickly in my last few minutes -- well,
15 first I need to tell you in terms of partnerships, this
16 project was funded by several sources. U.S. EPA Region 9 was
17 a very big supporter. The California Delta program, which a
18 lot of you may know about in terms of the water issues in
19 California, they also funded some of this. The Pesticide

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1 Environmental Stewardship Program funded it. And, of course,
2 the Lodi Winegrape Commission's funds also helped pay.

3 So how do we go about developing this program? One
4 of the things that was important is to have growers be in
5 charge. So we met with -- the growers met and developed the
6 goals and principles for the workbook. We created a
7 technical advisory committee to write the workbook and hear
8 some of the people that we partner with that were on the
9 Committee.

10 And then of course once we wrote the workbook, we
11 had two pilot workshops. The growers actually went and
12 filled out the workbook. And we're not talking about five
13 minutes sitting down and sort of checking boxes. It takes
14 about four hours to go through this. And of course, again,
15 it helps to bring wine and sandwiches. But we have them go
16 through it. And we came up with all the feedback something
17 called Lodi Winegrowers workbook, a self assessment of
18 integrated farming practices.

19 So what does a self assessment accomplish? Well,

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1 it helps growers literally assess their integrated farming
2 practices in specific fields on their farms. What is more
3 important, it helps identify areas that they need to do some
4 work. And one way to describe this is I think all of use
5 realize we have problems in agriculture, but we don't really
6 want to admit it's happening on our farm.

7 This workbook -- this approach I think helps
8 growers realize, oh, gosh, I didn't know I did that. You
9 know, maybe I should do some work on that. And so that's the
10 next step, is it helps growers develop a plan of action to
11 solve those very specific problems, and then finally it gives
12 them a timetable.

13 So now the next few slides, you're not going to be
14 able to read it, but I just wanted to show the general
15 physical outline of the book. Well, no, I'm not quite there
16 yet.

17 So what does the book look like? As I mentioned,
18 is a whole farming system book, so it deals with viticulture,
19 soil management, water management, pest management and

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1 habitat, a very big issue with winegrapes in California.
2 People, the public, are very upset about the conversion of
3 oak wood lands to vineyards. I mean really upset about it to
4 the point of civil disobedience. They are starting to talk
5 about civil disobedience. And when that word comes up, you
6 know people are upset.

7 Human resources -- the worker -- and wine quality,
8 which has to be a part of it. If you don't produce good
9 winegrapes, you're going to go broke. And then these action
10 plans and a glossary.

11 So what does the workbook look like and how does it
12 work? Now for those of you in the back, you won't be able to
13 read it. But very quickly, in all of those areas we've
14 divided up growing winegrapes into 105 very important issues.
15 And the issues are very specific. This is just an example.

16 If my pointer works here, this issue is vineyard
17 monitoring for insect and mite pests. So the grower reads
18 these four categories, and it goes from ideal to less than
19 ideal. We don't use the word bad. You know, from ideal to

1 less than ideal. So in this case, the ideal situation for
2 this kind of monitoring is that the grower or PCA monitors at
3 least weekly and they keep a written record. And down here
4 it's like they would never even get out of their house,
5 little alone their pickup truck.

6 Once they've done that, then they have an
7 evaluation sheet for each issue and they make a check mark as
8 to what one best describes what they do. Now you can't see
9 it much here, but the column number one is in red. And the
10 reason it's in red is that's the thing you need to be worried
11 about. So this grower said, you know, I almost never get out
12 of my house, little alone my pickup truck, so I'm a number
13 one.

14 Now once you fill out this book after three hours,
15 unfortunately your job is only beginning, because then you
16 have to go through the evaluation sheets and say, okay, which
17 one of those can I work on and am I willing to work on. We
18 don't tell them what to work on. They decide for themselves.
19 And the idea behind that is maybe the grower actually knows

1 that they can do as opposed to gee, it would be nice to do
2 it, but I don't think I ever will.

3 And so, again, looking at this specific example,
4 this grower doesn't monitor their vineyard, and so they
5 literally said I'm going to start monitoring every two weeks
6 and I'm going to start it next growing season. And so they
7 literally set up an action plan. And they only maybe picked
8 two or three things to start with, but it gets them to
9 actually physically do something.

10 So I think because of the time, I've got some
11 example pages. The other thing that is interesting is we've
12 got this book, Chalk a Block, with information about how to
13 do some of these things. This is the first sheet in the book
14 and it's about leaf removal. And right down below here is a
15 box that says, well, this is how you do leaf removal.

16 And I think -- because of the time, I think I'll
17 quit there, and if you're really interested about this, we
18 can talk about it later. But how we're going to implement
19 tests? We're going to follow our neighborhood grower meeting

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1 model, and we're going to get about five growers at a time,
2 and we're going to sit down and actually help them fill this
3 out. And then we'll follow up with them one on one on their
4 action plans.

5 We've done 45 growers so far. And in terms of
6 evaluation, actually somebody has reviewed this in Fruit
7 Grower Magazine, and I brought these along. It's the review
8 to pass out. There are not enough for everybody, but it
9 gives you an idea of what the industry is thinking about. I
10 didn't write that. I wish I did, but I didn't. In fact, you
11 would think they would pay me to write that. I paid them.

12 But it gives you an idea of, well, what does the
13 winegrape industry think about this. And so over the next
14 two years, our goal is to go through 200 growers with this
15 workbook.

16 And with that, I think I've got -- my 20 minutes is
17 up.

18 MR. EHRMANN: Thank you very much.

19 **(Applause.)**

1 MR. EHRMANN: Again, what I would like to do is
2 just take questions of clarification. I know this springs a
3 lot of broader issues to mind and other examples that people
4 have, etc., and I would like to reserve that for our later
5 discussion. But if just questions for clarification, how
6 many of this or what about that ir clarify this, that's what
7 we would like to take at this point.

8 Cindy?

9 MS. BAKER: That was a very informative
10 presentation. Thank you. I've heard about what you guys
11 have done up there. I've never actually seen the whole
12 presentation. I just had a couple of questions of
13 clarification.

14 You put together this workgroup and this plan -- I
15 mean this workbook and this plan. How many growers have you
16 actually gone through this with so far, roughly?

17 MR. OHMART: Yeah. We've just finished the book in
18 April.

19 MS. BAKER: Right.

1 MR. OHMART: And we've actually held five
2 workshops, 45 growers. But we're merely getting started.
3 This next year is when we're really going to get going. And
4 I'm really excited about the workbook. I mean, the feedback
5 -- I've never worked on a project like this where everybody
6 is so excited.

7 But talk to me five years from now, because if this
8 doesn't actually change growers' practices, as far as I'm
9 concerned, it will be a failure. And I don't know what's
10 going to happen.

11 MS. BAKER: And of those 45 growers, are people
12 actually implementing this stuff now, or are you still in the
13 process where you're educating people? I mean, where are you
14 kind of with that?

15 MR. OHMART: The first five workshops were just to
16 sort of get a feel of how it was going. What we really
17 didn't do was help them write action plans, and that's really
18 where the action is going to be.

19 MS. BAKER: Okay.

1 MR. OHMART: And so we're going to really start
2 that this winter and literally follow up. Do the workshop
3 and then go to the grower's farm and say, okay, let's write
4 an action plan and then help them implement that if they need
5 help.

6 MS. BAKER: And are there specific goals, like a
7 certain percent reduction? I mean, I'm thinking of Sarah --
8 what you did, Sarah, before when you had specific things.
9 Are there those types of things, too?

10 MR. OHMART: We have not done that.

11 MS. BAKER: Okay.

12 MR. OHMART: And I think those are very important
13 to do. In one of my work plans to one of the agencies, I
14 mentioned a certain percentage of simazine use reduction.
15 But I think we probably should this winter set some goals
16 like that, but we have not yet.

17 MR. EHRMANN: Bill and then Rob.

18 MR. LOVELADY: Yeah, just for clarification. I
19 didn't quite understand. You said that it was not data

1 driven -- the insect numbers were not data driven. Do you
2 mean they're not scaling, or what do you mean?

3 MR. OHMART: Yeah. My experience -- and I keep
4 waiting to be proven wrong. Every time I go to a new crop, I
5 don't see growers writing numbers down, and I don't see
6 consultants writing numbers down. I know some people do
7 somewhere, but I just don't see it myself.

8 And that's what I meant by -- so an example might
9 be in our situation with grape leaf hopper, which is not a
10 direct pest on a fruit, but people spray for it. And I keep
11 thinking, well, that's a great place to try to reduce
12 pesticide use. Growers just don't keep numbers and neither
13 do consultants.

14 MR. LOVELADY: Well, if their neighbor sprays, they
15 spray.

16 MR. OHMART: No. It's more like -- as a pest
17 control advisor, it's amazing what you can carry around in
18 your head. I mean, I couldn't believe it myself. I can
19 still remember five years ago what I saw on such and such a

1 block. That's what people do. It's all up here.

2 But the problem is if you don't really know what
3 your threshold is, there is no way you can say, well, gee, I
4 sprayed at this level last year. Was that level 15 or was it
5 12. And I think having hard data is going to really help
6 actually move down the road about developing real good action
7 thresholds.

8 So that's what I meant by that kind of statement.

9 MR. LOVELADY: We can have some of our cotton
10 farmers to help your grape growers.

11 MR. OHMART: Well, I know. And like I said, I keep
12 hearing this.

13 MR. LOVELADY: Well, if you were making \$3,100 an
14 acre, maybe you wouldn't care as much, either.

15 **(Laughter.)**

16 MR. LOVELADY: How much -- on that example, the
17 pest you just cited, how much would one treatment cost?

18 MR. OHMART: For the leaf hopper? Oh, probably
19 about 30 or 40 bucks an acre.

1 MR. LOVELADY: So out of \$3,100, right?

2 MR. OHMART: Yeah. But I've worked with almonds
3 and walnuts and -- I guess another way to put this, is I'm
4 really -- I'm into using computers out in the field. I've
5 been using them for 10 years. And if you look at all of the
6 software companies that sell software to growers, in
7 California, you know, there is full pesticide use reporting.
8 Those companies -- there is software out there for growers to
9 buy to keep track of everything on the farm, except pest
10 numbers.

11 There is nothing out there that I've seen, and the
12 reason I know is because I keep thinking I'm going to go into
13 business and sell the software, because I have it. But that
14 to me indicates that there is not enough market out there for
15 people to sell. They have everything but keeping track of
16 pest numbers.

17 So I keep -- you know, I keep hearing. I know
18 there are some people that track coddling moth. They've got
19 to have this kind of thing. But -- well, I could keep going.

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1 MR. EHRMANN: Okay. Rob and then Jean-Mari.

2 MR. HEDBERG: I just had a question. You said, I
3 think, that weed control is your biggest challenge?

4 MR. OHMART: Yeah.

5 MR. HEDBERG: And that for many IPM programs you
6 have all the tools. It's just getting them implemented.
7 Relative to weeds, do you have the solutions? Do you have
8 the alternatives, or do you need to research some new ones?

9 MR. OHMART: What we -- I'm a very pragmatic
10 person. What I'm going to really go far is things like,
11 well, let's reduce simazine by 50 percent. I'm going to
12 start there as opposed to saying, okay, I'm going to get
13 every grower to go totally non-chemical weed management.
14 There aren't any good alternatives. At Lodi they've looked
15 at a whole bunch: mow and blow and flaming and all this kind
16 of thing. They don't use it, because it's just not economic.

17

18 So I guess the answer is, we need alternatives.

19 But in the meantime, we're going to really just try to -- how

1 can we reduce our herbicide use without alternatives for now
2 and hopefully something economic will come along. So weed
3 management is a big issue, because there isn't anything
4 economic out there at the moment.

5 MR. EHRMANN: Okay. Jean-Mari and then Wally and
6 then we'll move along.

7 MS. PELTIER: Cliff, what percentage of your budget
8 comes from the growers, and then how much comes from grants?
9 And then a follow up question to that, what is the money in
10 the budget used for? Are there actual -- is it a direct
11 transfer through to growers, or is the money used for
12 research?

13 MR. OHMART: The IPM budget is pretty much totally
14 grant funded. Pretty much from the start of the Commission,
15 they said let's try to leverage what we have. That's the IPM
16 program. Everything else is strictly for grower assessment.
17 And so all the marketing and all the research, all of that,
18 are growers' dollars that come straight to the Commission and
19 then back out.

1 MS. PELTIER: So the money for IPM implementation,
2 how does that -- what is that used for? How are you using
3 money to get guys to implement IPM systems?

4 MR. OHMART: It's used for people. The money is
5 used for people.

6 STEVE: For Cliff's salary.

7 MS. PELTIER: Outside of Cliff's salary, Steve.

8 **(Laughter.)**

9 MR. OHMART: It's for my salary.

10 MS. PELTIER: No, but I mean guys going out and
11 monitoring?

12 MR. OHMART: That's a very good question.

13 MS. PELTIER: Is it paying for the guys out in the
14 field? Are they in the field? Is that what you're paying
15 for?

16 MR. OHMART: Say that again?

17 MS. PELTIER: Is it for guys to do the field
18 monitoring?

19 MR. OHMART: I do the field monitoring. I'm a big

1 believer in despite. You know, my salary and my Ph.D and
2 stuff, I'm the one that should be doing the monitoring. I
3 interact with growers all the time by doing that. I also
4 have someone that also helps me, but his salary also.

5 I'm sort of like the university people. I'm driven
6 my writing grants at the moment. But the Commission has
7 always said, you know, if they dry up, we will keep you on.
8 So the IPM is -- from that angle the IPM supports itself, but
9 the rest of the Commission is all grower money.

10 MR. EHRMANN: So it sounds like it's the --

11 MR. OHMART: I'm a busy guy. That's why my hair is
12 turning gray.

13 MR. EHRMANN: It's the funding for him and the
14 other folks who are doing the direct, kind of hands on in
15 terms of developing the workbook and that kind of stuff.
16 Everything in terms of the actual implementation is paid for
17 by the industry fund.

18 MR. OHMART: Well, yeah, but growers are doing
19 -- the growers are doing -- whatever they do, they do

1 themselves.

2 MS. PELTIER: But the grower's cost of IPM is zero
3 in your system? It's paid for by somebody else picking up
4 the tab?

5 MR. OHMART: Well, I'm basically a facilitator, and
6 so that is paid. They're not paying for that, because I've
7 been able to get grants. I'm a facilitator. In terms of the
8 implementation, they do that themselves.

9 You know, an example might be the Lion Twins Farms.
10 They are really into permanent native grass cover crops.
11 They've paid for all of that themselves for the last eight
12 years, and they do a lot of work to find out, you know, does
13 this effect the wine. I mean, all of that is paid for. The
14 grower decides I'm going to do it, and then they do it.

15 The Commission doesn't subsidize anything. But
16 what they do, is they provide a facilitator like me, which is
17 really what I am.

18 MR. EHRMANN: Okay, one more. Wally?

19 DR. EWART: In terms of moving forward in doing

1 these programs, are you going to have control, farmers versus
2 this program, to get to the bottom line economics to, you
3 know, find out what the difference is in the program that
4 you're moving toward versus the program that a conventional
5 farmer who isn't in the program would do under the same
6 farming conditions?

7 MR. OHMART: No. And I -- I'm don't -- I don't
8 like -- the idea of having an IPM vineyard versus a non-IPM
9 vineyard and looking for the bottom line, so to speak, what's
10 cheaper, I personally feel that I don't want to go in that
11 direction. And that's because IPM is -- well, what is IPM?

12 So and so over here is growing permanent native
13 grass cover crop and they're using only glyphosate. They're
14 not using premaderb (phonetic) herbicide. And they're
15 monitoring and they're doing this and that. But somebody
16 else over here is just doing cover crop, but you can't say
17 that this is IPM and that's not.

18 So, you know, it's such a hairy issue and hard to
19 define, I think, to try to do the side by side. I personally

1 would rather invest my time in other things. And that's
2 strictly a personal view.

3 Does that answer your question, Wally?

4 DR. EWART: Well, it does answer the question.
5 It's just that in the IPM programs, in apples it's a very
6 different situation. It's been very necessary to have that
7 control to show the differences. And in fact in terms of
8 implementation, I think you're missing the buck.

9 MR. OHMART: Well, I think in our case, if we had
10 some really night and day issues that we were dealing with,
11 it would be really worth doing that. I think ours is not
12 quite night and day that way. And so like I say, then you're
13 caught with saying, okay, well, what is IPM. Is it all these
14 things? Is it five out of ten? And so that means do you
15 have a five out of ten, and then you have a control and you
16 have a ten out of ten. So it's difficult.

17 And we've done -- there have been economic studies
18 done at Lodi that came out with mixed results. We actually
19 had an economist from U.C. Davis look at it. So I think it

1 depends on the situation and what you're looking at.

2 MR. EHRMANN: Okay. Thank you, Cliff, very much.
3 Let's turn then to a series of presentations on peaches. And
4 we'll just introduce each presenter as we go.

5 Larry Gutt is the first presenter from Michigan
6 State. Larry?

7 MR. GUTT: Gutt.

8 MR. EHRMANN: Gutt, I'm sorry.

9 MR. GUTT: Okay. I'm the first presenter on peach.
10 A couple of things as an introduction. I am a tree fruit
11 entomologist at Michigan State University. As we look at
12 Cliff's presentation and his first slide, and you compare on
13 my first slide and introduction to his, it kind of summarizes
14 how different my talk will be than his.

15 His had a nice pretty picture of grapes and mine
16 has a bunch of ugly pests.

17 **(Laughter.)**

18 But you get the idea of where we're going here.
19 The other thing I noticed in this room is that there are two

1 of us, I think, of the men that don't have suits on, and
2 there are two speakers. And I guess we could make a lot of
3 inferences about that, where we're coming from and stuff, but
4 I can't speak for the other speaker.

5 But I can speak for myself. The reason is because
6 since I've moved to Michigan, I've put on a lot of weight and
7 I can't fit in any of my suits any more.

8 (Laughter.)

9 STEVE: And they don't pay you enough to buy one.

10 (Laughter.)

11 MR. GUTT: Yeah, I wasn't going to say that. Thank
12 you.

13 (Laughter.)

14 MR. EHRMANN: Steve is everybody's friend.

15 MR. GUTT: Okay. So when I was asked to present
16 here, there wasn't really a lot of direction on what to
17 present and I was left wide open. So whatever I present is
18 my responsibility. I picked out one part one way that I
19 wanted to present it, and that's what I'm going to do.

1 This is what I'm going to talk about today. I'll
2 outline my presentation very briefly. I'm going to talk
3 about the challenge in peaches. I'll tell you very quickly
4 about fruit production in Michigan to get you on the same
5 page. Then I'm going to talk about peach IPM and the absence
6 of OPs.

7 And I'm talking about that in part, because I'm in
8 kind of a unique position in Michigan in the sense that
9 Gerber Baby Foods is there and they have not allowed OPs for
10 quite some time. So I've been working in these systems.

11 And then I'm going to talk about what I have
12 labelled some broader challenges to implementing IPM in fruit
13 crops. And I just picked two, again, because I think there
14 are two that my position puts me -- I'm sort of in a unique
15 position in that I think my experience has been around those
16 two issues. So I want to say something about them.

17 And then I'm going to talk about meeting the
18 challenge. I'm not going to talk about implementing programs
19 by meeting the challenge. I mean that I have been involved

1 in three strategic planning workgroups with growers and other
2 industry people in cherries, peaches and applies. And I'm
3 going to try to summarize in three slides kind of what the
4 consistencies are that you hear from those meetings.

5 Well, the first thing is Michigan's tree fruit
6 production, we have it scattered all over the state, but most
7 of the production is right along Lake Michigan, which will be
8 here. And we have five main growing regions, but only three
9 of them really produce peaches. Up here in the northwest,
10 it's almost all cherries.

11 We have a region here, Oceana Mason County, mostly
12 processing peaches. Down in the southwest, mostly fresh
13 market peaches. And over here north of Detroit, Michigan, we
14 have a lot of direct market peaches and some other things.
15 All of those areas also have apples. The main apple growing
16 area is here, and there are not very many peaches grown
17 there.

18 There are about 5,000 acres of peaches in the
19 state, about a 11.5 million dollar value. And another unique

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1 thing I want to put in here about Michigan, it is the home of
2 Gerber products, which is located essentially here and gets
3 about 35 to 40 percent of its peaches for baby food from this
4 region of its national use. And it makes 72 percent of the
5 baby food market.

6 So I didn't want to come here and have withdrawal
7 symptoms. I am a land grant university researcher, so I
8 don't want to bore you with a lot of data, but I had to put
9 some in there. I thought I would get a little shaky during
10 my talk. So I don't have a lot of data. And I tried to make
11 it very general kinds of data so you don't have to study
12 these. They all make a simple point that I'll tell you
13 about.

14 I came to Michigan in 1997. And the first thing
15 when I got there, Gerber's had gotten an environmental
16 stewardship grant just starting, so I jumped right in and
17 said yeah, I would like to be involved in that. So we had a
18 partnership with Gerber's and MSU and with -- this is a
19 private pest consulting group that worked on this project.

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1 And it ended in over a three year process with about 520
2 acres of Clingstone peaches that Gerber's would buy.

3 There were 27 growers in the project. Gerber's
4 provided the funds to use pheromone as a major control for
5 OFM in this project, with some assistance from that grant.
6 And also Gerber's pays for this scouting firm to scout all
7 the growers' farms, and they still do even after this
8 project.

9 This is a summary of kind of how it worked in
10 general in the orchards that I got involved in to monitor to
11 see how it's working. You can follow this pretty simply. I
12 don't know. I'm not going to describe in detail how
13 pheromone has worked that much. But we use insect pheromones
14 to try to get control.

15 And you can see in the red, this would show you the
16 population of oriental fruit moth, the main pest, in
17 comparison orchards to the Gerber project orchards that are
18 owned by other growers that aren't Gerber growers and are
19 running a program that included OPs. So that's the OFM

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1 population in those blocks, and there were ten of them that
2 we monitored.

3 This is OFM in the box that were getting
4 pheromone. And this is also one that was getting pheromone
5 that basically was failing. This is about what we saw in the
6 project, somewhere around 5 to 10 percent of the orchards we
7 would not get the control we wanted. So that's one thing.

8 The other thing over here is that the insecticide
9 use in all these blocks, these are means. I'm not talking
10 fast enough, I guess. These are mean number of applications
11 in all these farms. This would be in the ones that
12 correspond to this, and this is in the ones that correspond
13 to this. So these are the Gerber farms.

14 And reducing insecticide use -- but I really put
15 this up for another point, which is that using pheromone,
16 they still are putting insecticides in there. And I'm going
17 to hammer on that a little later.

18 So I need to say something about pheromone and
19 using mating disruption, because I think it's really

1 important. It's not some magic thing. This is what I've
2 been doing for 10 or 15 years, so I wanted to give a
3 perspective of this group, because it's one of the kinds of
4 alternatives that people really hold up high and say, wow,
5 this is great.

6 Well, it's got some problems in peaches that we
7 need to address and that I wanted to share with you. One is
8 that if you put a product out there, this is a product that
9 is used to get successful mating disruption control. It's
10 got insect sex hormone in it. You put it out and you disrupt
11 their mating.

12 Well, if you put it in Michigan peaches about here,
13 you get about 95 days and then it's empty. And that is okay
14 if you're growing peaches for Gerber and you're going to sell
15 them to the processing market, because they're probably
16 harvested right here. In Michigan you've got at least
17 another 35 days for most of the fresh market peaches, so it's
18 not going to make it through the year. You're going to have
19 to do something else. It's going to fail at that point.

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1 If you're in California, Steve Balling would tell
2 you you're going to be way out here. They've got more blips
3 and it keeps going way out there. So they have even a more
4 serious problem. So that's a big limitation.

5 And this is the one I talked about before, but I
6 really want to really make a point of this. This is the
7 peach situation where you're still using pheromones, and some
8 of these are still controlling oriental fruit moth. Mating
9 disruption is not a stand alone in almost all situations.
10 And I want to emphasize this with data from a very famous,
11 area wide management program. This is the Coddling Moth Area
12 Wide Management Program in the western United States. I came
13 from there. I was involved in starting this project in the
14 early '90's.

15 And if you look at what's going on, the 10,000
16 acres that are being treated with pheromone there, only 14
17 percent in this 1997 data set survey used pheromone alone for
18 Cauly moth control, and 86 percent of them used one, two or
19 more than two covers. So it's really a combination program.

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1 It's not a stand alone program and it won't be.

2 If it's a stand alone program, I'm going to go back
3 to OFM now. We have a very serious issue out there, because
4 there are no new chemistries that work on oriental fruit
5 moth. We have lots of different moths out there. We've got
6 Coddling moth, which is the famous worm in the apple. We've
7 got all these other worms out there, and new chemistries seem
8 to be okay on most of those pests. They're okay.

9 The one worm pest that stands out in fruit
10 production is oriental fruit moth. When we do repeated
11 trials of efficacy, this is the untreated checks. And we
12 look at one new product, Easteem, which you saw in the list
13 today. Pyriproxyfen has got registration. If you look at
14 indoxacarb -- this is spelled wrong. This is spintor
15 (phonetic) or spinosad. And these are two insect growth
16 regulators that are now registered.

17 You can see that in no cases do you get the kind of
18 control you need of oriental fruit moth. These are the best
19 new chemistries that are out there. This pest is not

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1 controlled by these. So we're struggling. Not only that,
2 but when you start to disrupt -- with mating disruption for
3 one pest, you end up with all these other pests.

4 And in peaches, we have a situation where many of
5 the other pests belong to this group, which I've tagged as
6 beetles, bugs and flies. And I call them beetles, bugs and
7 flies because the pesticide that is used to control them
8 historically has been different than the ones that you use
9 against these other pests.

10 If you're looking at moths and soft bodied and
11 mites and things, especially soft bodied and moths, these
12 insects tend to feed on the foliage and the crop and that
13 sort of thing. So they take up the pesticide. And you can
14 get them to get a dose. These things you have to kill.
15 They're big old adults, and you have to kill the adults and
16 they're very hard to kill.

17 And all of the new chemistries that are coming out
18 now, all of them basically have no contact activity. They
19 all have to be consumed. So all these things that run around

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1 and need contact activity, we're having trouble controlling.
2 And not only that, but they're not really on the label. I
3 mean, companies don't put a big effort into testing them.

4 So if you look at what's out there, if you take an
5 IR-4 list or whatever of all the new alternatives that are
6 out there, and what the companies are trying to target and
7 spending money to target, only 8 percent of them target this
8 group -- beetles, bugs and flies. We've got bunker culeo.
9 The Japanese beetle you'll hear about from some other people
10 today. And ligus (phonetic). I'm going to talk about one
11 right here called rose chafer. So you've got all these pests
12 in peaches. You've got no new chemistries that are targeted
13 for them.

14 Here's the one that I'm going to tell you about.
15 And believe me, I'm going to run out of data slides pretty
16 soon. But I wanted to show you one more, for sure. This is
17 rose chafer. It's a big beetle. And this is what it does to
18 the fruit. They come into peaches from the outside and
19 basically they head to the fruit. They mate and they feed

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1 all at the same time, and they're like piranhas. This is a
2 good fruit.

3 (Laughter.)

4 I think Hiter (phonetic) Shears is going to show
5 you some where you'll have 15 or 20 of these on your fruit
6 and all that is left is a seed. So this is not cosmetic
7 damage. You probably won't pick this up in the store.

8 (Laughter.)

9 So these things really go after it. Well, they're
10 a big pest in Michigan. So here's all your new
11 -- here are your new chemistries. And I'm doing this in
12 cooperation with Gerber's and with some funding from the
13 State of Michigan and all kinds of sources, because the
14 companies that are out there that manufacture these materials
15 don't provide any funding to do research on peach. That's
16 like no market.

17 So most of the data on these chemistries is on
18 apples, so we're kind of saying, well, we've got to look on
19 peach. So we find some other sources and we bootleg it and

1 we try to look at it. The only thing that has killed rose
2 chafer in the past was methyl parathion. That's not
3 available to these growers any more, so they're struggling to
4 find something to kill it.

5 So the only option they have conventionally is
6 either carbaryl or pyrethroids -- esonder (phonetic),
7 espondolarat (phonetic). And that looks about like carbaryl.
8 You can see in this study these are loud bioassays where we
9 make the beetles contact this material. And this is one day
10 residue, three day residue, seven day residue. So this is
11 what happens over time. It basically disappears.

12 And the best you're getting with a registered
13 material -- and most of the compounds that are coming up that
14 could be alternatives, this is octara (phonetic) thiamethoxam
15 and doxicarbonagan (phonetic). This is a clay material.
16 These are some alternatives. We've got nee (phonetic) mix in
17 here. We've got pepper and capsaicin. I mean, we're going
18 for everything.

19 And none of them work essentially. Fifty percent

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1 is about the best you can get to kill these beetles, and they
2 fade very quickly. So really we're having trouble trying to
3 find some.

4 Again, I'm talking to slow, I guess. So what
5 happens in Michigan peach orchards? So I've worked in these
6 500 orchards, and I tried to monitor as many as I could over
7 three years. Actually a couple of years in detail. And
8 here's what we found.

9 Well, first these beetles come from the outside, so
10 this is what peach orchards look like in Michigan in this
11 region where Gerber's buys its fruit. They're on this kind
12 of sandy soil and these grass fields are all around them and
13 these woodlands, and the larva of these beetles -- they feed
14 on grasses -- on the roots of grasses -- and they come in
15 every year from everywhere and then they leave. So if you
16 kill them in your orchard, they're coming back anyway.

17 Anyway, they come in from here. And this is just
18 to give you an idea of how many are in Michigan. This is a
19 summary of all the beetle trapping I did. And this would be

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1 way out in the field, and then coming this direction, this
2 zero means that's at the edge of the field and then moving
3 into the orchard. So when we're trapping, on average out in
4 these fields we're catching 5,000 beetles per trap. So there
5 are a lot of beetles out there.

6 And what happens? Well, we get fruit injury in
7 every orchard that I tested. So I looked in these orchards,
8 and I can tell you, all 500 acres have rose chafer eating
9 fruit. So it's everywhere. And the mean damage is about 4
10 percent and three locations out of 18 had 10 percent. And
11 working with Gerber's, we estimate this is about -- if you
12 culled 4 percent on average, it's about \$100 per acre or
13 about half a million dollars probably lost last year.

14 We're not done with all of our pests. We have
15 another group of pests in peaches called borers. These
16 things feed on the wood, and a trunk spray of chlorpyrifos
17 has really been the best control on these things. And we can
18 continue to do that, but we would like to not. The growers
19 really would like to not do this. They would like to find an

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1 alternative. It's not a fun thing to do.

2 And so we've been working on alternatives, and
3 here's what I can tell you in summary. We can use
4 pheromones. I call it here disruption for our borers. But
5 we have two borers. One is called the lessor and one is
6 called the greater. And in order to get control, you have to
7 use two products. One product won't get them both. You have
8 very good control of one of them called lessor and the other
9 one is marginal or greater. So one of them is hard to
10 control and one is easy with pheromones. So it's getting
11 complicated.

12 Then you've got another one in there called the
13 American Plum Borer. And we don't have any work on
14 pheromone, so we don't know what it's going to do. And it's
15 in there, too. So even if you disrupted the other two,
16 you've got to spray for the third one. So it's a difficult
17 issue.

18 I threw this one in here. This one is another
19 borer, the fourth one. This one is an apple called the

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1 Dogwood Borer. You get no control with pheromone and you
2 can't use chlorpyrifos any more. So this borer, there are no
3 controls for apple growers.

4 Okay. Now I'm going to go on to the second part of
5 my things, which are some broader considerations. And I
6 picked two. The first one I picked I called Regional
7 Considerations. And I picked this because in 1991 I was a
8 fruit entomologist in Washington and worked in the west coast
9 complex of pests. And then I came to Michigan in '97. So I
10 really have worked in both systems. I know a lot about both
11 of them, and I think I can really comment on this issue,
12 because it's a critical one.

13 There are some big differences in regions around
14 particular areas, but I'm just going to talk about west and
15 east and that we need to consider these when we're deciding
16 on research and all these kinds of things, because they're
17 very different.

18 One is that the pest complex in the east, and you
19 all -- probably a lot of you know this and probably heard it.

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1 It's much more complicated and OPs are required for a whole
2 group of pests. In fruit production in the west, really OPs
3 are targeted for two or three pests, so it's a very different
4 system.

5 Even probably more important is that there are
6 other regional considerations that we often don't pay
7 attention to that play into this implementation thing. If
8 you implement something in the west as a model, it basically
9 is not going to have any bearing on what's happening in the
10 east. It's so different. And I'm finding every year that
11 the differences are greater and greater and I didn't even
12 expect to see them.

13 So what are some of the other differences that I
14 didn't pay attention to? One is rain. So we have some fancy
15 new controls out there. One of them is this
16 Kaolin clay. This tree has been treated with a clay to try
17 to prevent insects from feeding on it. And it's a new novel
18 control.

19 Well, it's showing promise out west and there is a

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1 lot of work going on on it. And in fact, the company comes
2 from here and does all their work over here. Well, we
3 finally got them to work in the eastern part of Michigan, and
4 what do you think happens? It all washes off. You can't
5 keep it on. So you have to spray this stuff like every three
6 days in order to keep it coated. And it's just a very
7 difficult issue. So we need to work on keeping it on the
8 tree.

9 The same thing happens with pheromone. We've had
10 limited use in the east and lots of use in the west. And
11 there are two things associated with this. One is, of
12 course, that big pest complex makes it hard to use to
13 pheromone for one pest. That's obvious. The other one I'm
14 noticing is, I'm very interested in pheromones that can be
15 sprayed through a sprayer rather than put up with little hand
16 applicators.

17 When you put sprayable formyl out, it turns out in
18 every study for the last four years that it works great in
19 the west and fails in the east. So now we're finding out

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1 that the moisture and the conditions out in the east really
2 are breaking down these sprayable formyl capsules, so now we
3 need to work on, well, how can we have that not happen. We
4 really need research to figure out how we can prevent that,
5 because we need them badly.

6 And then finally, everybody probably knows there is a lot of
7 moisture over here, and so there is much more disease
8 pressure in the east than in the west.

9 And finally, the second one I wanted to comment on
10 that I haven't heard too much about, although we did talk
11 about it at lunch -- my group anyway -- is meeting market
12 demands. And this is a big one. And I'm bringing this up
13 because it has hit home with me this year. And so I have two
14 examples from this year and that's probably why I put it on
15 here.

16 I put an international one on here. And again,
17 these are not peaches, but I think they're important. The
18 international one is just to illustrate that we have these
19 zero tolerances for some pests -- in this case apple maggot -

1 - and really it's meeting this market that drives the program
2 for growers.

3 But more importantly on the national level, we have
4 a zero tolerance for worms in fruit. And what does that
5 mean? it's meant a lot this year, so I wanted to share that
6 with you.

7 **(END OF TAPE 4, SIDE A)**

8 MR. GUTT: -- detected in a load of apples means
9 that you get rejection. And so far about 25 to 30 percent of
10 the loads coming in in Michigan are being rejected because of
11 one worm. So the semi truck has to leave. You lose the
12 whole crop. The same thing in cherries. One curculio worm
13 detected in a load on each of 12 farms this year resulted in
14 dumping 500,000 pounds of cherries.

15 So growers have to deal with this, and I think
16 somehow we have to address this when we're doing
17 implementation. It's another area that we're not really
18 paying attention to that could help us. Can we ease that up.
19 Can we do something. Can we help people.

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1 So finally I have three slides to talk about
2 implementation and meeting the challenges, and these three
3 slides are a summary of the highlights kind of from various
4 strategic planning meetings that I've been in so far that are
5 associated with things you've heard about here.

6 The first one I have -- and when we did these
7 plans, we divided them into regulatory, educational and
8 research critical needs. So out of the regulatory comes two
9 that everybody seems to have some consensus on. One is --
10 and these are growers. These aren't mine. I didn't make
11 these up. One is slow down the FQPA process and speed up
12 review of new controls to afford producers an opportunity to
13 implement sound IPM. And growers all want this word
14 profitable in there, obviously.

15 And associated with this, I put this little figure
16 in here, because I looked at the IR-4 information for this
17 year, and IR-4 is critical to industries like peach. We
18 really need help and IR-4 is it. The companies aren't doing
19 it.

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1 So what's happened with IR-4 this year is we had
2 many packages submitted. There were probably 35 percent of
3 those that were out for IR-4 were completed. There are still
4 these that need to be worked on by IR-4. And we had about 36
5 percent that are rescheduled. So we need to really make IR-4
6 get all of this work done. It needs some funding, and it's
7 really critical.

8 And then this one was talked about today. This is
9 really essential. We need to develop and implement a program
10 that will allow researchers, growers and other people to do
11 on-farm work with new materials prior to registration. The
12 reason pheromones have been so successful is right just about
13 from the get go there was a special use permit that 250 acres
14 you could treat with having this tolerance. You had sort of
15 a general tolerance.

16 So we could test all kinds of things and get them
17 implemented. That's what's made that alternative really go
18 at the pace it's going. We need the same thing for these new
19 chemistries, because they suffer from the same limitations of

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1 pheromone in that you need to work on big areas to see how
2 they're going to work.

3 We have research challenges. The obvious one is
4 new insecticides and novel controls. But growers love on-
5 farm research, and I'm biased, too. So we need some sort of
6 national program to support on-farm research. This is not
7 well supported, and I am a real proponent of on-farm
8 research.

9 This is the number one educational tool in IPM, as
10 far as I'm concerned. This is how education in IPM gets
11 done. I should say on-farm implementation. And that's
12 really how IPM evolves and really gets going.

