The impacts of the Trump administration on the minor crop community’s access to crop protection tools continue to emerge, and will for some time to come. Here’s what you need to know now from the Minor Crop Farmer Alliance’s Technical Committee as work continues to implement our 2017 work plan.

1) **MCFA briefs EPA’s Keigwin on specialty crop priorities:** MCFA representatives had a very informative and collegial meeting on Sept. 20 with EPA Office of Pesticide Policy Director Rick Keigwin and his senior staff to advocate for specialty crop community needs. Topics raised included filling key staff vacancies, addressing questionable water models for assessing environmental and human health risks, and addressing serious flaws in the Endangered Species Act-required risk assessments. Meeting minutes are attached.

2) **USDA Office of Pest Management Policy should be permanently funded via the farm bill:** Evidence indicates that OPMP is valued by the Trump administration, and OPMP Director Sheryl Kunickis and her team have been a consistent voice for science and reason in federal pesticide policies and programs. As part of the 2017 farm bill platform and in response to questions that have been asked by members of the Specialty Crop Farm Bill Alliance, MCFA has suggested that the farm bill include permanent funding for OPMP, and that it remain within the Agriculture Secretary’s office.

3) **Presidential order calls for agencies to rely on the best available science when reviewing or approving crop protection tools:** USDA Senior Advisor to the Secretary Rebeckah Adcock provided an overview of this initiative and encouraged MCFA members to attend Secretary Sonny Perdue’s upcoming farm bill “bus tour” stops.

   Both OPMP’s Kunickis and Adcock participated in the MCFA Technical Committee’s Aug. 10 meeting in Washington, D.C.

4) **Grower Priority Database funding runs out:** MCFA continues to seek a long-term funding source for this vital international trade resource; funds were exhausted July 31. Meanwhile, Bryant Christie has committed to keeping the database up and running in the short term.

5) **MCFA plans to meet with EU Commission, European Food Safety Authority:** MCFA will organize meetings with EU and other officials in conjunction with
European Crop Protection Association/Food and Drink Europe’s MRL Workshop Oct. 16-17. MCFA Technical Committee Chairman Dan Botts will be joined by Mike Aerts of Florida Fruit and Vegetable Association, Gabriele Ludwig of Almond Board of California, and Matt Lantz of Bryant Christie, Inc. In addition to the commission and EFSA, they will meet with the U.S. mission to the European Union, several industry organizations and Bayer Crop Science. Issues to be discussed include the impacts on MRLs of the EU’s review of authorized substances, the role of risk in the ongoing regulatory process, and non-target impacts assessments.

6) **Global Minor Use Summit Oct. 1-4:** The IR-4 Program’s third global summit in Montreal will feature essential clearinghouse and discussion opportunities to help fill the specialty crop grower's toolbox. More information [here](#). Recommendations coming out of the meeting will be posted to the global minor use portal managed by IR-4. This will include presentations and notes from the breakout sessions that led to those recommendations.

7) **You can now access Lois Rossi’s expertise:** MCFA members that contribute $5,000 or more per year can now tap Rossi Consulting Group for consultation on commodity-specific regulatory concerns. This program will cover the first hour of consultation. MCFA Technical Committee Chair Dan Botts secured funding from a foundation to underwrite Rossi’s support.

**WE ARE COUNTING ON YOU**

MCFA is an industry alliance – that means we rely on you, our members to actively support our work. Here’s how:

- **Renew your membership** today, if you haven’t already.
- **Respond to MCFA’s calls** for action – sign on to letters, inform our regulatory comments by advising us about your commodity’s specifics. Then let your members and colleagues know about MCFA’s work.
- **Volunteer!** Share your expertise and ensure that your crop is represented by actively participating in MCFA.

To learn more, visit us [online](#).
Meeting Notes

MCFA Meeting with Rick Keigwin, EPA Office of Pesticide Programs

September 20, 2017
10:00 – 11:00 AM

Participants:

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<thead>
<tr>
<th>MCFA</th>
<th>Office of Pesticide Programs</th>
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<tr>
<td>Dan Botts</td>
<td>Rick Keigwin, Director, Office of Pesticide Programs (OPP)</td>
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<td>James Cranney</td>
<td>Dana Vogel, Director, Health Effects Division (HED)</td>
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<td>Mark Powers</td>
<td>Yu-Ting Guilaran, Director, Pesticide Reevaluation Division</td>
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<td>Ed Ruckert</td>
<td>(PRD)</td>
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<td>Mark Seetin</td>
<td>Charles “Billy” Smith, Deputy Director, PRD</td>
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<tr>
<td>Terry Humfeld</td>
<td>Wynne Miller, Director, Biological and Economic Assessment Division (BEAD)</td>
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<td>Gabriele Ludwig</td>
<td>Anita Pease, Acting Deputy Director, BEAD</td>
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<td>Joe Bischoff</td>
<td>Marietta Echeverria, Director, Ecological Fate and Effects Division (EFED)</td>
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<td>Dan Kenny, Acting Deputy Director, Registration Division (RD)</td>
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<td>Rosanna Louie-Juzwiak, Acting Chief of the Minor Use and Emergency Response Branch, RD</td>
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Agenda

