

2025  
*ANNUAL SPRING MEETING*

*STANDING COMMITTEE, WORKGROUP, AND  
LIAISON REPORTS*



## Check Sample Program Committee

Ping Wan

2/18/2025

### **General summary of work group/liaison activities for the year:**

The 2024 AAPCO Check Sample Program was successfully conducted by the Pesticide Laboratories, Office of Indiana State Chemist. Annual subscription fees are kept unchanged at \$200 per year for U.S. labs and \$250 per year for international labs. This has been the fee structure set by the AAPCO board since 2008. The AAPCO treasurer collects payments from the program participants and the entire proceeds of around \$20,000 are donated to the AAPCO general fund.

Check sample program 2024 attracted a total of 59 laboratories from the U.S. and all over the world. Interests in the program remain strong from both U.S. domestic labs and labs oversea. There were 36 domestic labs and 23 international labs from countries across four continents.

Three commercial pesticide products containing five pesticide active ingredients were offered in the 2024 program. We continue to offer a variety of analytes, matrices, and fortification levels each year to help labs gain experience testing many different types of formulation samples on the market. Homogeneity tests were performed by the hosting lab to guarantee the high quality of the test samples offered.

### Future activities:

1. Samples for the next round of testing have been shipped to participants during January 2025, with test results due at the end of March. Evaluation report will be shared with all participants in April 2025.
2. Ping will give a program update at the Lab Committee's meeting during the AAPCO annual conference in March 2025.

Respectively submitted,

Ping Wan

Office of Indiana State Chemist

## AAPCO Standing Committee Report to Annual Meeting

Standing Committee or Work Group: **Laboratory Committee**

Chair Person's Name: Ashley Pierce

Date of Report: **03/05/25**

Issues to be raised for discussion by AAPCO Board or General Session:

**The Laboratory Committee has no issues to be raised at this time.**

General summary of work group/liaison activities for the year:

### **EPA/AAPCO Lab Committee Conference Calls**

The EPA and AAPCO Laboratory Committee meet quarterly via Conference Calls hosted by EPA, providing the opportunity to address issues and situations that require attention more often than at the annual meeting. The calls also allow analyst level employees and those that are unable to attend the annual meeting for financial reasons to participate in nationwide discussions and directly communicate with other labs.

Specific topics included the Committee's continued struggle with recruiting states to host the EPA National Pesticide Laboratory Analyst Workshops. No laboratory workshop is scheduled for FY25. A virtual presentation was provided by AOAC to discuss various PT options and methodologies that AOAC has been working on for pesticide in food testing. Several discussions were had about the PREP lab issues courses, the EPA lab workshop, and difficult compounds. This year has been about rebuilding due to a significant amount of turnover in various positions throughout the laboratories.

### **AAPCO Laboratory Committee Annual Meeting Break-out Session**

*The Laboratory Committee meets annually during the AAPCO spring meeting. The following report outlines activities from last year's meeting.*

The Laboratory Committee met on Monday, March 6 and Tuesday, March 7, 2024, during the AAPCO annual meeting. Virtual attendance option was also provided. There were approximately 14 participants in person from state laboratories, with additional members participating virtually and EPA liaisons in attendance as well.

Updates and presentations were given by the following:

- AAPCO Formulation Check Sample Program update by Ping Wan of the Indiana State Chemist's Office. In 2024, eighty (80) laboratories participated in the program (more than half are international labs), including regulatory/government and private industries. Difficulties of international shipping due to complicated shipping

requirements was discussed as well as how collected funds are used. Refer to the AAPCO Check Sample Program Report for details.

- Wisconsin Residue Check Sample Program update by Matt Gramse of Wisconsin's Department of Agriculture, Trade and Consumer Protection. There were 29 labs that participated in the program in 2023. Two rounds of samples were sent out, one set of soil in the spring and another set of foliage in the fall. The program currently has five testing groups; glufosinate, glyphosate and metabolite, imidazolinones or strobilurins, pesticides, herbicides, and an unknown. A price increase was announced.

**NOTE: Pesticide Check sample programs offer laboratories the opportunity to ensure their laboratories are producing quality defensible data.**

- EPA's repository update by Craig Vigo. The Newsletter continues to serve as good communication tool between the repository and the labs. Important reminders for labs requesting items were discussed. For requesting analytical methods, contact Thuy Nguyen or Gregory Verdin.
- EPA National Pesticide Laboratory Analyst Workshops. Nevada and Colorado to host workshops in 2024.
- SFIREG Liaison Update by Jona Verreth, AAPCO Laboratory Committee SFIREG Liaison, Montana Analytical Laboratory Bureau
- State Round Table discussions to include testing capacity, issues, roadblocks, needs, unique cases, grant/funding issues
- PFAS in Pesticides by Thuy Nguyen, EPA/OPP/BEAD/Analytical Chemistry Branch
- Pesticides in the Bee Hive by Dennis vanEngelsdorp, University of Maryland
- non-Target Data Acquisition for Target Analysis (nDATA) Workflow for the Analysis of 1087 Pesticides in Fresh Produce using Liquid Chromatography-High Resolution Accurate Mass Spectrometry with a Compound Database by Jon Wong, US FDA

**The AAPCO Laboratory Committee meeting at the 2025 in person AAPCO yearly meeting.**

The Laboratory Committee is meeting in person and virtually during the 2025 AAPCO meeting in the afternoons of Monday, March 3 and Tuesday, March 4. Agenda topics include updates from partners and states, discussions on emerging issues, QAPPs with the EPA, and Pesticide Registration processes from BASF. There will also be in depth discussion on changes to the National Workshop Funding and best practices moving forward.

Respectfully submitted,  
Ashley Pierce  
Virginia Division of Consolidated Laboratory Services

## **PREP Steering Committee Report**

PREP Administrator: Lisa Blecker, Colorado State University

PREP Coordinator: Cindy Wire, US EPA Office of Chemical Safety and Pollution Prevention

Date of Report: February 26, 2025

### **2025 PREP Steering Committee**

We convened eight meetings with the PREP Steering Committee from September 11, 2024, through January 24, 2025, to plan the 2025 PREP season.

The 2025 PREP Steering Committee is comprised of the following voting members:

- Megan Patterson, AAPCO Immediate Past President, Steering Committee Chair
- Gretchen Paluch, AAPCO President
- Kelly Friend, AAPCO President Elect
- Colton Bond, AAPCO Director
- Brian Verhousstraete, AAPCO Director
- Kimberly Pardue Welch, EPA Region 8
- Kevin Martin, EPA Region 8
- Charles Kovatch, EPA OCSPP, Intergovernmental and Community Relations Branch
- Mike Bellot, EPA OECA, Office of Compliance
- Liz Vizard, EPA OECA, Office of Compliance

And the following non-voting members:

- Africa Dorame-Avalos, TPPC Representative
- Bob Blankenburg, AAPCO Director-at-large
- Sarah Caffery, AAPCO Director-at-large
- Allison Cuellar, ASPCRO Liaison
- Kelly Engle, EPA PIRT Liaison
- Cindy Wire, EPA PREP Project Officer

The PREP team worked with the Steering Committee to assess the needs of the PREP community by reviewing previous course curricula and evaluations, new topic suggestions and requests for additional resources by previous participants, annual feedback from the PREP community, the historical PREP course rotation, and priority issues identified by other related stakeholder groups. Taking into considerations all these needs, we established a schedule for the 2025 PREP Courses. On January 31 we made the swift decision to make changes to the 2025 schedule because of uncertainty within the agency. The updated 2025 schedule is:

1. Senior Executive Pesticide Program Management, June 24-26, Fort Collins, CO
2. Comprehensive Combo, August 4-7, Fort Collins, CO
3. Structural Pest Control Issues, September 8-11, Fort Collins, CO, OR
3. Endangered Species Combo, September 8-11, Fort Collins, CO

## **Issues to be raised for discussion by the AAPCO Board or General Session:**

No issues.

