

**STATE FIFRA ISSUES RESEARCH & EVALUATION GROUP
JOINT MEETING OF THE PESTICIDE OPERATIONS AND MANAGEMENT COMMITTEE
AND THE ENVIRONMENTAL QUALITY ISSUES COMMITTEE**

September 18-19, 2023

Renaissance Capital View Arlington, Crystal City, VA

MEETING MINUTES

Called by: Amy Brown, FL, POM Chairperson and Hotze Wijnja, MA, EQI Chairperson

Minutes by: Amy Sullivan, AAPCO Executive Secretary

Monday September 18, 2023 8:15 am

GENERAL SESSION

Wijnja opened the meeting by welcoming everyone and discussing the agenda development process. Introductions were made around the room, with Christina Zimmerman, WA, EQI and Ken Everett, CA, POM unable to attend in person.

ASSOCIATION OF AMERICAN PESTICIDE CONTROL OFFICIALS UPDATE

Gretchen Paluch, IA, AAPCO President-Elect

Paluch reviewed the current priority topics for AAPCO, including the C&T state plan approval process; implementation of bilingual labeling as required by PRIA 5; and EPA's efforts related to protection of endangered species. Paluch also emphasized the benefit of the June SFIREG meeting held in West Tennessee, which elevated concerns related to herbicide resistance, and possible negative outcomes for no-till and related conservation approaches by the mitigation measures EPA is utilizing currently for the new labels.

STATE FIFRA ISSUES, RESEARCH, AND EVALUATION GROUP UPDATE

Gary Bahr, WA, SFIREG Chairperson

Bahr thanked everyone for attending and welcomed the new members. He briefly described the SFIREG process and thanked the regional representatives for their involvement and coordination of Pre-SFIREG meetings prior to the upcoming December 4-5, 2023 meeting to be held in the Washington DC area. Bahr requested that states share any issues with him that may be useful for inclusion in the Pre-SFIREG meetings.

EPA OFFICE OF ENFORCEMENT AND COMPLIANCE ASSURANCE UPDATE

Kelly Engle, EPA, OECA

Engle provided two updates. She began by saying that OECA and OSCPP are considering a collaboration using FIFRA State and Tribal Assistance Grant (STAG) funding and would like to hear input from the states. She also shared that the next upcoming PIRT will be a Basic Inspector Training to be held December 3-5, 2023 in Savannah, GA.

EPA OFFICE OF PESTICIDE PROGRAMS UPDATE

Ed Messina, EPA, OPP

Please see presentation, highlighting the following areas: lots of activity in the biopesticides division, including genetics; soft surface guidance; Endocrine Disruptor Screening Program; new PRIA 5 website; 3 new active ingredients registered; 700 reregistration decisions completed; the ESA Mega-lawsuit has been signed and settled; and that OPP is revisiting the antibiotic/fungal registrations to preserve human health uses in coordination with the Centers for Disease Control and Prevention.

Cindy Wire, EPA R9 and SFIREG Liaison, thanked Bahr for including the Cooperative Agreement Guidance in Pre-SFIREG discussions. She also said that EPA would like to continue the enforceable label series conversation and has gotten interest in doing so in PREP feedback. She also mentioned that there will be a New Emerging Technologies PREP in October 2023.

Bahr asked Messina about the use of modeling in the Herbicide Strategy. Messina responded that they are starting to use range maps to evaluate impacts using end data in response to the demands to be more precise. He recognizes that this really is the best data and EPA is doing pilots with states and regionally.

PESTICIDE REGISTRATION IMPROVEMENT ACT (PRIA) 5 – BILINGUAL LABELING

- Elissa Reeves and Linda Arrington, EPA Pesticide Re-Evaluation Division

Please see presentation. Arrington shared that the agency expects to release their approach to tracking implementation of labels by 12/29/2024, and the full plan for implementation of bilingual labels by December 2025.