13 And finally education. We talked about educational
14 needs. And the number one for all growers in Michigan -- and
15 this is in every strategic meeting we had -- is new training
16 programs, and more important funds to support the development
17 of qualified pest management consultants. We just don't have
18 anybody that can do this consulting. It's really a major
19 issue.

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1 And finally we need to expand these implementation
2 projects. We have several going on here. I'm involved in
3 three projects in Michigan that I'm not going to talk about.
4 And I had a few things that I think are important. They need
5 to be well funded and long term, like four to six years.
6 They need land grant universities as chief partners.

7 And I had this in there before any of this
8 discussion, and I don't have it there, because I'm biased and
9 want a bunch of money. I put it in there because I've been
10 involved in three on-farm implementation projects, and I've
11 been to lots of meetings where people present stuff.

12 I've been involved in the famous project out west,
13 the Camp Project, which I got started with several other
14 people. One in Michigan that we called the Michigan Apple
15 IPM Project and then this Gerber's project. In every case,
16 the partnership with land grants has been really key to
17 getting this thing going and really making it work.

18 And I also want to share that it's not because of
19 money. I've been involved in three big implementation

1 projects with multi million dollars, and I haven't gotten one
2 dollar from any of them. All I do is help them get it going.
3 No money from the Gerber project. No money from Michigan
4 Apple IPM. That's a million dollars working with various
5 NGOs and stuff, and we sent all the money to a private
6 organization to completely run. And all we do is help them
7 get it going and consult. So it's not a money issue.

8 And that's it. This is my main help.

9 MR. EHRMANN: Thank you.

10 **(Applause.)**

11 MR. EHRMANN: Let me ask, just on a process point.
12 There are a number of other -- four other presenters who were
13 going to say some things about peaches, but we don't have
14 enough time to have the same length of presentation we just
15 had or that's all we're going to talk about.

16 So I need to ask Peter and Dean and Paul and Genne,
17 I think, to either compress what you were going to say or in
18 some way, you know, skip over things that may reinforce
19 points that Larry already made, etc. Or otherwise we're

1 going to -- we're not going to have time for other things we
2 need to accomplish on the agenda.

3 So let's take a couple more and then we'll take a
4 break somewhere in there. But why don't we go ahead with
5 Peter Scheer from Rutgers. And if you could help us out with
6 that way of managing your time, that would be very helpful.

7 MR. SCHEER: Hi, everybody. I'm Peter Scheer. I'm
8 with Rutgers University in New Jersey. Just a little bit of
9 a background. I was born and raised in New Jersey and left
10 there in the mid-70's and went west. And in those years
11 intervening, I have worked with orchard crops exclusively in
12 California, Oregon, Washington and macadamia nuts in Hawaii.
13 And during all those years, one thing that I missed, besides
14 New Jersey tomatoes, was the peaches. So it's nice to be
15 able to come back and help the peach growers with their
16 commodity.

17 It's amazing for such a small state that the value
18 of New Jersey's peaches ranks second in the country. It's
19 all fresh market. There are about 9,000 acres of fresh

1 market peaches and nectarines in the state. It's worth about
2 30 to 34 million dollars, depending upon the year. If the
3 south freezes out, then, you know, we usually make a little
4 bit more. But essentially our prices are dictated by the
5 quality that we produce and being close to so many areas to
6 sell our crop.

7 A couple of pertinent facts about peaches -- or
8 fresh market peaches -- is that they're very labor intensive.
9 We hand prune them. We hand thin them. We hand pick them.
10 And there is lots and lots of spraying going on out there.
11 As Dr. Gutt indicated, tremendous pest pressure from diseases
12 and from insects, so we're spraying five, seven, ten, 14 day
13 intervals, depending upon the time of the year.

14 One of the more disconcerting things I came across
15 when I first started my job there five seasons ago was this,
16 quote, 1994 USDA document that talked about where peaches
17 ranked in the implementation of IPM programs. It's near the
18 bottom of the list. Peaches are just such a commodity, at
19 least in the east, where we have to spray. Again, it's

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1 extremely perishable. You get an insect bite, you get a
2 little bit of rain, you get some brown rot, that peach will
3 melt right on the tree. It's a fresh market. It has a high
4 value. Thus we can't have any defects.

5 And then again we have this overlap of pests. If
6 we're spraying for oriental fruit moth, we're probably
7 getting plum curculeo and some other insects as well. More
8 importantly is to explain why we're spraying a lot. I guess
9 because we don't have treatment thresholds. Now I say
10 treatment thresholds versus economic thresholds. The whole
11 concept of economic thresholds doesn't work for tree fruit,
12 especially when the grower doesn't know how much that crop is
13 worth until he picks it, or it's been in his cold storage for
14 two or three weeks while he's trying to sell it.

15 Traditionally, economic thresholds, they know how
16 much that crop is worth. They know how much their control
17 measure is going to cost them to do it, so they factor this
18 in. Well, we don't know how much our crops are, like I said,
19 until after they're harvested.

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1 Then there is export concerns. We can't have any
2 worms in our fruit. And also peaches are kind of at the
3 bottom of the list as far as funding goes from various
4 sources when it comes time to researching this commodity.

5 Now our tree fruit growers for years have been
6 doing without specialists through retirements in New Jersey.
7 So they went to the State legislature and got a tree fruit
8 initiative, where they hired three new specialists to deal
9 with the production and the cultural aspects and the diseases
10 and the insects, plus people to work in the IPM program that
11 Dean Folk will talk about. So our growers are pretty
12 politically active.

13 Here is just a short list of some of the direct
14 pests that attack peaches. And I say direct pests. These
15 are the ones that actually take a bite out of the fruit. And
16 I've marked with an arrow the various pests that we're using
17 organophosphorus insecticides against. And these would
18 include the oriental fruit moth, the plum curculeo and the
19 various bugs that Dr. Gutt was talking about: stink bugs,

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1 tars plant bugs. The tars plant bug causes a lot of damage.

2 The various beetles.

3 Now fortunately here are some examples where you
4 had some recent additions to products to control these pests.
5 The green pea chafer. New Jersey had a Section 18 for
6 pervado (phonetic) and that provided excellent control of
7 this pest. Spintor or Spinosad worked really well against
8 thrips and the tufted apple bud moor.

9 Now there is a whole another list of pests that
10 attack the trunks, the twigs, the leaves, the roots. And
11 here again, these are products where we're using our OPs to
12 control these things.

13 The oriental fruit moth is our most major pest
14 there. It attacks both the shoots, the growing tips, and
15 also the fruit. It will leave a worm hole right through the
16 fruit. It's becoming a really major pest of apples now. For
17 the past four or five years, we've lost a lot of apple fruit
18 in the eastern regions from oriental fruit moth becoming a
19 pest in our apples as well. We have to deal with four to

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1 five generations a year. The latter half of the season there
2 are moths out there laying eggs. And we were still trapping
3 moths last Monday in our orchards.

4 The primary control measures were organophosphorus
5 compounds. Very little carbamates are used to control this
6 pest. But if we are using carbamates for other pests like
7 tufted apple bud moth, then we won't spray for oriental fruit
8 moth. Our growers are really savvy. They don't like to use
9 pyrethroids, because they know that that's going to flare
10 mites. So we have really well educated growers. And they
11 don't like to use pyrethroids, but are willing to do it if we
12 lose our OPs.

13 And we've had some success with mating disruption
14 for the oriental fruit moth. It's effective, but it's
15 selective. And as Larry indicated, you have all those other
16 pests that you're going to have to deal with anyway.

17 Here is a little data slide. Some new products.
18 You know, anywhere from three to four applications -- five
19 applications. Compared to emamectin or S-enthalorate

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1 (phonetic) or sauna, nothing compares to our standards. And
2 these products -- the one product that looks like it's
3 working is this methoxyfenozide or intrepid. You know, it's
4 an equivalent control to phosmet, but that's all it gets.
5 It's not going to get the bugs or the plum curculeo, so you
6 have to put something else in your tank to control those
7 insects.

8 Paul Gilibo is going to talk about plum curculeo.
9 We're in the same boat now as in the south where now we have
10 two generations per year to deal with. Just a little
11 data slide there. This is a test that was put out for green
12 peach aphid, which is at the same timing for some of our
13 earlier plum curculeo, 90 percent damage with these new
14 products. We don't have effective materials for peaches yet
15 to deal with plum curculeo.

16 The Japanese beetle. Piranhas. This is a Japanese
17 beetle ball. You get one Japanese beetle come in there and
18 it calls all its friends and buddies, and they have a mating
19 frenzy, a feeding frenzy and if you're lucky you get a few

1 bites out of it. But still that fruit is going to rot off
2 the tree and get some brown rot on there. Quite frequently
3 this is what you'll see after they're done. It's the pits,
4 let me tell you.

5 **(Laughter.)**

6 We've done quite a bit these last five years on
7 some integrated research for peach production, and a lot of
8 it has to do with ground cover management. We had a project
9 for a year, a multi state project, using different ground
10 covers in peach orchards to reduce bug problems. Then we
11 took that data and got some funding from a PMAP to combine
12 that with mating disruption.

13 Then we had such success after a year of that, that
14 we're telling our growers about it. They're getting excited.
15 They say, well, Pete -- or Dr. Pete, they say -- how much
16 does it cost. So we're doing the same thing essentially in
17 this project, where we're combining mating disruption and
18 ground cover management, to reduce our damage and our
19 pesticide use, and we're also bringing in an economist to

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1 tell them how much it costs.

2 Then there is another multi state project, where
3 we're looking at the biology management of the oriental fruit
4 moth, because it is our major pest in apple and peaches now
5 in the east.

6 And just a little bit on this clay -- this
7 K-adin clay. It doesn't work. I've looked at that for four
8 years. The only time we get it to work is when we're out
9 there with handgun applications putting this stuff on. Fifty
10 to 100 pounds per acre with a handgun. When we're doing it
11 with a speed sprayer, real life equipment -- you know, real
12 equipment -- not.

13 I was amazed at how weedy a lot of these orchards
14 were when I moved to New Jersey. And if you know anything
15 about the insect and weed interactions in orchard crops, lots
16 of times there are pests that are associated with these
17 weeds. And these are all major pests that attack peaches.
18 So my belief is that they are building up in the ground
19 cover. If the ground cover dries up, they move up and damage

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1 the tree.

2 So we got some funding to look at this. And just
3 quickly some of the problems with these weedy orchards is
4 they harbor insects and nematodes and viruses. If you have
5 weeds out there that are blooming when you're spraying
6 insecticides, you can get bee kills. So we're telling
7 growers to clean up their act and get rid of those weeds,
8 either planting seeds or using herbicides or even disking.
9 But if you use disking, then you're destroying your organic
10 matter content. You get erosion of the soil. So we're
11 getting growers to plant sods in their orchards and
12 maintaining mice weed strips.

13 And in some experiments where we had weeds and
14 clover, we had a lot more tarnish plant bug, which is a major
15 pest, compared to where we had, you know, sod or we kept the
16 weeds out by other methods. Two years in a row weeds and
17 clover were bad to have in the orchards.

18 We worked this out in grower orchards as well,
19 where we had -- oh, just to show you that the damage

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1 corresponds with the abundance, too. Where we had clover and
2 weeds, we had a lot more damage. And this is definitely
3 compared to where we didn't have any weeds in our other kinds
4 of ground cover management.

5 Our growers got involved in large blocks. They
6 divided these blocks of peaches up into thirds, where they
7 maintained their natural vegetation -- weeds. They cleaned
8 and cultivated periodically and then also planted sod. Then
9 they came along and sprayed everything the same. So the
10 other thing that was different their orchards was the orchard
11 floor. So any difference that we see in pests is because of
12 the orchard floor management.

13 This is cat facing damage caused by a complex of
14 pests. Where we had weeds, we had the damage compared to our
15 sod in both years. Now growers will disk periodically. And
16 we showed them after that first year, if you disk a little
17 bit more, by getting rid of the weeds, you're going to reduce
18 your damage.

19 It's not all gravy, though. You know, we did some

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1 nematode counts out there, and some of fescues that we're
2 promoting, like the hard fescue, which is a really nice turf
3 for these orchards, well, that's also going to build up some
4 nematodes. So there are still a few things we have to work
5 out on this system.

6 We combined mating disruption with ground cover
7 management, and the intent was to reduce our insecticide use.
8 What we have, this bottom line here, is abundance of these
9 tarnish plant bugs in our reduced risk peach block. For two
10 years in a row now we delayed the appearance of these pests
11 into the orchard, because they come from the outside. We
12 couldn't detect them for a month after they started showing
13 up in the conventional orchards that were right next door.

14 Damage. It looks pretty good. We had no
15 difference in oriental fruit moth damage using mating
16 disruption compared to our conventional methods in both
17 years. Again, we have less cat facing damage where we have
18 our ground covers versus the weeds.

19 And scale is now starting to show up. Here's the

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1 scale. This is the first time we've seen white peach scale
2 in New Jersey orchards. Normally it's a southern pest. Here
3 is a picture of it on the fruit. Here is it on the trunk.
4 And this is San Jose scale. And I wiped off too much of the
5 clay, but that's a K-adin clay treated peach filled with San
6 Jose scale.

7 We're also seeing other pests now in these orchards
8 that before they weren't a problem, of leek manner leaf
9 roller. And this will enter the fruit. Mating disruption
10 with these twist ties can also damage the trees. You can see
11 this girdling here, and the branch can snap off. You can
12 walk along and see these different colored limbs in the
13 orchard where these things have girdled the trees. And I
14 think Larry is right, that the sprayables are the way to go,
15 if we can get them to work.

16 But this is the nice part that I think some people
17 in this particular meeting like to see, is that we've reduced
18 the number of applications in our reduced risk program
19 compared to the convention programs, and also the pounds of

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1 active ingredient. So here we are still spraying, and we're
2 spraying early season. We're delaying when we put our mating
3 disruption out for the second float of the oriental fruit
4 moth, because we have other early pests that imadan will take
5 care of.

6 This is another grant that we're looking at
7 resistance to this pest and new ways to control it and time
8 it. And this is a multi state activity which I won't dwell
9 on, because we just started that this year.

10 So just a few comments on OP use. Some of our
11 bigger growers used to use methyl parathion. But New Jersey
12 had a special restricted label, where we could not apply if
13 there were any flowering weeds, period. So our growers are
14 really savvy about methyl parathion use or Pen Cap use,
15 because they didn't want to kill bees. And we haven't really
16 used it for about two years now, and we are starting to see
17 more and more scale.

18 Following the loss of Pen Cap, our growers -- a lot
19 of them -- switched to gluthion (phonetic) or maintained

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1 their use of gluthion until their reentry interval was
2 lengthened to 14 days for hand thinning. So then they
3 switched to phosmet or imadan. This is a product that on an
4 A-I basis is not as effective as azinphos methyl. So growers
5 are now putting more total poundage out in their orchards and
6 spraying more. And it's also not as rain fast. And we had a
7 lot of rain this past year, so growers are reapplying it more
8 so than if they were using azinphos methyl.

9 Peach borer control. Again, lorsban is our most
10 effective control measure. If we don't have control of these
11 boors, we won't have peach trees. You know, it's as simple
12 as that. They kill it.

13 A few other problems that are facing the eastern
14 peach growers -- I don't want to be exclusive; New Jersey
15 shares some common problems with some other groups -- is
16 market prices. We have some -- a lot of complaints from the
17 growers is that California is dumping fruit. How can they
18 grow and sell and ship peaches for \$5.00 a box, when the box
19 costs \$1.50 and shipping costs \$2.00.

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1 So there is a lot of concern that California is
2 dictating the price, and until they run out of peaches, we
3 can't sell our fruit. And that's a common concern that our
4 growers have. Plus they also yell, well, they can ship them
5 here, but we can't ship them there. Well, I try to explain
6 it's because California is a big ag state.

7 Labor. Labor shortages are common. And if there
8 is a shortage of labor, as there usually is, they would
9 rather have their labor prune the trees, thin the fruit and
10 pick the fruit than hang up these mating disruption
11 dispensers. This is, again, why we have to have some other
12 technologies to deal with mating disruption.

13 Then there is the plum pox virus. This is a new
14 virus -- or it's an old virus, but it's just been discovered
15 last year in Pennsylvania. It's a quarantine issue now. Now
16 they're finding it up in Canada. They're in an eradication
17 mode. Pennsylvania has already lost about 800 acres of
18 peaches. They're just cutting them down and burning the
19 trees.

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1 If this virus gets established, it's really going
2 to have an impact on peaches, California almonds and stone
3 fruit in general. So this is an area where we need some
4 research to come up with some resistant varieties.

5 I put this slide in. I have -- since I've been
6 working in the soft programs in the east, I've pulled more
7 ticks off of me than I ever have in my life. Fortunately,
8 they weren't deer ticks. But New Jersey has some deer
9 populations that over 100 deer per square mile. And that's
10 one reason why we have these high automobile insurance rates,
11 because of all the collisions with cars and deer.

12 But I predict, or I expect, that this lime disease
13 is going to take off in our farmworker community and our
14 grower community, because if you're out there spraying some
15 broad spectrum things, you're getting those ticks. And I
16 don't -- you know, I don't like going out there and having to
17 check my body. So if you have some person who can't read
18 some literature about deer ticks or lime disease, and these
19 things are microscopic, smaller than my freckles, you know,

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1 they're hard to find.

2 Okay. Two more slides. These are some needs for
3 eastern peach producers, and these are some needs that some
4 growers have expressed to me. Most importantly, they need to
5 make a living. They have to be able to have products that
6 they can sell at a price that they can pay off their yearly
7 debts and have an income.

8 They feel, like I said before, that they're at a
9 disadvantage to California, because California appears to be
10 dictating market prices. They need effective alternatives
11 before the standards are removed or their uses are altered.
12 They say that they're losing -- and I believe them. That
13 they're losing products and uses before there are
14 replacements.

15 They want the reentry intervals to be realistic.
16 If they're spraying five, seven, 10 or 14 day intervals and
17 there is a 14 day reentry interval on a product, there is no
18 way that they can get their commodity thinned unless they
19 switch to some more disruptive materials like pyrethroids.

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1 They need the tools to do the job. Growers say we
2 need the OPs. They won't want to go to pyrethroids. They
3 don't want to spray more for mites. And also that these pest
4 management programs that I'm supposed to be developing is
5 cost effective and that they work. And they also urge that
6 we keep lorsban or chlorpyrifos for boor control.

7 And as far as the needs that I think that the
8 academic or the research community needs, we need some more
9 incentives to test some of these products. Right now I do
10 efficacy testing. I get products from companies, spray them
11 out in the field or apply them to the trees, and then I make
12 comparisons with standard products, see whether this stuff
13 works or not.

14 Being a peach researcher, I get those things last,
15 you know, compared with apples. There are products that are
16 being registered in apples before I even get to look at them,
17 because the chemical companies, or the agro business
18 industry, you know, they have to make their dollars. And
19 they would rather make it on some commodities where they're

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1 going to make their money first, so let's do peaches last.

2 I was at a meeting last week, and here's all these
3 lists of when these products are going to be submitted and,
4 you know, when they're going to help to get the
5 registrations. Well, peaches weren't even on the lists.
6 When are they coming? Oh, maybe 2003 or 2004. So peaches
7 are a minor, minor crop that don't get much consideration.

8 And then we need some more funding to look for
9 these alternatives. And if we do get some funding, I think
10 that our pie in the east has to be bigger than the pie in the
11 west. If we get five or six or seven states on the east
12 coast together to research a problem, by the time we split up
13 that pie, our piece is smaller than those two states out
14 west.

15 And so when you think about all the universities
16 get a proportion of that money, 19 to 25 to 56 percent, you
17 know, every institution is losing money. So like we had this
18 \$150,000 grant for two years for four institutions. It comes
19 down to less than \$20,000 per investigator per year. That's

1 two summer help.

2 MR. EHRMANN: Okay.

3 MR. SCHEER: And then one more thing. We
4 definitely need more time to do the research, to validate
5 this research and then to implement it.

6 Thank you.

7 MR. EHRMANN: Thank you very much.

8 **(Applause.)**

9 Having just heard a number of the Committee members
10 talk about how you want more time for Committee discussion,
11 I'm a bit in the pickle here in terms of having three more
12 presenters on this one topic before we get to the two other
13 presenters that we were going to have before the end of the
14 day, and also have time for discussion.

15 So I'm going to suggest that we -- if I could beg
16 the indulgence of Dean and Paul and Genine, that we ask the
17 CARAT members who were going to make a few comments to make
18 those comments and then ask the other presenters to kind of
19 be part of the conversation. Come up to the table and be

1 part of the conversation.

2 I just don't know how I can -- unless we can reduce
3 those presentations to literally one slide, there is just no
4 way we're going to be able to encourage the kind of Committee
5 discussion that I know you were all just telling me you
6 wanted to have more of. So if somebody has another view,
7 feel free to express it, as always, obviously. But three
8 more presentations, 20 minutes each, and the day is done.
9 And the information, obviously, is very important, but I just
10 want to figure out an efficient way to get it in.

11 The only other thing I can think of is if we take
12 like a five minute break and ask the other three presenters
13 literally just to do their summary to make sure we get those
14 points into the discussion. That's another option. Pat, I
15 guess I would -- as the one who helped coordinate this -- ask
16 you what your thought would be in terms of how to -- I don't
17 want to be rude to the folks who came here, but I also want
18 to respect the Committee's desire for discussion time.

19 PAT: In (inaudible) discussion with the rest of

1 the people, you need (inaudible).

2 MR. EHRMANN: Well, let's do this. First of
3 all --

4 DR. BALLING: Well, John -- John?

5 MR. EHRMANN: I'm sorry.

6 DR. BALLING: You know, they have come a long way,
7 and maybe the timing isn't real good. But I can't imagine
8 that they can't summarize. Leave their slides alone and
9 summarize in three to five minutes what they wanted to say.

10 MR. EHRMANN: Well, that's what I was going to
11 suggest. If they need a break to do that, we can take a five
12 minute break to put their heads together and do that, or we
13 can just start doing that if Dean's ready to do that kind of
14 on the fly.

15 DR. BALLING: And also I would add, I didn't even
16 know I was supposed to follow up Sarah's presentation. Sarah
17 can just say whatever she wants.

18 MR. EHRMANN: Well, let's do this.

19 MR. WHALON: This is historic. Balling has

1 nothing? I can't believe it.

2 DR. BALLING: Well, don't worry. I've already been
3 picky about comments.

4 MALE SPEAKER: Can you believe it, Mark? You don't
5 believe it, do you?

6 DR. BALLING: You should talk, Whalon, of all
7 people here.

8 MR. EHRMANN: Let's take a five minute break. Go
9 out and grab a soda. I would ask Dean and Paul and Genine to
10 come up here so we can quickly figure out a way to get a few
11 more points made before we move to the next part of the
12 agenda.

13 **(Whereupon, a brief break was**
14 **taken.)**

15 MR. EHRMANN: Okay, here's what we're going to do.
16 First of all, take your seats, please. I have spoken with
17 our three presenters, and I've threatened them that if they
18 don't make this concise, they're going to have to come to the
19 next meeting of this group.

1 Dean Folk is going to go next. The folks have
2 assured me they're going to keep their presentations to three
3 to five minutes, just to kind of hit the key points. And
4 then we will turn to Steve, who won't have anything to say, I
5 understand, and Sarah.

6 FEMALE SPEAKER: Who always has something to say.

7 MR. EHRMANN: Who always has something to say.

8 DR. BALLING: No, a peach thing. I talk peaches.

9 MR. EHRMANN: Just to give a sense of kind of the
10 generic issues that arise from the presentations we've had,
11 we'll have some time for discussion -- to start a discussion
12 today. I need to leave a little time for public comment, if
13 anyone has signed up for public comment, and then we will
14 return to this discussion in the morning as the agenda
15 indicated.

16 So, again, I think the information that has been
17 presented by Larry and Peter is extremely valuable. It's
18 just unfortunate that given the number of things on the
19 Committee's agenda, it's hard for us to go into that level of

1 detail on all of these presentations.

2 So I appreciate Dean and Paul and Genine's
3 flexibility in summarizing their comments.

4 Paul -- or Dean? Excuse me.

5 MR. FOLK: Thanks. Just by way -- by the way, I
6 have my watch here, so I'm watching the time. It doesn't
7 mean I can tell time, but I'm watching it.

8 A little bit of background, like the others did.
9 We have a unique situation in New Jersey. I'm a County
10 Agent, but I have State wide responsibility. So I'm a State
11 wide Agricultural Agent and have responsibilities just for
12 coordinating integrated pest management programs for fruit.

13 And I've been doing this in New Jersey for about 20
14 years now. Before that I was an agriculture consultant in
15 Washington state, where I worked on some similar crops, and I
16 had done my graduate work just previous to that.

17 So with that, the first slide, talking about peach
18 integrated pest management. What I want to do is talk to you
19 about how we conduct an integrated pest management program

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1 with our growers in New Jersey. So what the other presenters
2 have said previously, could be said about grapes and applies
3 here. What the other two speakers said about peaches also
4 applies here. So I took some of those slides out.

5 Our program delivery is State wide. We have an
6 agent who coordinates the program. That's myself. We have
7 the County Agents and the specialists who contribute to the
8 program with research, as Peter would, and County Agents who
9 answer questions and get into the fertility end of it. We
10 have full time staff, a program associate stationed in
11 various counties throughout the State. We hire summer scouts
12 which the growers pay for. The little orange disks are the
13 growers. So this is the rough organization of the program.

14 This program we operate in peaches, apples and
15 blueberries. We work with -- of the total peach acreage in
16 the State, the growers we work with produce about 60 percent
17 of the acreage or the production in the State. The program -
18 - the whole program in itself costs about \$350,000 a year to
19 run, of which the growers contribute about \$60,000 per year,

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1 outside grant funds contribute about \$50,000 a year, and the
2 balance is paid for through State IPM funds and some federal
3 funds.

4 I talked about the funding. The purpose is to
5 educate and promote the total IPM program. We group our
6 participants into our primary participants who are scouted
7 and they pay a scouting fee, and secondary participants or
8 other growers who get information -- IPM information --
9 through newsletters, meetings or they might scout themselves.

10 Part of our information transmittal, so to speak,
11 is very one on one, very on-farm. This just shows a picture
12 of the data. We are a data intensive program, which is a
13 little different than Cliff was talking about. We do hire
14 our scouts. The growers don't gather this data. We gather
15 it and they pay us to do it. That little yellow is the
16 report form. And we have an example of on-farm charts which
17 track some of the pheromone trap counts. And we have to keep
18 data in some form, and that's just an example of a close up
19 of a data sheet.

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1 It relies on intensive scouting. That's just an
2 example of scouting the ground cover in weedy orchard. And
3 we try to get the growers to use multiple practices, using
4 information, adherence to the recommendations, looking at
5 threshold levels when we have them or action levels, getting
6 them to use alternate middle spraying, a biological control
7 of mites, reducing the rates, using selective materials,
8 degree day models, adherence to fertilizer in the Maddaside
9 (phonetic) recommendations. We try to go for the whole ball
10 of wax, because that's what growers are interested in.

11 This is just a pest complex, which you've already
12 seen. But I did want to throw out the fact that there are
13 some diseases. I know we're talking about insects, but I'm
14 going to show you a couple of these diseases, because they do
15 effect insecticide use. We cannot separate them.

16 Now oriental fruit moth is the main pest. We do
17 use a model for that. We've shown that in the mid-80's we
18 tried to insert the model for first generation, and we were
19 able to reduce insecticide use by 40 percent for the first

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1 generation. So we did insert that into our program, but we
2 would like to see the model used for succeeding generations.

3 Cat facing damage, which is those true bugs. Those
4 stinging, piercing, sucking mouth part bugs: the ligus bug,
5 tarnish plant bug and stink bugs. This is the type of damage
6 they cause. Obviously you wouldn't see those type of peaches
7 in the store. You wouldn't buy them if you saw them. Those
8 are the critters that do the damage. We also have green pea
9 chafers. These are some of the key pests that mating
10 disruption does not control. Tufted apple bud moth. Just
11 some examples of the damage that would occur.

12 Diseases. There are many diseases. I just put a
13 couple in here to show you some of the things that growers
14 are up against. This is peach scab. You probably won't find
15 a peach like this in the store. Obviously peach production,
16 like other fruit production, is a competitive business,
17 because growers need quality. And everything the growers do
18 is done to get the best quality fruit. Brown rot. There are
19 thousands and thousands of spores on this fruit. You won't

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1 find this in the store, obviously.

2 One of the things we do is we do a post-harvest
3 analysis every year. We sample. In 100 fruit samples, we
4 might take 500 samples per year. So we're looking at
5 anywhere from 50,000 fruit to 70,000 fruit individually at
6 the end of each harvest to analyze the type of damage that is
7 present.

8 And this is just data from several years, '95, '96,
9 '97 and '98. We can show growers what are the principal
10 pests. And as you see here, we talked about oriental fruit
11 moth -- this is the third from the left -- as a primary
12 target for mating disruption which had been a primary target
13 with OP use.

14 But you see the San Jose scale there was a big bar
15 in '98. And I don't have '99 and 2000 data up here yet. But
16 you would see a big bar up to there. You also see cat facing
17 damage on the left -- big bars. They are principal pests and
18 it's very hard to control those without OPs.

19 Some pesticide survey work. We do a pesticide

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1 survey every year. We take growers' spray records and
2 calculate them backwards and put them into a database, which
3 we've put together to keep a record for grower pesticide use,
4 in-season pest levels and fruit quality. All the data that
5 we gather in our IPM program goes into an access database.

6 This is A-I applied taken from '92. And what I
7 want to point out here is that you see the largest number is
8 total acreage treated, and you'll see in the next slide it's
9 presented a little differently. Azinphos methyl was the king
10 here, but methyl parathion at eight, two thirds of the way
11 down, was also fairly large. So methyl parathion was heavily
12 used, but not the principal one back then. The other thing
13 you'll see here is that permethrin down at the bottom was 110
14 acres. Not very big. And that was the -- and S-entalorate
15 (phonetic) up at 881. Those are the pyrethroids.

16 In 1999 we do this, look at asauna. This is
17 presented a little bit differently. This is a total of 21
18 growers with 2,960 acres, where we got some spray records
19 from. Asauna at 905 acres, almost a third of the acres, now

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1 have pyrethroids. A big increase from the early '90's.

2 You also see as you go through the slides that Pen
3 Cap has disappeared. Azinphos methyl is very big in terms of
4 -- you'll see azinphos and guthion up there. And emamectin
5 is also a very large number. But mostly you'll see it in
6 azinphos methyl.

7 So to take home from these pesticide slides is that
8 we have an increased use of pyrethroids as opposed to the
9 early '90's, and that's a partial result of this transition
10 phase and growers not having many alternatives to go to. You
11 also see more use of ambush pounce in here as a pyrethroid,
12 and that's just a trend. Growers don't want to, but they
13 are.

14 The other take home from pesticide use, this is a
15 slide from grower codes on the left, pounds of formulated
16 insecticide or pesticide per acre and dollar amounts per
17 acre. And you'll see, if you can read this, you'll have some
18 very large numbers of some growers spending over \$360 per
19 acre and some growers barely hitting \$100 per acre. And if

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1 you were to put a column of percent clean fruit there, you
2 would see that it does not match up to the grower that has
3 the most expenditures per acre.

4 And we use this as a teaching tool. We show
5 growers what they use -- and some growers don't know what
6 they use per acre. We show them what they use per acre, what
7 they spend and what their clean fruit was as an educational
8 tool. Because we put them all in the same room and if, you
9 know, grower A over here spent \$400 an acre for fruit and got
10 80 percent, and grower B over here spent \$200 and he got 90
11 percent clean fruit, you know, this guy is going to want to
12 know what this guy did. And so that's our teaching tool.

13 A little bit about -- I'm going to skip that in the
14 interest of time.

15 MR. EHRMANN: Yeah, let's keep moving.

16 MR. FOLK: But one thing that was said about mating
17 disruption and that we still have to use pesticides. Mating
18 disruption currently for the hand ties cost about anywhere
19 from 45 to 60 dollars an acre, depending on the type you're

1 using. That means you're going to have to save at least that
2 much from an economic viewpoint from the growers' point of
3 view.

4 And this shows a grower and a variety -- comparing
5 like varieties where we had split farms. This is from last
6 year, where the same variety had some under mating disruption
7 and some under standard spray practices. And the next column
8 is the cost difference or the amount of insecticide cost we
9 saved by using mating disruption and then the percent dollar
10 change.

11 And you'll see that even the highest one is around
12 31 or 32 dollars an acre. Well, that's good, because the
13 growers got the dispensers for free, but that's not good
14 enough. We have to save more money. We have to get the
15 system down. And these are from growers having various types
16 of ground covers: weedy, grass and so forth. So we have to
17 hone the system down a little better.

18 MR. EHRMANN: Can you just go to your -- you're
19 going to have to go to your summary.

1 MR. FOLK: And in summary, that is it.

2 MR. EHRMANN: Oh, hey, what good timing. Thank you
3 very much.

4 **(Applause.)**

5 MR. EHRMANN: Okay, Paul? Paul has dispensed with
6 his slides, he tells me.

7 MR. GILIBO: I'm not our peach specialist, who is
8 Dan Horton. But he and I were discussing who should come to
9 this kind of meeting, and I said Dan -- I said I was in EPA
10 for five years. I have a lot higher threshold for crushing
11 boredom, so let me go.

12 **(Laughter.)**

13 This morning I was awake and sitting up in my seat
14 for two consecutive hours at one point.

15 **(Laughter.)**

16 No. I think this meeting has been real useful.
17 And I will cut right to the chase.

18 The southeastern peach industry includes about 11
19 states, and we have about 40 percent of the U.S. fresh peach

1 acreage. It's about 100 million dollars or more per year, so
2 it's a big deal.

3 Almost all of our peaches are sold as fresh
4 wholesale. And that's also a key point, which means we load
5 these things up on trucks and we ship them to supermarkets in
6 places across the United States. These truck loads are worth
7 about \$17,000 apiece. If the trucks get there and there are
8 even a few wormy peaches in there, the buyer will not accept
9 them. There is no secondary market, so the grower has lost
10 his entire seasonal investment, the transportation cost and
11 ironically even has to pay to get rid of them.

12 And you might say, well, why, you know, can't we
13 have some kind of educational program or some kind of
14 regulation, you know, to make the supermarkets lower their
15 threshold a little bit. Well, who's driving that? Well,
16 we're driving it. You know, even if a like group like this,
17 if you go to Kroeger or Public's or Safeway or whatever your
18 favorite supermarket is, and you buy a wormy peach there one
19 time, you might forgive them.

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1 But if you go there twice in a row and you buy
2 wormy peaches, you might never shop in that store again, and
3 you certainly won't buy their peaches. Most people would not
4 only not go back to that store, but they might be on the
5 phone with their attorney. So that's why the threshold is
6 so, so low.

7 Another point that I want to make here is our
8 situation is not exactly like the other region. Our big pest
9 is plum curculeo. It's the one that produces those wormy
10 fruits. We have to be able to control that pest or we cannot
11 stay in business. We have to.

12 Organophosphates are the insecticide of choice,
13 because they're very effective against that plum curculeo.
14 They also suppress a number of secondary pests, as other
15 speakers have eluded to. In 45 years of use in peaches, we
16 have not had any resistance problems with organophosphates
17 and plum curculeo. And that's a big, big point.

18 And finally, and not necessarily least important,
19 organophosphates are relatively inexpensive. When I finished

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1 my undergraduate degree, I went and talked to a group, you
2 know, about sustainable ag. And, you know, I really thought
3 I knew it all. An older gentleman got up at the end and he
4 said, son. He said do you know what sustainable agriculture
5 is? He said that's agriculture that makes money. And I have
6 never forgotten that, because they are -- that's their job,
7 just like your job.

8 Another thing to keep in mind, growers invest more
9 than \$2,400 per acre before they harvest a single peach.
10 Peach tree borers and scale insects that the other speakers
11 have talked about, they kill peach trees. So you have to
12 control those. That's the other big place where we use an
13 organophosphate. Virtually every acre in the southeast is
14 sprayed one time post-season with chlorpyrifos to control
15 borers.

16 Now to -- we have some opportunities to reduce our
17 dependence on organophosphates, and this is what it will
18 take. To reduce our reliance on phosmet, which is what we
19 use to control plum curculeo, we need a consistent way to

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1 predict when the curculeo is going to be there. And that
2 means we've got to come up with an accurate model. A second
3 thing is we need some insecticide or some other method to
4 control a plum curculeo that does not exacerbate secondary
5 pests.

6 Since the 80's we've started introducing some
7 pyrethroids into our system. Now we have problems with scale
8 insects that we used to never have to spray for. It's
9 because that pyrethroid is not controlling that secondary
10 pest like the organophosphates did.

11 To get away from chlorpyrifos to control peach tree
12 borer, there are some mating disruption chemicals available,
13 and some of the speakers talked about that. One big problem
14 is the price for the twist on tie dispensing of the
15 pheromones. A hundred dollars per acre. If you have a
16 thousand acre peach orchard, it's \$100,000. Chlorpyrifos
17 costs \$25 an acre. Pretty easy to see which one you would
18 choose. And chlorpyrifos is very effective against peach
19 tree borer.

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1 The spraying pheromone is less expensive, but in a
2 limited test so far, we couldn't prove that it was going to
3 work. And we need to be able to prove that kind of stuff.

4 In summary, with the new tools that we have and the
5 progress that we're making with modeling, we think we really
6 do have an opportunity to reduce our reliance on
7 organophosphates. We are going to need time. We're thinking
8 that a realistic time frame is maybe five or six years if we
9 have adequate funding.