## **General Summary of activities for the 2024 Season:**

### Continued Work on the PREP Website

The PREP Network website was updated in the following ways:

1. Landing page
  - a. Overview and link to 2024 course pages, including topic, dates, and locations for each
  - b. List of Steering Committee members
2. A course page for each of the four planned courses that includes:
  - a. Location
  - b. Audience
  - c. Course goal
  - d. Nomination and participants
  - e. Planning group
3. PREP mailing list which is comprised of key contacts at state, tribe, and territory regulatory agencies, and U.S. EPA that we use to distribute course and nomination announcements
4. PREP Team
  - a. Team member photos were updated
5. Archived courses
  - a. 2023 PREP courses were added

### Continued Microsoft Teams PREP Network

We continued to expand our Microsoft Teams site for the PREP Network. For each course, there is a subject matter-specific channel. All attendees are added to a channel, but also have access to the entire site. We post course documents, pose discussion questions brought up during the courses and in the evaluations, and post participant-filmed videos discussing issues they encounter in their work. This is designed to be an additional avenue for networking and sharing strategies. This site has remained active for online and in-person courses.

### Continued PREP Archive

We continued growing our PREP Archive, which only the PREP community has access to. It contains all the content from every course, including presentations, discussion notes, and participant resources. Participants have access to the entire archive, not just the materials from their course.

### Made Significant Improvements to the PREP Database

The compilation and creation of the PREP database was completed. The database serves the needs of the team by providing quick and efficient access to key information. The information can be used to improve reporting, address inquiries and questions regarding past courses and provide key insights into the future implementation of the program. The access and information this database provides is as follows:

1. Complete participant roster from 1990 to 2024
  - a. Including all attendees and speakers/instructors.

- b. Includes attendees, speakers, nominees, and planning group members from 2020 to 2024.
- 2. Individual lookup page to view information related to any participant including:
  - a. Name, affiliation, agency, and contact information of that individual.
  - b. Courses they participated in and the roles they filled in each course.
- 3. Course lookup page to view information related to any course including:
  - a. Roster with all participants involved in any role.
  - b. Course information, dates, and location.
- 4. General statistics page to view course statistics including:
  - a. Nominee and participant breakdowns by affiliation for the last five years.
  - b. Participant numbers for any selected timeframe, affiliation, and role.
  - c. Attendee breakdown by year for any selected state.

## **Highlights from 2024 PREP Courses:**

### 1. Certification and Training PREP Course, April 22-25, 2024, Fort Collins, Colorado

We convened 7, 1.5-hour long planning group meetings between December 12 and February 6 to refine the target audience and course goal, identify major topic areas, develop the agenda and finalize nominations.

The **target audience** is personnel that work under a FIFRA cooperative agreement involved in certification and training program management.

The **goal of the course** is to discuss needs, potential strategies, approaches, and communications to effectively implement changes to certification and training programs.

### **Major topic areas for the course are:**

- Discuss the challenges states, tribes, and territories may face when implementing certification and training programs, and identify potential solutions
- A coregulator exchange regarding guidance from EPA on certification plan modification, and pathways for communication as changes are being implemented
- Share resources with attendees to help them effectively implement their plans
- Explore the impact new certification plans will have on coregulators, their educational partners, and other stakeholders, and how to work together to ensure effective implementation

Nominations for this course opened on January 4, 2024, and closed on February 1, 2024. Notifications were sent to nominees by February 8, 2024. At the request of EPA, we made arrangements to invite up to 10 EPA participants, whereas we typically invite only 3. Because of the content of this course, we also made arrangements to invite up to 4 Pesticide Safety Educators (PSEPs) to represent each AAPSE region.

### **Key data points for this course:**

- We received a total of 63 nominations: 36 state, 2 territory, 5 tribal, 10 EPA, and 10 PSEP.
- We invited 41 total participants: 23 state, 1 territory, 3 tribal, 10 EPA, and 4 PSEP.
- We hosted 37 total participants: 22 state, 1 territory, 1 tribal, 9 EPA, and 4 PSEP
- We hosted 23 speakers: 1 state, 4 state participant, 1 tribal participant, 7 EPA, 1 county, and 9 university

This course was well received. Ninety six percent of final survey respondents (N=26) indicated they would recommend this course to others in their organization. When asked to provide more details, one respondent said, "This was the most beneficial program I have ever attended. The benefit from the knowledge I gained is, at this time, incalculable." A summary of the final evaluation is included at the end of this report.

## **2. Compliance and Enforcement Management PREP Course, June 24-27, 2024, Davis, California**

We convened six 1.5-hour planning group meetings from January 31 to March 28 to refine the target audience and course goal, identify major topic areas, develop the agenda, and finalize nominations.

The **target audience** is state, territory, or tribal pesticide compliance and enforcement program managers, and staff that work under a FIFRA cooperative agreement.

The **goal of the course** is to increase knowledge of current and emerging pesticide compliance and enforcement issues for effective state, tribal, and territory pesticide enforcement programs.

**Major topic areas** for the course are:

- Discussion of the growing regulatory and enforcement challenges of eCommerce, and how coregulators can complement each other's efforts and get credit for compliance work.
- Enforceability of new label language due to upcoming regulatory changes including bilingual labeling, endangered species mitigation efforts, and new emerging technology.
- A discussion of key enforcement topics including challenges related to spray drift cases.
- Working across jurisdictions with tribes to better understand unique challenges, issues of mutual concern, and opportunities to partner and increase capacity.
- Leadership training that includes a variety of topics, including professional survival skills and having crucial conversations.

Nominations for this course opened on February 22, 2024, and closed on March 21, 2024. Acceptance/waitlist notifications were sent to nominees by April 4, 2024. After nominations closed for this course on March 21, 2024, we received a request from EPA's Office of Enforcement and Compliance Assurance to invite up to 10 regional EPA participants, whereas we typically invite only 3. In response to this request the PREP Team reopened nominations for 1 week to allow EPA regional personnel to submit additional nominations for this course.