- Kelly Friend, FL, AAPCO WPS Standing Committee Chairperson

The WPS committee has met a few times since PRIA 5 was released and this is a hot topic. Primary concerns center on enforcement questions such as, is the translation guide enforceable; do the registrants have to use the translation guide; who is responsible for updating and maintaining the translation guide? She also emphasized that there needs to be offline access.

- Megan Provost, RISE, representing the PRIA Coalition

Please see presentation. Provost shared that the coalition is working with some of advocacy groups such as Earth Justice, Natural Resources Defense Council, and Farmworker Justice. Regarding the question of how to get the labels into the hands of farmworkers, Provost stated that it is best to include the bilingual labeling directly in the labels on the pesticide containers, and that the PRIA Coalition is continuing to discuss the topic with EPA. QR codes as a mechanism for Spanish translations is also part of the discussion. Reeves added that EPA is striving for a multipronged approach, and that they

want to develop something to present to stakeholders to get feedback. Provost said that the NGOs want something quickly, and seem to be in favor of electronic labeling.

Sullivan asked if the target audience is actually farmworkers (as the language commonly used) or handlers/applicators (per WPS vocabulary)? Arrington clarified that the audience is handlers/applicators, recognizing that it is better to include workers as well and that EPA wants to work towards that. Bahr added that Farm Labor Contractors play a role as well, and Reeves agreed saying that they want to communicate with everyone. Caffery asked about QR codes, since they appear to fall into labeling, would they then be enforceable? Reeves responded that it is too early to say right now. Caffery also asked about supplemental distributor products. Arrington said that according to the Office of General Counsel, if the basic label does not have the Spanish translation, then the supplemental cannot. If the basic does have it, then the supplemental can have it. Reeves ended the conversation by sharing that EPA is working on a Frequently Asked Questions site.

ENDANGERED SPECIES ACT (ESA)

- Jan Matuszko, EPA Environmental Fate and Effects Division

Matuszko began by saying that EPA has had some challenges using a pesticide by pesticide approach to implementing mitigation for protection of ESA listed species. The new approach should be smarter and faster. Therefore, they have initiated two efforts, the first being the Vulnerable Species Pilot Project. Matuszko stated that the SFIREG comments submitted to the docket captured most or all of the major comment themes. Many wanted the agency to consider the risk profile of the pesticides. The scope was called into question, especially related to non-ag use products and the lack of mitigation identified for them. Pesticide Use Limitation Areas (PULAs) were considered too large, and should be based on habitat, not range. And that the agency should use already mapped habitats. Additionally, it was suggested that the agency should include impacts of avoidance areas, and that avoidance is not workable, and that the alternative of working directly with the US Fish and Wildlife Service is not practical. So, the agency sees that it has work to do and finds the comments convincing. Matuszko wants to communicate about resolving the themes identified above.

The Herbicide Strategy is a first attempt to address impacts earlier in the process. The Strategy is to address drift and runoff for 900 species of plants in the lower 48 states. They just cannot do a chemical by chemical approach; there are too many and not enough time or resources. The Herbicide Strategy should provide efficiencies to risk assessment and communication with the USFWS. EPA is working with USDA Office of Pest Management Programs and USFWS. The Strategy is not rulemaking. It is a framework for use in registration and reregistration. Incorporating mitigations in the Pesticide Interim Decisions will provide an opportunity for comments.

The Herbicide Strategy includes mitigation practices already used by growers. It is structured to allow flexibility. The level of mitigation equals the level of the projected population impacts. More mitigation is required for more population impacts. The agency

already analyzes for population impacts for drift and runoff, but the difference is the numbers for mitigations. EPA did a literature search on efficacy of practices. In reality the results and efficacy depends on specifics. EPA then averaged the known efficacy of the mitigations and used that to create the point system. There are proposed exemptions. The conservation plans growers use with USDA programs may be enough to meet credits. Lowering application rates is another option. The information will evolve on these practices and it is important to leave space for new ideas. EPA is working to refine species information with USFWS for the PULAs.