- MCFA Update – August 10, 2017, Technical Committee Meeting

After introductions, on behalf of MCFA, Dan Botts thanked Rick and his staff for arranging their schedules to meet with us. Dan provided an overview of the purpose of the meeting. The role of MCFA and its historical relationship with OPP was briefly reviewed. It has been an open and positive interaction. In that same vein, MCFA wanted to advise Rick of some of the issues and concerns that MCFA intended to pursue. We thought it important to discuss our concerns directly with the career staff prior to any future meeting with the new Assistant Administrator. MCFA’s Action Plan previously had been provided to Rick. The issues for discussion at this meeting were derived from the discussions and follow-up to the August 10, 2017 MCFA Technical Committee meeting.
Specific Discussion Topics

- Minor Use Officer/Team – Registration Division
- FQPA Minor Use Support – Minor Use Ombudsman
- Resources for the Registration Division

The first three topics were grouped together for discussion purposes. Dan described the concerns regarding the minor use program particularly since Barbara Madden had retired. It appeared that in the prior Administration, the importance of the minor use program had been de-emphasized and we wanted to reverse that trend. Rick acknowledged the importance of the Minor Use Officer and the team supporting the minor use activities not only in the Registration Division but across the other divisions as well. He indicated his strong support for reestablishing the Minor Use position and finding the appropriate person to move into that role. He announced that Rosanna Louie-Juzwiak has been detailed to serve as acting chief of the Minor Use and Emergency Response Branch. It was acknowledged that the team has been reduced over time from five people to its current level of 2.5 people. The level of work the branch had historically been responsible for requires the team to be at full strength. There are Agency wide staffing requirements that OPP has to work within. However, Rick is working on getting past those issues and finalizing the team as soon as possible.

Rick also acknowledged the importance of the FQPA dictated minor use ombudsman position at the OPP Director’s office level and indicated a willingness to consider bringing that position back.

Any time there is a change in administrations, an education process occurs with new appointees regarding the operations and activities of the Agency, including OPP. That process is well underway regarding the Registration and Pesticide Reevaluation Divisions. Rick noted that current staffing for OPP is approximately half of the level in place when PRIA was first enacted. Such process initially may impact the finalization of Agency actions. However, the education process is at a point where actions are moving forward with increasing speed.

Dan indicated that while MCFA has not been directly involved in the negotiations associated with the current PRIA legislation, it has been supporting the overall effort to have the PRIA finalized and the necessary funding made available to OPP. He noted that MCFA members want OPP to be successful so the public has confidence in the program and thereby can have confidence that pesticides can be used safely.

- Crop Groupings
- Pilot Project – Import Tolerances

These two topics were also combined during the discussions. Dana Vogel provided an update on the status of the crop grouping efforts and indicated that an aggressive timeline for completion of various pending regulatory actions was in place. Some of these actions are expected to be finalized before the end of the year. The one crop group that has some issues left to be resolved
is the cereals group. The need to complete action on updating the crop grouping regulations as soon as possible in order to interface with the Codex Crop Grouping effort currently underway was acknowledged.

Regarding the pilot program for establishing import tolerances using reviews and data from other competent authorities such as Codex or the European Union, we were advised the Pilot was implemented. Five product/use projects are involved in the Pilot, and one tolerance for hops is in the final stages of preparation for publication. The Agency currently believes that the approach reflected in the Pilot has merit for establishing future import tolerances.

- Water Modeling/Risk Assessments

The long standing issue of the impact of water modeling on both new product registrations and product reevaluation decisions was discussed. Rick and his staff clearly recognized the concerns, and described a newly implemented policy change (two weeks old) for product registration decisions that considers the risk contribution of the new uses compared to existing uses. Rick advised the change was staff generated. In short, the extent of current uses will be considered when the Agency decides whether there is a need to conduct a new water modeling risk assessment when addressing a new use for a registered product. Based on, among other things, the extent of current uses, new water modeling for a new proposed use of a registered pesticide might be deferred to the registration reevaluation process. In such circumstance the proposed new use/tolerance would continue to be processed.

OPP is planning to convene a Science Advisory Panel (SAP) meeting in June of 2018 on how to qualify and use water monitoring data in the risk assessment process. We requested a briefing at the next MCFA Technical Committee meeting on this new policy and the criteria that drives decisions as it is implemented. Rick and Marietta Echeverria agreed to have the program staff provide that briefing.

- ESA Implementation

Because of time constraints, the Endangered Species Act (ESA) implementation discussion was brief. Dan Botts requested OPP’s participation in the planning process for a potential ESA MCFA workshop to look at, among other things, non-regulatory efforts to provide mitigation for perceived pesticide risks. The format and structure would be similar to the MCFA sponsored Workshop held in Denver in 2011. Rick agreed that OPP would available to participate in the planning process. It is projected that such a workshop could be held in the spring or summer of 2018.