**Key data points for this course:**

- We received a total of 50 nominations: 32 state, 3 territory, 7 tribal, and 5 EPA, and 1 private industry.
- We invited 33 total participants: 20 state, 2 territory, 4 tribal, and 7 EPA.
- We hosted 30 participants: 19 state, 2 territory, 4 tribal\*, and 5 EPA
  - \*1 tribal participant was not nominated for this course and arrived unexpectedly. They were welcomed to attend upon arrival. The PREP Team did not pay for their travel to course.
- We hosted 21 speakers: 2 state, 1 tribal, 11 EPA, 5 state participant, 1 territory participant, and 1 private

This course was well received. Ninety six percent of final survey respondents (N=24) indicated they would recommend this course to others in their organization. When asked how they plan to expand and strengthen their professional network, one participant replied "The networking was unreal in the sense that I have met many other people in different areas that do what I do. So, my contact book of references for questions/concerns with

regulations and enforcement grew immensely." A summary of the final evaluation is included at the end of this report.

### 3. Pesticide Labels from Registration to Enforcement PREP Course, August 5-8, 2024, Fort Collins, Colorado

We convened six 1.5-hour planning group meetings from March 21 to May 8 to refine the target audience and course goal, identify major topic areas, develop the agenda, and finalize nominations.

The **target audience** of this course is personnel that work under a FIFRA cooperative agreement involved in pesticide label review and/or programmatic activities related to enforcing labels. A group of participants with diverse experiences is expected.

The **course goal** is to understand the relationship between pesticide product registration, label review, and the enforceability of pesticide labels.

Major **topic areas** for this course are:

- Provide a basic overview of the pesticide registration process including the types of registrations and exemptions.
- Give an overview of the enforceability of pesticide label language and associated challenges.
- Discuss upcoming changes and impacts to the pesticide label including ESA mitigation measures, bilingual labeling, web-distributed labels, and other label initiatives.
- Discuss how new and emerging technology could impact pesticide labeling in the future

Nominations for this course opened on April 4, 2024, and closed on May 2, 2024. Acceptance/waitlist notifications were sent to nominees by May 16, 2024. At the request of EPA, we made arrangements to invite up to 10 EPA participants, whereas in a typical course we would invite only 3.

**Key data points for this course:**

- We received 42 total nominations for this course: 31 state, 2 territory, and 9 EPA.
- We invited 33 total participants: 24 state, 2 territory, and 7 EPA.
- We hosted 30 participants: 22 state, 2 territory, and 6 EPA
- We hosted 22 speakers: 3 state, 11 EPA, 1 private, 1 university, and 11 state participant.

All final survey respondents (N=27) indicated they would recommend this course to others in their organization. When asked why they would recommend this course to others, one participant replied "I would recommend this course to others because it provides a unique opportunity to learn what issues/challenges other states are experiencing. It also allows access to EPA personnel in both a classroom setting and a social setting. Information exchange with these top level EPA Managers provides an invaluable resource to those of us on the state level that we would not be provided if we didn't attend PREP Trainings." A summary of the final evaluation is included at the end of this report.

### 4. Laboratory Issues PREP Course, September 23-26, 2024, Denver, Colorado

We convened six 1.5-hour planning group meetings from May 9 to July 1, 2024 to refine the target audience and course goal, identify major topic areas, develop the agenda, and finalize nominations.

The **target audience** of this course is current and newer lab managers and directors working under FIFRA cooperative agreements. Experienced senior level FIFRA laboratory staff will also be considered.

The **course goal** is to share knowledge, expertise, communication strategies, and best practices to enhance competency and quality for managing a state regulatory pesticide laboratory.

**Major topic areas for this course:**

- Emerging environmental challenges laboratories face that require unplanned attention and resources.
- Communication strategies between lab and enforcement managers including how to collect defensible samples and how to interpret reported lab results.
- Leadership and management training including managing across generations, communication, time management, and succession planning.
- Pesticide residue analysis including instrumentation, methodology, and best practices.
- Quality control issues such as ISO accreditation, the measurement uncertainty process, and training to be an expert witness.

Nominations for this course opened on May 23, 2024, and closed on June 20, 2024. Acceptance/waitlist notifications were sent to nominees by July 5, 2024.

**Key data points for this course:**

- We received 35 total nominations for this course: 30 state, 2 territory, 2 EPA, and 1 international.
- We invited 28 total participants: 25 state, 2 EPA, and 1 international.
- We hosted 25 total participants: 23 state, 1 EPA, and 1 international.
- We hosted 26 speakers: 7 state, 6 EPA, 1 private, and 11 state participant, and 1 international

All final survey respondents (N=19) indicated they would recommend this course to others in their organization. When asked why they would recommend this course to others, one participant replied "I will definitely be having conversations with my management to better define the roles of the laboratory with respect to enforcement investigations. I will also be taking the "generation" information [managing multigenerational staff] into account with staff. I am also hoping to pursue the green lab certification and going to attempt to streamline our QAPP process." A summary of the final evaluation is included at the end of this report.

## PREP Participant Data for Courses Conducted in the 2024 Season

PREP Course and Dates	# nominations received						# participants attended (#invited, if different from attended)					
	Total	State	Ter.	Tribe	EPA	Other	Total	State	Ter.	Tribe	EPA	Other
<b>Certification and Training</b> April 22-25, 2024 Fort Collins, Colorado	<b>63</b>	36	2	5	10	10 (PSEP)	<b>37 (41)</b>	22 (23)	1	1 (3)	9 (10)	4 (PSEP)
<b>Compliance and Enforcement Management</b> June 24-27, 2024 Davis, California	<b>50</b>	32	3	7	5	1	<b>30 (33)</b>	19 (20)	2 (2)	4* (4)	5 (7)	0
<b>Pesticide Labels from Registration to Enforcement</b> August 5-8, 2024 Fort Collins, Colorado	<b>42</b>	31	2	0	9	0	<b>30 (35)</b>	22 (25)	2	0	6 (7)	0
<b>Laboratory Issues</b> September 23-26, 2024 Denver, Colorado	<b>35</b>	30	2	0	2	1 (CAN)	<b>25 (28)</b>	23 (25)	0	0	1 (2)	1 (CAN)

\* 1 tribal participant was not nominated for this course and arrived unexpectedly. They were welcomed to attend upon arrival

## PREP Courses Planned for 2025:

### 1. Senior Executive, June 24-26, Fort Collins, CO

The target audience for this course is new and experienced senior-level state, territory, and tribal pesticide program managers with direct responsibility for the implementation of their agency's pesticide program. The course goal is to provide participants with an opportunity to build and foster relationships and communication networks and to strengthen and enhance leadership skills.

### 2. Comprehensive Combo, August 4-7, Fort Collins, CO

The target audience for this course is new and experienced staff who work under a FIFRA cooperative agreement. This includes staff who are currently in a leadership role or aspire to be in one. The course goal is to provide basic information on pesticide program structure, coordination, communication, and current issues related to federal, state, tribal, and territory pesticide regulatory programs.

### 3. Structural Pest Control Issues, OR Endangered Species Combo, September 8-11, Fort Collins, CO

The target audience for the Structural Pest Control Issues course is personnel who work under a FIFRA cooperative agreement with responsibilities for regulating structural pesticide use. The course goal is to enhance a participants' ability to meet the present challenges and complexities of regulating and enforcing pesticide use in the structural pest control industry.

The target audience for the Endangered Species Combo course is personnel that work under a FIFRA cooperative agreement involved in pesticide label review and/or programmatic activities related to enforcing labels. A group of participants with a range of experiences is expected. The course goal is to understand the Endangered Species Act (ESA), its implementation in the registration process, and how it impacts pesticide compliance and enforcement.