The same team who drafted the Interim Ecological Measures (IEMs) identified in the Agency's Workplan are working on the Herbicide Strategy, and the comments received on the IEMs were incorporated into the Strategy.

Implementation will be through Bulletins Live Two (BLT). There could be a single species or groups of species identified in the bulletins.

The process to predict impacts, which is already done in risk assessment, was applied to 12 herbicides to provide tangible examples, including how various crop production systems would be impacted.

The previous webinar is archived on EPA's website and all are encouraged to listen to it. The Herbicide Strategy comments are due October 22, 2023. Matuszko offered to hold another Q&A session with the states as well (which the chairs followed up to request).

Currently Matuszko is working on a regional effort with Hawaii and USFWS. They are thinking of tackling species in groups or bins, for instance remote areas versus high use areas, and developing a framework. This winter they are targeting a workshop in Hawaii, and then will consider other regions. The draft Biological Evaluation in Rodenticides has a similar approach, where a single BE is used for all rodenticides. In November there will be a draft to address jeopardy, adverse modification, and mitigations. The final will be published in November 2024. All new a.i. registration are following the new approach.

- Irvin Huang, USFWS

Please see presentation. Huang provides toxicology input on ESA consultations.

Bahr by noting that state agencies frequently have plans in place for species, and that they are actively working together at the state level to implement the plans, with some aspects of the plan targeting recovery efforts. How can the states make sure they are working with the appropriate contacts at the FWS regions? Who should they contact to build relationships with? Who can they talk to about the accuracy of ranges, habitats, etc.? Huang responded that it will take some time to figure out the best process, and that patience will be required.

Bryer asked Huang how he felt about this change? Huang responded that it's a learning process. He acknowledged that the current process is too slow, and that the approach

needs to be more aggressive. Grouping chemistries or species is a good idea, but we need to refine the process. But these are the right steps to take.

Dwinell asked about the point where end users need to interact with FWS (essentially to consult with the local field office). He asked what preparations are being made for the field offices? Are they ready? Huang replied that FWS is preparing training to communicate with the field offices so that they know this is coming and will be ready. Need to build that out. Scott asked if there is a projected timetable? Huang said that there is not. Still working on the training, but can start developing a timetable. Matuszko added that this is still a proposal. They need to refine it first, then can approach the field offices. It is going to be a while, and there is no official timetable, but it is okay to start the process.

- Elyssa Arnold, USDA OPMP

Please see presentation. Arnold brought up some of the issues, such as who should be providing technical assistance in the field? Should it be Certified Crop Consultants, Extension, NRCS? Site specific exemptions are important. For documentation of measures taken, are there similar things in place already? What about leased farmland?

- Gretchen Paluch, IA and Steve Dwinell, VT AAPCO Workgroup Co-Chairs

Please see presentation. Paluch brought up design standards for how the picklist option would be considered effective. She encouraged looking at the Enlist Duo label as an example.

Dwinell proposed consideration of an additional subcommittee of SFIREG to work on ESA development and implementation. A new SFIREG grant will be submitted in the Spring of 2024, and the workgroup is interested in exploring if another committee could be added to it. The idea behind the proposal is that the SFIREG structure is already in place and effective. It will allow state representation at a broader level using the current mechanisms and will support POM and EQI to continue work on other issues instead of being swallowed by this topic. One drawback is that the committee would benefit from being multistakeholder, which SFIREG does not currently allow. It is possible that ex-officio representation could be utilized, or other ideas considered before the grant application is submitted. Major areas of interest for the workgroup currently: performance standards for the picklist; how to enforce; recordkeeping requirements.

- Taylor Randell Singleton, University of Georgia Extension

Please see presentation. Singleton presented Georgia's ESA pilot program results, refined mapping efforts. The goal of the program is to increase the quantity and quality of Georgia information available to EPA and the Services, so they can make more informed decisions. Matuszko stated that EPA is working with Singleton looking at their maps. Smith stated this would take significant implementation. Matuszko added it is all about the PULAS, not the full strategy.