10 We need to keep in mind that right now peach
11 producers have great confidence in what we say, because we
12 have not steered them wrong. We say, hey, spray this, they
13 spray it. We say you don't need to spray this, they won't
14 spray it. We cannot afford to jeopardize that relationship
15 by bringing new things forward that we have not tested
16 adequately. We have to know for sure that they're going to
17 work before we recommend them.

18 Finally, we talked about a number of new compounds
19 that are coming onto the market. And we are aggressively

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1 testing these things. One big unknown is we do not know how
2 these new materials are going to control secondary pests.
3 Keep in mind that organophosphates are gang busters on a wide
4 variety of pests. And so in a lot of cases we're controlling
5 things that we don't know we're controlling. And
6 organophosphates have been used in peaches in the southeast
7 for so long, we have hardly anybody that even remembers a
8 production system that did not rely on organophosphates.

9 Like I said, we introduced pyrethroids, and low and
10 behold, we have a new problem we have to treat for. We may
11 find another pesticide effective against plum curculeo, and
12 it may bring up another problem.

13 So just keep in mind this is going to be an ongoing
14 thing. There is never going to be an end and say, okay, we
15 have arrived. This is where we're going to be. It's going
16 to be a continuous process.

17 That's all I have to say.

18 MR. EHRMANN: Thank you very much, Paul.

19 **(Applause.)**

1 MR. EHRMANN: Genine -- is it Gettle? -- from EPA
2 Region 4 is going to make some comments about funding
3 opportunities.

4 MS. GETTLE: And I have to confess that my
5 presentation was going to be short all along.

6 **(Laughter.)**

7 So I can do this pretty quickly. I wanted to talk
8 just a couple of minutes about a couple of projects that
9 Region 4 had implemented using various grant mechanisms that
10 we have available to us at EPA.

11 We have funded two different activities at
12 different times. We funded originally in 1998 an activity
13 which looked at -- and I have to read this. They sprayed
14 alternate row middles. That was the name of it. It was the
15 Arm project.

16 And basically what they were looking at there was a
17 mechanism to apply less pesticide. They didn't spray the
18 entire grove. They sprayed alternate rows in the middle of
19 the grove, and they found that to be just as effective as if

1 they had sprayed the entire grove.

2 Now unfortunately this project was conducted with
3 some products that are no longer available to us. But one of
4 the challenges that we have in the region, and that we're
5 looking at in the region and at EPA, is trying to take this
6 technology and look at it and offer opportunities for people
7 to expand upon it so that we can use that technology and
8 reduce the pesticide use in the groves.

9 The second project is a project that we're funding
10 this year. And we're using agricultural initiative money to
11 fund a project that will do a systematic evaluation of low
12 risk insecticides to control the pests that we have in the
13 southeastern region in the United States.

14 We think that this is very promising. We
15 anticipate field trials to begin very soon. Dan Horton, who
16 Paul Gilibo mentioned, is the person who is doing this
17 research, and we anticipate that the field trials will begin
18 probably in South Carolina. And he will systematically go
19 through a number of different pesticides and evaluate their

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1 low risk probability and efficacy. And then we will evaluate
2 after the first two years of the project and come back and
3 determine if we need to do some additional work or put some
4 additional money into this activity.

5 These activities have been funded using PESP
6 grants, which we work with OPP on, or ag initiative money.
7 The challenge that we have in the region is that we always
8 have more grant proposals and more requests for money than we
9 have available to give out. We have to evaluate and make
10 decisions and make cuts and decide what we can fund and what
11 we can't fund, and come up with proposals that we think will
12 move the process forward with the money that we have
13 available.

14 And that's all I have to say.

15 MR. EHRMANN: Thank you very much.

16 **(Applause.)**

17 MR. EHRMANN: Again, on behalf of the Committee,
18 let me both thank and apologize to particularly the last
19 three presenters of terms of the need to abbreviate your

1 comments. But I think that will help us all have more
2 opportunity for discussion.

3 We've asked, as I mentioned earlier, one presenter
4 who knew she was going to do this, and one presenter who just
5 found out he was going to do this, as CARAT members to
6 reflect a bit upon some of the issues, both based on what
7 we've heard in these presentations and their own experience.

8 And Sarah, who has spoken to the Committee before
9 about some of the issues and the projects that she's engaged
10 in, is going to highlight some of those issues, as well as
11 some of her other thoughts.

12 Sarah?

13 MS. LYNCH: Yeah. The good news for all of you is
14 although I am a very talkative person, I've got to be out of
15 here at 5 o'clock to get home in time to relieve the
16 babysitter. So if I start talking way to fast, because there
17 is a good amount to cover, slow me down. But I do want to
18 make sure I get out of here and you're all out of here by
19 five.

1 I think this is a perfect time for me to remind
2 folks or to tell folks about a workshop that was held last
3 summer, because we've heard some of the stories of
4 individuals trying out in the field level to bring about
5 transition. And what I think we're trying to do right now is
6 step back and look at what are some of what we call the
7 critical elements in transitioning to biologically based pest
8 management systems.

9 And this was actually the focus of a workshop that
10 took place -- actually two of them that took place last
11 summer as we began to think, or wanting to think, about
12 transition issues.

13 Now the workshop was co-sponsored by a bunch of
14 people: the World Wildlife Fund, Gerber, Del Monte, Lodi-
15 Woodbridge, the collaboration that is the WWF/
16 WPVG/AUW collaboration with World Wildlife Fund, Wisconsin
17 Potato and Vegetable Growers Association, the University of
18 Wisconsin and the West Central Michigan Crop Management
19 Association. And then there was a follow on workshop that

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1 was co-sponsored by USDA.

2 And I want to focus a bit on this notion of
3 co-sponsors, because we've talked about partnerships. We've
4 talked about sort of stakeholders. And I think it's
5 important to think -- to see that we have a private -- the
6 public interest groups. We have the food processors, the
7 commodity associations, university and ag business, as well
8 as the Department of Agriculture. And we have a lot of
9 participation from USDA.

10 All of these entities have something to say. For
11 better or for worse, the decisions that are being made on
12 farms have an impact on a much broader community, and
13 therefore there are more people who have an interest in and a
14 different perspective on what the outcome needs to be.

15 And I think what's interesting in looking at this
16 is that with the diversity of interests, we're still able to
17 come together on particular sets of issues on the need to
18 transition and that we didn't all agree on every aspect. We
19 don't agree on a lot of things, in fact. But at least there

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1 is a core bit in terms of the importance of working in a more
2 collaborative fashion to transition to more biologically
3 based pest management systems.

4 The purpose was at that time to increase the
5 attention given to transition issues. It was also a need --
6 a recognition that while the focus, of course, right now is
7 the Food Quality Protection Act and the requirements that are
8 going to be -- or, you know, the registration and
9 reregistration of products, etc., and the need to respond to
10 that law.

11 But actually the pressure is facing growers. And
12 you've heard that from the previous presentations. In fact,
13 I never thought that I should probably put California as one
14 of the major factors of change, too, in terms of forcing
15 change in other states.

16 But you have the Food Quality Protection Act,
17 consumer preferences, pest resistance, farmworker safety,
18 food processor contracts and even credit systems. All of
19 these things are putting pressure on growers. So I think not

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1 to look just at the pest management systems. That's why I
2 think it's much more important to be looking at a broader,
3 sort of crop management system as opposed to just trying to
4 respond today to the Food Quality Protection Act, when
5 tomorrow there are other issues that we're going to have to
6 be looking at. So we should be thinking about the totality
7 now.

8 In your handout there is some information on what
9 we came up with in terms of -- and this was over the course
10 of these two meetings with a broad array of stakeholders --
11 what are the critical elements in transitionally to more
12 biologically based pest management systems. What do you have
13 to have in place, because it's not just flip the switch and
14 it all happens. It's a much more complex array.

15 So we identified six things -- six sort of broad
16 categories of elements that needed to be in place in order
17 for a comprehensive transition strategy to be implementable,
18 so to speak. Not all of these have equal importance in
19 different cropping systems at different times, different

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1 places. It's sort of a different array or different emphasis
2 on some of those different categories. But we need to be
3 thinking about all of these issues.

4 I won't go into them for the interest of time,
5 because there is a bit of a description in a handout that
6 you've got that has more of those issues discussed and what
7 we meant by them. But obviously we all understand that there
8 are -- the importance of each of these working together.

9 One of the things that I would say is some of you
10 may be saying, yes, we know all that. We know that you need
11 to have, you know, buy in. You have to have research and
12 extension. That's all that many of the people have talked
13 about. I would say that one of the things that is missing
14 from what I've heard, though, is a vision.

15 And that comes to the measurable goals and
16 timetables. Where do you see 21st century agriculture going
17 for your particular commodity? What is the vision? What are
18 you communicating in terms of where growers need to be in
19 order to be competitive? And that, I think, gets to the

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1 measurable goals and timetables.

2 I wanted to just now step back now from sort of
3 that generic description of what the transition critical
4 elements are to elaborate on just two points that I think are
5 important that we've eluded to earlier today. And that is
6 this sort of stakeholder process in setting targets and
7 timetables that are clear and transparent to not to the
8 growers and to the agricultural community, but to the
9 community at large.

10 As some of you know, World Wildlife Fund and the
11 Wisconsin Potato and Vegetable Growers have been in a
12 collaboration where we had established certain goals in terms
13 of pesticide -- reducing pesticide use, risk and reliance,
14 adoption of a bio intensive IPM, wildlife and ecosystem
15 conservation, figuring out ways to reward progress for
16 meeting those goals, and developing and field testing
17 measurement methods. Now part of that measurement methods
18 comes to setting and articulating goals and timetables.

19 Now why is that important? Well, here we have a

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1 situation where over the last -- by setting those goals and
2 timetables, one, three and five year goals, and figuring out
3 a way that we both all could agree on to measure that, you
4 have a situation where a great accomplishment has been
5 achieved. As others have said, there has been significant
6 progress being made in reducing reliance on pesticides --
7 high risk pesticides.

8 Here is a situation where because you had other
9 stakeholders involved -- not just the land grant university
10 system and the affected community, the grower community, but
11 other stakeholders -- you have the success not only being
12 talked about by the WPVG, but you have other stakeholders
13 coming in and being able to acclaim the progress that's being
14 made. So, again, you have brought other people into the
15 process who can then comment on and bring to the public
16 attention the real successes that are being made in terms of
17 risk reduction.

18 The other thing is, so it's not only just being
19 able to articulate to the broader community, to the public,

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1 to taxpayers, to your neighbors and to the consumers in the
2 supermarket. But there is another benefit that being able to
3 say specifically what you want -- what needs to be done in
4 terms of target and timetables, and figuring out a way to
5 measure this kind of progress, is here is some research or
6 some data from
7 -- as you know we set -- worked out a measure for looking at
8 risk reduction. And using this method, we're able to track
9 reductions over time.

10 We're also able to look at -- and in our case we
11 call it toxicity units, but it's really -- it's a way of
12 looking at pesticide use converted into our risk factor. But
13 this is data for all farms on a one acre basis. What is
14 their toxicity unit for that particular acre, looking at
15 approximately 90 growers. And you can see, you get this
16 distribution of use, which means that there are some growers,
17 who on a per acre basis for the same crop in the same year
18 and oftentimes in the same region, are using a lot less -- a
19 lot fewer pesticides. Some using a lot more in terms of

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1 pesticide risk.

2 And what we've now done with resources from grant
3 money that we've received from the American Farm Land Trust
4 and the EPA, we have hired that one person, that outreach
5 coordinator, who is now able to work on an individual basis
6 with growers. And you can see that you can convert that
7 goal, that ability to measure, and you can take it right to
8 the farm level. Those arrows now represent individual
9 farmers using their data, understanding where they are on the
10 continuum, being able to work at their farm table to help
11 them identify and adopt alternative practices that will
12 reduce their reliance on specific chemicals and, you know, in
13 terms of different cropping systems or practices.

14 So I just offer that as a way of, again, trying to
15 link up why it's so important to have that vision of where
16 you're trying to go, not only to communicate it to the public
17 at large, which I think is an important part of what needs to
18 happen, but also because somehow we have to be able to work
19 much more closely with the growers to pull them along to let

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1 them know about these alternatives that in some cases are
2 available. Some cases are not. And that's where the
3 research needs to go. But clearly there is the need to be
4 able to work and to work with them.

5 Now one thing also that came out of our workshop --
6 and this is a bit of self promotion, I suppose. But was the
7 need to highlight some of the success stories of transition.
8 So hot off the press is Lessons from the Farm. Eight
9 successful partnerships that protect diversity through
10 reducing risk from pesticides. This is only eight of the
11 stories. There are other great stories that are happening in
12 the field.

13 We heard earlier about the Pew Charitable Trust
14 efforts. There are others going on with the transition
15 strategies that USDA is working on. So right now it's just
16 the first version, and I'm hoping that over time there will
17 be more. But I think that there are stories out there that
18 can -- and experience that can really shape and inform all of
19 those who want to address this issue.

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1 Thanks.

2 MR. EHRMANN: Thank you, Sarah.

3 **(Applause.)**

4 MR. EHRMANN: John, a question or a comment?

5 MR. RIGOLIZZO: I have a comment and then I've got
6 a train to catch. I'm a fruit and vegetable grower from New
7 Jersey. I got a lot out of what was said here today. I
8 really did. I know Peter and Dean Folk personally. They do
9 a lot of work in our state.

10 I just wanted to reflect what I got out of this
11 before I run out of here. And I do apologize for having to
12 leave early. Somebody said that on-farm research and
13 implementation is the best thing for IPM. And as an IPM
14 cooperator, I do it for fruit and vegetables and I pay both
15 ways. That's the absolute truth.

16 If you want IPM to be a success, you've got to get
17 it out on the farm. You've got to get these things out there
18 and let growers play with them, because growers are always
19 the ones that make this stuff work. You know, as good as the

1 companies are and the scientists are, it's the growers who
2 use it and the growers that make it work and make it
3 profitable.

4 I really have a problem with transition. This
5 whole concept of transition, because for us in the peach
6 industry especially -- and in the vegetable industry -- this
7 transition is costing me money. It's costing us a lot of
8 money as growers. Because what transition means to me is
9 that there is a change -- a process of change -- and we've
10 always been told about the hope for something better.

11 Until we get something better, we had things taken
12 away. And some of those tools -- like for us in peaches, I
13 could tell you that we used to use parathion. And it was
14 relatively inexpensive, and it was very effective, and we
15 sprayed a lot less. And now we have the IPM and we do
16 azinphos methyl or emamectin. And for me, it means spraying
17 twice as much material at four times the cost.

18 So I'm not getting the dollars back in this
19 business -- in this fruit business -- that we used to get 20

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1 years ago. This is a difficult problem, and I'm afraid that
2 as we go through this transition process, if we keep
3 eliminating without having some alternative, or until we do
4 have an effective alternative, you're transitioning us out of
5 business. That's the problem that I have representing
6 farmers in my area.

7 And somebody else said about the time line for this
8 transition, that it probably should be five years, with
9 funding, politics, government and everything else, I would
10 make a small prediction that 10 years would be more
11 realistic. And I would hope that with all the good stuff
12 that we're doing in this effort, and the farmers, not only in
13 New Jersey but all around this country are very accepting of
14 new technology, would love to use it all to the best
15 advantage of the people that buy our products.

16 But if you're costing us more money today than it
17 was five or ten years ago in an effort to help the people of
18 this country and you're going to put us out of business, that
19 means they're going to buy it from some place else -- some

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1 other country -- who is really not doing what we're doing
2 here. It's a problem for me.

3 So I just wanted to emphasize those couple of
4 points, and I do appreciate the opportunity. Next time
5 probably Mr. Laurie will be here. He's probably more
6 eloquent than I am.

7 MR. EHRMANN: Well, we appreciate your comments.
8 I'm glad you got them in before you had to take off.

9 MR. RIGOLIZZO: Thank you.

10 MR. EHRMANN: Steve, some thoughts?

11 DR. BALLING: Del Monte has been involved in trying
12 to implement IPM, at least since I've been there for 13
13 years. And I really liked Cliff's comment that IPM turns out
14 to be integrated people management more than integrated pest
15 management.

16 We've tried a lot of different models. A lot of
17 different attempts to try to move integrated pest management
18 in different ways. Oddly enough, one of our most successful
19 was the Randall Island IPM in the pear program that Jean-Mari

1 and I worked on back in the early '90's. And I don't know if
2 we learned as much as we could have from that, because that
3 program really worked well.

4 One of the reasons that we had this transition
5 meeting -- and since then transition has become a dirty word.
6 It wasn't at the time. In fact, it was meant to say, how in
7 the hell are we going to transition. As we lose all these
8 chemicals, what are we going to do. Whatever the term is
9 appropriate now, the fact is, what we're trying to find is
10 models for helping us develop a stable pest management system
11 so we don't have the rug yanked out from under us and so that
12 we're competitive.

13 I apologize to the easterners on peaches, but
14 California is quite a bit more competitive. I now see more
15 than ever why we grow our peaches in California. And I'll
16 skip the rest of my peach talk. We can do that later.

17 **(Laughter.)**

18 So there are two things that we have found that are
19 critical to implementing IPM. One is motivation. EPA is

1 doing a fine job of motivating us.

2 (Laughter.)

3 MR. EHRMANN: Thank you, Steve.

4 DR. BALLING: And two is the people management
5 part. And that's one of the things we're struggling with.
6 And in deference -- since I forgot my ties and I had to wear
7 Larry Elworth's tie today, I'll speak for him. One of the
8 things that he is working on that we've been involved in and
9 am very excited about is some implementation projects through
10 the pest management strategic plan effort that are very
11 similar to what
12 Lodi-Woodbridge is trying to do and what we did at Randall
13 Island. And I think that's a very exciting opportunity for
14 us. It really involves on-farm working with the consultants.
15 Hands on kind of efforts that if you look at Gerber's
16 programs, Campbell Soup's programs and our successful ones,
17 that's what is involved.

18 MR. EHRMANN: Great. Do you want to add to that,
19 Jean-Mari?

1 MS. PELTIER: If I can just follow up a second on
2 what Steve said. In the area of people management -- and
3 Secretary Rominger, this is probably most directed to USDA.
4 I think that in this round of farm bill negotiations, we need
5 to really take a look at our delivery system that we have as
6 we're trying to move into IPM implementation.

7 I think that in the case of Randall Island
8 certainly, and I think also one of the precipitating actions
9 at Lodi-Woodbridge -- I could be wrong -- was the fact that
10 the traditional system of using county extension agents -- of
11 using what we call in California farm advisors -- fell apart.

12
13 We had the biggest pear producing district in the
14 state, which translates to the biggest pear producing county
15 in the United States, I think. And the farm advisor for
16 pears was moved out right at the time we were doing Randall
17 Island. So there was no extension. There was the
18 university. And there were individual private chemical
19 company PCAs who were involved.

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1 And I think that one of the critical elements that
2 we had that made Randall Island work was the fact that we had
3 PCAs by the end of the system. So when growers went to the
4 coffee shop, they were getting the same story from the PCAs
5 as they would have if they had been talking to a farm
6 advisor. And so I think when we're dealing with these
7 systems that are information management intensive, we've got
8 to take a new look at the way we deliver that information out
9 to the field.

10 And that's why I was probing, Cliff, in your
11 questions about where does the money on IPM go. If what it's
12 going to is delivery system to the grower, that's a really
13 critical element. Part of one of the critical elements in
14 Randall Island was also offsetting the cost of the pesticide,
15 because the cost of using the pheromone was tremendously more
16 expensive than using the OP. And so until we got to the
17 point where the use of the pheromone about equalized over
18 time, you know, it took some seed money to make that happen.
19 But even more critical is the delivery system, I think.

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1 MR. EHRMANN: Okay. Let me just -- in terms of our
2 time management for the rest of the afternoon, we've got
3 about 20 or 25 minutes left until we were scheduled
4 -- about 20 minutes left until we were scheduled to adjourn
5 at 5:15.

6 So what I would like to do is have discussion for
7 the next 15 minutes or so. I've got several people
8 -- the sign up sheet just said public sign up sheet. So I'm
9 not sure --

10 **(END OF TAPE FIVE, SIDE A)**

11 MR. EHRMANN: -- public comment versus who thought
12 they were just signing in. Creseda Silvers?

13 MS. SILVERS: Creseda.

14 MR. EHRMANN: Creseda. You want to make a public
15 comment? Okay, that's one. Jim Craney?

16 FEMALE SPEAKER: He's over there.

17 MR. EHRMANN: Do you have a comment? Okay.
18 Frederick Betts?

19 MR. BETTS: Yes.

1 MR. EHRMANN: Okay. And Linda Green? No? Is
2 there anybody else who wanted to make a public comment that I
3 missed? Yes, sir?

4 MR. WILSON: Jeff Wilson.

5 MR. EHRMANN: Jeff Wilson, okay. Okay, so four
6 people. Okay, great. Let's go on with discussion. Again,
7 what I'm going to do overnight is there were a number of
8 issues made in Sarah's presentation and the other presenters
9 of kind of key factors, elements of success, challenges, etc.
10 We'll try to summarize those overnight, obviously adding to
11 that what's coming out of this discussion in the next 15
12 minutes, and come in with a slide or two to kind of start
13 that discussion with just to give you something to react to.

14 Again, not to get a consensus of a formal process,
15 but just to say here are the kinds of issues that need to be
16 considered, here is the challenges and here is the
17 opportunities to help structure that discussion in the
18 morning.

19 I guess the other thing I would ask while I have

1 the floor is that we had talked with the co-chairs this
2 morning about the possibility of starting at 8:30. I don't
3 know if it's -- I know, Rich, you're not going to be able to
4 be here that early.

5 MR. ROMINGER: But I think you should start at
6 8:30.

7 MR. EHRMANN: Start at 8:30. Okay. Is that all
8 right with you, Mike?

9 MR. MCCABE: Yes.

10 MR. EHRMANN: Okay. So we will -- let's plan to
11 start, if we can, at 8:30 in the morning, and that will give
12 us a little extra time for that discussion. Because I know
13 by 1 o'clock -- even though the agenda says 1:15, I'm sure by
14 1 o'clock people are going to start edging toward their plane
15 ticket. So let's agree to start at 8:30, if we could.

16 Cindy, thanks for being patience.

17 MS. BAKER: Not a problem. And I'll make my
18 comment short, because I see we have this topic on the agenda
19 also for tomorrow. But I didn't know if all the presenters

1 who presented would be here tomorrow. And I wanted to thank
2 all of them. I think that Cliff and Peter and Paul and Larry
3 and Dean are all living real life what we're talking about
4 when we talk about transition.

5 And I think what became really apparent to me in
6 listening to all their different presentations and the topics
7 that they had there that this is -- and I sound like a broken
8 record -- but another prime candidate for a workgroup type
9 discussion. Because what I think came out loud and clear is
10 that not every situation and not every crop and not every
11 area of the country is the same when you start talking about
12 transition and all the different complex issues that come in.

13 And so I would propose that we add this to the list
14 of potential workgroup topics and that be one of transition.

15 MR. EHRMANN: Okay. Cliff?

16 MR. OHMART: Just a specific follow up to what
17 Jean-Mari said. I think a lot of what she said is true. But
18 I did want to point out that at least in our area one of the
19 reasons our program has been so successful is because the

1 University Cooperative Extension Farm Advisor, Paul Virdegaul
2 (phonetic), is one of the best in the state, and we've had
3 incredible cooperation.

4 But personally what I see, I see a serious issue
5 with the Cooperative Extension in California, and I'm pretty
6 sure some of it is related to more local politics of the
7 University of California than maybe at the national level,
8 even though the money comes from there. I've been trying to
9 figure it out myself. There are some serious political
10 things going on and the system is eroding.

11 Take the Department of Entomology, for example.
12 You see Davis is that very top department, but they're
13 literally forced to be going towards things like genomics,
14 because if not, they're not going to get any money. They're
15 not going to be promoted to the university. In fact, the
16 department chair a couple of years ago said if they did more
17 practical based research, they would be out of business in a
18 couple of years.

19 So, you know, it's very complicated. But I think

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1 some of the things farmers really need, the University of
2 California is less and less able to deliver it for various
3 reasons. And it's serious.

4 MR. EHRMANN: Okay. Wally?

5 DR. EWART: One of the issues that I think was
6 brought up by the presenters, and that is very important, is
7 marketability. And that has to do with quality. That has to
8 do with many factors. And so for process foods you have
9 certain standards. For fresh foods, you have certain
10 standards.

11 But one of the issues we didn't talk about very
12 much was the export market and the fact that a lot of these
13 crops are dependent upon exports and also dependent upon
14 having tolerances in those countries where those exports go.
15 And right now we have what we consider to be a looming
16 problem and a problem that has already started with the new
17 materials not having registrations in the countries we export
18 to, and not having the CODEX tolerances.

19 And so that's an issue that needs to be put into

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1 the scheme. The transition or pest management systems have
2 to address the fact that we have to be able to market the
3 crop, and if the crop is something that goes abroad, it has
4 to have the regulations in those countries that will allow it
5 to be exported.

6 MR. EHRMANN: Other comments on issues or
7 challenges or opportunities that came to your mind as you
8 were listening to the various presentations?

9 Mike?

10 MR. CARTER: Yeah. Actually I would like to
11 reinforce some of the things that Sarah said. Again, I
12 represent the Wisconsin Potato and Vegetable Growers
13 Association, which is the group that has partnered with the
14 World Wildlife Fund. And I wanted to give a little bit of a
15 perspective from the growers' angle on this project. I think
16 Sarah did an outstanding job of relaying to you some of the
17 issues that we face.

18 I wanted to talk quickly a little bit about some of
19 the grower buy-in issues that we have. When we went out and

1 we tried to sell this program, there were some very distinct
2 things that the growers needed to get out of the program to
3 make it worth their while. And she hit on some of those,
4 things like public recognition, which obviously we've gotten.

5

6 Help direct public policy. That's -- you know, I'm
7 sitting here, so I guess we're -- you know, we're doing
8 pretty well in that respect. Public investment. We're
9 getting better at that. It's the right thing to do and
10 probably is the most important.

11 And in saying that, I recognize that what I look
12 like probably to many of my agricultural brethren is the
13 goody two shoes. And I remember how goody two shoes were
14 treated back in school.

15 **(Laughter.)**

16 And it may or it may not explain why I ate lunch by
17 myself today.

18 **(Laughter.)**

19 At any rate, the point isn't to say this is how you

1 should do it. The point is to say that we are making an
2 attempt to address the challenges of FQPA. And we don't have
3 it completely figured out by a long shot. But we are making
4 that attempt, and I know that that will probably receive a
5 certain amount of criticism.

6 On the other hand, I think Sarah may have received
7 some criticism from some of the folks in her world or
8 universe by allowing a group like ours to actually have three
9 and five year goals and not have that immediate reduction in
10 the use of certain pesticides.

11 What I'm saying is, is that by partnering -- and
12 there are a lot of different sort of partnerships and Sarah
13 mentioned this as well. The partnerships that we have
14 forged, I think, is very unique, but it demonstrates that the
15 partnerships don't have to be grower group and university.
16 But they can be grower group and environmental organization
17 or any other number of ways. You know, your creativity is
18 only what limits you there.

19 And I have some other points, and maybe I can make

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1 them later tomorrow. I know that we're running short on
2 time. I do have actually one quick question for Cliff,
3 though.

4 You mentioned something that you didn't really have
5 any economic data on certain IPM measures. For us that's
6 actually a very important part, and I'm a little bit curious.
7 How do you determine what the thresholds are of certain pests
8 if you don't use economic data? I didn't completely
9 understand that.

10 MR. OHMART: Well, we do have economic data. But
11 in the things we've been concentrating on, especially spider
12 mites and leaf hoppers which we really concentrate on, the
13 thresholds that people use are all over the map. And so
14 we're trying to refine things.

15 But there have been economic studies done. Part of
16 the problem with winegrapes, is you've got a varying anywhere
17 from \$200 a ton to \$2,000 a ton in the same region, so
18 quality is what counts. And so it makes the economics even
19 more complicated. But what people have looked at is the

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1 economics of cover cropping, the economics of weed management
2 systems and that kind of thing. And the numbers are there,
3 but they're just very difficult to deal with because of this
4 variation of people doing a whole different range of levels
5 of things.

6 MR. CARTER: Yeah, thanks. And the reason I bring
7 that up is because economics is an incredibly important part
8 of our program. If it's not economically feasible -- if we
9 get a lower or a reduced risk chemical in place to take an
10 OP's place, for example, there isn't a whole lot we can do to
11 promote it other than say it's safer and it's better and
12 those sort of things.

13 The problem is -- and I know this has been said by
14 other folks. The problem is that all of these things will be
15 driven at the farm level. And unless you know what those
16 economic thresholds are -- and I understand the challenges
17 that you face there -- you're going to have one heck of a
18 time getting producers to implement some of these things,
19 because to them, this is their business. This is their

1 livelihood. And if they don't know what it's going to cost,
2 they probably won't do it because it's just too vague of a
3 gamble. The unknowns are just too great to take a chance.

4 So with that I'll shut up for the day.

5 MR. EHRMANN: Okay. Erik?

6 MR. OLSON: Yeah. First of all, I want to
7 apologize, because I may not be here tomorrow. I've got a
8 little crisis brewing, or a big one. So I wanted to just
9 first of all thank the presenters on the transition issues,
10 because I thought there were some excellent presentations and
11 certainly thought provoking. And in particular, I think some
12 of the lessons that all of them seem to have learned from
13 their experience was useful to me.

14 I spent several weeks this summer travelling
15 throughout the midwest, visiting with both organic and
16 conventional growers and talking to them about these issues.
17 And a lot of the same lessons that I heard them speak about,
18 I heard more about today.

19 I wanted to also just share one thought. We've

1 heard several times people suggesting that maybe we need
2 workgroups to address certain issues that have come up. I
3 think obviously many of the issues -- virtually all the
4 issues we've talked about -- could use more discussion.

5 I wonder -- in fact, I think it would be a mistake
6 for us to start proliferating a whole bunch of new
7 workgroups. I tend to think that some of the issues we've
8 discussed might benefit from perhaps a workshop where some of
9 these issues could be discussed.

10 But I'm concerned that going into -- spinning off
11 into a whole bunch of new workgroups may siphon away the
12 energies of members of this Committee and of the agency's,
13 and that it will be difficult to, at least in my mind,
14 justify a whole new additional set of processes to go in that
15 direction. So, you know, I do think it might be worthwhile
16 for us to have maybe a workshop at which some of these key
17 issues are discussed.

18 But having standing committees, I just question
19 whether, you know, it's likely we'll have adequate

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1 participation or that it might end up siphoning a lot of
2 EPA's and USDA's resources.

3 MR. EHRMANN: Yeah, Steve?

4 MR. RUTZ: Yeah. I'm very interested in, of
5 course, the state level compliance issues associated with any
6 sort of transitional process like this, especially when
7 you're talking about large educational challenges and cost
8 differentials in terms of old versus new technologies.

9 But I'm also particularly interested in what the
10 transition implications are relative to the Section 18
11 process. You know, thinking back to the peach situation
12 there, if there are OPs that are no longer available and
13 growers feel as though the new technologies are not yet ready
14 for use, what does that do in terms of the consideration of
15 OPs in terms of Section 18 options.

16 So I'd like to throw that out for consideration.

17 MR. EHRMANN: Okay. Do you want to comment?

18 MS. MULKEY: Well, that's not an easy one. The
19 issuance -- if an OP is -- let's say the tolerance has been

1 revoked. And then if a Section 18 were issued, there would
2 have to be a tolerance issued, which would mean that the
3 safety finding would have to be made -- the FQPA safety
4 finding.

5 Now it's possible that as we manage the risks of
6 the OPs to and through the cumulative assessment that one of
7 the things we can do is leave room in the cup, if you will,
8 for emergency authorizations. That is certainly a possible
9 scenario.

10 And I think it is worth mentioning that some of
11 these cups we've been talking about are kid's foods which
12 tend to have residues, which makes it harder to save enough
13 room in the cup. But maybe some of them have less residues
14 than others, or some use patterns that have less residues
15 than others. So that is a possible scenario.

16 But, of course, the presumption of your scenario
17 was that that pesticide combination had been revoked. If it
18 had been revoked, it was probably revoked for a reason that
19 had to do with exposure and residues. So it makes it less

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1 likely that we would be able to save enough room.

2 But that's the kind of thing that could be
3 contemplated as part of a management system.

4 MR. RUTZ: Just to make one comment there. I think
5 also a key part of that, of course, is the implementation
6 process in terms of what choices are made in the whole
7 communication scenario that occurs there, too. So hopefully
8 the best choices will be made up front when those selections
9 are made.

10 MS. MULKEY: Well, you certainly -- one strives for
11 that every day in every way.

12 MR. EHRMANN: Steve?

13 DR. BALLING: One quick comment. I was just trying
14 to think about sort of how to piece all of this together that
15 we've discussed this afternoon. And I think one of the
16 issues that we're seeing is right now the reduction in
17 available compounds is dropping off at a fairly gentle slope.
18 I think everyone has done a great job of really trying to be
19 as refined and narrow as possible in trying to absolutely

1 maximize the number of available uses that we maintain.

2 But I don't think anyone here has any expectation
3 that once we hit cumulative that there won't be a fairly
4 precipitous drop in available uses of a fair number of
5 currently used compounds. So a lot of this discussion about
6 transition is really in anticipation of the cumulative issue
7 for OPs, carbamates, especially.

8 And I think one of the things that I guess -- I
9 guess the take home message from this afternoon is that the
10 rate of increase of available alternatives -- be they new
11 chemical alternatives, be they cultural or whatever, IPM type
12 alternatives -- has got to increase at a rate that's going to
13 meet that time period, whatever number of years that is away.
14 I hope it's years away, Marcia.

15 So for that reason, that is, I think, the emphasis
16 to USDA from a research and implementation perspective, and
17 EPA from a registration perspective, that we need a ramp up
18 on that end to help us try to get through this process. And
19 then it's incumbent on us in the ag community to find ways to

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1 make it work, to use our models that we've been trying to
2 propose and those kinds of things.

3 MR. EHRMANN: Okay. Again, we'll be coming back to
4 these issues in the morning. Let me just quickly review the
5 morning agenda the way I think it now sits, which is we will
6 start at 8:30 with these kind of key points drawn from this
7 discussion on transition related issues.

8 We'll have that discussion for an hour or so and
9 then move to the presentation on drinking water. And there
10 is both presentation and obviously discussion time for the
11 drinking water issues. Then the public health pesticide
12 activities, and then an explicit discussion about workgroups
13 and committee process. And we may move that last item up a
14 little bit, depending on the schedule of the co-chairs,
15 because I want to make sure they're both here for that
16 discussion.

17 And, Erik, your thoughts and the thoughts we heard
18 earlier, you know, will kind of lay all of that on the table
19 and the co-chairs will want to discuss with you some of their

1 ideas specifically about how to proceed and reflect the
2 desires of the Committee as it relates to how the Committee's
3 work should be conducted, both during the meetings and
4 between meetings, etc. So we've heard those comments
5 throughout the day and have been noting that, as we've
6 mentioned.

7 Let me now turn to public comment. I guess there
8 are four presenters that I heard. I would like to give each
9 presenter two minutes for your comments. If you have written
10 comments, please submit those to Margie Fehrenbach, our
11 designated federal official, and she'll make sure they get in
12 the docket if you don't have time to communicate all of your
13 thoughts in that two minute period.

14 And let's start first with -- how do you say it,
15 again?

16 MS. SILVERS: Creseda.

17 MR. EHRMANN: Creseda.

18 MS. SILVERS: As I already mentioned, my name is
19 Creseda Silvers, and I'm a research associate with the

1 National Center for Food and Agricultural Policy. We're a
2 nonprofit organization here in Washington, D.C. We research
3 agricultural issues, particularly those pertaining to pest
4 management, and we analyze the impacts that they may have on
5 American farmers.

6 The National Center is currently embarked on a
7 study co-authored by Leonard Gionese and myself of economic
8 impacts of recent EPA regulatory decisions regarding
9 agricultural pesticides. Some of the decisions we're looking
10 at are directly related to FQPA and some are not. They
11 include actions or delayed actions on new registrations,
12 reregistrations and Section 18 emergency exemptions.

13 In the past, analysis of the benefits of a
14 pesticide active ingredient, and the cost to growers if it
15 were to be lost, would have been part of the decision making
16 process itself. Currently it's not. No agency, governmental
17 or nongovernmental, is assessing the cost of these regulatory
18 actions to growers. The decisions are entirely risk driven.

19 By ignoring the benefits of active ingredients

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1 under review, it is implied that there are no benefits, and
2 therefore it is implied that there would be no cost if their
3 uses were lost to growers. But in fact, loses are being
4 incurred to growers -- to American growers -- as a result of
5 the recent regulatory decisions, and that should be
6 acknowledged. And some stakeholders here today have made
7 reference to that.

8 And, of course, we realize efforts are being made
9 to prevent farmers from being stranded with no pesticide --
10 with no pest management choices. The agency is working for
11 speedy registration of OP alternatives, and workgroups are
12 developing transition strategies for specific crops. And we
13 commend you all for these efforts and other efforts as well.

14 But the practical and the economic consequences of
15 these shifts in transition are not being assessed. For
16 instance, one OP alternative costs the same per use as the
17 OP. Will it be as effective or will it require more
18 applications? Will it have the same range of activity
19 targeting the same pests, or will it need to be complimented

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1 with additional pesticides? And what does all of this mean
2 for the growers' return, especially with crop prices
3 currently as low as they are.

4 So in our study we try to address these types of
5 questions for specific crops and pest systems, exploring
6 changes to pesticide use, production cost and crop yields
7 that are direct results of some of the regulated changes made
8 since 1996.