## PESTICIDE INSPECTOR RESIDENTIAL TRAINING PROGRAM

### AAPCO 2025 Report

#### **PIRT Team**

Amy Sullivan  
PIRT Administrator

Cary Giguere  
PIRT Administrator

Tricia Wancko  
Project Manager

Kelly Engle  
EPA PIRT Coordinator

The purpose of the Pesticide Inspector Residential Training program (PIRT) is to provide pesticide educational training to enforcement staff of pesticide state lead agencies, territories, and tribes working under FIFRA cooperative agreements, to develop or enhance their ability to formulate and implement pesticide regulatory programs, and/or undertake new initiatives.

The scope is national and seeks to support pesticide enforcement staff by delivering a foundational understanding of FIFRA and basic inspector concepts and activities, how to conduct different types of inspections, strategies to address ongoing challenges, including tackling complex and highly nuanced issues surrounding implementation of new federal registrations, rulemaking, and priorities. PIRT uses demonstrated educational approaches to conducting investigations in its classroom instruction, field trips, and mock inspections. PIRT will seek to promote uniformity in enforcement understanding while taking into account differing needs based on geography and varying state or tribal regulations.

The primary goal is to provide a respectful, knowledgeable, and relevant program that offers sound, practical approaches to enforcement that are usable by the enforcement community. We also seek to foster community, encourage relationship building, allow for mentoring opportunities, and support resource sharing.

## OBJECTIVES

1. Providing high quality, relevant training for pesticide State Lead Agency, Tribal Pesticide Enforcement Program, and Territorial Lead Agency inspectors that are valued by pesticide enforcement programs. Three to four trainings will be offered per year in-person. In consultation with EPA's PIRT Coordinator and the Steering Committee, we will explore offering short virtual mini-PIRTs as well to engage a broader audience with PIRT.
2. Ensuring that trainings focused on fundamentals are available throughout the grant cycle as well as a wide variety of topic-specific and advanced trainings to engage varying levels of experience among enforcement staff.
3. Strengthening and expanding networks for inspectors and building collaborative relationships that support ongoing learning and resource utilization.
4. Provide a classroom style forum to learn about emerging issues to develop and share effective strategies for fostering compliance among the regulated community
5. Elevate the voice of enforcement staff by providing opportunities to discuss the issues they face currently, and to solicit strategies related to proposed measures that will impact enforcement into the future. Provide support for ongoing dialogue to share perspectives, concerns, and actively provide these suggestions for improvement with the larger FIFRA community via partners such as AAPCO, SFIREG, ASPCRO, and TPPC and increase awareness and use of the PIRT website.
6. Provide ongoing resource accessibility for enforcement programs through stewardship of course materials and related useful information on the PIRT website.
7. Evaluate and solicit membership of the PIRT Steering committee to ensure the success of the program.
8. Examine course success to continue improvement in engagement and educational approaches used in PIRT.

## STEERING COMMITTEE

### *Composition*

The PIRT Steering Committee is comprised of fourteen people in total: eight state members, one tribal member, and four EPA members, the PIRT Coordinator is a standing member of the Steering Committee. Five of the state members are from different EPA regions, while one member serves as a previous PIRT host representative. There is also one representative of the

American Association of Pesticide Control Officials, the Association of Structural Pest Control Regulatory Officials, and the Tribal Pesticide Program Council. The three EPA representatives are from the Office of Compliance, the Office of Civil Enforcement, and an EPA regional office. The PREP liaison from the Office of Chemical Safety and Pollution Prevention also sits on the steering committee.

The AAPCO President or designee will serve as the PIRT Steering committee co-chair with the PIRT administrators.

### **2025-2026 PIRT Steering Committee Members**

#### **State Lead Agencies**

Tony Cofer, Alabama Department of Agriculture

Michael Ekedahl, Wisconsin Department of Agriculture, Trade, and Consumer Protection

Michael Rigirozzi, Colorado Department of Agriculture, Division of Plant Industry

Matt Wood, Vermont Agency of Agriculture, Food and Markets

Garret Creason, Office of Indiana State Chemist

Patrick Jones, North Carolina Department of Agriculture and Consumer Services

Africa Dorame-Avalos, Inter Tribal Council of Arizona, Inc.

#### **Association of Structural Pest Control Regulatory Officials**

Allison Cuellar, Texas Department of Agriculture

#### **Association of American Pesticide Control Officials**

Bob Blankenburg, Alaska Department of Environmental Conservation

#### **U.S. Environmental Protection Agency**

Sharon Dobesh, EPA Region 7

Ricardo Jones, EPA OECA, Office of Compliance

Royan Teter, EPA OECA, Office of Civil Enforcement

Cindy Wire, EPA PREP Liaison

### *Timing*

The PIRT Steering Committee is convened on an annual basis during the in July, or as needed, to make decisions concerning course selections and the target audience for each course. The work of the Steering Committee is typically complete by October 1st of the year and before any planning groups are convened.

### *Roles*

1. Review national course survey results and select courses for the coming season.
2. Determine the specific type, format, and number of training courses.
3. The Steering Committee has responsibility for determining the following information for each course:
  - a. target audience,
  - b. course goals,
  - c. major topic areas,
  - d. field trips, mock inspections, or similar hands-on activities,
  - d. determine if a pre-course webinar or homework is necessary,
  - e. date and location of course,
  - f. planning group members.

## **PLANNING GROUP**

### *Composition*

Planning groups consist of 7-8 state/tribal and EPA employees. We aim for at least 2 members who attended the last course of the same title. The 7-8 members are typically comprised of these groups:

- 5 SLAs -Including one from the location of the course
- 1 Tribal rep
- 1 EPA HQ
- 1 EPA Region

- 1 Steering Committee member

#### *Timing*

Planning groups generally meet once a week for several weeks until the planning is complete. Planning group meetings typically begin 5 months prior to the course.

#### *Roles*

The planning group's overall objective is to provide structure and support to ensure that the training is as successful as possible.

1. Develop agenda and details of each course
2. Create course agendas or training approaches
3. Develop an appropriate curriculum for each course in accordance with the guidance from the PIRT Steering Committee
4. Conduct the following work:
  - a. Refine the target audience,
  - b. Refine the course goal,
  - c. Refine major topic areas,
  - d. Identify appropriate speakers,
  - e. Provide guidance on how long to spend on each topic,
  - f. Identify the type of activity,
  - g. Provide input on the proposed list of nominees accepted into the course.

## **Workshop: Determining Compliance with Endangered Species Act (ESA) Strategy Requirements**

*September 18-19, 2024, Philadelphia, PA*

Pesticide regulatory agencies' inspection and compliance programs will be responsible for determining how pesticide applicators are implementing and complying with the ESA Strategy pesticide use requirements. Guidance and information on how to conduct inspections and determine compliance is needed by EPA and co-regulators (states, territories and Tribes) to ensure successful implementation of the ESA Strategies. This workshop served as an initial step

toward forming a consistent and robust approach for monitoring compliance with pesticide use requirements related to EPA's ESA Strategies. The workshop focused on inspection processes for documenting pesticide applicators' compliance with the EPA ESA Strategies as they become implemented. Participants were asked to work together to identify issue areas and form recommendations for monitoring compliance with the run-off/erosion and drift mitigation measures, which are the core of the ESA Strategies.