EPA AND FDA PRODUCT OVERSIGHT

Billy Smith, EPA Registration Division

Smith began by referencing the February 2023 white paper, which looked at transferring some pet products to FDA oversight. There were 64 substantive comments in the docket. Smith is currently trying to summarize the comments but will not address them all. There has been little movement legislatively.

Brown asked if the effort only includes dogs and cats. Smith responded that he has no update now, but will address the question in the comment summary.

Regarding work with Seresto and FDA, Smith said that in July 2023 there was conclusion of a science review and a regulatory decision was released. The agency is requiring mitigations and will be separating cat and dog registrations to take into account size differences among animals. There is a 5 year time-limited registration currently in place, and requirements for enhanced incident reports, sales records, and better stewardship with the vet community.

Internally the agency is asking how to work better with the provided data and resolving what is actually needed. There are only 2 vets in EPA so the internal expertise is limited, and the agency is also working with FDA.

In registration review they hope to build off of what they did with Seresto, and the current schedule is on track.

Scott asked how FDA is responding. Smith replied that the best solution would be legislative. FDA wants additional resources, and EPA is asking for enhanced data exchange.

Caffery brought up PRN 94-6, which defines a FDA regulated lice produce. She has run into a copack lice product in pesticide registration.

EPA'S INCIDENT DATA SYSTEM (IDS)

- Susan Jennings, EPA OPP Senior Advisor for Public Health

Please see presentation. Jennings added that the query is fairly easy, and can provide individual versus aggregate incidents. The disclaimer is that the agency has limited confidence in the validity of the incidents.

- Meredith Cocks, National Pesticide Information Center

Please see presentation.

SFIREG PUBLIC COMMENT PROCESS AND ISSUE PAPER FOLLOW UP

Gary Bahr, WA, SFIREG Chairperson

Please see presentation.

POM BREAKOUT SESSION

AAPCO 24(C) GUIDANCE REVISIONS AND SECTION 18 TRAINING UPDATES

- Eric Bohnenblust, EPA Registration Division

Bohnenblust said that the agency has reviewed the 24(c) guidance and have a couple of little things to discuss internally. This week he will send comments back. Brown asked if they were scientific questions, and Bohnenblust said no, but they will offer up clarity. Brown then said that POM will set up a Teams meeting to review EPA's comments.

- Cindy Wire, Office of Program Support

Regarding the Section 18 tool, this was recently put into an Articulate platform as the previous PowerPoint format was unsupported by Microsoft. The work was done through PREP funding. Bohnenblust's group is reviewing it before it goes live, likely at the end of October.

"FREE OF" CLAIMS

Ed Messina, EPA OPP and Sarah Caffery, OISC

Messina began by explaining that comparative safety claims are not allowed on pesticide labeling. When the request to allow Deet Free on the label came in it appeared to be a safety claim for the purpose of marketing. In the marketplace a label was found that had Deet Free on the label and the agency requested the registrant take the claim off. EPA then issued the registrant a letter saying that if they would put a disclaimer on the label related to safety claims, then they could keep Deet Free on the label. Then they decided to reverse that decision and are currently evaluating the issue.

The Home Consumer Products Association, specifically the Clorox Company, wanted to have Bleach Free on their labels. Their rationale is that Clorox is synonymous with bleach to consumers, and they wanted to address confusion in the marketplace for their nonbleach products. EPA was considering if that would be allowable since it is not related to safety.

Are there other reasons besides a comparative safety claim for Deet Free to be on the label? It is a plasticizer, can be an allergen, 25(b) products do it, and the Office of General Counsel has proposed that it is a free speech issue. If the agency determines that they will not allow it, they will do a Notice of Intent to Cancel and it will go before an administrative judge.