9 I have with me today a summary of seven of the
10 cases that we've already investigated. While these represent
11 instances in which the regulatory decisions have had a
12 negative economic impact on growers, we're also investigating
13 decisions that have had minimal impacts because, for example,
14 economically viable alternatives were readily available. So,
15 of course, we intend to include those successes in our final
16 study as well.

17 As I mentioned, the preliminary study that I have
18 with me today is a summary. Eventually we'll release a full
19 report in which we elaborate on these seven cases and add to

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1 them with detailed accounts of others.

2 Ideally, such analysis, we believe, should be made
3 available during the regulatory decision making in order to
4 better inform the process. While we weren't quite able to do
5 that with this current study since it focuses on decisions
6 already made from 1996 up to the present, we hope to be able
7 to produce subsequent reports on a yearly basis and thereby
8 provide more timely analysis of the decisions as they're
9 being made.

10 So we have more copies of our preliminary study out
11 in the hallway, and people are welcome to contact me for
12 additional copies.

13 Thanks for your attention.

14 MR. EHRMANN: Thank you very much. Jim Craney?

15 MR. CRANEY: Thanks a lot. My name is Jim Craney.
16 I'm from the U.S. Apple Association, and I'm also Secretary
17 of the Minor Crop Farmer Alliance. And I just wanted to make
18 a very quick clarification for the benefit of the advisory
19 committee members.

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1 In the discussion this morning about the channels
2 of trade and the methyl parathion tolerance revocation, it
3 was noted that the Minor Crop Farmer Alliance submitted
4 comments to EPA and FDA. And that's true. But I also wanted
5 to let everyone know that those comments were -- consisted of
6 comments that represent the concerns of, and comments of
7 approximately 100 fresh fruit and vegetable grower
8 organizations from across the country.

9 So the point is that those comments represent the
10 vast majority of fruit and vegetable production in the United
11 States and also a wide geographic region in the United
12 States. So I wanted to make that quick point.

13 And secondly, Marcia Mulkey, I believe, made a
14 comment this morning drawing some similarities between the
15 methyl parathion tolerance revocation and the process that
16 was used to revoke the tolerance for propargite. While I
17 would agree with Marcia that there are some similarities, I
18 also wanted to point out that on methyl parathion that
19 process took approximately four years to remove the tolerance

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1 for certain crops for methyl parathion -- for propargite.
2 But I don't believe that's what is being proposed under FQPA
3 for methyl parathion and also for other chemicals as they
4 come down the road.

5 I just wanted to make that distinction. Thank you.

6 MR. EHRMANN: Thank you. Frederick Betts?

7 MR. BETTS: Good afternoon. My name is Fred Betts.
8 I'm the Director of Regulatory Affairs for Eaton (phonetic)
9 Bioscience. But this afternoon I'm pleased to make some
10 comments on behalf of the Biopesticide Industry Alliance.
11 This is a newly formed group. The Alliance has about 22
12 member companies. All the companies are in the business of
13 discovering, developing and commercializing biologically
14 based pesticides, or biopesticides, such as biochemicals and
15 microbial pesticides.

16 The goals of the Alliance are primarily twofold.
17 First we seek to certify and to communicate the quality and
18 the effectiveness of biological pesticides, and secondly we
19 seek to work with regulatory agencies to refine and improve

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1 the regulatory process for biopesticides on all levels,
2 state, national and international.

3 Our message today and the comments I would offer
4 today are simply that we believe biopesticides have some
5 significant solutions to offer. Not the only solution, but
6 some practical solutions to offer to the issues that you all
7 are addressing in the area of transition and reassessment.

8 For example, biopesticides are typically low risk
9 alternatives to many of the conventional products. Most of
10 them enjoy an exemption from the requirement of a tolerance.
11 Many of these products have established themselves as useful
12 tools in integrated pest management programs, resistance
13 management programs, as well as utility as methyl bromide
14 alternatives or partial methyl bromide alternatives. So
15 there are a number of opportunities for these kinds of
16 products.

17 So in conclusion, I appreciate the opportunity to
18 comment. We look forward to being able to contribute in any
19 way appropriate to the work of this Committee and your

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1 associated stakeholders.

2 Thanks very much.

3 MR. EHRMANN: Thank you. Jeff Wilson?

4 MR. WILSON: Good afternoon. I'm a small fruit and
5 vegetable farmer from Ontario, Canada. I chaired the Crop
6 Plant Protection and Environment Committee for Canadian
7 Horticultural Council. We're also members of the Minor Crop
8 Farmers Alliance.

9 Some quick points and questions based on some of
10 today's activities. On IPM I think we have to accept that
11 some of the goals of IPM tend to get skewed towards
12 reductionism. And to make a long story short, it's an easy
13 sell. Environmental groups can sell reductionism to the
14 public and farmers save some pesticide application and
15 related costs.

16 What happens when we approach the point -- call it
17 economic thresholds, call it when the challenge really occurs
18 -- and someone mentioned three to five years down the road --
19 where we have to match up the real economic needs of the

1 farmers with the continual drive to reduce those very uses.
2 The second point on that is, are consumers in sync in
3 matching the concept of pesticide or risk reduction with the
4 demand for quality that they've made a very clear indication
5 they go for at the grocery counter.

6 The second question on a comment on the status of
7 the OPs -- and I'll try to put this constructively. But it
8 sounds like the lion share of the results came out in the
9 final two weeks before the end of the fiscal year. That was
10 probably done by a number of people, but would be reviewed on
11 our side by probably a single person or a single entity. It
12 puts quite a burden to do that amount of reviewing for all
13 those decision documents.

14 If there is a better way, I don't think I'm
15 speaking alone in saying that I think we would like to
16 explore that, so that we can get some meaningful dialogue
17 back and forth on some of these things.

18 Channels of trade. A question -- and I put this
19 out there because I am from Canada. Is it a potential where

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1 a use is de-listed or de-registered for a crop, the
2 subsequent MRL is dropped, but now we're down to point of
3 detection or level of detection?

4 If we use part per billion, is there a potential on
5 perennial crops that for a period of two or three years
6 following we could have in fact a level of detection of a
7 product that is no longer registered here in the United
8 States?

9 That's an issue to us in Canada. If there are
10 answers, fair enough. I'll be here tomorrow and may have
11 some comments at the end of tomorrow. Thank you.

12 MR. EHRMANN: Thank you. Any other public
13 comments? Did I miss anybody? Okay.

14 Again, I would like to thank our presenters --
15 oops. Marcia is -- okay. That's right. I would like to
16 thank our presenters for your time in coming to --

17 MALE SPEAKER: It's safe to read out loud.

18 MR. EHRMANN: It says don't call on Balling again.

19 **(Laughter.)**

1 MR. EHRMANN: Marcia would like a minute to clarify
2 an earlier -- a comment made in an earlier presentation.
3 Marcia?

4 MS. MULKEY: A small but important correction. As
5 Lois said when she presented the description of all the risk
6 management things that we've done for the completed
7 decisions, they were very brief in summary. Well, the one on
8 ethyl parathion, which is one that is being phased out
9 completely, was probably a little too brief in summary and it
10 may have created a misleading impression.

11 It says that the registration is canceled
12 immediately. And that is true for the technical grade
13 product. But the registrations for the end use products run
14 out another couple of years, so that they occur basically at
15 about the same time frame as the use restrictions and the
16 existing stock is used up.

17 That does not mean any more of the product can be
18 produced, because the technical grade is stopped and no more
19 of it is available. It just means that that's the way we run

1 the remaining product through the chain.

2 Thanks.

3 MR. EHRMANN: Okay. Rob, a question on that?

4 MR. HEDBERG: No, a different question.

5 MR. EHRMANN: Okay.

6 MR. HEDBERG: This morning we talked about the
7 worker protection standard. My understanding is that there
8 are two workshops which are going to be held here in the next
9 six months or so, one in California and one in Florida. I
10 think it might be good to get the dates for the people who
11 are here, so we know when those are going to be.

12 MS. MULKEY: Okay. We'll be glad to do that.
13 These are on the reassessment of the implementation of the
14 worker protection standard. And that's great. I think
15 that's yet another opportunity for some -- and they are open
16 discussion. I mean they are definitely feedback. In fact,
17 that's the primary purpose, to obtain feedback.

18 MR. EHRMANN: Okay. Let me turn to the
19 co-chairs for any closing comments. Rich?

1 MR. ROMINGER: I want to thank everybody for being
2 here today and for participating in the good discussions
3 we've had. We've heard a lot of concerns, as well as some
4 stories of what has really been happening out there.

5 I'm looking forward to the discussion tomorrow and
6 figuring out how we're going to be able to get the input that
7 all of you would like to get in to make sure that it gets
8 considered and the process that we'll use to do that. I
9 think there are probably a number of ways that we can do
10 that. So we'll have that discussion tomorrow morning and
11 make some decisions on how to proceed.

12 MR. MCCABE: I would just echo Rich's comments. I
13 want to thank everybody for being here. I look forward to
14 seeing you tomorrow. I'm sorry that we didn't get to that
15 bigger chunk of time this afternoon for some freewheeling
16 discussion. Hopefully we will have some of that tomorrow. I
17 suspect that we will, if I know this group. But I look
18 forward to that. I think that it will be very valuable.

19 And I think despite some of the concerns Bob

1 raised, and some others echoed it, about this not being as
2 conducive a forum to advice as you may think. I think that
3 just the discussion that we've had about a couple of these
4 topics and some of the issues that have been raised has
5 provided us with a perspective and overview of some of your
6 concerns that has provided us with some advice.

7 I think we can look for ways to structure it even
8 better. But we are looking to you to make this forum work
9 for you as well as make it work for us. So tomorrow we will
10 join together again and I will see you then.

11 MR. EHRMANN: Thank you all very much. Have a good
12 evening. See you at 8:30.

13 (Whereupon, the meeting was
14 adjourned.)

15 - - - - -

16

17 DAY TWO

18 OCTOBER 12, 2000

19 P R O C E E D I N G S

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1 - - - - -

2 MR. EHRMANN: Good morning. Let me just make a few
3 comments about the agenda and then turn it over to Mr. McCabe
4 for some opening comments.

5 Our agenda today calls for us to adjourn no later
6 than 1:15, and we'll stick with that schedule and kind of
7 calibrate our time, as always, as we get closer to that. For
8 the members of the public who are here, if you wish to make
9 public comment as part of this federal advisory committee
10 process, please sign up for that outside, so that I can gauge
11 how much time we need to allow for public comment at the end
12 of the morning.

13 And we're going to structure the first part of the
14 conversation to talk about some of the transition issues, and
15 then move to drinking water and public health issues, and
16 then discussion of the CARAT process, workgroups and those
17 issues, as is indicated on the agenda before we adjourn this
18 morning.

19 I know Mr. Rominger will be joining us in about 35

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1 or 40 minutes. Mike, comments?

2 MR. MCCABE: Yeah. I look forward to the
3 discussion that we're going to have today, particularly the
4 discussion about transition issues. I think that yesterday's
5 presentations -- even though they came at a time in our
6 agenda where I think many of us wanted to move to some other
7 issues and have a broader discussion
8 -- were very informative because they talked about the scope
9 of some of the challenges faced in the transition.
10 We're putting -- we're going to distribute now a summary of
11 some of the key issues. And as you'll see, it's two pages.
12 There are many issues that came up in the transition
13 discussion that we've been talking about and that you've been
14 talking about. I think it will be helpful to use this as the
15 basis for discussion.

16 This is not an official document. This really is
17 meant to be a tool to help the discussion in this area. And
18 it's one that we find is very important and one that needs
19 more discussion. And I think that as we talk about next

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1 steps, we ought to be talking about next steps in transition
2 and how CARAT can help in that process. So I look forward to
3 that.

4 MR. EHRMANN: Sarah is passing around this summary.
5 As Mike said, let me just reinforce the fact that this is a
6 set of items that we distilled out of yesterday's
7 presentations and other similar discussions on transition
8 issues. It's certainly not exhaustive. It doesn't cover
9 every issue. And it is the product of some of the staff who
10 were listening to the conversation yesterday and those of us
11 who did the typing last night.

12 So everything here is our responsibility, and it's
13 meant to kind of help frame our discussion this morning.
14 It's not meant, you know, to be a formal statement of the
15 Committee, or we're not going to look for a formal consensus
16 that everybody agrees with everything on this piece of paper.

17 But because we did have a wide range of information
18 presented yesterday, we thought it would be helpful to have
19 kind of a structure to lead us through the discussion that we

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1 want to have today on these issues for the next hour or so.

2 And I think the best way to approach this would be
3 to kind of use this flow in terms of the issues and see if
4 there are major kinds of points or concerns or opportunities
5 or challenges related to transition that you do not see
6 captured here that should be noted, again, without worrying
7 about the precise wording. And what we'll do is incorporate
8 the discussion into this and circulate it after the meeting
9 is concluded to folks, again, just as a record of this part
10 of the discussion.

11 I'm sure both the Department and the Agency will
12 then use this information to help structure their next steps
13 as they proceed and all of you proceed in various transition
14 related activities as Mike has indicated. So let me kind of
15 -- I don't necessarily want to take this just one item at a
16 time, because there may be interplay between the items. And,
17 again, I don't want to necessarily get to an editing kind of
18 level on this.

19 But as you -- why don't you just take a minute and

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1 kind of scan the document, since obviously you've just gotten
2 it. And then let's discuss the major kinds of issues,
3 themes, concerns or opportunities that you heard or you're
4 aware of that you don't see reflected here, or things that
5 you think are here that are just really not appropriately
6 stated or, you know, shouldn't be on the list of important
7 issues. And I think that will give us an opportunity for a
8 good discussion for the next period of time.

9 So as soon as somebody has a thought, feel free to
10 put up your card.

11 Yeah. Let me also say that I have invited the
12 presenters -- I have invited the presenters from yesterday,
13 who as you know we had to truncate several of their
14 presentations, also to join in this discussion, if they wish.
15 So I'll be looking for their hands and trying to make sure
16 they can blend into this conversation along with the
17 Committee members to the extent we have time to do that.

18 Mark?

19 MR. MILLER: Well, in difference to Steve I would

1 really like to take the opportunity to say that yesterday,
2 particularly the discussions -- or the presentations that we
3 had were excellent, and the time that we gave to them maybe
4 reflects where the rubber hits the road.

5 And I would like to throw my hat in the ring and
6 say that workshops or some sort of workgroup on the area of
7 transition is essential, because I think that's where the
8 real issues and the real impact of FQPA and the juggernaut
9 that FQPA represents hits the road.

10 And so I would like to today in some sort of
11 structured process address that. Address that in a more real
12 way. Address that in a way that we can get our hands around,
13 in a way that we can actually provide some advice to both
14 agencies.

15 In addition to that, I think that when we look at
16 transition, the people who are really being transitioned upon
17 are not here. We have one, Mike. And the people who are
18 being transitioned upon are almost voiceless in this process.
19 And so maybe in a workgroup process or some other process we

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1 can get more input from those folks.

2 MR. EHRMANN: Let me just add that we are going to
3 discuss explicitly the several different ideas for
4 workgroups, workshops, etc., that the Agency and the
5 Department discussed overnight and this morning. So there
6 will be a specific discussion and certainly transition is one
7 of those issues that folks have on that list. So we will
8 come back to that.

9 FEMALE SPEAKER: We're not supposed to talk about
10 that now?

11 MR. EHRMANN: Yeah. I would rather talk about the
12 substance of what's on the paper and then the process -- I
13 mean, obviously you can say whatever you want. But we will
14 have an explicit discussion about that. I think at this
15 point I would really like to get feedback on this -- on these
16 themes and these issues. Are these right? Are these wrong?
17 What's missing? Tear this up and start over or whatever.

18 And then we'll come to -- but I think Mark has put
19 a useful placeholder on that issue for us for when we come to

1 that discussion, probably after the break.

2 Bill?

3 MR. LOVELADY: I thought that the -- as regards to
4 the paper here, I thought that the presentations that we had
5 yesterday were excellent, and I think that they show
6 something that is in this document. I don't have any problem
7 -- and bear in mind, don't hold me to this, because I haven't
8 studied this in depth.

9 MR. EHRMANN: I understand.

10 MR. LOVELADY: But there is nothing in here that I
11 think is something that farmers don't agree with. They agree
12 with alternatives. They agree with IPM. They agree with
13 talking to their neighbors. They agree with the workshops.
14 All of these things. We do these things. I don't know how
15 many people are aware of the fact that we do do these things.

16 IPM has been around a long time and, you know,
17 we've had some discussion in the national debate about play
18 as is. Well, we've also had some discussion through the
19 years about what is IPM. Farmers do not want to have to use

1 any more inputs than they have to. They need to optimize
2 their operations.

3 And I think that these things right here that we
4 have on this paper, the things that I see, look good. But
5 when you relate what's on this to what we saw yesterday, the
6 figures that we saw yesterday, the absolute need for
7 something more than just timing -- timing is extremely
8 important. We all know that from farming when we use any
9 kind of input, whether it's a fertilizer, whether it's water
10 or whether it's a pesticide of some sort.

11 But I think it came out very clearly yesterday from
12 people who I think were fairly objective that you just can't
13 rely on alternatives all the time, that we do have to have
14 some time. You can't rush into transition. You have to --
15 we all want the safest possible products out there that we
16 can get. And there's nothing in here that contradicts that.

17 But I think that the reality that we saw yesterday
18 shows that when you use documents like this, you have to bear
19 in mind that the reality of it is that we still need time to

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1 find alternatives. And you can't transition to something
2 until you have something to transition to.

3 And so I compliment the presenters, and I
4 complement whoever compiled this list. I don't have any
5 problem with that. I just want to read this in the context
6 of the figures that we saw yesterday.

7 MR. EHRMANN: Okay, good. Wally?

8 DR. EWART: I agree with both of the comments that
9 have been made, and I won't use the word workshop after this
10 comment. But I think this document explains why we need to
11 go into depth on certain issues, and transition is definitely
12 one of those that we need to go into depth.

13 And the fact that you could bring a group of people
14 after the meeting together to get this document, I think
15 that's great and it gives us something to look at. But for
16 us, again, to advise you, we need a discussion within the
17 group here, and as Mark said, probably bringing other people
18 in and having more time to go over that.

19 And I agree with Mark. We're talking about people

1 who are being transitioned in the process and, you know, most
2 of us want to make sure that transition isn't out of
3 business. And I'm representing growers. You know, that's
4 certainly a possibility that that's what transition means to
5 them.

6 And, again, I applaud the people who presented
7 yesterday. I think we needed more time. We need more in
8 depth discussion and give and take. But I do want to say
9 that I appreciate your putting this together. I think this
10 is a good example of why we need more time on it.

11 MR. EHRMANN: Okay, thanks, Wally. Steve?

12 DR. BALLING: Yeah. Just a short, but I think sort
13 of significant point, at least from my perspective. It sort
14 of follows up on Dr. Ortman's comments yesterday about the
15 pesticide applicators and the importance of having them
16 trained as a very critical link in the chain of what we're
17 trying to do.

18 And I would just perhaps suggest that under the
19 education, training and outreach section down there at some

1 point the process -- the importance of the training for the
2 pesticide applicators should be recognized.

3 MR. EHRMANN: Okay. Eldon?

4 DR. ORTMAN: I would compliment the group for
5 putting this document together. And again I would second
6 what several others have said. I think this just illustrates
7 why we need a working group on transition.

8 A quick read of this document, I in general agree
9 with it. However, I have one major area which I would call
10 to your attention. On the first page under Models for Pest
11 Management Systems, number one, I do concur with the first
12 part of that sentence. However, I take serious exception to
13 the last part of that. You don't necessarily need a better
14 mousetrap.

15 And I base that comment on what we heard about
16 peaches. It may be true in grapes that you have all the
17 information that you need. But peaches is one very excellent
18 example of what is in the pest management community: a dire
19 need and an opportunity to develop new technology and to test

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1 that new technology. One of the interesting technologies
2 that could be available to us is embodied in the plant
3 pesticide rule and what we might see with that development.

4 Question: what is the status of the plant
5 pesticide rule? I understand it has moved forward. Can we
6 have some information on that as part of this discussion?

7 MR. EHRMANN: Comments on that?

8 MR. MCCABE: I mean, the plant pesticide rule has
9 moved forward. It is being considered now in the interagency
10 process at OMB. It is, as you know, a rule that has been
11 worked on for what, almost 12 years now. It's a complicated
12 rule made more complex by the issues that we confront every
13 day and the public perception of how we deal with
14 particularly the genetically modified products.

15 I can't tell you exactly what the schedule is going
16 to be. We hope to have this in proposal form by the end of
17 this administration. But it is -- I'm sorry. Final. That's
18 right.

19 DR. ORTMAN: When you say in --

1 MR. MCCABE: I just want to amplify that. Susan?

2 MS. WAYLAND: We are hoping that at least part of
3 this rule will be put into final. And we will probably ask
4 for additional comments on other parts of the rule, but that
5 will be dependent upon what happens in the interagency review
6 process.

7 DR. ORTMAN: So you are saying that there will be
8 additional opportunity for comment on the revised rule?

9 MS. WAYLAND: On parts of the revised rule.

10 DR. ORTMAN: Okay.

11 MR. EHRMANN: Okay. Cliff, you wanted to make a
12 comment?

13 DR. OHMART: Just to clear the record. We don't
14 have all the answers in winegrapes, that's for sure. I don't
15 want people to run away thinking that we've gone all soft.
16 That's the danger of making a statement like that.
17 Transition is tough no matter what.

18 The point I was trying to make, and I've seen
19 professionally over and over, for especially indirect pests

1 that don't directly attack the fruit, we've got pesticides
2 being applied that aren't necessary.

3 And so one of the problems with talking about
4 alternatives all the time, is you're talking about product
5 replacement. And there are certain parts of pest management
6 systems that we really -- product replacement is not the
7 answer. It's to reduce the use of certain things. It's only
8 for certain pests.

9 But that was the point I was trying to make. We do
10 have a lot of unanswered questions and big challenges in
11 winegrapes.

12 MR. EHRMANN: Sarah, Cindy and Steve.

13 MALE SPEAKER: All at once?

14 **(Laughter.)**

15 MS. LYNCH: Hey, that would be great, wouldn't it.
16 Yeah, I, too, want to join in congratulating and thanking the
17 folks that came in to give those presentations, because I
18 thought they were really informative. And it was unfortunate
19 that they were cut off, because I'm sure that as IPM

1 entomologists they also would have wanted to stress some of
2 the good things that do happen when you stop using
3 organophosphates in terms of beneficials returning to the
4 fields, the reemergence of microorganisms in the soil that
5 help make plants healthier to begin with, and better able to
6 withstand disease and pest pressures and things such as that.

7 And that's a whole other part of the complex that
8 would be equally exciting and perhaps some equally beautiful
9 pictures of those good, you know, earthworms and other types
10 of under the soil helpers to food production. So maybe we
11 could have another go around of those presentations and be
12 able to look at some of those things.

13 I wanted to respond, though, to something that Bill
14 had mentioned, too, about we have to have something --
15 alternatives to transition too. I think that before we have
16 that, we need to have a vision of what we're trying to get
17 people -- you know, where are we trying to go in 21st century
18 agriculture.

19 And I think, Keith and Al and Therese, you remember

1 when we had that meeting last August talking about sort of
2 where the Department of Agriculture needed to be going and
3 whatnot. We talked about needing to have that vision, so
4 that we could communicate to growers clearly what that vision
5 is.

6 What are the needs and the kinds of confluences of
7 issues that are going to be confronting, are confronting and
8 have confronted agriculture that they need to be responding
9 to to answer that very question of where are we trying to get
10 them to.

11 The Food Quality Protection Act is one, but there are others,
12 too, and I think we need to figure out a way to inform them
13 about that.

14 The other thing that I just wanted to say is that
15 part of what that vision gets to and the whole concept of the
16 partnerships and the stakeholder involvement is that the Food
17 Quality Protection Act is only, as I said, one issue. And
18 within this issue of pesticides, the organophosphates and
19 carbamates are only one. There is a zoonomy in the -- you

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1 know, brewing perhaps offshore, which are the endocrine
2 disrupting chemicals as well. And that's a very
3 controversial issue. The science is evolving.

4 But I think that unless we can develop a dialogue
5 so that we can begin to see these issues way off in the
6 distance to be able to prepare for them, so that we don't
7 have to have these sort of rug pulling out of your -- you
8 know, under your feet kind of a sense, when that really isn't
9 the case. Some of these things are viewed in the distance,
10 so we can see them and begin planning for them earlier.
11 Hence the real advantage of dialogue.

12 MR. EHRMANN: Thanks. Cindy?

13 MS. BAKER: You scared Steve away.

14 MR. EHRMANN: I guess. He doesn't like being in
15 line.

16 MS. BAKER: I said he agrees with everything Sarah
17 said. He put his card down, so that's good.

18 I, too, would like to thank Sarah and Cliff and
19 Dean and Peter and Larry and Paul -- it sounds like a band --

1 that made their presentations yesterday. Because I think the
2 more we hear about the realities of what people are dealing
3 with, we see that people are in fact trying to implement
4 transition, whether it be proactive or in response to changes
5 that have taken place in the dynamics of what they have. I
6 think it's good to hear how that happens.

7 One of the things -- I thought about this last
8 night, since you told us to think about it all night. I did.
9 And one of the things I remembered was that in the CARAT -- I
10 mean in the TRAC process, we had a committee
11 -- I think it was the Risk Mitigation Workgroup -- that dealt
12 with transition. And we actually came up with a definition
13 for transition. I didn't bring it with me to this meeting.
14 I forgot about it until last night.

15 But a lot of us worked together on it, and it was
16 one of the things that we were able to come out of there with
17 some consensus on. I remember Marian and Bill Spencer. Both
18 of -- all of us signed that, which was, I thought, a real
19 historic moment, to get us all to agree to that. And it

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1 might be beneficial to bring that definition back. I can get
2 it if you can't get it. I kept everything from TRAC, so we
3 have that.

4 But I think this concept of a vision is a really
5 good one. And I think that it has to be put together by the
6 people who are impacted by transition. And that's growers.
7 That's, you know, activist groups. That's residential
8 people. I mean we have to remember that when we talk about
9 transition, we're not just talking about agriculture. And to
10 bring those stakeholders together and I think define that is
11 a real large task.

12 I think the things that you put in here get at a
13 lot of the things that we talked about. They flush out a lot
14 of the issues that need to be dealt with. Just two comments
15 on the measurable goals. I think that when we talk about
16 transition, we have to keep in mind that this is an
17 evolutionary process, that just like the science it's an
18 evolving process. Not every case is the same, as we heard in
19 winegrapes, and what they've done in Wisconsin and what

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1 they're trying to do in peaches. Every circumstance may be
2 just a little bit different. And so I think it warrants
3 discussion of that dynamic.

4 I think under the area of Research, that last
5 number four point about the effectiveness of alternatives,
6 really is the effect of alternatives on secondary pests. Is
7 it that you, you know, have an increase in secondary, or you
8 control them or you don't. So it's really the effect on the
9 whole pest management system, I think, that has to be looked
10 at when you talk about transition.

11 MR. EHRMANN: Good, thanks. Jean-Mari? Steve, are
12 you truly not going to say anything?

13 DR. BALLING: I concur with Eldon and Cliff.

14 MS. BAKER: Oh, not Sarah and Cindy?

15 DR. BALLING: And Sarah and Cindy.

16 **(Laughter.)**

17 MS. LYNCH: Hey, Steve.

18 DR. BALLING: And Jean-Mari even before she says
19 it.

1 MS. PELTIER: Oh, wow.

2 DR. BALLING: I'm very agreeable today.

3 MS. PELTIER: I'm going to say something political
4 then, Steve.

5 **(Laughter.)**

6 FEMALE SPEAKER: Go, Jean-Mari.

7 MALE SPEAKER: Well, we commit the processing
8 industry to a couple hundred million to establish transition
9 systems.

10 MR. EHRMANN: The Michigan State Center for
11 whatever.

12 **(Laughter.)**

13 MALE SPEAKER: The Del Monte Center.

14 **(Laughter.)**

15 MR. EHRMANN: Jean-Mari, please pardon your
16 colleagues. Go right ahead.

17 MS. PELTIER: It's okay. I'm used to it. I want
18 to join the love-fest about yesterday's program, too. I
19 thought it was particularly helpful. I know some people may

1 have been turned off by the slides of bugs and nasty looking
2 fruit. But I think it was important to bring it back to the
3 issue of why growers use pesticides. It's not about using
4 pesticides. It's about controlling pests. And it's
5 important for us to bear in mind that the decisions that we
6 make have an impact on the grower's ability to control those
7 things that make the peaches look so very, very pretty.

8 I think that this is a really good document. I
9 think it outlines things. There is a couple of points -- or
10 there is a point I would like to make about the issue of
11 people issues. Sometimes when you say something out loud it
12 sounds okay, and when you see it on paper it kind of breaks.

13 And I've got to say that the tone in the people
14 issue sounds to me -- and I know I'm probably hypercritical
15 or hypersensitive. But it sounds like those pesky farmers,
16 if we just could get them to go along it's okay. And, you
17 know, engaging growers in IPM is critical. You know, growers
18 are engaged in IPM. Making them part of the solution is
19 important. But just the tone of that section kind of grates

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1 on me.

2 The other one point that isn't in here, that I
3 think each of the people who are actually out in the field
4 doing research made again and again and again, is that
5 retention of some uses of OPs is important and that OPs in an
6 integrated pest management program may have a niche and
7 should have a niche.

8 And there are some things that we've glossed over
9 in our rush to move through the risk assessments on these
10 OPs, where we've lost tools that could be very important in
11 an integrated pest management system, notably something like
12 methyl parathion and the roles that it played in some systems
13 because of the negatively correlated resistance of methyl
14 parathion and azinphos methyl. And a discussion of that at
15 that kind of a level never took place when we made the
16 decision on methyl parathion.

17 And, you know, we got it. We've talked many times
18 about the P word -- about prescriptive use -- and it was
19 raised again yesterday. And I think this document gets to

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1 the point that I raised in our first CARAT meeting, which is
2 to suggest that this assumes that there aren't going to be
3 any OPs for anything. That's what this document says. I
4 mean, it only talks about alternatives, transitioning to
5 alternatives, alternatives, alternatives, and it doesn't
6 leave any room in the use pattern for OPs.

7 And somehow it seems to me that that thing that
8 each one of those people said, at least certainly Larry said
9 it and Paul said it, I think needs to be reflected in this
10 statement.

11 MR. AIDALA: A couple of things on that. One is
12 there are lots of things that I had said in terms of this
13 sort of, you know, quick summary of some of the discussions
14 yesterday in terms of our reading.

15 But an example of one of the things just
16 specifically about whether it implies that all OPs are gone
17 is actually, I think given these kind of discussions we've
18 all had -- most of you have been with the first TRAC in '97.
19 The first whatever it was called in '97 and the TRAC and then

1 son of TRAC and, you know, forbearer of TRAC and whatever.
2 TRAC, the next generation.

3 (Laughter.)

4 And basically throughout that, for example, before
5 we did the individual OP assessments, I think there was a lot
6 of fear that, gee, each individual assessment is going to
7 result in all or certainly a significant number of uses
8 dropping -- ag uses dropping. And frankly that's a pattern
9 I've not seen. That's not to say there aren't ups and downs
10 in individual assessments and stuff.

11 Now we're at the point where, again, as we approach
12 cumulative, does it mean all OPs will go. We certainly can't
13 say that with any degree of certainty in terms of, quote, all
14 OPs. And, again, as we found out in the individual
15 assessments -- and this is just sort of a -- call it a
16 professional speculation at this point. You're going to find
17 where the drivers are and other things that aren't. If
18 you've got a bunch of nondetects on a crop that aren't
19 heavily consumed by certain, you know, sensitive sub-

1 populations, you're probably going to make it, quote/unquote.

2

3 There are other issues, and this is where other
4 meetings of this kind of group, and again its forbearers have
5 talked about, whether or not there is -- is the registrant
6 nonetheless, if they lose a certain crop or two, going to
7 still maintain the product line as a whole, etc., etc., etc.
8 And again we talked as a group about all of those issues over
9 the years.

10 One other thing is not here, too, in terms of --
11 because obviously if you talk about the mother transition, if
12 you will, kind of dynamic, there are other things that aren't
13 here also, which is, if nothing else, a simple statement of
14 comply with the law. The law says the numbers must be safe.

15 So did we think about methyl parathion and its
16 cross resistance? Absolutely. How do you think about it in
17 terms of an 880 percent risk cup being full? You think that,
18 gee, it may be a little tough to maintain that use. So I
19 mean that's basically the dynamic about what happened with

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1 methyl parathion. Given the high risks, you didn't have that
2 kind of opportunity.

3 Now fortunately we're not seeing those kind of hot
4 spots, if you will, across the board as we complete the
5 individual assessments. Cumulative will be -- you know,
6 we'll see. Again, I think off the top, though, I have not
7 heard anything from anybody inside the program that sort of
8 implies -- even implies, if you will -- that, quote, all OPs
9 must go. They're going to be hot spots, we think. We'll see
10 what the science tells us about that. We'll get the data,
11 you know, to sort of assess which ones that are and are not.
12 And it's hard to know a priority, again until the science is
13 all in and the data are all looked at, to kind of make those
14 kind of broad predictions across the board.

15 Again, the broadest predictions were started in the
16 hallway on August 3, 1996, when you started seeing where,
17 quote, well, gee, this means that we're going to have to move
18 away from certain classes of, you know, whatever else. And
19 frankly even those haven't come true over the years.

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1 But we'll see. If you want to predict that all OPs
2 must go under FQPA, we'll assert that's your claim.

3 MS. PELTIER: Jim, just a point of clarification.
4 My point is only that that was reflected in the presentations
5 that were made yesterday and it's not reflected in this
6 piece.

7 MR. AIDALA: And again, we do have this problem.
8 We've talked about this at these groups other times, too, and
9 we say there is -- one of the safest reducer criteria is an
10 OP alternative. Does that imply all OPs are bad? No, it
11 doesn't. But we're trying to sort of do this push and pull
12 of anticipating what might happen, so that growers aren't
13 left in the lurch, and so that we don't just see an
14 assessment when we say, oh, by the way, now you can't use it,
15 and now by the way, you know, Dave's company gets to start an
16 RND program three years from now that might get us a product
17 that takes two years to review.

18 So that's basically part of this push and pull that
19 we've all dealt with in these meetings in the past

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1 -- again, its forbearers since early '97.

2 MR. EHRMANN: Carolyn and Jay.

3 MS. BRICKEY: The first meeting we had, whatever
4 that first incantation was, I think I said that we needed to
5 get down to the hard cases and find out where the problems
6 were and try to identify them. And I think there has been
7 some work done through these groups to try to identify some
8 of those places, and certainly some of the presenters pointed
9 to that yesterday, which I think is really useful.

10 And I think where we really need to know this
11 information is not only for individual farmers who want to
12 start making decisions now about what kinds of alternatives
13 they would like to go to. But also in terms of assessing
14 what to do at the point where we have a cumulative
15 assessment. You know, we'll have that kind of information
16 hopefully available to look at and understand kind of how to
17 fit the mosaic together and know where there are certain uses
18 of OPs that EPA and USDA and the other folks involved,
19 including the stakeholders, believe need to be preserved.

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1 So I think, you know, every time we talk about
2 transition, we get a little more engaged. As far as I am
3 concerned, we could have a day and a half meeting just about
4 transition. That would be very good from the perspective
5 that I have and also from our community.

6 But I have to say a word about workgroups, because
7 I've heard that word about 68 times since I've been here.
8 And that is that I feel like, you know, when we did these
9 workgroups in one of our earlier advisory committees, it's
10 sort of like we all went to the same party, but I was
11 probably one of the people who didn't have a great time.

12 I felt like it took a lot of telephone calls and
13 work. I thought it was confusing. We don't have a deep
14 bench in our community to do this kind of work, you know.
15 And I think I was on three workgroups. I honestly don't
16 think we produced any work product that ultimately went into
17 any final document anywhere. I think maybe people felt good
18 about interacting, which is fine.

19 But I think at this point what we need to do is

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1 focus on a couple of issues that really need to galvanize our
2 efforts. And one of them is what we're going to do with
3 cumulative assessment. How that's going to work. And the
4 other is to keep engaging on transition. And as far as I'm
5 concerned, this forum is fine to do that in.

6 MR. EHRMANN: Okay. And again, we'll come back to
7 those workgroup issues later on. Jay?

8 MR. VROOM: I could say workgroups a couple more
9 times to get you to a round number here, Carolyn.

10 **(Laughter.)**

11 Thank you. I also thought the presentations
12 yesterday were spectacular and unfortunately too short in
13 some context. I wish that Sarah had more time to give us an
14 update on the Wisconsin potato project, because I think there
15 are some lessons that are still evolving out of that. Cliff,
16 I'm sure there will be more lessons that come out of the Lodi
17 effort, which has got a great start.

18 And all of that, plus the peach stories that were
19 so dramatic that we heard yesterday, I think reinforces one

1 additional word that needs to be in this transition sheet.
2 And that is flexibility, so that we aren't just looking
3 forward all the time, but looking over our shoulder on
4 occasion to see what just happened. What just happened in
5 the context of a little longer view of history, because none
6 of these things are absolute. This is a journey and not a
7 destination.

8 And someone said a moment ago that we need to try
9 to preserve as many uses as possible, even if they are
10 riskier than we would like as a society. Constrain them, but
11 not just throw them away, because there may come a pest, or a
12 reoccurrence of a pest, that needs, you know, some tough
13 medicine on a very targeted basis.

14 That's all part of what I think, you know, is a
15 robust IPM looking forward opportunity that we need to
16 employ. And I think that will also give growers a lot more
17 confidence that we have a flexible approach that will allow
18 them to reach back and use some old tools on a limited basis
19 on occasion.