## **Basic Structural Pesticide Inspection and Investigation Training**

*February 3-6 2025, Decatur, GA*

- Provide new pesticide inspectors with a basic knowledge and awareness of structural pesticide application techniques and considerations when performing inspections and investigations.
- Enhance participants' ability to meet the present challenges of regulating pesticide use where humans live, work, and play through increasing knowledge about pests, vector-borne diseases, non-target exposure, and effective communication about the risks and benefits of pesticide use.
- Provide networking opportunities for those in the pesticide community.

## **Worker Protection Pesticide Inspection and Investigation Training**

*May 12-15, 2025 / Grand Rapids, MI*

- Provide pesticide inspectors with a basic knowledge and awareness of the Worker Protection Standard (WPS) and considerations when performing inspections and investigations.
- Enhance participants' ability to meet the present challenges of enforcing and recording compliance with the WPS for both Tier 1 and Tier 2 inspections.
- Provide networking opportunities for those in the pesticide community.

## **Tribal - PIRT**

*July 13-17<sup>st</sup> 2025 - Polson Montana*

- Provide Tribal pesticide programs
- Provide Networking opportunities
- Train Tribal pesticide inspectors operating under a cooperative agreement, that would benefit from a general overview of issues and skills needed to conduct pesticide inspections, follow protocols and conduct for cause investigations, and address other compliance concerns related specifically to Tribal issues.

## **Basic Inspector -PIRT**

***October 6-9, 2025 - Burlington Vermont***

Training for State, Tribal and Territorial Pesticide inspectors operating under a cooperative agreement, that would benefit from a general overview of issues and skills needed to conduct pesticide inspections, follow protocols and conduct for cause investigations, and address other compliance concerns related specifically to Tribal issues.

Potential Course Topic Areas-

- FIFRA 101
- Label Comprehension
- Enforceable vs unenforceable
- Registration process
- AAPCO/SFIREG Structure
- Sampling
- Photo Documentation
- Report basics – putting it all together
- Maps- Google maps

Inspector Basics

- Interviewing
- Descalation
- Safety
- Professional witness preparation
- Building a case –Recognizing information needed

Update on activities  
AAPCO Annual Conference  
April 2025

# SFIREG

## State FIFRA Issues Research and Evaluation Group



This permanent committee was created by AAPCO when FIFRA was amended to provide States with Primacy for FIFRA Implementation, Use, and Enforcement (1978).

# SFIREG

SFIREG provides a means for the States to communicate directly to EPA and enables States to play a meaningful role in the development of pesticide policies and regulations.

***SFIREG is where the STATES can bring issues to the table to discuss with one another. If an issue is then considered to have widespread significance and EPA's assistance is needed to resolve the issue, SFIREG develops possible solutions and asks to either discuss the issue further or seeks resolution from EPA.***

# SFIREG - Full SFIREG Meeting

- SFIREG is composed of Representatives from each of the EPA regions.
- The 10 Regional Representatives form Full SFIREG.
- The SFIREG Representative is responsible for communicating with the states in the region and bringing regional issues to Full SFIREG.

# SFIREG Regional Representatives

EPA Region	Representative	Agency
Region 1	David Rousseau	New Hampshire Department of Agriculture, Markets & Food
Region 2	Anthony Lamanno	NYS Dept. of Environmental Conservation
Region 3	Frank Schneider	Pennsylvania Department of Agriculture
Region 4	Kristen Lashley	Alabama Department of Agriculture
Region 5	Ryan Berzinski	Wisconsin Department of Agriculture, Trade, and Consumer Protection
Region 6	Ryan Williams	Oklahoma Department of Agriculture
Region 7	Kelly Navinsky-Wenzl	Kansas Department of Agriculture
Region 8	Dylan Zubke	North Dakota Department of Agriculture
Region 9	Jack Peterson	Arizona Department of Agriculture
Region 10	Brian Hurzeler	Idaho Department of Agriculture

<https://aapco.org/full-sfireg-committee-members/>

# **-SFIREG Working Committees-**

*Engaging in In-Depth Discussions and Approaches to Resolving Issues*

## **Pesticide Operations and Management**

- Focus on Operational and managerial aspects of implementation of pesticide programs, for example,
  - Registration
  - Certification
  - Enforcement
  - WPS
- 10 Representatives in addition to Chair

## **Environmental Quality Issues**

- Focus on Technical aspects of the implementation of pesticide programs, for example,
  - Water Quality
  - Risk Assessment
  - Technical Standards
  - TES
- 10 Representatives in addition to Chair

***Working Committees Report to Full SFIREG. Their primary function is to research and develop issues.***

# **-SFIREG Working Committees-**

*Engaging in In-Depth Discussions and Approaches to Resolving Issues*

## **ESA Strategy Implementation**

- Focus on Technical aspects of the implementation of EPA's ESA Strategies
  - Comment on Interim Decisions that incorporate ESA Mitigation Measures
  - Comment on PULAs and BLT additions
  - Discuss verification and enforcement issues
  - Provide information to EPA on implementation
- 10 Representatives in addition to Chair

***Working Committees Report to Full SFIREG. Their primary function is to research and develop issues.***

# Full SFIREG

Meets in June and December

All ten regional representatives

Working Committee Chairs

Partners

SFIREG Regional Reports  
Working Committee Reports  
OPP Updates  
OECA Updates  
Partner Updates

# Pre-SFIREG meetings

- Each EPA Region
- identify issues to bring to Full SFIREG
- meet with EPA Region staff
- meet with PSEPs

# SFIREG Upcoming Meetings

- April 7 & 8, 2025 – Joint Working Committee – Raleigh, NC
- June 2 &3, 2025 – Full SFIREG – Alexandria, VA
- September 15-16, 2025 – Joint Working Committee – TBD
- December 8 & 9, 2025 – Full SFIREG, Alexandria, VA

***<https://aapco.org>***

## **2025 AAPCO Annual Meeting – Worker Protection Committee Report**

Work Group/Committee: Worker Protection Committee

Chair: Kelly Friend, Florida Department of Agriculture and Consumer Services

Pat Farquhar, North Carolina Department of Agriculture and Consumer Services

Members:

<b>Member</b>	<b>Agency</b>	<b>Email Address</b>
Amy Sullivan	AAPCO	<a href="mailto:aapco.sfireg@gmail.com">aapco.sfireg@gmail.com</a>
Tony Cofer	Alabama Dept of Agriculture Industries	<a href="mailto:tony.cofer@agi.alabama.gov">tony.cofer@agi.alabama.gov</a>
Jack Peterson	Arizona Dept. of Agriculture	<a href="mailto:jpeterson@azda.gov">jpeterson@azda.gov</a>
Donna Marciano	California Department of Pesticide Regulation Enforcement Branch	<a href="mailto:Donna.Marciano@cdpr.ca.gov">Donna.Marciano@cdpr.ca.gov</a>
Kelly Friend	Florida Dept. of Agriculture and Consumer Services	<a href="mailto:kelly.friend@fdacs.gov">kelly.friend@fdacs.gov</a>
Neil Richmond	Florida Dept. of Agriculture and Consumer Services	<a href="mailto:neil.richmond@fdacs.gov">neil.richmond@fdacs.gov</a>
Ricardo Davalos	Florida Dept. of Agriculture and Consumer Services	<a href="mailto:Ricardo.Davalos@FDACS.gov">Ricardo.Davalos@FDACS.gov</a>
Nick Sumner	Georgia Dept. of Agriculture	<a href="mailto:nicholas.sumner@agr.georgia.gov">nicholas.sumner@agr.georgia.gov</a>
Antonio Castro-Escobar	Michigan Dept. of Agriculture and Rural Development	<a href="mailto:escobara@michigan.gov">escobara@michigan.gov</a>
Jasper Cobb	Mississippi Dept. of Ag and Commerce	<a href="mailto:Jasper@mdac.ms.gov">Jasper@mdac.ms.gov</a>
Laura Vollar	Mississippi Dept. of Ag and Commerce	<a href="mailto:LauraV@mdac.ms.gov">LauraV@mdac.ms.gov</a>
Kristin Lashley	Alabama Department of Agriculture	<a href="mailto:kristen.lashley@agi.alabama.gov">kristen.lashley@agi.alabama.gov</a>
Robin Tutor-Marcom	Nort Carolina Agromedicine Institute	<a href="mailto:tutorr@ecu.edu">tutorr@ecu.edu</a>
Patrick Farquhar	North Carolina Dept. of Agriculture and Consumer Services	<a href="mailto:Pat.Farquhar@ncagr.gov">Pat.Farquhar@ncagr.gov</a>
Patrick Jones	North Carolina Dept. of Agriculture and Consumer Services	<a href="mailto:patrick.jones@ncagr.gov">patrick.jones@ncagr.gov</a>
Carmina Hanson	North Carolina Dept. of Agriculture and Consumer Services	<a href="mailto:Carmina.Hanson@ncagr.gov">Carmina.Hanson@ncagr.gov</a>
Leo Reed	Office of the Indiana State Chemist	<a href="mailto:reedla@purdue.edu">reedla@purdue.edu</a>
Dave Scott	Office of the Indiana State Chemist	<a href="mailto:scottde@purdue.edu">scottde@purdue.edu</a>
Kaci Buhl	Oregon State University – NPIC	<a href="mailto:buhlk@ace.orst.edu">buhlk@ace.orst.edu</a>
Ted Bunch*	Oregon OSHA	<a href="mailto:theodore.bunch@dcbs.oregon.gov">theodore.bunch@dcbs.oregon.gov</a>
Jessica Lenker	Pennsylvania Dept. of Agriculture	<a href="mailto:jeslenker@pa.gov">jeslenker@pa.gov</a>
Kathy Booker	Tennessee Dept. of Agriculture	<a href="mailto:kathy.booker@tn.gov">kathy.booker@tn.gov</a>
Richard Strickland	Tennessee Dept. of Agriculture	<a href="mailto:richard.strickland@tn.gov">richard.strickland@tn.gov</a>
Perry Cervantes	Texas Dept. of Agriculture	<a href="mailto:Perry.Cervantes@texasagriculture.gov">Perry.Cervantes@texasagriculture.gov</a>
Helene Ambrosino	US Environmental Protection Agency	<a href="mailto:Ambrosino.helene@epa.gov">Ambrosino.helene@epa.gov</a>
Carolyn Schroeder	US Environmental Protection Agency	<a href="mailto:Schroeder.Carolyn@epa.gov">Schroeder.Carolyn@epa.gov</a>
Ryne Yarger	US Environmental Protection Agency	<a href="mailto:Yarger.Ryne@epa.gov">Yarger.Ryne@epa.gov</a>
Matthew Lloyd	US Environmental Protection Agency	<a href="mailto:Lloyd.Matthew@epa.gov">Lloyd.Matthew@epa.gov</a>
Royan Teter	US Environmental Protection Agency	<a href="mailto:Teter.Royan@epa.gov">Teter.Royan@epa.gov</a>
*New Members		

**Issues to be raised for discussion by AAPCO Board or General Session:**

None noted.

**General summary of committee activities for the year:**

Committee Meeting

The Worker Protection Committee met virtually on October 16, 2024. Three speakers provided presentations:

- AEZ Update - Ryne Yarger – EPA Certification and Worker Protection Branch, Pesticide Re-Evaluation Division, Office of Pesticide Programs

Ryne provided an update on the latest with the Application Exclusion Zone.

The 2024 Final Rule includes the following:

- Prohibits applications from contacting people, either from direct contact or spray drift.
- AEZs can extend off the agricultural employer's establishment.
- Application suspension requirements for individuals within an AEZ are applicable in all situations, including when individuals are within an easement on the establishment.
- AEZ distances as follows:
  - 100 ft for aerial; airblast or air-propelled; and fumigant, smoke, mist, or fog applications.
  - 100 ft for ground-based, fine spray applications.
  - 25 ft for ground-based sprays using medium or larger droplet sizes sprayed above 12 inches.
- Replaces Volume Median Diameter (VMD) with ASABE S572 for defining droplet size.
- Applications must be suspended if someone is within an AEZ.
- Suspended applications can resume after individuals are no longer within an AEZ.
- Owners and their immediate family may remain inside closed buildings, housing, or shelters on the establishment within an AEZ.
- Update handler training requirements to include information regarding resuming suspended applications and owner's family exemption.

- Bilingual Labeling FAQ and Next Steps – Linda Arrington/Sue Bartow – EPA Pesticide Re-Evaluation Division, Office of Pesticide Programs

Linda provided an update on the Bilingual Labeling next steps:

- Beginning on December 29, 2025, product labels on restricted use pesticide products and agricultural use products with the highest toxicity will be required to bear Spanish language translations for the health and safety sections. All pesticide labels must have translations by 2030. The translations must appear on the pesticide product container or must be provided through a hyperlink or other readily accessible electronic method.

- NC State Farmworker Internet Survey – Catherine LePrevost – Associate Extension Professor, NC State University

Catherine provided an overview of North Carolina's Internet Study which can be found at:

Internet Devices and Internet Access Among Migrant and Seasonal Farmworkers, North Carolina, 2023  
(<https://journals.sagepub.com/doi/10.1177/00333549241295632>)

#### Other Activities

The EPA, Pesticide Re-Evaluation Division, Office of Pesticide Programs provided the Worker Protection Committee the opportunity to review the Spanish Translation Guide for Pesticide Labeling for feedback. We provided feedback from Committee members on November 12, 2024. Ricardo Davalos (FL) and Carmina Hanson (NC) provided alternative language related to PPE that will help protect Spanish speaking pesticide handlers and workers.

**AAPCO LIFE MEMBERSHIP/MEMORIALS COMMITTEE**

**2025**

**RECOMMENDATIONS**

Respectfully submitted by

Life Membership and Memorials Committee

J. Patrick Jones

February 25, 2025

**LIFE MEMBERSHIP NOMINATION:**

**Gary Bahr**

**Science Liaison, Director's Office**

**Washington State Dept. of Agriculture**

**Nominated by**

Kelly McLain

Assistant Director/Policy Advisor

**Washington State Dept. of**

**Agriculture**

I would like to nominate Gary Bahr for Life Membership.