EPA held a call with some state representatives from the 25(b) workgroup as well as AAPCO and SFIREG leadership, who oppose allowing the claim, and has met with OPP's Division Directors on the topic. At this time it seem probably that the agency will allow Deet Free with a disclaimer.

Arrington was asked her opinion and responded No Comment. The POM committee will meet to consider writing a formal comment in the issue.

Caffery, AAPCO 25(b) Workgroup Chairperson, shared that the workgroup found out that EPA had written four letters to registrants about the issue because a registrant asked if 25(b) products needed to comply with no free-of claims due to the discussion with the Section 3 products. Caffery replied that for 25(b) it would be considered a False and Misleading statement. Most of the 25(b) products fell in line with not using the statements. Wisconsin did an audit of their registrations and found that most companies were falling in line with not including the statement. Indiana did a similar audit as well.

There was a question about commercial free speech related to regulated products and labels and how they intersect, as that is a new concept and seems counterintuitive given the regulatory nature of labeling. Messina responded that because the deet free claim is not about safety, but other concerns, the EPA attorneys were able to frame it that way.

Peacock asked if there had been any registrant feedback about the use of deet free, as it comes across as a marketing claim, and could potentially cause some market advantage for some registrants over others. Messina responded that there has been input from at least one registrant who does not support the use of deet free claims, and that registrant does also have 25(b) products in the marketplace as well.

Other free of claims that have come up in EPA discussions with registrants include bleach free and phosphorous free.

CROP LIFE AMERICA REGISTRATION REVIEW WORKGROUP UPDATE

Sarah Caffery, OISC

The issue is that revised federal labels are taking longer than 18 months for some states to review. Only 4 states are impacted, particularly California. The registrants are hoping to find a solution as this impacts their ability to get the older labels off the shelves and replaced with the revised labels. This issue then comes up against how long EPA will allow existing stocks to remain on the shelves.

The workgroup is trying to come up with a solution. Some possibilities being considered include using an affidavit to help speed the review process, and continuing discussions with EPA about the time allowed for existing stocks to be sold.

COMMITTEE MEMBERS STATE AND REGIONAL TOPICS

Patrick Jones, NC brought up concern about the current respiration language on labels. Several years ago a substantial effort was made by Garnet Cooke, OR and Robin Tutor, NC to provide an updated crosswalk for EPA to use for respirator language requirements on labels. This was supposed to be incorporated into the Label Review Manual so that all respirator language moving forward would be updated with correct respirator information.

This hasn't happened. Arrington and Wire both requested the crosswalk and intend to resolve the issue.

Farquhar asked how EPA was currently managing pesticide device issues. Four years ago NC sent in an Enforcement Case Review to Region 4 and to EPA Headquarters. NC has not seen a response yet. The issue related to the use of a device that produces a pesticide, in this case a hypochlorous acid generator found to be used in rural hospitals in all parts of the hospital as the sole means of disinfection. The current approach of EPA is not protective of human health, because the definition currently provides for the exemption of the device if the material used in the device is purchased separately. If the material (in this case, sodium chloride) is provided with the device, then it is considered a pesticide and is subject to regulation. Wire will follow up on the issue.

EQI BREAKOUT SESSION

METHOMYL FLY BAIT

The discussion followed up on the consideration of the 2023 survey results and sales information that was provided by a manufacturer. EQI continues to look into the issue related to misuse of methomyl flybait and evaluate if requesting RUP classification of the product is best option to address this issue. EQI will further look into the reasons for RUP classification of the various methomyl products. It was pointed out that RUP classification of the flybait product would bring challenges related to certification requirements for the livestock operation user group. Proper evaluation of the issue is challenging given the lack of sufficient data and information. A few states (IN, MI) made the flybait state-restricted use; is there any information available on the effect of the restriction in these states? In the context of potential rodenticide restrictions, the survey results indicated concerns that such restrictions would likely increase in misuse of flybait as an alternative tool for rodent control.