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1 I think we also saw yesterday that, you know, there
2 are some crops like peaches that are incredibly fragile and,
3 you know, they are special cases, and we need to keep working
4 harding in some of those areas. The companies I represent
5 admittedly can't afford to invest a lot in research and
6 development for new products or defending old products that
7 might be safe, but they just can't afford to do the work
8 because it's such a small crop and represents the kind of
9 residue potential that it does and so on.

10 One thing about using vision as the first topic on
11 this page. If there is a vision thing around this, I would
12 argue that it be on the page ahead of this, which would
13 accompany this page, summarizing discussions yesterday and
14 today on transition, accompanied by a parallel page on
15 reassessment. Because, folks, we are not done with that. We
16 heard about that a lot yesterday, also, and I don't want to
17 lose sight of the fact that there is still a lot of work to
18 be done on reassessment. The science policies that Bill
19 reviewed for us yesterday are still works in progress. He

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1 emphasized that and we can't lose sight of that.

2 So flexibility, reassessment. I think Eldon's
3 point is absolutely correct that if we are ready to give up
4 on building a better mousetrap, then I know a lot of
5 companies that I represent won't want to continue to pay me
6 to sit here. Their vision is looking forward and looking for
7 better mousetraps. And we're excited about that and we think
8 there is a future for better mousetraps.

9 Lastly, I thought -- just again returning to the
10 peach examples yesterday, I was reminded of the story about
11 how you don't need the second parachute if the first one
12 doesn't work. You know, there are a lot of crops where if
13 you don't have pest management that is effective, the second
14 round or the second shot doesn't matter, because it won't be
15 there.

16 And the vision of that one peach pit hanging there
17 on the limb was profound. And so I thought that was a very
18 important visual that I came away with from yesterday's
19 discussions.

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1 Thanks.

2 MR. EHRMANN: Thanks, Jay. There have been a
3 number of very helpful comments in terms of the language
4 here. I think your point about flexibility relates to the
5 earlier part about an evolutionary kind of process. Jean-
6 Mari, your comments about the tone of some of the language,
7 any suggestions you have would be very helpful, because I
8 actually had some of the same -- when I re-read it this
9 morning, I had some of the same reactions.

10 So I think, you know, this again is a work in
11 progress just to give us something to kind of be a
12 placeholder for this part of the discussion. And it
13 obviously doesn't mean these are the only issues on the table
14 for the CARAT, but these are very helpful comments.

15 Rob?

16 MR. HEDBERG: I guess what I would like to do, is
17 when we talk about vision I've been giving it some thought.
18 And I would sort of like to throw out my ideas on this as a
19 starting point. I think it has to be something in the nature

1 of a triad.

2 I think here it's this group. We've got the
3 responsibility, the task and the charge to do three things.
4 And that would be to protect the people, and to include the
5 FQPA charge, children, workers and consumers simultaneously.
6 We've got to protect the environment. That's our FIFRA
7 charge. And we have to do that both here in this country and
8 around the world. And the third one is the policy charge
9 that we heard of some yesterday. We've got to protect the
10 farms.

11 We've got to keep the production here, rather than
12 as Sarah just used the word offshore. I'm very leery about
13 exporting our production and our problems offshore, where
14 they're out of sight and out of mind. I think we have an
15 opportunity and a responsibility with all the resources we
16 have in this country to solve the problems here.

17 That then takes us to the issue of resources. And
18 I'm encouraged to see a million and a half more in the USDA
19 budget. A million and a half dollars is a scratch on the

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1 surface, a drop in the bucket. We're going to have to start
2 talking about an order of magnitude of more money, much as is
3 being done when you talked about funding for the NIH, the
4 National Science Foundation. People are talking about
5 doubling the budget.

6 We saw yesterday how difficult in one small crop,
7 maybe a hundred million dollar crop of peaches, the problems
8 are. The zoonomy waiting for us is when we try to take this
9 into the 60 to 80 billion dollar agricultural industry across
10 this country with the major crops. We're going to need an
11 awful lot more than a million and a half dollars to solve
12 these kind of problems.

13 One other thing on resources. On the list here
14 that I don't see, which I think we do have to address, is the
15 resources within the Agency for dealing with all of the IR-4
16 submissions, the ADGEVENT and inert ingredient issues. The
17 resources aren't there is develop the products that we're
18 going to need as alternatives in this transition process.

19 MR. EHRMANN: Thanks. Dave and then Mark.

1 DR. WHITACRE: The presentations yesterday
2 crystallized out a couple of very important things that had
3 been talked about. One thing, John, that was not captured in
4 the verbiage, although the point has been made, is that
5 transition has to take place on the farm or at the user
6 level. That's an important thing that I hadn't quite thought
7 of in those terms, but I think it's absolutely true. And a
8 lot of this down here on the first side of the page of notes
9 that you handed out captures that, but it's not crystallized
10 out in one term.

11 But that then tees up a second thing in my mind
12 which has to do with this constraint of resources which is
13 inevitable, of course, and then maybe a question to USDA
14 folks and to all of the folks on the state's side.
15 And that is, I also had the impression from looking at the
16 research list yesterday, and from knowing a little bit about,
17 you know, how many entities there are that are asking for
18 resources, is there a way to try to reinforce the partnering
19 that is going to go on and be placed against some of the most

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1 difficult problems?

2 The sense I have is that some of these problems are
3 being pelted with popcorn as opposed to being hit with a
4 mallet. And can the state folks in the future find ways to
5 set priorities with the federal folks together on some of
6 these areas and utilize resources better for the top things
7 which unavoidably results in having to take some of the
8 things off the bottom of the list. And I guess, if you'll
9 excuse me, I'm thinking also as a taxpayer. I have the fear
10 that there is going to be so many things pursued with
11 insufficient resources that none of them are going to come to
12 fruition.

13 A second point -- going to a second thing -- on
14 measurable goals. The one thing that has occurred to me
15 after remembering what has happened in CARAT, which really
16 went rather well, is that after -- in thinking about the
17 pacing of how the meetings are going to go forward in CARAT,
18 it is likely that there is going to be little more than a
19 year left by the time the next meeting rolls around for

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1 CARAT.

2 And I would like to suggest strongly to EPA that
3 they really try to pull together the most critical things
4 that want to see covered, and USDA, in partnership with EPA,
5 the most critical things that need to be covered in CARAT, so
6 that those items -- those must do topics -- must cover topics
7 -- are included before the end of the two year CARAT process.
8 So not only having the goals and the right goals, but make
9 sure the priorities are such that you can hit the important
10 ones.

11 One final thing. I still get the sense from
12 hearing John -- and I don't recall his last name. The grower
13 from New Jersey that was here yesterday.

14 FEMALE SPEAKER: Rigolizzo.

15 DR. WHITACRE: Rigolizzo. Thank you. Saying, you
16 know, that he's in trouble. And the illusions that we heard
17 from some of the presenters yesterday is that there are real
18 problems out there. I'm thinking that it will take a long
19 time to go through to finish the risk assessments and work on

1 these other items.

2 Of course we're going to be talking about
3 transitions. But when cumulative -- the cumulative policy
4 really kicks in, there is going to be a potential emergency.
5 And any effort to try to build a ramp up, that there are
6 contingencies to be able to deal with that and not just the
7 routine talking about transition and how we can do it. The
8 earlier that's done, the better off folks may feel in a
9 couple of years.

10 That's just another thought. Thanks.

11 **(END OF TAPE ONE, SIDE A)**

12 MR. WHALON: -- to say something again. But the
13 real focus of what we heard yesterday is not a small crop.
14 It's not an issue of keeping OPs alive forever. It's really
15 an issue of where IPM and transition are impacting. IPM is a
16 site specific issue. It's a block by block, field by field,
17 issue, and you can't implement it from Washington. The
18 people that presented yesterday are in the field on the
19 ground.

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1 And one of the real frustrations I have is that
2 we're in some ways applying a California model -- that's a
3 potentiation word or phrase -- to the whole U.S. And what
4 I'm seeing from my perspective is that the mechanism to do it
5 -- the mechanism to accomplish transition -- is dying on the
6 vine. Really. Literally. Extension, the land grants,
7 they're transitioning away.

8 I think Cliff's comments relative to the land
9 grants are a foresight to what is happening nationally. And
10 how we as a group address that, and how it relates to
11 transition, is a crucial issue for the rest of the country.

12 And I just throw that out on the table, because I
13 think that that's one of the major issues that FQPA is
14 impacting long term. Long term. And I'm waiting for Mike's
15 comments, because he's the only grower here relative to
16 transitioned upon.

17 The other thing I would like to say is that --

18 FEMALE SPEAKER: Don't forget Bill, Mark.

19 MALE SPEAKER: Bill.

1 MR. WHALON: Oh, Bill. That's right. Okay.
2 Sorry. Actually I have -- I don't want to tell you about my
3 acreage.

4 The other thing I wanted to say was to build a
5 little bit on what Sarah's comment was relative to the
6 endocrine issue and the eco issue, and how that's coming down
7 and what this group is going to do about that. I don't know
8 that we can do much about it.

9 But Dan Botts said yesterday that -- and I don't
10 know if it was in the context of this group or in a smaller
11 context. He said that that's the major issue, long term, for
12 all these compounds. And the thing that I come back to on
13 that arena is that a lot of the new alternatives have eco
14 impacts. And those eco impacts are not measured, and we
15 haven't set up any kind of system really to address those.

16 And so I'm wondering about as we transition growers
17 to these new things, what are the unseen, and unmeasurable at
18 this point, impacts that we're going to lasso those guys with
19 in the future.

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1 So when we talk about transition, I agree with the
2 issue of transition being an evolutionary process. And I
3 agree with the idea that it's site specific and people
4 intensive. And I'm reminded also that the things that we
5 heard yesterday, I heard in 1982 in the Huff Acre project,
6 and I heard in 1986 in the Atkinson project. And yet we
7 haven't learned from previous experience in this whole arena.

8 And the end issue is growers on the farm, and
9 they're the people who are receiving all of this stuff. And
10 I think they're largely unrepresented. Largely unrepresented
11 in this context and we need their input. And that's why I
12 think that workgroups are important and why we need to pull
13 in some other resources for those workgroups.

14 MR. EHRMANN: Larry, did you have a comment? Okay,
15 go ahead, whichever one of you wants to go first. Just get
16 to the mike. That would be great.

17 MALE SPEAKER: Yeah. Can I wear bib overalls next
18 time?

19 **(Laughter.)**

1 MR. EHRMANN: That wouldn't make us feel better.

2 MALE SPEAKER: I think you need to grow cotton in
3 Michigan, Bill.

4 MALE SPEAKER: Better get the patent up there in
5 Michigan.

6 MR. ELWORTH: Well, I appreciate being able to be
7 part of this conversation. I wanted to say three things.
8 I've been involved in three IPM implementation programs,
9 still two of them going on now, which have had some successes
10 which weren't what I was talking about yesterday. And in
11 that, there are a couple of things that I've learned that I
12 think are very important to making a successful
13 implementation program. And probably the most important
14 thing, I was also at both of the workshops that Sarah was
15 talking about, where growers and everybody were talking about
16 transition.

17 One thing that's not in here that we spent a lot of
18 time on at that meeting that to me is the most important part
19 of a successful program is that you work with the

1 infrastructure that's there. The word infrastructure got
2 battered around a lot in those meetings and it's not in here.
3 And what that means to me, and what has made those three
4 programs go, is we didn't invent a whole new system for
5 delivering information in doing IPM.

6 If you do that, it won't work. It will be a
7 disaster, because the system that is there already will work
8 against you, definitely. So, for example, in the IPM program
9 in Michigan apples, we go in there and we work with the ag
10 chemical distributors, with the extension people, with the
11 private consultants. And we bring them into the program and
12 we use the system that is already there.

13 This is the most important thing to having a
14 successful program. If you don't do that, it's going to
15 fail. It can't succeed and I don't see that in here. So I
16 think it's really important.

17 The other one is this issue of measurable goals
18 always comes up. And in all three of those grants and
19 projects, you have to have measurable goals, I guess because

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1 it's a grant. And what always happens is the measurable
2 goals are the easiest things that you can put numbers to, so
3 it's always like how many acres are going to be there. How
4 is pesticide reduction. How many growers are involved.
5 Those are measurable things, so I guess that's good to have
6 in a grant.

7 But I want to emphasize that the most important
8 measurable goal in any of these projects is profitability.
9 It basically comes down that the goal for every project is
10 the same. The overriding goal is that we're trying to
11 develop new programs that are profitable. New pest
12 management programs that are profitable. That is the goal.
13 That has to be the goal.

14 And the third thing is, in reading through this
15 document I could make lots of editorial changes and things.
16 But there is one that I think is really important, at least
17 to me. On the first page in three different instances the
18 word alternatives is used as part of the discussion. I think
19 it should be replaced with new pest management programs.

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1 For example, in measurable goals you need to be
2 able to measure and understand the economic implications of
3 new IPM programs, not alternatives, because that's what's
4 being implemented. And the same thing on the next one down.
5 Resources are needed for research, field testing,
6 implementation and evaluation of pest management programs,
7 not new alternatives.

8 And again, the last -- well, if you keep going down
9 there, it says make better use of what we have as
10 alternatives. It's really make better use of the IPM
11 strategies and pest control tactics that we have. It's not
12 make better use of alternatives.

13 Thank you.

14 MR. EHRMANN: Okay, thank you.

15 MALE SPEAKER: Thanks very much. I think this is a
16 good document. I would like to add a couple of things, and
17 in doing so just go off of the basis of what some other
18 people have already said.

19 Sarah said we need to look at where we are trying

1 to go. And I just want to say that so often farmers view
2 where they're trying to go is simply to stay in business next
3 year. Larry talked about the profitability. But when a
4 farmer -- when you ask a farmer where you're going, they're
5 going to say, well, I want to be in business next year and
6 pay off my debts.

7 And, you know, we charge for our program. Growers
8 participate in our program. They support the program
9 monetarily. But sometimes it's hard for them to do that, yet
10 they still do it and they still keep coming back to do that.

11 Farmers are inherently low risk people. They have
12 all their crop out there in the field. Their crop is at
13 risk. And pesticides are low risk, because it's an old
14 technology. They know what to do with it. They know if they
15 spray something, it's going to decrease their risks. And if
16 you come at them with a new technology, that is often viewed
17 as a higher risk. And so farmers are low risk. New
18 technology is often viewed as a higher risk.

19 And one of the things that is not in here is a

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1 heading about risks and incentives to help growers adopt
2 those new risks. And perhaps if you go into a working group
3 stage looking at this type of discussion, you want to place a
4 section about talking about incentives. What kind of
5 incentives can you put in place to help growers adapt these
6 new risks. If we have all the research, if we have all the
7 resources, what can we do for them.

8 And that's what I wanted to say about incentives.

9 Thanks.

10 MR. EHRMANN: Thank you. Cliff?

11 DR. OHMART: Yeah. Again, I actually didn't think
12 that I said much controversially yesterday, but hearing a few
13 comments, maybe I did. And I want to specifically respond to
14 this idea that Jean-Mari mentioned about integrated people
15 management, and hopefully it was a misinterpretation, because
16 I really wasn't referring to growers.

17 I had a slide that I did not show that involved all
18 the different groups that farmers deal with and then farmers
19 as well. And so I was referring to the ag chemical industry.

1 I was referring to state and federal agencies. I was
2 referring to environmental groups. I was referring to
3 lawyers. And I have this great diagram that has arrows going
4 all over the place, and just a few go out to the growers. So
5 that was really -- the people I was interested in managing
6 weren't the farmers.

7 And then the second thing, again I think what's
8 valuable about a panel like this is we all bring our biases
9 and things we feel passionately about. And so I'm hoping I
10 can contribute to that. One of the things is that in working
11 with a lot of growers and a lot of different crops, not all
12 growers are engaged in IPM. And if we think they are, and if
13 they think they are, we're kidding ourselves and they're
14 kidding themselves.

15 So our challenge, and my challenge, is to make
16 growers realize, well, you may think you're an IPM grower,
17 but you're not. I mean, it's the idea of we need to lift our
18 game. So I think these words are important, because if we go
19 on assuming all growers are engaged in IPM, we're going to

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1 fail, because they're not. And this is all part of this
2 education.

3 And then also to touch on what Mark mentioned.
4 There is no question, the way things are going that I can
5 see, that we are heading toward privatized extension. And if
6 you look at Australia and New Zealand, they've already
7 privatized their extension. And I would hate to see that
8 happen in the U.S.

9 But right now if we don't address the issues about
10 land grants and what they're doing, we -- I mean the
11 Winegrape Commission is proof that growers said, you know,
12 we've got to solve our own problems. We're going to form a
13 group. And I would hate to see it go that way. Maybe we
14 can't stop it. But I just wanted to emphasize what Mark
15 said.

16 MR. EHRMANN: Okay. What I would like to do is
17 take the cards that are up on this topic, and then we'll
18 summarize a bit and -- I was going to say transition to the
19 drinking water issue. But move onto the drinking water

1 discussion.

2 So, Shelley, you're next.

3 MS. DAVIS: Well, I found yesterday's discussion
4 very enlightening, also. I don't want to repeat, you know,
5 lots of things that people have been saying. But it's clear
6 that education is a key component of this, and a tremendous
7 amount of resources are going to go -- need to go into
8 educating growers on the ground about the value of this
9 transition.

10 But one thing that I found lacking in yesterday's
11 conversation -- and I forget which speaker said kind of at
12 the end, you know, as we're transitioning, remember -- you
13 know, don't have an REI that's 14 days, if we need to harvest
14 or spray every five days. And what struck me about it was,
15 gee, this person really doesn't know -- doesn't think REIs
16 are particularly valuable. They're just kind of a pain in
17 the neck.

18 And that's one of these nagging problems that gets
19 lost, you know, as we focus on the need to transition and

1 different pest control strategies. I like that idea. We
2 still also have to sell the idea that this is really safer.
3 That safety is important. That there are real health risks
4 at stake and this isn't a frill.

5 The other part of it, which I also -- you know,
6 just to reiterate what somebody else has said, you know, we
7 can't get people to buy into safety if it means that they're
8 going to go bankrupt and their kids aren't going to eat. So
9 I really do think that we have to build in incentives --
10 marketing incentives -- to make it safer or better -- better
11 for them, not just better for us. Because if it's better for
12 them, they'll do it and then people will benefit.

13 And the final thing that I just want to say is that
14 I really do think that our group needs to focus its energies
15 -- you know, five or six or 10 or a million ideas got thrown
16 out for workgroups. We're not going to accomplish that. I
17 really do think we should focus on being a group as a whole,
18 take one or two, or three at the most, key issues and
19 actually dig in together and work on them.

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1 MR. EHRMANN: Mike? Thanks, Shelley. Mike?

2 MR. CARTER: First of all, I think I need to
3 clarify something, Mark. Actually I'm not a producer, so,
4 Bill, you stand alone.

5 (Laughter.)

6 I'm sorry if I gave you that impression.

7 MR. AIDALA: But we're all going to wear overalls
8 next time.

9 MALE SPEAKER: Well, Bill, you're it.

10 MR. CARTER: So I hope that doesn't do anything to
11 any shred of credibility that I may have had.

12 (Laughter.)

13 But I am honored, though, that you did mistake me
14 for a grower. And I say that because I represent about 200
15 of them. So I just want to comment on a couple of things.

16 First of all, one of the things that we've haven't
17 really talked about a whole lot in this group -- and I
18 apologize. At times I feel like everybody here knows
19 everybody else, and this is obviously something that's been

1 going on for a long time. And I'm trying to, you know,
2 getting on the train at the last minute here.

3 And one of the things that I think is absolutely
4 critical is resistance management. And we haven't really
5 talked about that at all. When I have discussions with our
6 researchers back at the University of Wisconsin, our potato
7 guys, it's absolutely imperative in their mind that we don't
8 lose certain tools. And perhaps the tools -- the way we use
9 the tools becomes a little bit different.

10 But it is important that we don't burnout some of
11 the new materials like quadrus (phonetic), which is a
12 exozystrubin (phonetic), or spinosad, or frofil (phonetic) or
13 any of these things, because they are wonderful. But if we
14 don't use them properly, what we're going to do, is we're
15 going to be back at square one.

16 I think that that topic deserves at least a certain
17 amount of discussion or attention. And perhaps it has, and I
18 apologize if that's something that you all have already been
19 talking about in previous meetings. But as an outsider, I

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1 guess, as it were, to me it looks like one of the more
2 important topics and one that deserves a certain amount of
3 attention.

4 Another thing, I don't know all of the politics, I
5 guess, that's going on in this room. But I will say that as
6 an outsider, it seems to me that workshops or workgroups
7 would be a good idea. And, you know, I hope
8 -- I hope we as a group continue to focus in that area. And
9 the reason, in my view anyway, that they seem like they would
10 be a great option is because I think this is a pretty big
11 forum to talk about some of the more detailed issues that
12 need to be talked about, specifically in IPM.

13 I think we had some fantastic presentations
14 yesterday. I think one of the things that we learned is that
15 there is a lot of information out there. And I'm not so sure
16 that a group of this size -- I think a group of this size
17 definitely has limitations, and I think one of those
18 limitations is that you can't get into the specifics, like I
19 think perhaps we needed to a little bit more yesterday as it

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1 would relate to the peach issue.

2 It looked to me like we had speakers that were
3 trying to make points and would have loved to have more time,
4 but, you know, we ran into time constraints. I think that's
5 a perfect example of how maybe the smaller groups could maybe
6 get a little bit further on down the line than this
7 particular group.

8 MR. EHRMANN: Good, thanks. Sarah and then Lori
9 and Dan.

10 MS. LYNCH: I would like to pick up on some
11 comments that Jean-Mari and actually Wally said, because I
12 think this issue of grower sustainability -- grower
13 profitability -- is incredibly important. And it's a reason
14 why I've been personally so focussed on this transition
15 issue.

16 Because I think as somebody who likes to eat -- I
17 like to have food -- and as somebody who works for an
18 organization whose mission is the protection of bio
19 diversity, you think about where that open space is and who

1 manages it, and what an important partner they could be in
2 working and identifying ways to work more collaboratively to
3 preserve that bio diversity in terms of protection of streams
4 and open spaces, nesting sites, migratory flyaways. All
5 those kinds of value added or additional product in addition
6 to food and fiber that farms can produce. I'm very, very
7 concerned about creating or participating and/or contributing
8 to some kind of more sustainable farming system.

9 But on the other hand, I don't think we can lose
10 sight of the fact that there is a real public health and
11 ecological health concern about the use of pesticides. So
12 before we start talking about prescriptive uses, etc., etc.,
13 etc., I would like to hear about the plans -- the transition
14 plans -- that agriculture would like to put forth.

15 For example, I heard yesterday, and I've heard it
16 in other forums, that there is sort of a sigh of relief in
17 the countryside that FQPA is not going to, you know, be much
18 of an issue. People are waiting for the election hoping
19 that, you know, pressure will back off. Keith told us

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1 yesterday that there is about 98 million dollars or, you
2 know, thereabouts that the Department sort of adds up in
3 terms of contribution to FQPA.

4 Isn't that what you're -- 89 million dollars. And
5 the ARS budget is what, about one billion dollars. So we
6 hear that some in the -- that in the land grant university
7 system that, you know, there is some focus, but not too much.

8
9 So I'm wondering how patient do we have to be
10 before -- or how much do we have to be considering all these
11 other, you know, needs for delay or concerns about do people
12 have enough time to transition, when it doesn't sound like
13 people are taking it all that seriously just yet.

14 So before we get to that, I would really like to
15 see that. I would like to hear the commodity groups come
16 forward and talk to us about how they are -- the vision that
17 they have and how they're moving their groups forward to
18 think through these issues, because it is incredibly
19 critical.

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1 The one last thing I would like to say is that I
2 don't think transition just happens on the farm. I think it
3 also has to happen at the consumers and taxpayers and that we
4 all do have a stake in this. We have an important stake, not
5 only because we like to eat food, but because we care about
6 the environment. And not trying to bring in those other
7 folks that also need to transition in their thinking about
8 the value of supporting these kinds of initiatives has to
9 happen.

10 MR. EHRMANN: Okay. Dan, actually I think I said -
11 - you were actually first before Lori, if you want to go
12 ahead, and then Lori.

13 MR. BOTTS: Whichever way you would like to run it
14 is fine with me. Looking around the room and going back,
15 historically Carolyn -- well, she's gone. But --

16 FEMALE SPEAKER: She'll be back.

17 MR. BOTTS: I know she'll be back. Going back to
18 September 26th of 1997 -- '96 -- when the Food Safety
19 Advisory Committee first met, I think there three of us that

1 are sitting in this room that were sitting around that table.

2 John, you were one of them.

3 MR. EHRMANN: Yeah.

4 MR. BOTTS: And Carolyn and myself as official
5 members of the committee. There were a lot of other people
6 in the room, especially staff people and other people. And I
7 would like to kind of characterize a little as we get into a
8 transition discussion how I've seen this process evolve since
9 that time to where we are now.

10 And I'll go back to a comment I made at that
11 meeting, which was 10 years from now as a group we can
12 collectively stand up and be real proud of creating a
13 regulatory system that worked, that was protective of the
14 people that the Food Quality Protection Act said it needed to
15 be protective of, or else we could sit back and be extremely
16 ashamed of letting that opportunity pass and having a
17 regulatory system that in the minds of a lot of people was
18 suspect as anything in this town.

19 I think we've made a lot of progress toward

1 creating, at least in the dietary aspects of the analysis in
2 the risk process for the safety aspects of pesticides in
3 relation to their use on food in this country, miserable
4 steps forward in being able to say we do have a way to
5 measure and assess and create that knowledge that what we're
6 doing is right from a regulatory sense.

7 I will also say that having sat through a whole
8 universe of technical briefings on other issues, I'm not as
9 sure that we're to that level of assessment in other areas
10 that are just as important, whether it's ecological fate,
11 whether it's occupational health and safety, or whether it's
12 those issues.

13 I don't disagree with Shelley. We need to be
14 protective of the workers in the field. But we need to be
15 protective in a manner that is really protective rather than
16 using a worse case, worse case, worse case, to describe all
17 conditions across the country in all applications, because
18 there are differences, even with this ecological folio
19 residues and the rest of the stuff that drive those issues.

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1 And right now we're not at that level of sophistication.

2 Sarah, I agree with you. We have been pushing the
3 growers at our level. And I am a grower representative.
4 Contrary to popular belief, I was a grower.

5 **(Laughter.)**

6 I think that's because I have been in Washington
7 more than I've been in Florida for the past five years as a
8 result of these committees. But the people who tell me what
9 to do and who I have to answer to are people who grow crops
10 in Florida.

11 And the first words out of their mouth when I go
12 back to them and tell them, well, it looks like you're going
13 to have to do this, this, this and this, the very first word
14 is why. These are products that we have been using for the
15 past 20 or 30 years because a regulatory agency said they
16 could be used in the manner that we're using them. We
17 haven't seen an indication that there is a problem.

18 My response is, the standards have changed. We're
19 looking at a different criteria safety, and we need to work

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1 together to get to the point where we know exactly what that
2 risk is. And there has not been a single case where I have
3 gone back to them and said this is the risk that is there, it
4 appears to be real, that they haven't stepped forward and
5 said, we'll fix it and we'll do something about it.

6 But until they understand why they're being asked
7 to do this, you can go out there with all the programs and
8 incentives and everything under the sun, human nature is such
9 that they're not going to change unless it's a regulatory gun
10 to their head. And in a lot of cases, that's been what has
11 pushed the trigger in some of the issues we have in front of
12 us.

13 The transition discussion yesterday was great.
14 This is a good start. But this is geared toward
15 organophosphates alone. FQPA deals with every single
16 pesticide that has been registered in this country prior to
17 1996. There is a whole universe of other transition issues
18 that need to be looked at and considered before we come out
19 with this model or a specific plan.

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1 And I don't think you do that in a group this big.
2 I'm sorry. I just don't think you can. We tried. We've
3 been trying for the past five years. Every meeting we talk
4 about transition and we don't get very much further down the
5 road than we started from.

6 I think we can get there, but it's going to take a
7 focus. It's going to take the Agency telling us these are
8 the things that we absolutely have to have out of this group
9 to answer the questions we need answered. And then we're
10 going to have to be given a charge to move forward and do
11 something.

12 Thank you.

13 MR. EHRMANN: Thanks, Dan. Lori?

14 DR. BERGER: My name is Lori Berger, and I'm new to
15 this group. I'm not a veteran of TRAC or a lot of the other
16 groups that have been meeting for the many years that Dan
17 just referred to.

18 I represent a coalition of growers and commodity
19 groups in California that ranges from stone fruit to citrus

1 to strawberries to avocados. And I'm really proud of a lot
2 of the work that's going on in California. The presentations
3 yesterday focussed on peaches. We're doing a lot of the same
4 things.

5 And we have 250 varieties plus in peaches, and I
6 can tell you that there are some wonderful things going on in
7 IPM in California. And the grower groups that I'm
8 representing are actively participating. We've come a long
9 way. We have a long way to go.

10 So as far as this process, Robert after lunch
11 yesterday kind of crystallized my thoughts. This group up
12 until yesterday afternoon was really not what I thought it
13 was going to be. It was pretty much a classroom exercise.
14 And because I'm new, I really appreciated all of the
15 information being provided to us on the different risk
16 assessment technologies and idea. But there really had not
17 been that much exchange until yesterday afternoon.

18 And so I'm feeling better. I guess I'm from
19 California. I should be feeling something.

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1 **(Laughter.)**

2 So I am, and so I'm really encouraged about that.
3 But I'm also from Missouri. You've got to show me. And as
4 far as risk assessments, I would really benefit if we could
5 walk through a risk assessment. I think it would be a great
6 exercise for everyone, no matter what side of the table that
7 they're sitting on. Let's look at these -- let's look at a
8 product or some products and really pick apart the inherent
9 risk in the chemistry. The inherent risk in the field worker
10 issues.

11 Let's look at that and talk about it and have
12 exchange. There are a lot of people that are new, like
13 myself. I haven't heard their voices. And I would like to,
14 because I know that they were asked to be a part of this
15 process so that we could gain from where they're coming from.

16
17 Finally, as far as this process, one of the things
18 as a person that is coming from California, I have seen the
19 erosion of our cooperative extension system. We have some

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1 super people out in California, but their numbers are
2 dwindling. And I really see, whether it's California or
3 Michigan or Texas or Florida, whatever we come up with to
4 transition to, we are going to need people to take that
5 message forward.

6 And if our infrastructure is not there, whether
7 it's beefing up our universities and cooperative extension,
8 whether it is equipping the private sector to deliver this
9 information, now is the time we need to really take the long
10 view of that system.

11 So those are my comments, and thanks very much.

12 MR. EHRMANN: Thank you. We will, as I mentioned
13 earlier, take all the very good suggestions that have been
14 made about this document just as a way of capturing this
15 discussion and organizing it. And my guess is either in
16 whatever interim process is set up or in future discussions
17 of this Committee, I think this gives us a good list of
18 issues to be working from.

19 And that's really what we wanted to get out of this

1 discussion yesterday and today. So I appreciate your input
2 on that. If you do have other comments on it -- tone,
3 editorial or additional items that you've been jotting notes
4 -- if you can get us that information, that would be very
5 helpful as well.

6 Mike, do you want to summarize?

7 MR. MCCABE: Yeah. I think what this discussion
8 has shown, and what the document underscores, is that there
9 are a lot of issues relating to transition that need to be
10 addressed. And whether the CARAT format as it is currently
11 structured is the best vehicle for that is something that
12 needs to be discussed.

13 I've heard workshops. I've heard workgroups. I
14 think that we've also talked about the advantage of having a
15 smaller group with more interaction. I am going to spend
16 some time during the break to talk to my colleagues from the
17 USDA -- I'm glad to see Rich is here -- about what format we
18 might look at to focus better on these transition issues,
19 because it's clear that they need to be focused on.

1 The issue then becomes what is the charge of
2 whatever the group is that we put together and what are we
3 looking to achieve by putting that together. And just as you
4 look through the list, I mean, you could have 15 of these
5 groups each dealing with a different issue. And we can't
6 afford to do that. So we need to have some discussions, and
7 I think that we can tee something up perhaps for discussion
8 later in the day on where we move on this.

9 But clearly transition and the issues that have
10 been brought up in the last day, this morning and prior to
11 this meeting is something that needs more of our attention.
12 How best to do that is what we've got to talk about a little
13 later in the day.

14 MR. EHRMANN: Thanks, Mike. We could either take a
15 break at this point or go ahead with the drinking water
16 presentation as it is listed on the agenda. I would suggest
17 we -- I would lean toward the latter. Since we're going to
18 go to about 1 o'clock, the break would be a little more in
19 the middle of the morning. If we go ahead and have the

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1 presentation portion of the drinking water, then we'll take a
2 break and then come back for discussion on that, as the
3 agenda calls for.

4 Is that okay with folks to go with that plan? And
5 with that, let me turn it to Susan Wayland to introduce our
6 presenter. Susan?

7 MS. WAYLAND: Thanks, John. I wanted to have an
8 opportunity to introduce Denise Keehner to you this morning.
9 I guess I should say to reintroduce Denise. Many of you have
10 met her before in this forum. She has been dealing with
11 environmental fate and ecological issues, which she is about
12 to talk about, in fact.

13 But I wanted to let you know that Denise has been
14 just selected as newest member of the Senior executive
15 Service and Division Director in the Office of Pesticide
16 Programs. She will be the Director of the Biological and
17 Economic -- what is it?

18 MS. KEEHNER: Analysis.

19 MS. WAYLAND: Analysis. Thank you. I say BEAD all

1 the time. Analysis Division. This is a very critical
2 division. It's one of our biggest links to the agricultural
3 community. They do all of the economic impact assessments
4 for the decisions that we make at EPA in the pesticides
5 world, and they also manage our two pesticide laboratories.

6 Denise has had a very long and distinguished career
7 at EPA. She's been in the pesticide area earlier in her
8 career and now later in her career. She's been in our toxic
9 substances program and she's also been in EPA's solid waste
10 program. So she brings a real variety of experience and a
11 lot of skill and information to this job.

12 And I wanted to let you know that she is our newest
13 division director. She will be continuing to work on some of
14 the issues that she's been involved in, such as the one she's
15 about to talk about, for continuity, because we don't want to
16 lose her expertise in that area as well.

17 So I introduce to you Denise Keehner.

18 MS. KEEHNER: Thank you, Susan. Just a few
19 comments on my move to the Biological and Economic Analysis

1 Division. Although I have really very much enjoyed my tenure
2 in the Environmental Fate and Effects Division, working on
3 drinking water issues and working on ecological risk
4 assessment methods and improvements in that area, I am very
5 much looking forward to the move to BEAD. I expect that to
6 occur around the first week in November.

7 Susan mentioned my career at EPA. Even though I
8 have a very youthful appearance, I have been with the Agency
9 --

10 (Laughter.)

11 I've been with the agency for 23 years, actually.
12 And I've spent --

13 MALE SPEAKER: You started when you were 12,
14 though.

15 MS. KEEHNER: Right.

16 (Laughter.)

17 That's right. Cradle to grave. Yeah, something
18 like that.

19 (Laughter.)

1 I've spent the last --

2 **(END OF TAPE ONE, SIDE B)**

3 MS. KEEHNER: -- five years I've been the acting
4 Director of EFED. I don't have a lot of specific plans for
5 what I'm going to do or what I'm going to try to do in terms
6 of leadership of BEAD yet. I'm smart enough to know that you
7 don't come into a new organization and have a list of things
8 -- specifics -- that you're trying to accomplish.

9 But I do know that there are some important things
10 that need to occur, both in the day to day activities of the
11 program to support registration and reregistration, and also
12 there is a need to increase, I believe, our investment in the
13 development of improved methods and tools that BEAD uses as
14 it supports the program activities.

15 In terms of my leadership style, I'm very much
16 someone who believes in bringing people into the process. I
17 spent my career -- and if you follow my career and the things
18 that I've done and the different programs that I've worked
19 in, I do have a pattern of bringing people into the process,

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1 of opening up processes, of making things more transparent,
2 of getting opinions and views of other people in making that
3 part of the process.

4 I also believe very much and very sincerely in the
5 need for collaboration, particularly when you are trying to
6 launch new efforts to develop improved methods. You still
7 have the day to day work that needs to be done in order to
8 accomplish improvements and methods and approaches. You have
9 to partner, because the resources really are not there to do
10 both at the same time. Partnering is an essential part of
11 making progress in some of these areas.

12 I'm also very much a believer in objectivity,
13 honesty and straightforwardness in my dealings and my
14 assessments and how I approach the science of whatever it is
15 that I'm involved in.

16 And finally, just to reemphasize, I do see the
17 mission of any science division within the Office of
18 Pesticide Programs as twofold. One is to provide the input
19 on the individual decisions that are going through, but also

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1 a responsibility to forward and advance the science and the
2 methods of assessment.

3 So I look forward to working with you when I move
4 into my new position. And as Susan mentioned, I'll still be
5 involved in the drinking water arena, at least for the near
6 term and midterm.

7 So why don't we move over into the drinking water
8 arena now. We are very much happy to be here this morning to
9 share with the CARAT Committee what we're doing in the
10 drinking water assessment world and why, how the process is
11 working for us, and where we are going to be going with
12 improvements over the course of the next several years.

13 We have improved our methods fairly significantly
14 recently, particularly over the past few years. We are
15 bringing better science to bear on the assessment process in
16 the drinking water arena. We are
17 -- our methods are better able than they have been to reflect
18 real world circumstances and conditions. And we are working
19 in a very collaborative way with the U.S. Geological Survey,

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1 USDA and others to make even more progress as we move into
2 this upcoming fiscal year.