Gary Bahr spent 25 years with the Idaho Dept. of Agriculture Idaho in various positions, ranging from Bureau Chief, Section Manager and Scientist.

He then spent an additional 10 years with the Washington State Dept. of Agriculture working tirelessly to support state lead agencies in their FIFRA responsibilities. He spent his last eight years with WSDA as the SFIREG chair, constantly pushing EPA to prioritize their relationship with SLA's and making sure our state feedback on EPA proposals were heard.

## **MEMORIAL RECOGNITION:**

### **Phillip Gray**

Information submitted by Amy Sullivan, AAPCO Executive Secretary

Phil Gray passed away on July 217, 2024, in Greensboro, Vermont. Phil served in the Office of Pesticide Programs at EPA. He retired after 30 years of service and then became the Executive Secretary for AAPCO.

Many AAPCO members knew and worked with Phil Gray and he will be missed.

Philip Hayward Gray Jr., died peacefully at the Greensboro Nursing Home on Wednesday, July 17, 2024.

The son of Philip Hayward Gray Sr., and Margaret Day Gray and the oldest of their six children, Phil was born in Barre on Aug. 3, 1931. His childhood largely spent in Madison, Wis., included Greensboro summers, fostering a life-long love for the Northeast Kingdom.

A highlight of his high-school experience was winning Choate's school-wide chess tournament as a freshman. He went on to earn a bachelor's degree at Yale in 1954 and marry Hazel Burton, before completing a master's at Columbia in 1956. Following two years in the U.S. Army (and the births of daughter, Margaret and son, Philip Burton), Phil joined the Department of State's Foreign Service, becoming an accomplished speaker of Arabic, a skill he honed during posts in Beirut, Lebanon (where daughter Ellen was born), Baghdad, Iraq (where Phil served as an economics officer, and son Bruce was born), and as a political officer in Amman, Jordan.

A superlative poker player, he enjoyed regular games with other Foreign Service officers, financing two oriental rugs with his winnings. His colleagues, knowing full well whose cash was behind these, would ruefully ask Hazel if they could spit on the rugs when it was Phil's turn to host a game.

Following the family's return to the States in 1967, Phil continued with government service, working briefly for the Office of Economic Opportunity before moving to the Office of Pesticide Programs of the Environmental Protection Agency. Retiring after 30 years in the federal government and moving year-round to Greensboro, Phil married Janet Birrell Travers in 1999, and they went on to enjoy exploring many exotic destinations together.

He joined the nonprofit sector as a part-time administrator for an association of state pesticide regulators while, locally, his community involvement became extensive. Phil was president of the Greensboro Association and board member as well as long-serving secretary of the Mountain View Country Club. He chaired the Greensboro Planning Commission, was on the Hazen Union School Board and visited area nursing homes as an ombudsman for the Area Agency on Aging.

A regular platelet donor — involving a somewhat more complex procedure than simple blood donation — he donated over 100 gallons of platelets during 823 trips to Burlington. In 2018, he and Jan, together, won the coveted Greensboro Selectboard's annual Greensboro Award. A fierce competitor, Phil was a force to be reckoned with from sailboat races to tennis tournaments, winning

prizes in each. For decades, he greatly enjoyed matching wits with the New York Times crossword puzzles.

Phil is survived by his wife, Jan; his four children; seven grandchildren; two great-granddaughters; stepdaughters, Gretchen Cassell and Marcy Larrabee and families; and numerous other relatives.

A service of remembrance will be held in Fellowship Hall, Greensboro Church of Christ, from 11 a.m.-noon (followed by refreshments) on Wednesday, Aug. 7, 2024. In lieu of flowers, donations in Phil's memory may be made to the Greensboro Nursing Home or a favorite nonprofit organization, the Center for Biological Diversity, located in Tucson, Ariz.



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Industry Relations Workgroup Report  
February 18, 2025

Co-Chair, Derrick Lastinger (GA)  
Co-Chair, Janet Hou (BASF)

The AAPCO Industry Relations Workgroup submits the following report for the 2025 Board of Directors annual meeting.

The AAPCO Industry Relations Workgroup (IRWG) was established to maintain an open dialogue with the pesticide industry and provide a forum to discuss industry issues and concerns with pesticide regulatory officials. The workgroup maintains communication with the AAPCO board to ensure efficient and effective efforts between the groups.

### **Activities**

#### **Meetings**

The workgroup met on December 4, 2024, on Microsoft Teams prior to the December full SFIREG Meeting. The meeting included 28 attendees. The work group discussed the following items:

1. Becky Langer-Curry was recognized for serving as co-chair of the workgroup since January 2023.
2. 2025 AAPCO Conference Agenda and them “Into the Future” to be held March 2-5 at the Hilton Old Town Alexandria, Virginia. The group noted topics that may benefit with industry participation and provided speaker suggestions for AAPCO to consider. This year AAPCO is inviting speakers to represent industry perspectives throughout the agenda in place of the separate industry forum session.
3. Welcome reception and the new poster session opportunity. Potential topics were discussed for the poster session.
  - a. *Fertilizer vs. Pesticide labeling – similarities, differences, challenges* Melinda Bowman(FMC)
  - b. *Endangers Species Act & Pesticide Use Limitation Areas* - Taylor Randell Singleton, Ph.D. University of Georgia
4. The group discussed keeping engaged throughout the year and looking for ideas to make the most of the workgroup.
5. Derrick will share the ideas and suggestions with the AAPCO Planning committee.

In October, AAPCO President, Gretchen Paluch (IA) appointed Janet Hou (BASF) to serve as co-chair of the AAPCO IRWG.

In September, Dr. Becky Langer-Curry with Bayer CropScience announced that she will be stepping down from her co-chair position and will be starting a new position with the National Corn Growers Association.

### **Future Activities**

The workgroup plans to have a gathering to touch base with members on Monday, March 3<sup>rd</sup> at 5:00 in the Hilton Old Town Alexandra. The activity will be hosted by Dillon Gabbert and CropLife America and RISE.

## **AAPCO REPORT TO MEMBERSHIP**

### **AAPCO Pollinator Protection Workgroup**

**Chair: Patrick Jones (North Carolina)**

**March 2025**

Workgroup Activities March 2024-March 2025:

Not a lot of activity to report for this fiscal year.

The AAPCO Pollinator Protection Workgroup in conjunction with representatives from numerous state lead agencies (SLAs), developed the biennial survey to capture the efforts of SLA Pollinator Protection Plans. The survey was sent out to SLAs on October 14, 2024.

Response to the survey was light with 18 responses. Survey results were captured in a PowerPoint presentation and submitted to AAPCO. Results have been posted on AAPCO's website under surveys. This survey serves as a national assessment and is a useful tool to capture LSA pollinator protection activities.

With the retirement of past members, the Pollinator Protection Workgroup is actively soliciting for new workgroup members. Interested parties are encouraged to contact Pat Jones, NC, or the AAPCO-SFIREG Executive Secretary, Amy Sullivan. We could use more members from across the country.