The action item was that the committee look into what the other use patterns are for methomyl and what the reasoning is behind RUP versus General Use classification. There was also an interest in getting more information on the drinking water exposure aspect of methomyl products.

WATER QUALITY DATA AND PESTICIDES: REPORTING AND TRACKING OF PROGRESS

The need for tools to track management and progress with pesticides of concern is getting more important given the current regulatory developments. Aspects brought up and discussed included: The need for tools to properly track and evaluate water quality data, as it was incorporated in the previously used POINTS system, is becoming more important in the context of certain regulatory developments such as ESA and pesticide regulatory requirements for specific pesticides (e.g., atrazine). The question was brought up if states still get funding for water quality and pesticides. Washington State, for example, receives a small amount of annual funding for this aspect of their program. There was also the question of whether Groundwater Quality plans, as implemented prior to 2010, were still being used. Without a system like POINTS, states have to come up with their own approach

to evaluate pesticides and water quality. There is also a benefit to have some data sharing capability to facilitate information exchange between states. It was suggested that the upcoming Cooperative Agreement guidance discussions would provide an opportunity to articulate the states' water quality program needs. These are important program aspects in the context of current regulatory developments. These program needs could also be discussed at pre-SFIREG meetings to provide an opportunity for state- and region-specific input.

ENDOCRINE DISRUPTOR SCREENING PROGRAM

There was a brief consideration of what EQI's role could be regarding this topic. It is generally viewed as a topic that requires highly specific expertise. EQI will continue to follow the developments and it was suggested that we may focus on aspects that may have relevance to water quality and pesticides. EQI will take a high-level overview of EPA's next release of information and update relative to this program.

SFIREG PUBLIC COMMENT PROCESS: ROLE OF EQI

The consideration related to the SFIREG public comment process included that the suggestion of setting priorities given the number of proposals and actions that are coming out. There is a need to improve the process for public comment process as well as the follow-up to issue papers. As SFIREG is looking into the ways to improve the process, collaboration with SFIREG leadership can further guide the role of EQI in this process. A current priority issue is the comments to the proposed Herbicide Strategy. EQI is available to provide assistance with developing comments to this proposed strategy.

Tuesday September 19, 2023 8:15 am

GENERAL SESSION

PFAS AND PESTICIDES

Jeff Dawson, EPA OCSPP IO and Thuy Nguyen EPA BEAD Lab

Please see presentation. Dawson recommends reading the report to Congress (slide 5) and watching the YouTube video for European Union information (slide 6).

The national testing strategy changed the PFAS definition in use by EPA. This increased the items to consider from 6,500 to 13,500. To further understand the definitions used by the OECD and EPA, Dawson pointed folks to the narrative published in the federal register about this difference.

Nguyen reviewed the timeline (slide 19) and reviewed published work related to:

1. Mosquito products
2. Oily matrix
3. Testing data on mosquito products

4. Leaching potential of HDPE fluorinated containers, and
5. New method for measuring PFAS in pesticide formulations.

They also have ongoing studies and methodology studies.

Bryer asked how much weight does EPA give to third party lab results, such as we've seen in the last three years? Nguyen replied that she did not want to answer that but noted that methods in general have not gone through a multi-lab validation. A discussion about quality assurance with independent labs followed. TSCA requires Good Laboratory Practices (GLP), but there are some requests that fall outside of established GLP. There remains a question about if the differences between the Lassi study and EPA's replication of the work is due to contamination or methods.

RODENTICIDES

- Dana Friedman, EPA PRD

Please see presentation. The focus of the presentation is on the public comments on the Proposed Interim Decision (PID). Friedman noted that EPA did do waivers on some data because they had enough for some ecotox areas. Biological Evaluations (BE) are due this year and finals are due next year.