3 I think that having this presentation as a
4 foundation should set the stage pretty well for discussions
5 that this group might want to have about some of the public
6 policy issues that are associated with drinking water
7 assessment and drinking water risk management.

8 The people who are responsible for conducting and
9 developing -- conducting drinking water assessments and for
10 developing new methods and approaches are scientists. And if
11 you know anything about scientists -- particularly I have
12 many, many Ph.D level scientists within the Environmental
13 Fate and Effects Division.

14 If you know anything about scientists, they really
15 want to understand. Their fundamental desire is to try to
16 understand what is going on in the environment. And in this
17 case as far as drinking water is concerned, what is happening
18 when pesticides are used, where do the pesticides go with
19 regard to drinking water sources, what are the

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1 concentrations, etc.

2 The only other agenda that is at play is sort of a
3 management agenda. And that management agenda revolves
4 around trying to complete these assessments in the most
5 efficient and effective manner possible using a
6 scientifically sound process.

7 The fact of the matter is, we do not have infinite
8 resources, and we have to have a system or a process that
9 allows us to quickly and easily identify compounds and uses
10 that are not likely to pose a problem in drinking water, so
11 that we can focus most of our efforts on those pesticides and
12 uses and locations that do.

13 In very broad terms, when we complete a drinking
14 water assessment under the Food Quality Protection Act, what
15 we are trying to do is to understand the occurrence of
16 pesticides in the water that people drink, or trying to
17 understand the risk that is associated with that occurrence.
18 And we're trying to understand the factors that influence the
19 occurrence of pesticides in water.

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1 It's very important to the risk management side of
2 the program for us to be able to know who is going to be
3 exposed, how many people are going to be exposed, to what
4 concentrations, for how long, geographically where those
5 higher levels might be. Risk managers are also very
6 interested in understanding what can be done to mitigate or
7 reduce levels that are above human health levels of concern.

8 Actions such as reduced application rates,
9 geographic restrictions, buffer strips to mitigate runoff,
10 and adjustments to application methods within the spray drift
11 arena are the kinds of things that have some potential in
12 certain circumstances to reduce the concentrations of
13 pesticides reaching water. And the risk management side of
14 the programs asks us if we do this, what will happen. What
15 do you anticipate will occur in terms of the concentrations.

16 Our role as a division is really twofold. We do
17 have the responsibility for developing the methods and
18 approaches and the system for assessing drinking water
19 occurrence of pesticides. But we also, as I mentioned in the

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1 BEAD case, have this responsibility of developing the day to
2 day assessments for individual pesticides.

3 We have to use a cost effective process to get
4 there. It's really not good enough for us to be able to do a
5 topnotch assessment of the occurrence of a particular
6 pesticide in drinking water, because we really can't afford
7 to do an area by area, pesticide by pesticide, full blown
8 assessment in every case. We have to have the ability to
9 easily identify those compounds that are not of a concern so
10 that we can focus our resources on those that are of a
11 concern.

12 Once we finish with our characterization and our
13 assessment of the occurrence of the pesticide in drinking
14 water, we turn that assessment over to the Health Effects
15 Division, and the Health Effects Division takes that and uses
16 it in its human health risk assessment process.

17 In a few minutes Dr. Bill Wilbur from the U.S.
18 Geological Survey, Nelson Thurman from EFED, Dr. Ron Parker
19 from EFED, and Dr. Rudy Pisigan from EFED will provide you

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1 with an overview of where we are and where we're going with
2 our drinking water assessments.

3 But before Dr. Wilbur gives his presentation and we
4 start the technical presentations, I want to highlight just a
5 few things. First, it's very important for everyone to
6 understand that drinking water is fundamentally different
7 from food in some very key ways that affect how you assess
8 risk and also how you manage risk.

9 People -- other than people who take their drinking
10 water from bottled water, people generally get their drinking
11 water locally. Food, on the other hand, is nationally
12 distributed. What's in your drinking water is very much
13 impacted by what is occurring in proximity to your drinking
14 water source. That's another important difference. When you
15 go to a grocery store, what's in or on your food at the
16 grocery store generally has a little to do with what's
17 occurring in terms of local circumstances.

18 Also, for an adult if you assume two liters of
19 water ingested per day, there is no other single commodity

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1 that comes close, at least in my understanding of it, to
2 water in terms of the amount consumed and the frequency of
3 consumption. You have daily consumption, and you're talking
4 about ingestion of two liters of that material give or take
5 per day.

6 The second thing is that even though most surface
7 water based community water systems do use some form of
8 treatment, based on the available information that we've been
9 able to pull together in consultation with many experts in
10 the field, including a recent Scientific Advisory Panel
11 meeting, it appears as though that conventional water
12 treatment, which is the predominant form of water treatment
13 in the United States, is not really all that effective in
14 most cases in reducing the risk associated with the
15 occurrence of pesticides in raw water.

16 There are technologies, such as granulated
17 activated carbon, that do have some effectiveness for some
18 classes of pesticides and generally much more effective in
19 reducing concentrations, but they aren't -- that type of

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1 system is not the predominant form of treatment in the United
2 States. In fact, less than 5 percent, I believe, of the
3 systems use granulated activated carbon.

4 The third point that I wanted to highlight is that
5 the reality is that certain pesticides in certain locations
6 are going to be an issue. The name of our game in the
7 assessment business is to figure out which pesticides, and
8 where, are going to be of concern, and to do that as
9 efficiently and effectively as possible.

10 We don't think that all pesticides in all locations
11 are a significant drinking water concern within EFED. My
12 scientists believe that certain pesticides in certain
13 locations are, and we're trying to figure out which they are
14 and where those are.

15 This all leads up to sort of a summary, to me, of
16 what constitutes an effective drinking water assessment
17 process under the Food Quality Protection Act. And I see
18 that there are at least two elements that are important in an
19 effective process.

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1 The first is to have a reliable, cheap, effective
2 screening device that allows us in a scientifically
3 defensible manner to identify pesticides that we don't need
4 to worry about from a drinking water perspective. We do want
5 that system to err on the side of protection, but we don't
6 want it to err too much. Otherwise, we're wasting resources
7 doing more refined assessments for compounds that don't
8 really need a refined assessment.

9 My scientists called it the Goldie Locks principal
10 the other day. Our screening method can't be too hot or too
11 cold. It's got to be just right. We want it to do the job
12 that needs to be done.

13 The second major component in the drinking water
14 assessment process is having a sound predictive tool.
15 Something that allows you to go to the next level of
16 refinement to have confidence in your estimates of pesticide
17 concentrations at individual drinking water intakes in
18 particular localities and particular locations.

19 It's very important, I think, for all of us to

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1 recognize that we really cannot rely on drinking water
2 monitoring alone as the basis for Food Quality Protection Act
3 risk assessments. Drinking water, as I've mentioned several
4 times, is a local issue. Pesticide use is variable season to
5 season, year to year and location to location. Monitoring is
6 very expensive.

7 Companies that are involved in individual
8 monitoring programs for individual pesticides will tell you
9 we're talking several million dollars for a compound that has
10 any type of a broad use in order to adequately capture the
11 use area of the compound with the number of samples that are
12 needed to really reflect the variability in pesticide
13 concentrations over time.

14 And the other thing that is important to recognize
15 is monitoring by definition is after the fact. When we're
16 dealing with new compounds coming into the process, we want
17 to be able to have a method that is in fact able to predict
18 with an adequate level of confidence what those
19 concentrations are going to be at particular intakes, so that

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1 we can take actions to prevent contamination rather than
2 dealing with clean up after the fact.

3 We have made a lot of strides since 1996 in
4 improving our drinking water assessment process. We've
5 improved our screens. We're making appropriate use of all
6 available monitoring data from all the sources that we were
7 able to tap into. We're bringing GIS related information and
8 tools to bear to help us to better characterize the
9 occurrence of pesticides in water.

10 We've worked with the U.S. Geological Survey on a
11 pilot reservoir monitoring study, and we're just beginning to
12 see preliminary results. They're undergoing QAQC and peer
13 review right now. But we're beginning to get some of that
14 data and be able to take a peek at it, anyway. And we have
15 been working with the U.S. Geological Survey on the
16 development of this more refined predictive tool.

17 We've done all of this work in a very open manner.
18 We sought and obtained external scientific peer review
19 throughout the process. We've had three LC workshops and

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1 seven scientific advisory panel meetings since 1997. All of
2 those efforts have been focused on making our assessment
3 process better and also on improving the ability of our
4 process to reflect the real world.

5 As we enter 2001 EFED -- in the drinking water
6 arena, our primary focus is going to be on advancing the
7 development of these better predictive tools and to work in a
8 very collaborative way with USGS and USDA to organize any
9 monitoring efforts around the objective of advancing as
10 quickly as possible the development of these more refined
11 predictive tools.

12 I would like to now turn the floor over to Bill
13 Wilbur from the U.S. Geological Survey, and Nelson Thurman,
14 who will be providing you with sort of an overview of what we
15 know generally about the occurrence of pesticides in water
16 and drinking water. Then Nelson is going to walk through our
17 current assessment process and methods and provide you with
18 some perspectives -- or some statistics on what's working and
19 how it's working for us, and where we're going generally.

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1 Dr. Ron Parker is going to do a quick presentation
2 on our work to develop this more sophisticated predictive
3 model. And then Rudy Pisigan will touch on what we know
4 about treatment. Because we just got out of a scientific
5 advisory panel meeting, and I think the basic conclusions
6 coming out of that meeting are going to have some bearing on
7 where we go in the future.

8 And then I'm going to ask Al Jennings at the end to
9 briefly discuss the recent formation and mission of an EPA,
10 USDA and USGS interagency steering committee on drinking
11 water assessment.

12 Dr. Wilbur?

13 DR. WILBUR: Can everybody hear me okay in the
14 back?

15 MALE SPEAKER: You have to use the microphone.

16 MR. EHRMANN: You need the mike.

17 DR. WILBUR: Let's go ahead and have the first
18 -- yeah. That's not it. It just says Pesticides in the
19 Nation's Water Resources. Keep going. Good.

1 Well, good morning and thank you. This morning
2 what I would like to do is provide you with a brief overview
3 of what we've learned about the occurrence and distribution
4 of pesticides in streams and ground water of the United
5 States. It's part of the first phase of the U.S. Geological
6 Survey's national water quality assessment program.

7 The goals of the NWQA program, as we refer to it,
8 are to provide nationally consistent descriptions of current
9 water quality conditions, how they're changing, and as Denise
10 pointed out, from a scientific point of view to really
11 provide an understanding of the major factors that effect
12 water quality conditions and those changes, and provide those
13 explanations to others.

14 To meet the goals of the program, we're sampling a
15 very extensive list of physical, chemical and biological
16 perimeters, including a wide array of volatile organic
17 compounds, nutritions --

18 FEMALE SPEAKER: Excuse me. Do we have this one?
19 I have a bunch of them, but I don't have this one.

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1 DR. WILBUR: You should have a light blue sheet.

2 MS. KEEHNER: Right, the blue one pager.

3 MR. EHRMANN: It was on the table this morning, I
4 think.

5 DR. WILBUR: Right.

6 FEMALE SPEAKER: It's not that.

7 MR. EHRMANN: It's not that.

8 DR. WILBUR: No.

9 FEMALE SPEAKER: Okay.

10 DR. WILBUR: No, you won't have copies of the
11 slides.

12 FEMALE SPEAKER: Thank you.

13 MS. KEEHNER: You have a lot of them, but not that
14 one.

15 MR. EHRMANN: It says USGS.

16 DR. WILBUR: We're different. We're sampling for a
17 wider range of various measures -- physical, chemical and
18 biological perimeters. And included amongst those are 80 of
19 the 120 most commonly used pesticides in agriculture and in

1 urban and suburban settings.

2 One of the comments that I'll make is many of the
3 analyses that we perform are at the part per billion level,
4 substantially below many of the current criteria and
5 standards. The reason we do that is because of the
6 objectives. We need to actually have actual measurements of
7 concentrations, so we can see how concentrations vary both in
8 space and time, and to look at how these contaminants are
9 actually transported through the environment.

10 The findings that I'm going to present this morning
11 are based on an analyses of about 5,000 water samples of
12 streams and ground water, and about 500 samples of stream bed
13 sediments and fish. Seventy six currently used pesticides
14 were analyzed in water and account for about 75 percent of
15 the pesticides that are used in both agriculture and, of
16 course, urban and suburban uses as well.

17 One of the goals of the program, which is really
18 fundamental to the mission of the Geological Survey, is to
19 provide unbiased scientific information to others, and

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1 especially those that are responsible for the management of
2 earth resources, regulation and for policy decisions. And so
3 we're very pleased to have had over the last few years a very
4 strong and collaborative relationship with EPA, and
5 especially with the Office of Pesticide Programs. And you're
6 going to hear more about some of those collaborative
7 activities both later on in this presentation and also
8 subsequently by other presentations as well.

9 Okay. Well, the question is, are pesticides in
10 water? And the short answer is yes. They are much more
11 widespread, both geographically and year around, than we
12 initially believed they would be. What this slide shows is
13 that almost every stream sample that we collected, and about
14 half of the samples from wells, contained at least one of the
15 pesticides that we measured for.

16 Ground water samples frequently -- or less
17 frequently contain detectible pesticides, because there's
18 much more opportunity for retention of these compounds on
19 soil as water moves from the land surface to ground water,

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1 and because the travel times from the land surface to the
2 aquifers are much longer than, of course, for streams.

3 Most commonly found pesticides in water are four of
4 the most commonly used herbicides on crop land for the
5 herbicides with the greatest use in urban areas and other
6 nonagricultural applications, and four insecticides
7 that have both agricultural and urban uses. Some of these
8 pesticides are household words in many parts of
9 the country: atrazine, metelochlor, 2,4-D and
10 diazinon.

11 Some of them are less frequently well known: de-
12 ethyl atrazine, adegaday (phonetic) of atrazine, which we
13 find very frequently and almost always with its parent
14 compound, atrazine, promotoan (phonetic), a herbicide with no
15 registered agricultural uses, but extensive use in urban
16 areas and for control of vegetation along road sides and
17 construction sites.

18 One of the most significant findings was the very
19 frequent and prevalent occurrence of pesticides, especially

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1 insecticides, in urban streams. It likely results from the
2 combination of intensive use on lawns and gardens combined
3 with intensive irrigation or little irrigation during the
4 growing season and the efficient flow pathways that occur,
5 especially in urban areas with the impervious roads, and
6 storm drains.

7 Well, the significance of pesticides in water
8 resources really cannot be adequately understood by national
9 comparisons and statistics. Each region in the watershed has
10 its own characteristics and influences: soils, climate,
11 dominant crops and most prevalent pests. They all vary. In
12 fact, at the heart of the NWQA design are individual and
13 tailored studies of specific geographic areas so we can
14 examine how these various differences play out on the
15 occurrence of distribution of pesticides.

16 This is an example that puts some of our results in
17 a geographic context, and it illustrates the simple
18 relationship between chemical concentrations and pesticide
19 uses. What this particular graph shows is the relatively

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1 high concentrations of herbicides, particularly in the corn
2 and soybean belt in the middle part of the country, where
3 they do have relatively high pesticide application rates.
4 But it also shows relatively high concentrations in the
5 Willamette Basin up in Oregon, and in the San Joaquin Valley
6 in California, and the Trinity River Basin down in Texas as
7 well.

8 As I pointed out a moment ago, another significant
9 finding that has surprised many is that almost every urban
10 stream ranked among the highest in concentrations of
11 insecticides. And those concentrations frequently exceeded
12 aquatic life guidelines.

13 The urban areas that we studied span a wide range
14 of climatic and cultural settings. And these results suggest
15 that pesticides may be a very significant concern to aquatic
16 life in urban streams throughout the country.

17 Should we be concerned? The significance of
18 pesticides in potential drinking water sources seems to be
19 low when compared to current drinking water standards and

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1 guidelines. And this is good news. Only a small percentage
2 of the streams that we sampled had average concentrations
3 greater than drinking water standards, and none of the sites
4 that we sampled where those concentrations were exceeded are
5 actually used as a source of drinking water supply. In
6 ground water, few wells, even in very shallow retard zones,
7 had concentrations greater than a standard.

8 Well, the difficulty we have in concluding that we
9 shouldn't be concerned is that few of these pesticides
10 actually have standards or guidelines, and the existing
11 standards and guidelines have not been designed to account
12 for actual patterns of pesticide exposure, largely because
13 the science wasn't ready to do that.

14 Thus the reason for any concern for our nation's
15 drinking water supply is not the certain knowledge that
16 problems will occur, but the uncertainty that they won't.
17 For example, drinking water standards are based on long term
18 average exposure to single compounds, whereas water sources
19 are most likely going to contain complex mixtures of parent

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1 compounds and their metabolites and usually have seasonal
2 patterns with much greater -- where concentrations may be
3 much larger than average concentrations.

4 And I'll show you some examples of those in a
5 moment. For aquatic life, based on current guidelines there
6 is more evidence for concern. More than 70 percent of the
7 urban sites that we sampled had diazinon concentrations that
8 exceeded a U.S. or a Canadian guideline, followed closely by
9 chlorpyrifos and malathion. But you'll also note that
10 atrazine also exceeded its Canadian guideline at almost 40
11 percent of the agricultural screens that we sampled. Many of
12 the exceedences were only one or two samples, but sustained
13 periods of time with exceedences were common for atrazine and
14 diazinon at some sites.

15 As with drinking water, aquatic life guidelines
16 have been established for only a limited number of the
17 compounds that we're looking for.

18 Okay. This slide may be a little complex, but I
19 think it's worth the effort, if you bear with it. I

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1 mentioned a moment ago the complicating factors of mixtures,
2 including breakdown products of metabolites and the effects
3 of seasonality. And I want to show you some examples.

4 This first slide shows that pesticides almost
5 always occur as mixtures of several compounds rather than
6 individually. For example, about 80 percent of the samples
7 from urban and mixed land use streams -- that's the red and
8 blue lines up top -- for mixed land use contained about four
9 pesticides, compared to about 50 percent of the samples from
10 agricultural streams. And in contrast, if you'll look down
11 in the right hand corner, about 15 percent of all the stream
12 samples contained 10 or more pesticides.

13 The second complexity that I mentioned which adds
14 to the mixtures problem is the role of pesticide breakdown
15 products or metabolites. And this is an example of
16 herbicides measured in the Iowa River, where the total
17 herbicide breakdown products were frequently found in more
18 than 10 times the concentration of the parent compounds over
19 a two year period. And one of the things you might want to

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1 notice here, is on that Y axis, that's a log rhythmic scale,
2 so those units go up in magnitudes of ten each time.

3 Studies indicate the breakdown products are often
4 even more important in ground water and they often are more
5 toxic than their parent. In both the second and third groups
6 of the study and investigations that we've taken on, we've
7 increased on our emphasis on measuring metabolites, because
8 of these early findings and because of the results of others,
9 that have really shown the importance of these metabolites to
10 the overall pesticide occurrence picture.

11 Okay. Finally, pesticides in streams almost always
12 follow strong seasonal patterns rather than remaining
13 constant throughout the year. And the same seasonal patterns
14 seem to repeat or generally occur year after year.

15 This is an example of an Ohio stream -- an
16 agricultural stream -- draining corn and soybeans. It's an
17 example of a data set that was compiled by Heidelberg
18 College, one of the few long term data sets that exists. And
19 one of the things you'll notice is that although the MCL is

1 substantially exceeded for a period of time each year, the
2 mean concentrations never exceed the standard. And this is
3 the type of exposure patterns that we typically see.

4 Well, NWQA's primary objective has been to assess
5 ambient water quality, and thus we've had limited ability to
6 really address specific drinking water issues. However,
7 beginning in 1999, as Denise mentioned, we began a pilot
8 monitoring effort with EPA's Office of Pesticide Programs in
9 the Office of Ground Water and Drinking Water to determine
10 the occurrence of pesticides in drinking water and to
11 document some of the effects of treatment on pesticide
12 concentrations.

13 The study focused on 12 water supplier -- public
14 supply reservoirs that were selected to represent different
15 land and pesticide use areas within watersheds that varied
16 with their soil and runoff characteristics. Water samples
17 were collected at both the intakes and at the finished water
18 at least 11 times, including quarterly samples throughout the
19 year and biweekly samples during the period of pesticide

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1 application and greatest runoff. Thus what we're developing
2 is a very substantial data set of water samples in both raw
3 and finished water.

4 Now the data from the first year of this effort are
5 going through the final stages of quality assurance and
6 quality control, and we believe that a lot of that
7 information will be available right after the first of the
8 year.

9 Some of the preliminary examination of the data
10 that we've seen so far confirm what we've seen in ambient
11 streams, and thus there are pesticides in raw waters used as
12 sources of drinking water supply. And at some sites, we're
13 actually seeing measurable concentrations in the finished
14 water as well. And again, as I mentioned, these data sets
15 will be available right after the first of the year.

16 Well, finally, the NWQA program is collaborating
17 very closely with EPA on a number of issues that will lead
18 hopefully to better information and reduction of uncertainty
19 on exposure and estimating risk. We're now working with the

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1 data sets. This is only from 20 study units that were
2 sampled beginning back in 1993, and we're now starting to
3 work with data sets that were developed beginning in 1996.
4 And after the end of this coming fiscal year, we'll have a
5 third data set.

6 So we'll have on the order of about 59 areas,
7 probably almost three times the amount of information that we
8 have to date, on the occurrence and distribution of
9 pesticides and other physical and biological parameters. And
10 this will greatly improve our ability to look at the
11 occurrence and distribution of pesticides and metabolites and
12 mixtures, their seasonal patterns and so forth.

13 We're working to develop predictive models, so we
14 can extrapolate our understanding to areas that haven't been
15 sampled but have similar physical and chemical
16 characteristics, and also to areas that have some numbers of
17 samples. And we're, of course, working very closely with the
18 Office of Pesticide Programs on this effort. You'll hear
19 about that effort in a moment.

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1 And we're struggling with this, because workgroups
2 are very labor intensive. They are labor intensive from our
3 standpoint. They're labor intensive from your standpoint.
4 They also don't always lend themselves to the resources of
5 some of the people here. Not everybody has a Washington
6 office. Not everybody has the kind of resources or personnel
7 that can attend these workgroups and can participate fully.
8 So we are aware of those limitations. And in fact, that was
9 part of the reason that we haven't jumped at putting together
10 workgroups.

11 However, I think that on a couple of issues that we
12 see coming up, workgroups or some format similar to that
13 could be very useful in terms of getting into more depth,
14 pursuing more of the peripheral issues, but also core issues,
15 relating to some of these areas.

16 And I think that what we would like to propose,
17 without having every i dotted and t crossed on this
18 understanding, is a workgroup -- two workgroups. One would
19 be on transition. I think that this morning's discussion

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1 clearly indicated that we need to have that. But we
2 need to narrow down the focus of what that is in transition.
3 I mean, it cannot be all of the dozen things that were on
4 that list, but there are some key areas that I think
5 everybody pretty well agrees on that we could have some
6 beneficial dialogue and recommendations on that.

7 Transition issues -- I mean, you know, it could be
8 research and funding issues. The whole issue of the farmer
9 buy in. You know, how do you get the agricultural community
10 -- the farmers -- to really participate in IPM and what are
11 the impacts on the farmer. What are the ongoing impacts,
12 some of which were graphically illustrated yesterday in terms
13 of the transition problems. Also, how do we measure. How do
14 we evaluate what is happening during the transition.

15 So I think that we can put together a workgroup on
16 transition. That would be one. Also not just in yesterday's
17 discussion, but also in some side discussions, the issue of
18 cumulative risk. This could be integrated into transition,
19 but I think it also needs some separate attention.

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1 The workshop that we had was very effective in
2 terms of teeing up some of the issues. But I think that as
3 we work through the cumulative risk issue, as we move towards
4 developing the methodology, we need to have a better idea of
5 what the public participation is and what the process is for
6 the cumulative risk issue.

7 We also -- there are also other issues that could
8 be addressed, probably initially better through workshops,
9 and I think drinking water is one of them. Also the
10 occupational issues, the worker exposure issues. And we may
11 find that we need to devote more to those issues after the
12 workshop. But let's not jump right into a workgroup, because
13 we do have limited resources. We do have limited staff time.

14 And as I think that you can see from the
15 accomplishments that we've already achieved, this staff is
16 working overtime. They are putting a tremendous amount of
17 effort into making FQPA work, and to getting the
18 reassessments done, and to having the outreach that we
19 mentioned in detail yesterday. And we don't want to get them

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1 off track on that, but at the same time, I think that if we
2 are able to target some issue areas, we could actually
3 hopefully help not only staff, but all of us in moving
4 forward in this area.

5 In addition, we should talk about another CARAT
6 meeting, and I think that the CARAT meeting is something that
7 in all likelihood could not occur before February. I mean,
8 if you look at what is going to happen in a month, no matter
9 who wins, there will be a new administration. And the new
10 administration will bring in new people. There also are the
11 holidays, and in this town, as I'm sure many towns, things
12 slow down.

13 But the transition and holidays and just all of the
14 end of the year work that we have to do, I think says that
15 February is the earliest that we could have a CARAT meeting.
16 That doesn't mean that we shouldn't initiate some of these
17 other things, and I think that we should, because we need to
18 start the information flowing on that.

19 As far as agenda items, we can decide that in the

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1 future. But a couple of agenda items that have come up:
2 children protection, the whole issue of what we're trying to
3 achieve there and what the issues are with that, and
4 nonagricultural pest control issues. I think that those are
5 areas where if we could have more discussion, if we could
6 have some presentations, it might help all of us in looking
7 at areas beyond just the OP pesticide issues that we've
8 focused on in the last two meetings.

9 I'll turn it over to Rich. We've had some
10 discussions during the break. Jim and others -- Jim, Keith
11 and others have been talking about trying to put some meat on
12 the bones of this. But that's the general proposal that we
13 have.

14 MR. ROMINGER: Thank you, Mike. I think Mike has
15 outlined a good process for moving forward. Certainly the
16 major issue of transition, as we heard yesterday from peaches
17 and winegrapes, there's going to be a lot of work needed
18 there. So that's a good subject for a workgroup. Certainly
19 if we do the cumulative risk that's going to drive what we

1 need to do in transition in a lot of ways. So those will be
2 very helpful.

3 And then to hold some workshops as well on some of
4 the other issues. I think the worker issues and the drinking
5 water issue -- another workshop on those would be helpful in
6 getting us more information and giving you a chance to talk
7 more in depth about those issues.

8 I think it sounds like the way to proceed. I agree
9 with Mike that February is the earliest. I would think
10 that's very optimistic that the next administration would get
11 things together in February. It might more likely be March
12 before we get around to the next CARAT meeting.

13 But in the meantime, these workgroups could be
14 doing some very productive work. So we would like to hear
15 your comments on those suggestions.

16 MR. MCCABE: So it's unanimous, okay?

17 **(Laughter.)**

18 Thank you.

19 MR. EHRMANN: Bob?

1 MR. ROSENBERG You know, I do this so reluctantly.
2 I always sound so negative.

3 MR. EHRMANN: We don't see it that way, Bob.

4 MR. ROSENBERG: Well, I appreciate that. I think
5 this is an important step and a good step. There is a whole
6 range of issues that you did sort of address. The one that
7 obviously I care the most about is the ones associated with
8 residential exposure assessments. I think there are other
9 people in the room that probably share that concern. I think
10 even the ag community will increasingly share that concern as
11 you go forward with aggregate and cumulative risk
12 assessments, and residential risks will be eating up big
13 chunks of risk cups that would have been otherwise devoted to
14 commodities and other ag uses.

15 I think that the thing which the TRAC process did
16 best was to de-mystify the way the agency does dietary
17 exposure risk assessments and has built, I think, a fair
18 amount of confidence amongst people within the ag community.
19 You know, the folks I represent have always said -- and I

1 believe this to be true -- that if they have confidence in
2 this process, and if at the end of the process there is a
3 showing that a product poses an unacceptable risk, that we
4 would walk away from that product. And I believe that in my
5 heart to be true.

6 The problem is, because so little public attention
7 has been paid to the data being used for residential risk
8 assessments, the methodology, the default assumptions or even
9 the process, I think that confidence does not exist amongst
10 pest control operators, lawn care guys, tree care guys and
11 golf care guys.

12 And I do think that whether it's through a workshop
13 or through a workgroup, it would be extremely useful to give
14 some consideration to trying to shed a little bit more light
15 on those kinds of issues like residential exposure or worker
16 exposure.

17 This, I think, may be a topic for a workshop. I
18 don't think it quite rises to the workgroup level. But I'll
19 let Marcia --

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1 MS. MULKEY: Well, I wanted to just mention that a
2 number of you who are also on the PPDC, which, as you know,
3 is the Pesticide Programs Dialogue Committee, an advisory
4 committee which has been operating for some time now, it has
5 two workgroups active -- maybe three. But two that come to
6 mind are rodenticides and inert disclosure issues.

7 We do have a meeting now scheduled for basically
8 the turn of November and December. And that is another forum
9 where it's entirely possible to take especially some of these
10 issues like occupational, which are really not reassessments
11 -- you know, they're FIFRA issues, basically. We've talked
12 before about other forums, so that is another possibility for
13 some of these issues.

14 It is clear that the number of issues you're
15 interested in and we're engaged in exceeds the practical list
16 of anything. But I thought it was at least worth mentioning
17 that that's another important and near term forum where there
18 is an opportunity for some of these things.

19 MR. ROMINGER: We want you to have confidence in

1 the process, and we think that the best way to do that is for
2 you to have input into the process. So that's what we're
3 going to try and do.

4 MR. ROSENBERG: I appreciate it.

5 MR. EHRMANN: Cindy?

6 MS. BAKER: I just want to say thank you, and I
7 appreciate the proposal that you would put forth workgroups.
8 I am a believer that I think we can do some very productive
9 things in the area of transition and cumulative with those
10 workgroups. I know it's a huge drain on both USDA and EPA
11 resources.

12 I don't have a wealth of people behind me, so it's
13 a drain on myself to get here. But I would be more than
14 willing to do it on those two issues which I think are
15 fundamental to what this Committee is about and how this
16 Committee has pulled together to advise. And I think the
17 interactions that can take place, at least the examples that
18 we've seen -- the PPDC workgroups, I think, have been
19 extremely successful in moving issues forward and coming to

1 consensus and talking about things.

2 And I think the same would be true of these. So I
3 know it's a sacrifice on both your parts to come forward and
4 offer that. And I appreciate it and I think it will be
5 valuable.

6 MR. AIDALA: One thing, if I can jump in for a
7 second, just in thinking aloud about this again. You've seen
8 some real time decisions this morning about the things that
9 Mike and Rich have both said.

10 As people comment, I think one thing we will also
11 like feedback on is size. The last time -- again, the good
12 workgroups end up -- everybody wants to show up. So is it --
13 and it's not to say, you know, I would like to or --
14 obviously you can make those testimonials. But also the
15 general size that you think might be a good working group.
16 And obviously we'll have to have balance and all the other
17 things that are essential to make the process work.

18 But just so, again, if there is buy in, then
19 everyone is nodding their head that workgroups are a great

1 thing. Well, again, a workgroup of 35 people becomes another
2 CARAT meeting. But, again, literally at the last -- during
3 TRAC workgroups, you know, the really good meetings, everyone
4 wanted to show up. And so obviously then we have just
5 another CARAT meeting.

6 And the suggestion is in light of that, that you
7 think that we can be more efficient in some way. So just if
8 people could respond to that, that would be useful.

9 MS. BAKER: I think -- I mean just to respond a
10 little bit to that, Jim. I think some of it is the size.
11 And you're right, a lot of those meetings got very big and it
12 got difficult. But the other thing is the process by which
13 those went. Those were different than what we've been doing
14 here.

15 I mean, I think we came with specific topics that
16 we came prepared to talk about. We had more lead time in
17 terms of the issues that we brought forward. I think we had
18 a lot more exchange between people. And those are the things
19 that I think were the critical elements that made some of

1 those things successful.

2 How about 15. Is that how I get into it?

3 **(Laughter.)**

4 I can see you growling at Mike, again.

5 MR. AIDALA: We seek your input, I mean, on that.

6 And the other thing is, I think another thing that helped is
7 sort of narrowing what the issues are in general, but then
8 also that particular session.

9 So, for example, as Mike said, you know, on
10 cumulative it isn't like all of cumulative or the science of
11 cumulative and all that, because this is not a scientific
12 body, but rather, you know, what is that process we're going
13 to use around that. And obviously it may take some briefings
14 on what the science currently is saying and things, but this
15 is not a science group and all of that.

16 So what are the points that are appropriate in
17 terms of agenda things. That's some of what was already
18 mentioned that we will be further ferreting out as we go
19 forward with workgroups.

1 MR. MCCABE: I think also, Cindy, as you said, it
2 would be more productive if you have some specific topics and
3 you're prepared.

4 MS. BAKER: Right.

5 MR. MCCABE: So maybe we can get enough information
6 out ahead of time so that you do have some homework to do
7 beforehand.

8 MS. BAKER: Right.

9 MR. EHRMANN: Good. Sarah?

10 MS. LYNCH: I would like to get a little bit of an
11 idea of the difference between a workgroup and a workshop,
12 because here is my -- and what -- it seems like the workgroup
13 is CARAT folks. And if the idea is to stimulate a dialogue
14 into great -- and to preserve in that dialogue the diverse
15 voices at the table, then to be really honest, there are real
16 constraints to the amount of time I know I could, or probably
17 some of the others in the public interest community could put
18 into workgroups.
19 And that's what we want to do, is create that dialogue

1 between us, which I think is incredibly important.

2 One way to do that, perhaps, would be at the CARAT
3 meetings to have breakout groups, where instead of -- in
4 addition the members of the CARAT team could go into these
5 different groups and chew over specific, in depth smaller
6 group questions, issues, etc., so that it would be more in
7 the agenda of the CARAT meetings than outside of the CARAT
8 meetings.

9 That would be my suggestion, because I think that
10 there is a real time constraint that some of us have in terms
11 of how we can participate in these very important issues.

12 The other thing that I would say on this issue of a
13 workshop, I think transition is incredibly important. And I
14 think it would be great if CARAT could talk about it.
15 However, I agree with all of the -- some of the other
16 comments that some of the very important people who need to
17 be here to talk about that aren't here.

18 And so, therefore, I would think that transition
19 would be a better thing for a workshop, especially if you

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1 could bring in -- and February would be a good time, because
2 that's generally speaking not a harvest time, although for
3 some I know it is. To bring in the very people that are
4 engaged in transition efforts across the country. And it
5 would be great to inform all of us about the pluses and
6 minuses or, you know, the hardships.

7 But also I think sort of another very useful
8 purpose -- we've heard from all the IPM practitioners that
9 growers learn best from each other. And it would be an
10 opportunity for those folks that are really trying to push
11 the envelope of transition to communicate amongst themselves
12 as well.

13 MR. MCCABE: Sarah, I think that that's a good
14 point and an important point, and it was illustrated
15 yesterday by the presentations that we had. Those folks were
16 involved in transition, and we saw some of the concerns that
17 were raised and we could identify with them much more
18 directly.

19 Having a workgroup does not mean that you don't --

1 that you can't invite those people in, that you can't have
2 them as part of that. And I think that that may be something
3 that the workgroup would discuss. And if it was seen that a
4 workshop type format or, you know, maybe even a conference
5 would be something that would help bring the agricultural
6 community more into a discussion of these issues, that might
7 be something to look at in the future, too.

8 I don't know whether you were in the room, but the
9 problem with our CARAT schedule is that at the very earliest
10 the next CARAT meeting would be February. And as Rich said,
11 that's probably very optimistic. So I think that, you know,
12 these issues do need to be addressed and addressed before
13 that.

14 MR. EHRMANN: Bill?

15 MR. LOVELADY: Well, I would certainly like to
16 thank the chairs for making this announcement. And I think
17 it goes -- I certainly sympathize with everyone's concern
18 about lack of resources and another meeting, because I am a
19 farmer. And I'm not a large corporate farmer. I manage my

1 own farm. And I have to get here from almost the Pacific
2 Ocean. So it really is -- it's not easy to do. But it is
3 something that I think is so important that I'm going to make
4 every attempt to be here when I'm needed to be here.

5 And so I certainly thank you for making this
6 announcement about some working groups. I think it will go a
7 long way towards solving some of the problems that we see in
8 the future. And certainly transition and cumulative risk are
9 right at the top of the list. I know there are other issues
10 that may become part of the discussion.

11 But I am thankful that you saw fit to do this, and
12 I think it's a positive move.

13 MR. EHRMANN: Let me just ask. There are a number
14 of cards up, obviously, and I want to give everyone an
15 opportunity to speak. If we can keep the comments -- if you
16 could follow Dr. Balling's precedent from this morning and
17 just say I agree with X or whatever. But let's try to move
18 through these comments so that the co-chairs can digest what
19 they've heard and at the same time have time for our other

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1 presentations.

2 So, Carolyn, you were next.

3 MS. BRICKEY: Yeah, I guess I do agree that these
4 are the two most important topics that you've selected as
5 potential candidates for workgroups. But I still am very
6 unclear about what the purpose of the workgroup is in either
7 case. What it would do. How it would be structured.

8 And, you know, as Sarah points out, the time
9 constraint is a big thing. I'm on the PPDC. I'm on the
10 inerts workgroup. You know, I mean, there's just a lot of
11 stuff going on and it's just hard to keep up and do all of
12 it. And I can tell you, some of these conference calls -- no
13 offense to anyone -- are torture. So you have to really feel
14 like going into it, that you know what you're supposed to be
15 doing and what you're going to get out of it.

