

ESA-FIFRA Strategies and Actions: USDA Perspective

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Vulnerable Species Pilot Project – USDA Comments/Concerns

- Severe impacts on farmers and farmland in avoidance areas
 - Pesticide use will be disallowed on >5.7 million acres of cropland, forests, grassland, pasture (including >780,000 acres of cropland).
 - Estimated loss in net revenue for corn, soybeans, and wheat alone is \$278 million/year.
- Impractical runoff/erosion mitigations in minimization areas
 - Requiring 4 practices regardless of efficacy differences and cropping systems.
- Accelerated process inconsistent with past approaches under FIFRA
 - Lack of risk assessment
 - Commitment to expansion

Vulnerable Species Pilot Project – USDA Recommendations

- Additional steps requested prior to finalization and implementation:
 1. *Assessing risk* of pesticide exposure to the species
 2. *Calculating impact* of the proposed mitigations
 3. *Minimizing impact* by identifying mitigations that result in the least amount of impact to growers
 4. *Communicating* with stakeholders through onsite technical briefings and conversations
 5. *Facilitating compliance* by offering guidance and coordinating technical and financial assistance

Herbicide Strategy – Initial Reactions

- Positives: Risk-based, no avoidance areas
- Very complex
- PULA refinement is a hot topic (we are supportive)
- Likely to have substantial impacts on growers, applicators, SLAs, and others
- Implementation will be challenging and will require substantial resources – educational, technical, financial
- Required runoff/erosion mitigation points will not be achievable in many cases – site-specific plans and Conservation Program participation will be key

Conservation Program Exemption

- Applies to Vulnerable Species Pilot and Herbicide Strategy.
- Allows growers to follow a **site-specific runoff and/or erosion plan** implemented according to the recommendations of a recognized conservation program OR designed in conjunction with a qualified professional instead of following the mitigation menu/points system.
- USDA strongly supports this approach and is working to understand who is already enrolled in conservation programs and what is needed to increase their reach.
 - May need financial support to develop new or bolster existing programs, ensure sufficient capacity for technical support, expand education/outreach to growers.
 - Program administrators need to know if they meet EPA's standards.
 - Certification/documentation of recommendations and actions is important.

OPMP Survey Results Preview

- 287 respondents representing 4,700 outdoor ag operations
- ~80% of respondents participated in runoff/erosion reduction programs on one or more operations (~35% of total operations)
- Government programs were the most common (64% of respondents)
 - State programs cited: CA, IL, MD, MI, MN, MO, NC, NY, PA, TN, VA, VT, WI
- Specialty crop respondents participated in runoff/erosion programs ~10% less frequently than non-specialty crop respondents and reported using Federal and State programs about half as frequently.
- Reported barriers to program participation: operations did not experience problematic runoff/erosion (34%), no programs available (39%), too expensive (27%), on a waiting list (25%)
- Open comment themes: distrust of programs (esp. government), difficulty of paperwork and meeting program requirements (too much red tape), too expensive, leased land