The comment review is ongoing, but consistent concerns appear to be:

1. Cost for nonrefillable containers
2. Waste with the nonrefillable containers
3. Carcass searches
4. Recordkeeping
5. Lack of applicators
6. Logistics related to training and licensing.

EPA supports stewardship efforts by registrants, which is a proposed requirement in the terms and conditions of federal registration.

The agency wants to have further communication with the states, and Friedman requested a subset of SLAs to do smaller group meetings for potential refinements.

EPA is open to alternative ideas.

EPA has met with the Rodenticide Task Force. Some issues discussed are that the agency needs data showing no uptake to plants, which would allow application to be considered non-crop. They have met with entities interested in providing/conducting those types of studies.

The National Pest Management Association registrants have also met with EPA and asked for alternative mitigations. The agency has received stewardship and training offers as well as monitoring data. EPA will not wait for the monitoring data to be gathered, but they do

encourage it, including sharing with the US Fish and Wildlife Service. EPA has been informally meeting with the USFWS while developing the draft BE.

Scott noted that he hoped the agency was aware of potential difficulty if the bait boxes are considered application equipment because that would require the supervisor to inspect the boxes daily. Freidman stated this is on EPA's radar and they are talking it through.

- Katie Swift, Rodenticide Task Force

Please see presentation.

A couple of key concerns related to implementation that Swift brought up were:

1. Limitations to success of registrant stewardship – there is no requirement or incentive for applicators to access it.
2. And successful implementation of mitigation measures depends on education. Appropriate education requires specialized trainings that include an understanding of wildlife and rodent biology.

There is interest in tracing a specific application of a product through the food web to evaluate the efficacy of carcass searches.

CHLORPYRIFOS AND OTHER ORGANOPHOSPHATE'S PESTITATION UPDATES; OP REGISTRATION REVIEW SCHEDULE

Anna Romanovsky, EPA PRD

Please see summary document.

CHLORINE GAS PRODUCTS AND RUP DESIGNATION

Eric Meiderhoff, EPA Antimicrobials Division

Meiderhoff stated that an amended RUP designation for the Interim Decision would have to include other programmatic considerations in the amendment. The question was asked if EPA is requiring testing with the Chlorine Institute, with Meiderhoff responding yes, but not for safety, rather for efficacy in certain uses.

At this time there is not a lot of movement with the issue, but it will be revisited in the future.

CERTIFICATION AND TRAINING

Aiden Black and Isabel Gross, EPA PRD

Please see presentation. At this time it appears all SLAs are on track to have approved plans by the November 4, 2023 deadline.

AAPCO TECHNOLOGY WORKGROUP

Dwight Seal, NC, Chairperson

Please see presentation.

Seal mentioned that the FAA has streamlined Part 137, the applications are made online, and only the Part 107 is required.

Seal recommends that states develop a guidance document for UAV applicators. Seal also discussed the upcoming October 3-5, 2023 RPASS conference. He is working with Dan Danielson from Texas A&M, and will try to provide complimentary online passes for interested SLAs. The conference will be technical.

A couple of questions came up which are still being worked on, such as who is the applicator for ground drones/autonomous ground rigs, and who is working on targeted applications? Seal suggested Texas A&M and Auburn University.

TREATED SEED ISSUE PAPER – COMMITTEE DISCUSSION

The committee discussed the issue paper, EPA's response, and what is currently happening. The topic has intersections with other issue areas; it was included in the amendment to the ESA workplan with interim ecological measures discussed. The Advanced Notice of Proposed Rule Making (ANPRM) will come out in a couple of weeks and SFIREG will review and likely comment.

OTHER EMERGING TOPICS

Dicamba: Indiana said that they are down to 21 cases this past year, probably due to Enlist and early cut off dates. Minnesota and Iowa agreed with that characterization.

Herbicide Strategy comments are due October 22, 2023.

Both the Device Issue Paper and 25(b) rulemaking appear to be being worked on actively, but specifics are unclear.

Adjournment 12:00 pm