16 So I just urge you to be very judicious in how you
17 structure it. I would be happy to provide future input on
18 that, but I don't want to take a lot of time on that now.

19 MR. MCCABE: I think you're absolutely right. We

1 need to have clear direction on what these workgroups are
2 going to achieve. What they're going to address. And I
3 think, as Cindy said, there needs to be some charge that they
4 go forward with, rather than just sort of meet and talk about
5 these things. I mean, otherwise we'll have some nice
6 meetings, but won't produce anything.

7 And we want to see something come out of this.
8 Something that can advise. Something that, you know, can
9 elevate the informed debate on these issues.

10 MR. EHRMANN: And I think one of the factors -- and
11 I think Jay mentioned this yesterday -- in terms of kind of a
12 process suggestion is that groups like this can bring ideas
13 and concepts to the larger group that are really presented by
14 members of the TRAC, you know, from across stakeholder
15 perspectives, which helps to kind of break up the dynamic of
16 the Department and the Agency always being the presenters.

17 You would do that, though -- you need to do that in
18 response to a question or, you know, the issues on which the
19 Department and the Agency want advice. So, I mean, that's

1 why it's kind of two pieces of the puzzle. And my experience
2 is that, as people have said, a group just kind of put aside
3 -- you know, put out there with a very large general charge
4 isn't necessarily going to be that much help in terms of
5 giving advice.

6 I think the real motivation of those who have been
7 particularly interested in workgroups has been, we want to be
8 able to give some advice. We want to be helpful to the
9 Department and the Agency. So I think it's incumbent on
10 them, as Mike is suggesting and Rich, too, to put the -- you
11 know, here are the issues we're grappling with as the
12 agencies help us. You know, these three points or these
13 five, whatever it is, rather than kind of replicating the
14 broader discussion.

15 So that's going to take a little work to get that
16 together as Mike indicated, to get your thoughts about what
17 those issues are, and across the Department and the Agency to
18 have some more discussions. That's going to be very helpful.

19 There are also a number of methodologies that we're

1 using these days to try to be more efficient about this. And
2 there is no replacement for being in the room and grappling
3 with these issues, so I'm not saying there wouldn't be any
4 meetings. But, you know, through the Internet and other
5 approaches there are a lot of ways to exchange ideas and
6 refine thoughts that can help make those meetings maximally
7 productive when you actually get in the room.

8 So I think everybody is aware of everybody's
9 resource and time constraints and need to factor that in in
10 terms of the process that we would use to help bring
11 crystallized thoughts to the CARAT which is the ultimate
12 objective.

13 Next is Mark.

14 MR. WHALON: Thanks, John. And I want to echo the
15 thanks for hearing us, Mike and Rich. I appreciate that.

16 I would like to address the resource issue, too. I
17 think that the issues of transition and cumulative analysis
18 are too important not to put personnel and other resources
19 into them. They're critical. They're absolutely critical.

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1 But I would like to echo what Sarah said about
2 additional resources. I think that the challenge really --
3 maybe to John or to those of you that structure these
4 meetings and will be involved in the workshops or the working
5 groups and whatever comes out of those working groups -- is
6 to get the critical resources, personnel and other to the
7 table at the time that we have those discussions. That's
8 going to be critical to moving ahead.

9 And the other thing that I would just like to say
10 is that if what comes out of the workgroup on transition and
11 cumulative is a workshop, and the structure of that workshop
12 and the purpose and hopefully synergism, that would be a
13 great accomplishment coming out of a workgroup.

14 So maybe that ought to be the first agenda process
15 for one of those workgroups, that we lay out the purpose, and
16 we lay out the structure, and we lay out what we would like
17 to accomplish in terms of synergism about these issues.

18 Thanks. I really appreciate you hearing us.

19 MR. EHRMANN: Rob?

1 MR. HEDBERG: I would just reiterate what you said.
2 You don't always have to meet face to face.

3 MR. EHRMANN: Okay, thank you. Jean-Mari?

4 MS. PELTIER: Thank you. And I want to echo the
5 same thing. I would say, though, that I think Sarah makes a
6 good point. In the past when we had the TRAC meetings and
7 the workgroups with TRAC, we met in conjunction with TRAC,
8 and I think that was effective.

9 I would just put in a pitch, though. I think there
10 are some of us around the room who have had a lot of
11 experience in dealing on transition issues ourselves. The
12 citrus industry has been very actively involved. So I think
13 if we had a meeting and just allowed some of us to brainstorm
14 about transition strategies, I think it would be good.

15 I would put in a pitch to do it on the west coast,
16 because if you look at -- for Carolyn it's got to be better.
17 For those of us over here on this side of the table, there
18 are a number who are west coasters. If we choose a city that
19 is served by Southwest Airlines, you can get there cheap, and

1 I think it might be an effective way to do it.

2 MR. AIDALA: Well, you're either going to go to
3 Steve's house or Dan's house.

4 **(Laughter.)**

5 MR. EHRMANN: Jean-Mari?

6 MS. PELTIER: I have a cabin in the woods.

7 MALE SPEAKER: For those in Michigan, it doesn't
8 matter.

9 MR. MCCABE: If we get the budget that I hope that
10 we get, we may have some travel money to go to the west
11 coast. If we don't, yeah.

12 And on the topic that Sarah brought up about the
13 breakout groups at a future CARAT meeting, I think that
14 that's -- that really is something that we ought to think
15 about, because they can be very productive. And it can also
16 inject a level of energy into the meeting that, you know, can
17 move you in places that you might not have gone before.

18 So I think we ought to think about that.

19 MS. DAVIS: Along that same line, if you could get

1 Cliff to bring some of his products.

2 (Laughter.)

3 And in that vain, we might want to add some, you
4 know, bread makers and cheese makers to the CARAT group.

5 MS. PELTIER: I have organic olive oil that I can
6 bring, because we're organic olive oil producers.

7 MS. DAVIS: There you go.

8 MR. AIDALA: Hey, sounds like a party to me.

9 MR. EHRMANN: Shelley Davis?

10 FEMALE SPEAKER: Jack Daniels would be okay.

11 MALE SPEAKER: Sounds like I got the resources to
12 travel now.

13 (Laughter.)

14 MS. DAVIS: I think that in some ways there is a
15 little bit of tension in these meetings between complete
16 transparency and allowing the CARAT to have time to discuss
17 and advise. And by that I mean that a lot of the time of the
18 CARAT is taken up by these educational presentations, which I
19 think are very good and very important. But to my mind

1 that's the kind of thing that could be more effectively done
2 in a workshop.

3 So I would think that think about how some of these
4 educational things could be packaged in a workshop, which
5 therefore is also open to more people. You know, a wider
6 range of folks. And then give us written material and have a
7 real short presentation and let us spend these times together
8 in discussion and, therefore, you know, advising and all that
9 kind of aspect of it.

10 And if I could just raise one thing which I think I
11 have said since 1996 at various of these meetings, you know,
12 push is going to come to shove with cumulative when the risk
13 cup is too full. And the real question at the heart of the
14 Food Quality Protection Act is how do the decisions get made
15 when the risk cup over- flows. And talking about that
16 process, to me, would be something that would be useful with
17 this range of stakeholders.

18 MR. EHRMANN: Thank you. Let's see. Wally and
19 then Cliff.

1 DR. EWART: I want to echo thanks for listening to
2 us about the ability to advise, which I think is very
3 important to the commitment we in the agricultural community
4 have made.

5 And also to talk -- to answer to Jim about the
6 question of how many. I think around 15 people is a good
7 number. Maybe it's not the number for each group, but I
8 could be part of it.

9 I think the cumulative area is an area that I would
10 like to see action on before we have our next CARAT meeting.
11 Because I think we're at a stage in that process where our
12 input hasn't been heard, and we're at a stage where we would
13 like to be able to not only be on the same page, but also be
14 able to advise on that as stakeholders.

15 Thank you.

16 MR. EHRMANN: Thanks. Cliff?

17 MR. OHMART: Just a quick comment on the resources
18 issue. The transition workgroup would be something that I
19 personally would be really wanting to be involved in. But

1 the only reason I'm here today is just because -- I don't
2 have resources to travel like this. I feel like I could
3 contribute. So I did want to also mention that.

4 And then along with Jean-Mari, since they're
5 talking about the west coast, I would be willing to open up
6 the new Lodi Wine Visitors Center as a place to meet for the
7 workgroup, if they meet out there.

8 (Laughter.)

9 FEMALE SPEAKER: Yeah.

10 MR. OHMART: Oh, yeah. There's a wine tasting bar
11 open seven days a week.

12 (Laughter.)

13 MR. EHRMANN: Lori, last comment on this?

14 DR. BERGER: Yes. I just wanted to agree with
15 Shelley that I think some of these topics are excellent to
16 perhaps visit on a workshop or just kind of an update basis
17 before we have our CARAT meeting, so when we do have the
18 CARAT meeting, we can actually have exchange and discuss.

19 And then as far as workgroups, I kind of have a

1 little bit of a problem with limiting it to, you know, ten
2 people or 15 people, because if people are getting involved
3 with that to learn about that particular area, if their
4 number isn't called to be a part of the workgroup, they might
5 feel like they've been left out. So I would just caution
6 that there be some real thought put into how these things are
7 limited in participation.

8 MR. AIDALA: And, again, I think there are some
9 different models we can use to decide on the topic and the
10 specific purpose of that subgroup in terms of education,
11 developing proposals, bringing ideas to the CARAT, and I
12 think we'll have to sort through that pretty carefully. And
13 the numbers issue is going to be closely related to that. So
14 that's very helpful.

15 All those comments are very helpful. I think, co-
16 chairs, that there seems to be pretty broad based support for
17 what you suggested, Mike.

18 MR. MCCABE: We'll work on it.

19 MR. AIDALA: We'll work on it. And you'll be

1 getting communication in the relatively near future about
2 specifically some of the ideas from the Agency and the
3 Department about how to proceed and express your interest in
4 which issues and that kind of thing.

5 MR. EHRMANN: Okay. I would like to thank the
6 presenters for allowing us to interrupt the flow of their
7 drinking water presentations to have this discussion.

8 Denise, if you could return for you to introduce
9 your next presenter?

10 MS. KEEHNER: Nelson Thurman from EFED is going to
11 basically go over what we know and what we're doing in the
12 drinking water assessment arena right now. What I've asked
13 him to do is try to flip through things fairly quickly, but
14 hit on some sort of highlights and high points in terms of
15 what we're doing and how we're doing it.

16 MR. THURMAN: Okay. Essentially what I'm going to
17 do is talk to you about how information we've learned from
18 programs, such as what Bill Wilbur presented to you, have
19 been used -- how we've used that in terms of coming up with a

1 drinking water assessment.

2 No single study or program has given us a complete
3 picture. But there are a lot of pieces to the puzzle that
4 we've been able to pull together to give us information on
5 the likelihood, extent and nature of occurrence of pesticides
6 in drinking water. And this in turn has driven the way we
7 approach that.

8 We know some pesticides have been found in water.
9 Some of these are found not only in drinking water sources,
10 but have made it through the drinking treatment process.
11 Just importantly, we know that not all pesticides have
12 occurred in there and we need a way of separating those that
13 are not likely to be found in drinking water from those that
14 are of potential concern.

15 Further, because we're not just considering
16 drinking water concentration but we're looking at aggregate
17 exposure, it's possible that some pesticides may be a concern
18 even at very low concentrations in water. So we need a way
19 to take that into account.

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1 We also know that drinking water is local, as
2 Denise pointed out. We know that the number of factors
3 affect the vulnerability of certain drinking water resources,
4 so that some will be more vulnerable than others. So we need
5 to take into account the local variations.

6 There is also a seasonal variation and the year to
7 year variation. This particular figure just points out the
8 difference between one year and the next year. You see more
9 than 20-fold difference in 1999 which was a dry year.

10 This may seem like a little strange graph, but I
11 want to use it to illustrate the type of variability we need
12 to take into account when we're doing our drinking water
13 assessments. If you look at that red squiggly line in the
14 middle, that line represents the mean concentration of a
15 pesticide. And this is no pesticide in particular. It's
16 just for illustration.

17 If you go left to right across that graph, that
18 represents the variation from place to place where you may
19 find that pesticide concentration. If we go out to that 90

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1 percentile and go up there, you may find that the mean
2 concentration that 90 percent of the population are exposed
3 to would be four or less, or conversely 10 percent of the
4 population may be exposed to concentration of greater than
5 four.

6 However, there is the year to year variability that
7 you may see. The blue and green lines kind of give you a
8 bracket of that type of variability. So these are the type
9 of things we need to address when we're doing our
10 assessments.

11 Let's go to the next one. This just basically
12 summarizes that. Essentially what we do for our process is
13 first of all we try to screen out those pesticides that are
14 not likely to be a concern from those that may be a potential
15 concern.

16 First of all, we use screening models to estimate
17 the pesticide concentration in drinking water, and we compare
18 this to a health based level of comparison. Essentially if
19 you look at the risk cup, what we do for screening purposes,

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1 is we load in the exposure from food and residential first,
2 and what's left over is the drinking water level comparison.

3 So if you had a risk cup of, say, ten, and food and
4 residential came up to seven, we would have a level of
5 comparison of three. Now the way we use our screen is if our
6 model estimates -- for instance, if we have this drinking
7 water level comparison of three, and our model estimates come
8 up with one, then we're confident that that pesticide is not
9 going to be a problem and we don't do anything else about it.

10 If the reverse happens, and we have a pesticide
11 with a concentration of three and the level of comparison is
12 one, then what that means is that we need to get more
13 information. And that's how we use the screening process.

14 We know there are a number of drivers that we need
15 to take into consideration, and this just illustrates the
16 major ones. If you look at the pesticide use and pesticide
17 properties at the top, it gives us an idea of how much
18 pesticide is potentially available to move to a water source.
19 The site and hydrology factors and the weather factors, the

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1 parts at the bottom, give us an idea of how much would
2 actually move. So those interact together.

3 I'm really going to skip over the ground water
4 screening part, other than to let you know that we do have a
5 screen that we put into place. It's based on monitoring
6 data. I'm going to skip that. We're working on a second
7 level screen now. We're going to focus on surface water
8 screen, because this is where most of our concerns have come
9 in in our assessments.

10 When the FQPA came into place, the first surface
11 water models we had were developed for ecological exposure
12 assessments. And we simulated a high runoff field draining
13 into a farm pond. Now we knew that did not represent a
14 drinking water source, but we were confident that as a screen
15 -- and once again, just to separate whether a potential -- it
16 at least would work until we got something better. And we
17 did a lot of work going to Science Advisory Panels and
18 various workshops to come up with better tools.

19 **(END OF TAPE 2, SIDE B)**

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1 MR. THURMAN: So we're representing something that
2 isn't actually a drinking water source. In fact, that
3 picture you see right there is the index reservoir that we
4 used in our assessment. It represents the type of reservoirs
5 that we know to be particularly vulnerable, which are small
6 reservoirs and small watersheds. They're runoff prone.
7 They're agricultural areas in the midwest.
8 We have monitoring data to know that there are pesticides
9 within them.

10 We also have made some adjustments based on the
11 fact that a watershed is not going to be completely covered
12 with a crop of use, so that we're accounting for the
13 percentage of that area as cropped.

14 We evaluated these screening models against the
15 monitoring data that we've had. This happens to be an
16 illustration for atrazine. What you're seeing there is from
17 a study that was conducted by the registrant community. Each
18 of those lines are peak concentrations at individual
19 reservoirs. Most of these reservoirs are in the midwest and,

1 once again, represents some of the ones we think are going to
2 be vulnerable.

3 If you look at our model level, you can see that
4 what we're having -- that this is functioning as an effective
5 screen. And the story is told for just about every other
6 pesticide we have. Our modeling estimates are either
7 following at the high end of the actual monitoring
8 concentrations or slightly above the high end.

9 We've also evaluated the impact of our screening
10 process of those pesticides that are undergoing tolerance
11 assessments. In fact, the numbers you see up here are going
12 to be a little bit different from what you read in the
13 background document. I think in the background document we
14 told you there were 74 chemicals that have screening
15 assessments done.

16 Well, out of those 17 chemicals, we had not yet
17 calculated drinking water level of comparison, because the
18 food and residential exposures took that up. If you look at
19 the 57 chemicals which had screening assessments and drinking

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1 water level comparisons -- both -- you see the vast majority
2 of those passed the screen. Of those that didn't pass, the
3 majority of the concerns were with surface water. We also
4 know that a lot of those concerns were with chronic exposure.

5 MS. KEEHNER: Can you explain that ratio one more
6 time?

7 MR. THURMAN: Okay. There is -- we had 74
8 chemicals that we looked at. And of those 74 chemicals,
9 these are the ones where we've had screening assessments
10 done. Of those 17 of them, we were unable to calculate
11 -- at the point we did the assessment, we had not been able
12 to calculate drinking water level comparison, because the
13 exposure from food and residential took the risk cup up. So
14 there was no drinking water level comparison. There was no
15 room for that. So if you were to add those in -- they
16 haven't passed any screens, because there was no screen to
17 pass.

18 And that's roughly about 60 percent were passing the screen.

19 But the ones where we have been able to calculate

1 drinking water level comparison, 79 percent of those have
2 passed so far.

3 Okay. We are still looking at some improvements,
4 and some of these you're going to see in some science policy
5 papers that are coming out, as well as science advisory panel
6 presentations. We're essentially adding a third screen that
7 is going to take into account some of the variability in time
8 that we see at these sites. And we look at those screens as
9 an improvement that will help us further narrow our focus on
10 those that are of potential concern.

11 We do use monitoring data whenever it is available.
12 Monitoring data early in the screening process is used to
13 augment our screen. As we move up farther into the screen,
14 monitoring data becomes much more prominent in terms of
15 making our risk assessments in that regard. As you know,
16 it's not going to be available for all pesticides,
17 particularly for new pesticides.

18 We do consider the quality of the data. You know,
19 the quantity of it. How much of the pesticide use area has

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1 been represented by the monitoring. How many years of
2 sampling have occurred. And the relevance. Do the data
3 actually -- are they actually represented to the pesticide
4 use areas.

5 All of this information we take into account. At
6 the same time, we also realize that some of this data is not
7 going to be available. We have used data call in to get
8 additional information. Even those are going to be
9 expensive. They're going to take some time. As a result, we
10 are looking at other ways of providing projective tools to
11 take into account the more limited monitoring data we often
12 find.

13 And this is where Dr. Ron Parker is going to talk
14 to you about those tools.

15 DR. PARKER: Well, thank you. I'll try to be
16 brief, as well. I'm going to talk to you about tools and
17 methods we're developing beyond the screening level that
18 you've just heard about.

19 Let's suppose that a chemical fails the high

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1 exposure site screen. Our screening assessment says that at
2 a few vulnerable sites we have a maximum concentration of,
3 say, 40 parts per billion. Let's suppose further that
4 toxicity tests show a potential toxicity of 35 parts per
5 billion. How big a problem might we have? Without looking
6 at other sites, we can't really say at that point.

7 What we need is some type of linkage to the
8 population exposed at each concentration level. There are
9 more than 8,000 community water systems that use surface
10 water as a source of supply. The concentration varies in
11 those -- from place to place, from day to day and from year
12 to year within each system. Recognizing the need to link the
13 number of individuals exposed, we've explored two USGS NWQA
14 sub-projects which involve computer simulation.

15 Both of these projects have methods to estimate
16 pesticide concentrations at community water system locations.
17 Based on concentrations measured at other sites, the link to
18 populations exposed is through the numbers of persons that
19 are served by each of those community water systems. This

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1 gives the population exposed at each concentration level.

2 And I can show a demonstration of that here in a
3 second. The U.S. Geological Survey accelerated these
4 projects to speed up the pesticide portion of their work, and
5 we've presented the results of both of these projects twice
6 to science advisory panels, the first time in March and the
7 second time just at the end of September.

8 The graph on the screen is an example of the
9 results we will be getting. Along the bottom of the graph,
10 you can see the proportion of the population served from zero
11 to one. In this case, the one represents 60 million people
12 in that particular database. Along the left side, you can
13 see the concentration of each number of people which are
14 exposed at that level.

15 I might add that it's the form of this graph that
16 is important in this case and not the actual numbers for
17 atrazine.

18 If you move along to the plate nine level on the
19 bottom on the right, you can see in this example that roughly

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1 54 million people, .9 times 60 million, would have a
2 pesticide concentration below 0.4 milligrams per liter, and
3 the remaining six million people would have a concentration
4 about that .4 milligrams per liter.

5 Did we miss a slide there? Let me say something
6 about how this method works. The U.S. Geological Survey
7 looked at several potential factors that might be useful in
8 determining pesticide concentrations in surface water. The
9 pesticide use intensity, the amount of pesticide applied in
10 each water set above the community water system, was the most
11 important variable. If the pesticide isn't applied in the
12 watershed above, then obviously you don't have pesticide in
13 the drinking water.

14 The size of the drainage area was also very
15 important. The soil properties determine how much of the
16 pesticide soaks into the ground and how much runs off to be
17 available in the surface water. The down over land flow
18 category represents the amount of rainfall that happened in
19 that particular watershed. As we move further into this

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1 project, we may find -- I would presume that we would find
2 other factors that are important as well.

3 This is the general structure of one of the models
4 using these variables. The positive variables in the table
5 have a plus sign and are shown in black there. The negative
6 variables in the table have a minus sign and are shown in
7 red. These are the same variables that were important enough
8 in the previous slide there.

9 Along the bottom you can see the percentage values.
10 Those are the R-squared values which mean something if you're
11 a statistician. The R-squared value is a measure of the
12 predicted -- the predictive value of the particular model for
13 that particular portion of the distribution.

14 This is an example of that. The R-squared values
15 vary from zero for no predictive ability to a maximum of one
16 for perfect predictive ability. This small circle is the
17 closer. Those small circles are to the line. The more
18 predictive ability that you have in the center graph there,
19 you can see an estimate that was made completely based on the

1 pesticide use intensity in the basin. That one in particular
2 had a R-square of about .7.

3 In looking at the bottom graph there, looking at
4 the full model where you have all five of the predictors
5 working, you can see much better agreement. Much better
6 predictive ability. That particular one had a R-square value
7 of .91, which is excellent for this type of environmental
8 modeling.

9 Sid, could you go back to the double graph that was
10 on there earlier? One more. There it is.

11 In this figure you can see work which has been done
12 toward validation of this process. This is a comparison of
13 the measured values with the predicted values for
14 concentrations at the same site. Each of those dots is one
15 particular value. Along the left you can see the predicted
16 concentration based on these regressions equations, and along
17 the bottom you can see the measured concentration that we're
18 trying to predict with those equations.

19 The green dots are the values based on the actual

1 regression equation that was used for developing the model.
2 The blue and the red dots represent sites which are used to
3 see how well that equation works at other locations that
4 we're not using in developing the model. And you can see
5 that it also works very well for those sites.

6 The upper graph, the 95th percentile represents the
7 higher values which would only be seen five days out of the
8 year. All of the other 95 days out of the year, you would
9 actually have lower values. The lower graph is the mean
10 annual concentrations for those sites for each of those
11 years.

12 MS. KEEHNER: What does this mean?

13 DR. PARKER: It's a measure of how well we can
14 actually predict the values at each of those sites. In
15 getting away from our single high exposure site screen, we
16 eventually hope to be estimating predictions at up to 8,000
17 individual drinking water locations, based on the amount of
18 pesticide applied in the basin and the amount of rainfall
19 that is washing that off in order to get a link to the actual

1 population.

2 So it's important that we're able to predict not
3 only at our single high exposure site for the screen, but
4 that we be able to look at the variability and the range
5 across all of the sites that use surface water across the
6 country. We're also doing a little bit of exploration of a
7 single, simple model for ground water as well.

8 Okay. Now to the where do we go from here.
9 Results for atrazine suggest that this method will work, not
10 only for atrazine but for other chemicals as well. Both of
11 the science advisory panel meetings have also endorsed this
12 conclusion. There is a methodology to carry out a cumulative
13 aggregate exposure assessment for the OPs, which will be
14 presented to a SAP meeting in December using this
15 methodology.

16 And in a moment we'll be hearing about an
17 intergovernmental steering committee formed of ourselves, of
18 the Department of Agriculture and USGS which has been formed
19 toward developing a plan for collection of data and for the

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1 model development.

2 To this point in the presentation, we've been
3 talking about raw water only. Next Dr. Rudy Pisigan will be
4 looking at the impact of water treatment on pesticides and on
5 some implications of the policy.

6 Thank you.

7 MR. EHRMANN: Mark did you have a question
8 specifically?

9 MR. MILLER: Yeah, I just had a specific question
10 relative to this. First of all, I think there was one or
11 maybe even two slides that you didn't include in this
12 handout, and I wondered if we could get them subsequently.

13 DR. PARKER: Yeah, absolutely.

14 MR. MILLER: Thanks. The other question I had is,
15 in the multiple regression like you're using here to do
16 predictions, I would like to know how many predictors you're
17 actually using. Are they laid out in that table?

18 DR. PARKER: They are. There are five predictors
19 at the present time. We're moving in to looking at pesticide

1 fate characteristics for each of the pesticides and impact of
2 local weather as predictors also. In looking at the
3 variability from year to year, frequently it's the weather
4 that drives that.

5 MR. MILLER: And my third comment is, have you
6 looked at the power of the test as you've gone to more
7 predictors in terms of -- I mean, the more predictors you
8 use, the greater the amount of variation you could explain,
9 and part of it is because of the error term you're using.

10 And I just wondered if you looked at the power of
11 the test relative to the number of predictors you're using.

12 DR. PARKER: Well, we have. Sid, could you put on
13 the graph with the three -- the slide with the three graphs?

14 The center one there, all of the prediction is done
15 totally based on the amount of pesticide that was applied in
16 the basin from not very adequate data. So even using that
17 one predictor, we still have a R-squared of -- I think it was
18 about .7.

19 Using the whole model with the last four regression

1 variables, you can see that the predictive values were much
2 closer to the line. The predicted values are much closer to
3 the measured values. And the R-square in that particular
4 case for these 567 sites in the current database was .91,
5 which is absolutely fabulous for this kind of modeling.

6 MR. MILLER: It's really great, and I'm really
7 impressed. Are other compounds -- do they respond in the
8 same way that atrazine does?

9 DR. PARKER: They do. If I would have had a little
10 more time, we have four or five other herbicides for which
11 individual models have been developed. Two or three
12 insecticides, also. They all respond very well to this kind
13 of analysis.

14 MR. MILLER: Thanks. The only other that I would
15 say to you is that in the previous presentation Nelson listed
16 10 and two, the compounds that were of concern. I wonder if
17 you would just provide that to us.

18 DR. PARKER: Which of those compounds?

19 MR. MILLER: Yeah, that's it. That's the question.

1 Essentially I think it's the third to the last slide that
2 Nelson had. He listed ten that exceed on surface water and
3 two that exceed on ground water.

4 MR. EHRMANN: Which is which?

5 MS. KEEHNER: You want the specific compounds that
6 had --

7 MR. MILLER: Yeah.

8 MS. KEEHNER: Okay, sure. That's easy.

9 MR. EHRMANN: Okay? Let's go to our next
10 presenter, if we might. Our last presenter.

11 MS. KEEHNER: Right.

12 MR. EHRMANN: Thank you.

13 MS. KEEHNER: So Dr. Rudy Pisigan. He was part of
14 our scientific advisory panel team that went to the SAP in
15 September on the topic of the impacts of treatment on the
16 occurrence of pesticides in drinking water.

17 DR. PISIGAN: I'm the last speaker who would
18 briefly discuss the last line of the plans to exposure
19 assessment of pesticides in drinking water. This will be

1 very quick and to the point.

2 (Laughter.)

3 MR. EHRMANN: Thank you. That's very good.

4 (Laughter.)

5 FEMALE SPEAKER: All right.

6 (Applause.)

7 DR. PISIGAN: So just in summary --

8 (Laughter.)

9 -- we have looked at different processes that can
10 remove or postpone pesticides in the raw water used for
11 producing drinking water. And basically this is what I and
12 Dr. James Hedrick with indulgence found out from our
13 preliminary literature review.

14 Conventional treatment that includes scarbulation
15 (phonetic) population, which is widely used in most treatment
16 plants, generally is not effective in the world of
17 pesticides. Air stripping, or also known as aeration, this
18 process could be effective in removing boiler type pesticides
19 like those used for fumigation.

1 Carbon absorption and membrane treatment, which are
2 not frequently used in most water treatment facilities, they
3 have high removal efficiency. I have to point out that these
4 are not widely used. They are only used probably in large
5 water treatment systems serving maybe 50,000 to more than
6 100,000 people.

7 The next important transformation process is
8 softening, which is typically conducted when you have a hard
9 water with high levels of magnesium and calcium. So you make
10 that system alkaline, high PH. In that particular past
11 condition, we have data information to suggest that
12 pesticides can be converted to byproducts.

13 And lastly, chlorination, which is used for
14 disinfection and at other times oxidation, we have
15 information and data to suggest that some pesticides can be
16 postponed to oxidation byproducts. A case in point is
17 diazinon, which can be converted to oxon, which is far more
18 toxic than the parent pesticide.

19 Now what are the implications of these water

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1 treatment impacts, especially when we try to do assessment
2 for drinking water? It appears that a case by case approach
3 is applicable when we factor in treatment effects. At the
4 same time, we have to realize that we need more data in order
5 to factor in treatment effects. The data in most
6 cases are not available for most pesticides. We have also to
7 contend that the treatment effects will be viable, and in
8 some cases the removal efficiencies of the same treatment
9 that makes will vary from one treatment plant to another.

10 And most important, we need to take into account
11 the transformation products that are generated from
12 chlorination and softening, because if some of them are more
13 toxic, then we've got to deal with them.

14 In the future, you are going to expect from EFED
15 obviously to release a paper on the effects of water
16 treatment so that the public can review and comment on it.

17 Thank you for your attention.

18 MR. EHRMANN: Thank you very much. Denise, any
19 closing comments to summarize your presenters, and then we'll

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1 have Al say a few words about the interagency process.

2 MS. KEEHNER: Okay, very good. I guess just in
3 conclusion, we obviously have spent a lot of time within EFED
4 trying to understand, and within the U.S. Geological Survey
5 trying to understand the whole issue of the occurrence of
6 pesticides in drinking water. We are coordinating with our
7 Office of Ground Water and Drinking Water. We are
8 coordinating with the Department of Agriculture as well.

9 I think that this suggestion that we have a
10 workshop on drinking water is a good one, because I want you
11 to understand better and have a better knowledge base of what
12 is known and what isn't known, and to have an opportunity to
13 dialogue about it a little bit to sort of improve your
14 foundation as you move into discussion of any kind of policy
15 issues.

16 Because there are substantial, in my view, public
17 policy issues that are looming on the drinking water front.
18 Just a very quick one is the whole issue of the balance
19 between prevention and treatment. You know, what is the

1 appropriate public policy posture in cases where pesticides
2 are occurring more frequently than just occasionally. Is
3 treatment the answer really or is prevention where we want to
4 end up.

5 MR. EHRMANN: Okay. Thank you very much. Before
6 we turn to Al, let's just have a round of applause to thank
7 the various presenters.

8 **(Applause.)**

9 Again, we appreciate your flexibility in conforming
10 to our all too tight schedule and imparting a lot of very
11 useful information. And you do have, for the most part, the
12 slides, etc., so I'm sure if anybody has any follow up
13 questions -- and we will open this up for discussion in a
14 minute, too. But if you have any specific clarifying kind of
15 technical questions, I'm sure Denise and her folks would be
16 happy to respond to those questions. So be sure you review
17 those materials and we can do that.

18 I want to turn to Al just to say a couple words
19 about the interagency process, and then we'll open it up for

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1 broader discussion. Al?

2 MR. JENNINGS: Okay. I just need a couple of
3 minutes. It's already been talked about briefly. But we
4 agreed with EPA and the Geological Survey that there is a
5 better mousetrap here for predicting drinking water
6 concentrations, and we've worked over the last couple of
7 months to try to sort out how we're going to get ourselves
8 organized to help develop this.

9 And there is a steering committee, EPA, Geological
10 Survey and us. Right now we're talking about two workgroups
11 to be part of that steering committee. One focused on model
12 development and refinement and monitoring data that is needed
13 to validate or further development of the model.

14 And the second one -- for lack of a better term --
15 that we're talking about is the ancillary data group. And I
16 think that name means that we see lots of other information
17 that is going to ultimately be needed to go into the model,
18 but can't get any further than that. So hence the title
19 ancillary data.

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1 Lots of information that we can see there on
2 pesticide use data. We've got a good handle through our
3 surveys and through registrant surveys of a number on what
4 the national picture looks like. In some cases what the
5 state picture looks like. But also recognize that in the
6 predictive model, the closer we can get to actual watershed
7 use data, the better off we're going to be. That, of course,
8 is easy to say and hard to obtain data.

9 But anyhow the group will be -- we're meeting next
10 week to kick off the workgroup process. And of course we'll
11 be consulting and talking to the NGOs who have an interest in
12 this as it goes along. Certainly the idea of a workshop is a
13 good one. I think probably multiple workshops as we measure
14 our progress make a lot of sense.

15 That's what we're about. I guess one other
16 thought. The tie in here with the Pesticide Data Program is
17 a strong one. Keith mentioned yesterday in the budget that
18 it looks like we're going to get an additional million or so
19 dollars in the Pesticide Data Program, and a lot of that will

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1 be targeted at drinking water monitoring. So we're looking
2 for how we can match PDP with the model development to help
3 further that effort.

4 MR. EHRMANN: Thanks, Al. Let me -- just in terms
5 of our agenda, it's about noon. The last time I checked,
6 there was only one public commenter signed up in terms of
7 allowing time for that. So I think we can take probably
8 whatever time we need, at least half an hour or so, if you
9 want on discussion of what you just heard on drinking water.
10 Then we'll go to the public health presentation and have some
11 time for discussion on that and summarize things.

12 So comments on the drinking water. Sarah, did you
13 have a comment?

14 MS. LYNCH: Yeah. I just wanted to urge when
15 looking at the benefits or trade off between treatment versus
16 prevention that you also look at the costs. I didn't see
17 that in the materials that you provided that you were going
18 to be looking at that, and I think that's an important part
19 of the picture.

1 MR. EHRMANN: Okay. Dan?

2 MR. BOTTS: Just a real quick follow up in looking
3 at the maps that were up there. There seems to be a much
4 more geographically intensive process than the watershed and
5 reservoir models that had been discussed and talked about.

6 One of the concerns that we've had, at least from
7 our perspective in the specialty crop production area, is it
8 seems to work extremely well in row crops where there is
9 pretty much a confined rotation type process on a watershed
10 basis where you're rotating between three or four crops on a
11 cycle and the land use is essentially constant in
12 agriculture. On some of the places that we farm on specialty
13 crops, there doesn't appear to be a problem, at least from
14 the detection issues that were shown there.

15 How are we going to go about getting the land use
16 information to be able to use that model for those specialty
17 crop uses or predictors, especially on new products?

18 MR. EHRMANN: Comment?

19 MS. KEEHNER: I think that that's one of the

1 challenges facing, frankly, the interagency or
2 intergovernmental workgroup, and the formation of that
3 ancillary data workgroup is to figure out how can we best
4 approach gathering the kind of information that you need to
5 really cover the full spectrum of pesticides and pesticide
6 uses in cases where you have an exceedence of, you know, the
7 screening level assessment.

8 I don't know what the answer is right now. But
9 we've got to bring the people in the room who might be able
10 to help in that area and develop a plan to gather that
11 information in some manner.

12 MR. BOTTS: That's the reason I raised the
13 question, because I think as these interagency agreements go
14 forward, the people who actually determine where these
15 products are used are the growers, and they need to be
16 involved in the discussion of how you get to those endpoints
17 of data needs and how you're going to get that information
18 collected.

19 MR. EHRMANN: Good. Thanks, Dan. Other comments?

1 Questions? Yeah, Jay?

2 MR. VROOM: I think that it's important to continue
3 to emphasize the value of the interagency work, particularly
4 not only specific work the USDA has done to benefit water
5 quality. But also in general the progress that farm
6 legislation for the last 15 years has made in reducing soil
7 erosion and increasing conservation tillage and many, many
8 other things that relate to farmer education.

9 And new practices contribute a lot to a positive
10 trend line. And some of the data that we saw snapshots of
11 here in the course of the presentations, you can see some of
12 that trend line and some of the data is older. Even the last
13 three to four years, I know there have been a lot of
14 continued cultural practice improvements with regard to
15 conservation tillage and the like, which is incentivized by
16 the farm bill.

17 So I think that that interagency interaction and
18 continued emphasis also on farm education and cultural
19 practice improvement is really, really critical.

1 Thanks.

2 MR. EHRMANN: Good. Other comments? Yeah, Rob?

3 MR. HEDBERG: One thing I would like to see in the
4 models, too, is -- the art spreads that they have are very
5 good for risk assessment. It would also be good to look at
6 what can we do about risk mitigation and prevention on site.

7 If at all possible, if you could assess what
8 treatments the farmers could implement and what impact those
9 would have.

10 MR. EHRMANN: Yeah.

11 MR. JENNINGS: Well, I definitely agree with that.
12 And one of the things that we will be looking for is how to
13 put those terms in the model, so that in addition to
14 predicting, we know what we can go back and tell the farmers
15 to do or not to do to make sure the chemical or whatever
16 stays where it's supposed to.

17 That's a good point.

18 MR. EHRMANN: Cliff?

19 DR. OHMART: I have a question. I don't know if

1 anyone can answer it. But in California through the Clean
2 Water Act, the TMDL issue was really starting to get the
3 spotlight.

4 And my question to someone out there would be,
5 coordination with the environmental impacts versus drinking
6 water impacts, is anybody looking at that?

7 MS. KEEHNER: Yeah. In addition to the drinking --
8 my management of the drinking water arena, I also have
9 responsibility for managing the ecological risk assessment
10 process. And in fact, there is quite a bit of work underway
11 between us and the Office of Water on the TMDL issue.

12 So not to worry. At least within the agency, there
13 is quite a bit of coordination going on. And in fact, there
14 is a working group that has been developed to actually look
15 at the issue of whether we need a pesticide specific surface
16 water prevention or strategy associated with those ecological
17 impacts in the TMDL program.

18 Total Maximum Daily Loads. It's an Office of Water
19 -- it's under the Clean Water Act. It's about identifying

1 impaired waterways, and then taking action from an ecological
2 standpoint, and then taking necessary actions to eliminate
3 those waterways from being impaired, putting restrictions in
4 place on certain releases and trying to get those back into
5 compliance.

6 MR. EHRMANN: Marcia?

7 MS. MULKEY: One thing that might be --

8 MALE SPEAKER: A small, noncontroversial program.

9 MS. MULKEY: Right.

10 **(Laughter.)**

11 Well, actually one thing that might be worth
12 mentioning is that EPA is working to improve its capacity to
13 engage with the agricultural community across environmental
14 issues. And whatever you may think about our success in
15 interacting with the agricultural community in the pesticide
16 program, the water program has less experience and less
17 history.

18 And so one of the things we're trying to do is to
19 integrate across our programs, especially in the regional

1 offices, to engage with the agricultural community. And
2 that's actually a topic that is worthy of some attention from
3 stakeholders like you folks. The risk of expanding our focus
4 way out of kilter, it would be worth your understanding some
5 of it.

6 There is also some limited ways in which the Clean
7 Air Act is engaging with the agricultural community. But
8 things like -- it tends not to be the heavy pesticide uses,
9 but things like the concentrated animal feedlots and so forth
10 are massive challenges to EPA's environmental protection
11 programs.

12 MR. EHRMANN: Okay. Any other comments on the
13 drinking water issue presentations? Again, review those
14 materials. If you have other questions, there is discussion
15 about having a workshop on this issue to provide more
16 opportunity to dig in and also to hear about some of the
17 information that is going to continue to roll out. So the
18 agency will be working on that going forward, as Mike and
19 Rich indicated.

1 Let's turn then to the presentation -- short
2 presentation on public health pesticide activities from
3 Arnold Layne.

4 MS. MULKEY: Just briefly for those of you who
5 haven't met Arnold, he is our senior management leader for
6 Public Health Pesticides. We have a fancier title than that.

7 **(Laughter.)**

8 MR. LAYNE: A public health official.

9 MS. MULKEY: All right. And he helps us assure
10 that within OPP we are coordinated across our various
11 bureaucratic subdivisions.

12 MR. EHRMANN: Great. Thanks, Arnold. I'm glad
13 you're here.

14 MR. LAYNE: Thank you. Good afternoon.

15 MS. BAKER: This is our eye test?

16 **(Laughter.)**

17 MR. EHRMANN: You can't see that, Cindy? What's
18 the problem.

19 MS. BAKER: Oh, sure. I can see that bottom line,

1 yeah.

2 MS. MULKEY: You have a handout.

3 MS. BAKER: Staff encourages something.

4 **(Laughter.)**

5 MR. LAYNE: Oh, it's working.

6 MALE SPEAKER: Do we have a handout on this?

7 MS. MULKEY: I believe so, right?

8 MR. LAYNE: You have the MOU. I pulled this
9 together rather quickly, and I apologize for the slides. But
10 we'll get you copies of it in the mail.

11 Good afternoon. I'm Arnold Layne. I am Chief of
12 one of two insecticide branches in the Registration Division.
13 As Marcia indicated, I also have the honor of serving as the
14 Office of Pesticide Programs Public Health Official. And I
15 am charged with ensuring the implementation of the public
16 health provisions of FQPA. I serve also as the
17 single point of contact to CDC and USDA on public health
18 issues. And in some small way I assist the Office of
19 Pesticide Programs with public health issues related to

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1 pesticides, such as the West Nile virus crisis that we're
2 facing right now.

3 Immediately after my appointment in 1998, I formed
4 a public health steering committee and also some sub-
5 workgroups in order to ensure that we were going to fully
6 implement the provisions in FQPA.

7 One of the things that we're doing and have been
8 doing for about nine months now is engaging with CDC on a
9 monthly basis. We hold monthly conference and coordination
10 calls with CDC. We have standing agenda items that we talk
11 about. But we also go a step further and we talk about
12 issues of mutual interest to both agencies.

13 Both EPA and CDC developed a standard operating
14 procedure that we use and have been using for quite some time
15 in order to consult on public health pesticides.
16 The red bold text there is just an indication of the things
17 that we have done since the last CARAT session. I'm pleased
18 to report today that in July EPA and CDC completed and signed
19 and agreed to a Memorandum of Understanding. And what that

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1 memorandum of understanding does is provide a very broad and
2 very general framework for our joint efforts and coordination
3 efforts between both of the agencies.

4 I want to make it very clear that the law did not
5 require us to have a MOU. Both agencies, though, felt the
6 critical need to have one in place to sort of memorialize the
7 ongoing activities that we have been doing for the past two
8 years, to memorialize that in writing.

9 EPA and CDC are also engaging on other pesticide
10 issues. We are talking about things like insect repellents,
11 labelling, kid's labelling and efficacy protocols. And most
12 recently, EPA and CDC have been trying to find more creative
13 ways to further enhance our coordination activities. And
14 some of the things that we're discussing right now is sort of
15 brainstorming about our staff exchanges and weekend resident
16 programs, or WRE programs, where folks from EPA go to Atlanta
17 and spend about a week to learn about CDC and vice versa.

18 For the benefit of the -- next slide, please. And
19 if you loved the first one, you'll love this one.

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1 **(Laughter.)**

2 FEMALE SPEAKER: Oh, yeah.

3 MR. LAYNE: For the benefit of those new CARAT
4 members here today, what I would like to quickly do is walk
5 you through what some of the requirements are in the law
6 related to public health pesticides and to tell you what
7 we've done with regards to those provisions.

8 The law requires us to essentially publish or
9 identify a list of significant public health pests of
10 significant importance. We've done that. We published in
11 April 2000 a list of pests of significant public health
12 importance. And the comment period ended in July, after a
13 request for an extension.

14 What we've been doing since the last CARAT session
15 is polling through those numerous comments. We've done that.
16 And at this point in time, in the very near future --
17 hopefully by the end of this month -- we will be going
18 forward to senior management to provide them with
19 recommendations on how we think we should finalize this list.

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1 The law also requires EPA to consult with HHS or
2 CDC before taking a suspension or cancellation or final
3 action against a registrant or a chemical. As I said
4 earlier, we've developed a process for that in coordination
5 with CDC. We have also consulted with CDC on 11 chemicals so
6 far, many of which were organophosphates and carbamates.

7 The law requires that we sort of implement programs
8 to improve and facilitate the safe and necessary use of
9 chemical, biological and other methods to combat and control
10 public health pests of importance. We are achieving that
11 mandate through the Pesticide Environmental Stewardship
12 Program. We are holding coordination meetings with states.
13 We're talking to stakeholders and with our ongoing activities
14 with CDC and USDA. PESP promotes IPM or integrate pest
15 management and the reduction of the use of chemicals. A
16 couple of examples of members who we work with who are
17 members of PESP is the Department of Defense, CDC and the
18 American Mosquito Control Association.

19 One of my steering committee members serves on the

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1 CDC-led West Nile Federal Coordinating Committee, so we're
2 engaged with CDC directly on those issues and with the
3 states.

4 EPA, as well as CDC, has developed mosquito control
5 fact sheets to provide to states and the general public who
6 have interests and concerns about West Nile virus and what
7 the states are doing with regard to mitigating that
8 particular bug. Here recently EPA and CDC have developed a
9 draft joint statement on mosquito control. We felt that it
10 was important that both agencies present a unified front on
11 the West Nile virus and also mosquito control in general.

12 The law provides also for an exemption or reduction
13 of reregistration fees and registration maintenance fees.
14 The public health steering committee will review those
15 requests and make decisions with regard to that. We have not
16 received any requests for reregistration fees. And correct
17 me if I'm wrong, I think the reason we haven't is because
18 there are no longer reregistration fees.

19 **(END OF TAPE THREE, SIDE A)**

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1 MR. LAYNE: -- registration fees. One was granted
2 and one was denied. And I want to give you a sense of what
3 it means when we say one was granted and the implications,
4 because there is an economic twist to all of this.

5 Registration maintenance fees is about \$2,000. The
6 one registrant, which was a small business owner in
7 Baltimore, requested a reduction or a waiver of maintenance
8 fees. We granted his request, because he provided us with a
9 justification as to that his products were public health and
10 they were all mosquito and mosquitocide type products. But
11 it cost the agency \$40,000, which doesn't sound like a whole
12 lot of money. But you can imagine the implications if we are
13 to receive a flood of registrants requesting a waiver of
14 maintenance fees.

15 What we hope to do this November in the normal
16 maintenance fee billing package that we send out to all
17 registrants on an annual basis is to provide criteria and
18 justification and how to sort of apply for this waiver.

19 The law also gives another benefit, and that is if

1 you are a public health pesticide, you have the ability to
2 ask for and potentially receive an expedited review process
3 of your chemical. We have not had any requests to date
4 asking for an expedited review for a public health pesticide.

5 The public health steering committee and I -- we're
6 trying to find ways to, and exploring options to figure out
7 how we're going to deal with such requests. One thing that
8 we've talked about is modifying our priority ranking
9 procedures that are currently in place and/or forming an ad
10 hoc group that will review those requests and make decisions
11 in a timely fashion as to whether a registrant actually gets
12 to the head of the queue.

13 The last requirement in FQPA is really not directed
14 at EPA. It's in fact directed at CDC or HHS. And that is,
15 CDC has to make arrangements for the conduct of studies if in
16 fact a registrant, for whatever reason, decides that he or
17 she cannot afford to conduct data as a result of data gaps.
18 They can then -- and CDC determines that the public health
19 use issue has the potential of going away, the registrant can

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1 suggest that CDC conduct that data for them.

2 What EPA has done to help CDC in this regard, is
3 we've provided them with what we think some of the potential
4 data gaps would be, and also an estimate of the costs
5 associated with conducting those tests. We've also
6 facilitated discussions between CDC and the IR-4 program at
7 Rutgers University. The IR-4 program has an established
8 testing program in place already, and we thought that CDC
9 could benefit from their knowledge and experience.

10 We have not yet been faced with a case warranting a
11 commitment from HHS to conduct the studies. But we do, as I
12 said earlier, have processes in place to get there.

13 And essentially that's my presentation for this
14 morning. I would like to entertain any questions that you
15 may have.

16 MR. EHRMANN: George?

17 **(Laughter.)**

18 MR. EHRMANN: We've been waiting for this, George.

19 MR. WICHTERMAN: I feel like I've been let out of a

1 box.

2 (Laughter.)

3 First of all, I want to thank the group for at
4 least putting us on the agenda after two years. It's been
5 very refreshing and I would encourage more of this dialogue.
6 I've got so many questions, and I know the hour is short.

7 But first of all, I would like to know, is anyone
8 in the room present today from CDC? Okay.

9 MS. MULKEY: As you know, a CDC representative was
10 here yesterday.

11 MR. WICHTERMAN: Yes, Mike McGeehin.

12 MS. MULKEY: Uh-huh.

13 MR. WICHTERMAN: Yeah. Was anything shared at that
14 point in time with him present in regards to public health
15 issues?

16 MS. MULKEY: There may have been some passing
17 mention. There was no specific discussion.

18 MR. EHRMANN: Do you mean off-line? Is that what
19 you're talking about?

1 MR. WICHTERMAN: Either off-line or on-line,
2 whatever. I don't know whether he was at the table or not.
3 I was not here.

4 MS. MULKEY: He was at the table, yes. He was
5 introduced.

6 MR. EHRMANN: Yeah, he was here, but we didn't
7 -- you know, obviously this topic wasn't on the agenda in
8 this forum yesterday.

9 MR. WICHTERMAN: Okay. Well, in the memorandum of
10 understanding in item -- I believe it's 3B where they talk
11 about the issues of consultation and so forth, in the Food
12 Quality Protection Act, as far as it relates to HHS'
13 mandates, there are only two principal functions. One is
14 consultative and the second is data collection.

15 And my question is, they go to great length to talk
16 about the discussion part of this mandate, but why wasn't
17 anything included in the MOU about their responsibility as it
18 relates to data collection?

19 MR. LAYNE: Well, there was discussion regarding

1 data collection. Again, the MOU is very broad and provides a
2 general framework of how both agencies will cooperate and
3 work together.

4 I would like to direct your attention, though, to
5 the background section. And you're right, it doesn't say the
6 words data development program. But I think the paragraph
7 that talks about recognizing the need for tested and
8 effective minor use pesticides which are widely used in
9 public health programs to combat a variety of pests. For
10 example, seeking to preserve the continued availability of
11 these beneficial products that could be canceled otherwise
12 due to a lack of support by their registrant gets at the
13 spirit of the data development program.

14 MR. WICHTERMAN: One last comment. I think it
15 would behoove the group to include CDC in on a workshop on
16 how they plan to integrate the risk assessment and transition
17 process as being developed here. How they would be
18 integrated in this particular aspect. I don't know if it
19 would be worthy of a workgroup, but at least a workshop, and

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1 have them at the table as well, simultaneously with me being
2 present and other folks.

3 MR. EHRMANN: Thanks, George. A good suggestion.
4 Bob -- Robert?

5 ROBERT: Thanks. Yeah, I also wanted to echo the
6 comments of George. I think it's very important that as part
7 of this process that CDC be represented at the table and be
8 here for these discussions, since that's one of their charges
9 in this, participating in public stakeholder meetings.

10 Second, you had cited a couple -- the fact that you
11 had only two waiver requests and no requests filed for
12 expedited review. Some of that may be tied in directly to
13 the lack of a definition and the lack of the list, if you
14 will, of what is a public health pesticide at this point in
15 time. And once I think that becomes more defined, you may
16 then start to see a little bit more action in that area.

17 MR. LAYNE: And I agree with you on that point.

18 ROBERT: Yeah. And did you give a timing as to
19 when we might see the completed pesticide list -- public

1 health pesticide list?

2 MR. LAYNE: Well, no, I didn't. But we're hoping
3 to brief senior management probably -- hopefully at the end
4 of this month and go forward with the finalized list.

5 ROBERT: For the benefit of the group, is it
6 possible to characterize a little bit of some of the
7 discussions or the comments in the generation of this list as
8 to how inclusive or exclusive it will be?

9 MR. LAYNE: Let me talk from the past, and that is
10 we went out with a list that was somewhat abbreviated. We
11 tried to sort of define the list and develop a list based on
12 what we thought were good interpretations of what the law
13 required us to do. So the list was very short.

14 With respect to the multitude of comments that we
15 received, there were some common themes. One was obviously
16 the list was too short. I think in some respects we may have
17 lost some credibility with the public health stakeholders out
18 there. There are a plethora of public health pests.

19 But what we were trying to do, again, was define a

1 significant public health pest, and the law did not provide
2 us any sort of legislative history to help us deal with
3 defining what it is to be a public health pesticide.

4 The other common theme that we've heard through the
5 commenters is that the list really should be
6 de-linked from mostly all the other provisions in FQPA. And
7 what that said -- and I'm going to be a little trepidacious
8 here, because I've not talked with management about this.

9 But one of the recommendations or one of the
10 options is to actually do that. Actually de-link the list
11 from the FQPA requirements and go out with a list that sort
12 of is recognized by the public health community as public
13 health pests. And that's where we're headed, and I would
14 like to sort of stop right there, because I have not shared
15 this with management.

16 **(Laughter.)**

17 MR. AIDALA: You have now.

18 MR. EHRMANN: You have now.

19 **(Laughter.)**

1 MR. EHRMANN: Thanks. Keith?

2 MR. PITTS: I've just -- in my brief tenure at
3 USDA, I think one of the more interesting things we came
4 across was this list. And I can tell you that it got
5 expansive to the point where we had APHIS having bison and
6 golden eagles on the list. And Al had some pretty good
7 discussions with them about the scope of what a public health
8 pest was.

9 So there was a pretty extensive effort to have a
10 very expansive list and work down from there.

11 MR. EHRMANN: Were the golden eagles a carrier or
12 something? What was the --

13 MALE SPEAKER: They shoot down airplanes.

14 MALE SPEAKER: Oh.

15 MALE SPEAKER: And going from the bison, right.

16 MR. PITTS: I didn't even ask about the bison.

17 **(Laughter.)**

18 MR. EHRMANN: Carolyn?

19 MS. BRICKEY: Yeah. Arnold, I believe one of the

1 issues is funding for CDC, is it not? They've never received
2 any funding to do any pesticide work at all, right?

3 MR. LAYNE: That's my understanding of it. This
4 has been an unfunded mandate for CDC. And I must give
5 credit, though, to CDC, because in the face of not having
6 funding, they have worked with us tremendously in trying to
7 find creative ways to consult with us. The only issue at
8 hand for them is obviously a testing program. That's quite
9 expensive to develop, and they don't have the funds to do it.

10 MR. WICHTERMAN: I'm sorry. You said a testing
11 program?

12 MR. LAYNE: Yes. A data development program,
13 essentially.

14 MR. WICHTERMAN: Okay. Also -- I'm sorry. During
15 your discussion you mentioned some other issues that you were
16 working on, and you had mentioned, I guess briefly, kid
17 labelling and efficacy protocols?

18 MR. LAYNE: Uh-huh.

19 MR. WICHTERMAN: Can you talk a little bit more

1 about that and also what some of those other issues were? I
2 didn't get them all.

3 MR. LAYNE: Well, I just raised those just to give
4 you an idea that -- I think in fairness to CDC and with EPA.
5 We decided to go beyond the scope of the law with respect to
6 public health pesticides. We used the monthly conference
7 call to engage in those issues relative to sort of
8 implementing the provisions of FQPA. But we also
9 see that there is a great need and a great reason for
10 engaging with them on other issues that are of mutual
11 interest to both agencies, one of which is sort of labelling
12 issues. Labelling on insecticide or public health type
13 products to sort of get CDC's feel on some of those issues.
14 So we're engaging them as much as possible. But again, it
15 goes beyond sort of the scope of the law.

16 MR. AIDALA: Explain that a little bit further.
17 These provisions were put into roughly parallel minor use
18 provisions. Minor use have a priority. You know, Congress
19 decides there is some kind of societal justification for

1 giving them some kind of priority or other affirmative waiver
2 opportunities.

3 Also things like the IR-4 program, that there is at
4 least authorized by FQPA but not appropriated -- and that's
5 the money issue Carolyn raises about. IR-4 like funding of
6 actual studies to support registration, which has not been
7 forthcoming.

8 And separate from that, what Arnold has been
9 talking about beyond that, is obviously even before the West
10 Nile virus, you know, there were a lot of issues that we just
11 have a natural need to talk with and interact with CDC on
12 things like what you just talked about. What we just talked
13 about, labelling and other kinds of things. So it's not just
14 sort of the narrow confines of what provision of FQPA says
15 per se, but also the larger issue of just, you know,
16 interagency coordination.

17 MR. LAYNE: Yeah. And CDC participates, or has
18 participated, on our science advisory panels. So that's the
19 sort of message I was trying to get across.

1 MR. WICHTERMAN: And you characterized it as being
2 very helpful in opening the door to communication?

3 MR. LAYNE: I do. There is a huge benefit to
4 having the law, because I'm not sure that we would typically
5 think of CDC in the realm of pesticides. And so it has
6 sparked this sort of interest in what both agencies are
7 doing. So there are a couple of things coming out of this
8 requirement in the law that is beneficial.

9 MR. WICHTERMAN: Okay. I just wish the CDC
10 official could have been here to share some of that as well.

11 MR. EHRMANN: Dan?

12 MR. BOTTS: And this question is probably more
13 appropriately directed to him. But in reference to Carolyn's
14 question relative to funding, has there been any indication
15 that there has been a request for funding by HHS in any of
16 their budget proposals to cover their responsibilities under
17 the law?

18 MR. EHRMANN: Anybody know? Arnold, do you?

19 MR. LAYNE: I'm not aware.

1 MR. AIDALA: As I understand it, there was not for
2 the initial years of FQPA. I'm less certain that in the last
3 cycle or two there has not been. Marcia may know that.

4 MR. WICHTERMAN: I can respond to that.

5 MS. BRICKEY: I think there have been efforts in
6 that regard.

7 MR. EHRMANN: You think there have been?

8 MALE SPEAKER: Yes.

9 MR. EHRMANN: George?

10 MR. WICHTERMAN: I can respond to that. Back in
11 May, Mike McGeehin with CDC, representing the National Center
12 for Environmental Health, spoke to us and made a comment that
13 both the National Center for Infectious Diseases, as well as
14 the National Center for Environmental Health, were going to
15 put in a joint funding request. But unfortunately that's a
16 two year funding cycle, and they indicated at that time that
17 in the fiscal year 2002 that monies would be available. But
18 he was not at liberty to share with us what amount, if any,
19 was in there, because the President had not reviewed the

1 budget.

2 So the latest that we're aware of since May of this
3 year.

4 MR. EHRMANN: Okay, thank you. Any other questions
5 or comments for Arnold at this point?

6 MR. WICHTERMAN: I've got one more.

7 MR. EHRMANN: Okay.

8 MR. WICHTERMAN: I was pleasantly surprised in
9 Arnold's presentation that EPA is considering putting someone
10 on detail -- I believe that's the appropriate term -- down to
11 CDC. And it's my opinion that if EPA does something like
12 this, that this will be the way to jump start the process and
13 really get things moving after four years.

14 MR. EHRMANN: Okay. Any other thoughts? Thank you
15 very much, Arnold. I appreciate it.

16 MR. LAYNE: Thank you.

17 MR. EHRMANN: I have three people who have signed
18 up for public comment. What I would like to do is ask them
19 to make those comments, and then turn it over to Mike for

1 closing comments on behalf of both co-chairs.

2 The three people that I have on the list are Rich
3 Banono, Ed Gray and Jeff Wilson. Is Rich here? Okay. Sir,
4 if you could just keep your comments to two minutes.

5 MR. BANONO: Okay.

6 MR. EHRMANN: Please proceed and tell us a bit
7 about yourself. And also if you do have any written
8 comments, you're welcome to submit those.

9 MR. BANONO: I've already submitted my written
10 comments.

11 MR. EHRMANN: Great.

12 MR. BANONO: My name is Rich Banonow. I'm from
13 Massachusetts. Part of me works for U Mass Extension. I
14 write the vegetable, small fruit and wheat control
15 recommendations for the six New England states. The other
16 half of me is a vegetable and greenhouse grower. I raise
17 about 50 acres of fresh market vegetables about 30 miles
18 north of Boston. So I approach it a little bit from a grower
19 and a little bit from an extension person.

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1 I'm also a public member of the Massachusetts
2 Pesticide Control Board. I've been doing that for ten years.
3 So I represent the public from that standpoint.

4 So just some thoughts from sitting here for a day
5 and a half. I never went to the TRAC meetings, but I'm
6 sitting here for a day and a half. I should be home
7 harvesting leeks, but just some thoughts.

8 I think this current CARAT forum really doesn't
9 provide a good opportunity for advice on a specific basis,
10 and the workgroups and workshops, I think, would help this.
11 The best opportunities for providing advice really came from
12 the presenters yesterday. A key message which needs to be
13 reinforced is that pest management is all about controlling
14 pests, weeds, insects and diseases, and spraying is part of
15 that.

16 There are always a few success stories to get
17 extrapolated. One of my pet peeves is that people say, well,
18 if it works well on this pest and this crop in this area,
19 that, well, it must work on -- there must be similar success

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1 stories for all pests and all crops in all areas. And this
2 isn't necessarily true.

3 I think research on new chemistry is essential.
4 How these products and fit into the production practices.
5 There is a huge lack of knowledge with some of the new
6 biopesticides coming on the market. They come on the market
7 so fast that the researchers and the extension people really
8 don't have time to look at it and see how they fit in.

9 And a lot of times people ask, well, why aren't
10 growers using something. And a lot of these new products
11 aren't even the recommendations that the universities send
12 out, and everybody is really hesitant to see what they do,
13 because there just isn't enough knowledge on them. With the
14 old products -- the conventional products -- you have 17
15 years of data sometimes before you had a vegetable
16 registration or a fruit registration, especially with
17 herbicides.

18 I think there is always going to be an adjustment
19 period with new products and new pest management techniques.

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1 But just keep in mind that I don't think growers have an
2 aversion to saying, oh, well, if this is a BID pesticide or
3 this isn't a conventional pesticide, I don't want to use it.

4 I mean, there are considerations. Is it easy to
5 fit into your pest management strategy. Can you afford it.
6 Does it work. And if it doesn't, it won't get used. If it
7 does, it will get used and it really doesn't make any
8 difference what the chemistry is all about to a grower.

9 Effective grower education has been and will
10 continue to be an integral part of improving pest management
11 techniques and practices, and I think extension is always
12 going to be a key to that.

13 Just a couple of other comments. And I'm really
14 not trying to offend anybody here. The reason that EPA
15 doesn't perceive that the sky is falling as all of these
16 changes are made is simply because there is always enough
17 offshore production to make up for whatever domestic
18 production is lost. And if 20 percent of the apple growers
19 in New England go out of business, or 10 percent of the

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1 cherry growers in Michigan go out of business, nobody really
2 notices it.

3 I mean, pick up a jar of apple juice and see where
4 the concentrate is from. And I defy people to find USA on
5 there a lot of times, and Germany, Hungary, China and those
6 are the countries that show up. Argentina. But no one
7 really notices and the public certainly doesn't notice that.
8 And I guess it really concerns me that there is not a greater
9 desire on the part of the government to keep production
10 domestic. A lot of people don't seem to care about that.

11 Reducing risk is important, although if pounds go
12 up, agriculture still gets criticized. Whether it's all the
13 sulfur being used by Galleon Grapes in California and an
14 environmental working group being bent out of shape about
15 that, or whether the GAO report that they're doing for Leahy
16 on 75 percent IPM adoption, and they want to know why the
17 pounds go up and whether it's round up from rounded up
18 already soybeans. Even though it's lower risk the pounds go
19 up, and so it's really difficult to talk to the public about

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1 risk or toxicity levels. It always comes down to pounds, it
2 seems.

3 I guess risk -- you know, risk is always going to
4 be equal to toxicity times exposure and exposure being use.
5 And if a lower toxicity compound is used at a higher rate per
6 acre, or more times per season, then risk may not go down at
7 all. Risk may go up. So we need to keep that in mind.

8 And finally, I guess this has been sort of this
9 little theme. People joke about it all during these
10 conversations. But politically if OPs need to be eliminated,
11 the risk cup is always going to be too full. And no matter
12 how much science you have, the assumptions and the
13 interpretations of the science will always get you the
14 politics that you want.

15 And if that wasn't true, it really wouldn't make
16 any difference who is going to get elected four years from
17 now, and it really wouldn't make any difference who is going
18 to be in the front office three months from now. Politics is
19 just part of the process, and we all just need to understand

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1 that that's always going to be there.

2 Thanks.

3 MR. EHRMANN: Thank you. Ed?

4 MR. GRAY: When I left EPA ten or 11 years ago, I
5 received a plaque from some of my coworkers in the Office of
6 General Counsel, which reflected a sentence that I had often
7 said in one way or another to them, which was: when all else
8 fails, read the statute.

9 **(Laughter.)**

10 MR. EHRMANN: But you didn't leave the plaque, so
11 we haven't seen that since then.

12 **(Laughter.)**

13 MR. GRAY: I may need to send it back.

14 **(Laughter.)**

15 And I just want to say that most of the
16 conversations that I heard today were based on the
17 assumption, sometimes explicitly stated, that, okay, the
18 aggregate exposures may be okay for most of these compounds,
19 but when you get to cumulative all hell is going to break

1 lose. And the unstated assumption there, I think, is that
2 you have to follow the same rules for cumulative assessment
3 that you do for aggregate and that it's rigid.

4 This is the statute. And it has a definition of
5 safe in it. And it's defined in terms of aggregate residue -
6 - or aggregate exposure to the residue. Now it also says
7 elsewhere that you should consider cumulative when you are
8 making a safety decision, but it doesn't say that you are
9 bound to assess cumulative exposure in the same way that you
10 are required to assess aggregate exposure.

11 And I would simply suggest that there is a politics
12 issue here, and it is to what extent are you going to do what
13 you may and treat it as if it's what you must. And I think a
14 lot of the problems here could be solved, or at least
15 mitigated, if we give a little more attention to the options
16 versus the mandates.

17 Thank you.

18 MR. EHRMANN: Thank you. Jay, is your card up for
19 after the public comment? Okay. Jeff Wilson?

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1 MR. WILSON: Hi. Jeff Wilson, a grower from
2 Ontario, Canada, representing the Canadian Horticultural
3 Council. We're here primarily because with NAFTA now, any
4 regulatory decision in any one of the three countries will
5 have some effect in the other countries. And we encourage
6 all of us to work a little closer together.

7 After the conclusion of a few comments I made
8 yesterday, to put a little more meat on it -- because we were
9 rushed for time -- here goes.

10 Regarding channels of trade, when a product is
11 dropped, de-listed or suspended the tolerance drops after a
12 period of time. How do we deal with the potential, based on
13 level of detection, for a positive hit on a produce no longer
14 in fact used. But if we assume a level of detection in parts
15 per billion, we could show a hit based on historical use
16 patterns.

17 In fact, there is some sense that on some products
18 we could show a hit for a period of two or three or question
19 mark years beyond the period when the product ceased to be

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1 used. And there will be implications for trade on that.

2 Regarding the status of the OPs, well, we
3 understand why the majority of the decision documents
4 resulted in the final two weeks of the fiscal period. It
5 places a huge burden on farm groups to properly analyze these
6 decisions. These documents were put together with good
7 intent by a larger number of people than those that will
8 review it at the end of the day. Some accommodation of user
9 needs would, in my estimation, be extremely beneficial for
10 the mutual buy in necessary to facilitate the very transition
11 outlined in some of the decisions mentioned there.

12 The whole issue of IPM transition -- and there was
13 certainly a fair bit of discussion this morning. I feel
14 there needs to be recognition that some of the roots of IPM
15 are based on reductionism. At the outset, the results tend
16 to be mutually beneficial. Regulators, advocacy groups and
17 others see reduction in pesticide use which justifies the
18 efforts. Farmers tend to see some dollar resources -- a
19 reduction of those -- based on a more analytical approach to

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1 pest management.

2 This was verified personally on my own farm. Any
3 time we've entered a new IPM program on a specific crop, we
4 typically have seen a 10 to 20 percent reduction in some
5 pesticides.

6 However, many non-farmer driven initiatives -- and
7 not to pick on the World Wildlife Fund potato one. But there
8 is an attempt to validate it in Canada with some limited
9 success right now. Part of it demands a continual reduction
10 in the use of products that may or may not be of concern.

11 The challenge, in our estimation, occurs in years
12 three to five. The farmers start to either see no or limited
13 potential for dollar reduction, so interest either plateaus
14 or wanes. Also potential problems also start to show up
15 there, and that's fairly predictable. I think there is
16 enough historical fact to back that up now. This may be
17 long after the fact when the partners have gone on to other
18 initiatives. How do we share the economic risk at this
19 point, recognizing that society to that point had been

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1 intimately involved.

2 Also, do we in fact have consumers on side/in sync.
3 Have we linked the issue on the one side of our minds
4 concerning pesticide use, genetically modified organisms and
5 others, but on the other side of our minds the bias we all
6 have for visually perfect produce.

7 Two years ago we went too far in reductionism on
8 our own farm in sweet corn. We missed a spray and occurred a
9 loss of over \$10,000. And where were the societal and
10 environmental partners who previously had lauded me for my
11 efforts when in fact we took that hit.

12 Finally, there is, in my estimation, a danger in
13 trying to link pesticide environmental improvement with
14 market potential. Every area has advantages and
15 disadvantages regarding pest management. Does this pit
16 farmers in one area against another. Is it a treadmill with
17 little or no benefit at the end of the day.

18 I would argue that there needs to be much more.
19 The process is so surface oriented. There needs to be much

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1 more in depth analysis of all this.

2 I'll get this typed up and get it in to Margie for
3 the record. It's sort of chicken scratches at this point.
4 Sorry to bore you. But this is something that is very
5 important to the farm community and those that are on the
6 line out there, especially the economic risk.

7 Thank you.

8 MR. EHRMANN: Thank you very much. Any other
9 public commenters? Okay. Jay, did you have a comment?

10 MR. VROOM: Yeah, thanks. Just two quick things.
11 At the June CARAT meeting I had made a suggestion that we
12 take a look at a matrix analysis of some FQPA decisions, just
13 to look at sort of side by side the non-biased sort of
14 straightforward view of the level of consistency across
15 related compounds, and also opposite the science policies
16 which were still in development.

17 This -- I'm passing around two sheets, a three page
18 draft matrix that we commissioned an independent consulting
19 toxicologist to put together. It doesn't represent ACPA's

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1 view of this. It's just a cut at that idea. And I would
2 suggest and offer that to whomever serves on the cumulative
3 workgroup that this might be, with some additional work and
4 perfection, a tool that could be used in that process.

5 And we'll continue to work on that, whether it goes
6 to that workgroup or not. But, again, the caveat on this is
7 that it is a draft. It doesn't represent anything more than
8 one individual's independent view of some of those issues.
9 There are many more.

10 The other thing I wanted to mention is that you
11 will recall about three years ago that we at ACPA were very
12 concerned about FQPA, and we had some messages designed
13 around this red fly swatter. We still have a few of things
14 around, and we still are concerned.

15 But we think this meeting has gone well, and thank
16 both EPA and USDA for the work that went into this and the
17 outcomes that we feel are apparent. And we have transitioned
18 this fall into a new message, which is we're all FQPA
19 stakeholders.

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1 And if you didn't get one of these, Ray McAllister
2 and I have a few left, if you're going camping this weekend
3 and are afraid of wind or whatever. Thank you.

4 MR. EHRMANN: Thanks, Jay. Ed?

5 MR. SNETSINGER: As a tribal member and a trail
6 member representative of the Tribal Pesticide Program, I
7 would like to thank you for inviting me here to receive some
8 tribal input.

9 Two issues that came up in our meeting of the
10 Tribal Pesticide Program last month were -- one was
11 subsistence and the other one was Section 18's. As it stands
12 right now, Section 18's -- tribes cannot administer or issue
13 out Section 18's.

14 And one thing I anticipate is that tribes -- as the
15 cancellation of the use of some of these chemicals goes on, I
16 think the demand for Section 18's within Indian country is
17 more and more. So if this is the avenue for us to administer
18 Section 18's with an Indian country, I think that would be
19 great.

1 Another issue, of course, was subsistence, and I'm
2 not sure how it relates to this group, but it is very
3 important in Indian country. Just to give you an example, in
4 the Shore Water Bay Indian community in Washington the
5 females there experience a 50 percent miscarriages. And
6 there may be some other factors, but some of it links to the
7 oysters being treated possibly with pesticides. That might
8 be a possibility of some of the miscarriages. So that's
9 another one of our concerns.

10 Thanks.

11 MR. EHRMANN: Thank you. Any other comments before
12 I turn it over to Mike for closing comments? Mike?

13 MR. MCCABE: Well, once again I would like to thank
14 all of you for being part of this process, particularly those
15 of you who came a long distance to be here. Nowadays whether
16 you're coming a long distance or a short distance, it seems
17 that if you're flying, it really doesn't matter. You get
18 there about the same time, and that's generally late.

19 I know this because I travel about once a week, and

1 I think that I've been on time about twice this year. But I
2 do appreciate not only the effort you put into coming here,
3 but the work that you put into this issue.

4 I think that based on what you saw primarily in
5 reports yesterday, you can see that we have made great
6 progress in implementing FQPA and that we are working very
7 hard to speed up our processes on registration and on
8 emergency exemptions. We've got a number of science policy
9 papers in place or will be in place shortly.

10 We have opened up our process to a point where I
11 think it surprises us sometimes just how open it is and how
12 much involvement we have from members of the public and
13 stakeholders.

14 This is something we are committed to. We want to
15 continue our progress in this area. We want your advice. We
16 want discussion of the issues. And I think that as we
17 develop our next CARAT meeting, as we develop the workgroups
18 and possible workshops, we will be able to do an even better
19 job of getting your input. Getting the kind of information

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1 that we need to do our job better.

2 Again, thank you. I look forward to seeing you the
3 next time, although it may be with resume in hand.

4 **(Laughter.)**

5 I don't think so, but --

6 **(Laughter.)**

7 But there is always that possibility, as my wife
8 reminds me as we go through our budget each month. But I
9 look forward to seeing you then. Thanks.

10 MR. EHRMANN: We will be, as I've mentioned,
11 summarizing the revisions to the transition piece and getting
12 that out to all of you. We'll also be -- the Agency and the
13 Department will be working on specific ideas, as Mike
14 indicated, relative to follow up activities, workgroups and
15 workshops, and get that information out to you as soon as it
16 is available.

17 And if you have any comments on any of the
18 materials you received after you have a chance to look at
19 them more closely, again, get those to Margie. She'll make

1 sure that feedback gets to the appropriate folks at either
2 the Department or the Agency.

3 Thanks again, and travel safe.

4 **(END OF MEETING)**

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13 CERTIFICATE OF TELEPHONE CALL

14

15 I, J. K. Tennyson, do hereby certify that the
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