NCDACS in conjunction with NPSEC, FDACS and EPA's financial support has completed the work on the updated video project. In short, the videos (Managing Hive Pests and Bee Kill Investigation) were translated into Spanish and French.

The Canadian versions were developed specifically for Canada and edited to include Heath Canada product registration with specific Canadian content. We created a Canadian French and English version of the Canadian videos. Gabrielle Claing who works for the Animal Health and Welfare Directorate, Ministry of Agriculture, Fisheries and Food in Canada was the lead representative for the creation of the Canadian versions.

The US versions were translated into Spanish. All videos will be hosted on the NCAGR Pollinator webpage

Interactive Rise Modules were also developed for online training in both English and Spanish. The Hive Pest Management module is hosted by EverBlue and can be used for applicators seeking recertification credits. Modules may be hosted by NCSU at [pesticidestewardship.org](http://pesticidestewardship.org) , this site could be used by individuals or groups wishing to review the training modules. The Bee Kill Investigation module will hopefully be approved for inspector training on Fed Talent of Inspector Wiki.

Special thanks to Mike Cameron of Grow Media and Chuck McIlhenny, an independent media producer, were the creative geniuses behind the project. Travis Snodgrass was the lead technical expert with help from the Apiary Services in Florida and North Carolina.

If you have any questions or if you are interested in serving on the {Pollinator Committee – please let me know.

Sincerely, Patrick Jones

# FIFRA 25(B) WORKGROUP

## 2024 ANNUAL REPORT

February 12, 2025

SLA Co-Chairs:

- Daniel Duer (Pennsylvania Department of Agriculture)
- Samantha Tochen (Washington State Department of Agriculture)

Industry Chair:

- Kim Nemeth (Procter & Gamble)

Members: 48 SLAs and 161 Industry Representatives

Current list of members can be found here: <https://aapco.org/2015/07/02/fifra-25b-workgroup/>

*The workgroup's mission is to facilitate the collaboration of states and industry in order to share information, provide guidance, foster label consistency, and reduce the duplication of efforts in the review and registration of Minimum Risk Pesticide products.*

## GENERAL SUMMARY OF ACTIVITIES FOR 2024:

### Industry Initiatives:

With the addition of an industry lead in 2024, the 25(b) workgroup has had some great discussions and collaborations from the year.

Industry has prioritized revisions to the following guidance document.

- Efficacy Guidance:
  - Why a revision was needed: BPPD intends to continue the minimum risk rulemaking process (NPRM) with a focus of on-body repellents because they tend to claim efficacy against public health pests. In a related action, BPPD is gathering publicly available data that addresses testing of personal repellents and taking this information to the HSRB for review. These data may be used to revisit efficacy standards for products making public health claims. Industry is drafting a white paper to enable comments on the NPRM and to the HSRB. We want to include a proposed framework for efficacy standards in our paper and revisited the AAPCO guidelines because registrants are currently complying with these SLA approved standards.

- Industry Participants: A smaller efficacy work group was created with volunteers from the full industry membership.
- Work to date: The current AAPCO guidelines were reviewed, and changes were proposed by the industry efficacy work group. The revised document was vetted with the full industry membership through email and discussion during multiple monthly meetings. The industry-aligned document was shared with SLAs in January 2025. SLAs and industry efficacy work group representatives met on February 5<sup>th</sup> and 7<sup>th</sup> to receive feedback and address questions.
- Next Steps: Feedback received was discussed with the broader SLA/industry work group during our monthly call on February 12<sup>th</sup>. Industry will target the end of February/early March to provide a revised document to SLAs. The goal is to align on a final document enabling comments to the HSRB in advance of the anticipated July 2025 meeting.

**State Initiatives:**

Over the course of 2024, SLAs have collaborated on the following topics

Topic	Different Occurrences
Ingredients	25
Claims & Labels	20
Non-Compliant Products	19
Efficacy	5

SLAs prioritized the need to revise three guidance documents.

- Inert Ingredient Guidance:
  - Why a revision was needed: Additional inert ingredients have been identified as concern for SLAs during reviews. Review of the previous document details to ensure that they are current.
  - SLA Workgroup Participants: Daniel Duer (PA), Sam Tochen (WA), Sarah Caffery (IN), Jolynn Morris (CO), Kimberly Williams (FL), Kristia Thomas (SD), Rebecca Tgibedes (NH), Shiden Azaria (DC)
  - Work to date: Reviewed and revised the current guidance document. Updates include additional background information on food use sites, addition of FAQs and commonly consumed food information, revisions to acceptable limits and previously included information for inerts, addition of new inert ingredients of concern, corrections to the inert tolerance table.
  - Next Steps: Complete a draft for Industry review, collaborate and update. Post a final document.

- Absence of Ingredient Claims document:
  - Why a revision was needed: EPA changed their stance on comparative claims in 2024.
  - SLA Workgroup Participants: Sarah Caffery (IN), Tory Matsumura (IN), Douglas Chan (ID), Heather Kirby (TN), Hillarie Gray (ID), Jeanine Broughel (NY), Kimberly Williams (FL), Monica Sipes (WI), Rashmi Singh (FL)
  - Work to date: A draft for guidance revision, discussions with EPA on different scenarios for claims of concern.
  - Next Steps: Finalize revisions, SLA and Industry review, finalizing for posting on the AAPCO website.
- The Label Guidance document:
  - Work to date: none
  - Why a revision is needed: SLA reviews have changed since this document was created, EPA has also revised their stance on comparative claims. Revision is needed to ensure that this document is current.

Sarah Caffery (IN) has transitioned out of the SLA chair position of this workgroup. Daniel Duer (PA) and Samanthan Tochen (WA) are the new co-chairs moving forward. We are looking forward to the next chapter for this workgroup! Thank you, Daniel and Samantha, for taking on the efforts to lead.

#### ISSUE TO PRESENT TO THE AAPCO BOARD AND MEMBERSHIP

No concerns to present to the AAPCO board at this time.

**To view our current guidance documents:** <https://aapco.org/2015/07/02/fifra-25b-workgroup/>

**To be added to the workgroup membership, email the appropriate chair:**

SLA Co-Chairs:

- Daniel Duer ([daduer@pa.gov](mailto:daduer@pa.gov))
- Samantha Tochen ([Samantha.Tochen@agr.wa.gov](mailto:Samantha.Tochen@agr.wa.gov))

Industry Chair:

- Kim Nemeth ([Nemeth.ka@pg.com](mailto:Nemeth.ka@pg.com))



## **AAPCO Technology Workgroup Report**

February 26, 2025

The mission of the AAPCO technology workgroup is to work with states, US EPA, and other stakeholders to gain a thorough understanding of issues associated with the use of new technologies within the existing regulatory framework, help develop guidance that will ensure consistent compliance interpretation and assistance and serve as a communication hub on these topics.

### **Members**

Chair: Nathan Davis, Office of the Indiana State Chemist

Tamara James, Florida Department of Agriculture and Consumer Services

Gary Buckner, Washington State Department of Agriculture

Hailey Peters, Florida Department of Agriculture and Consumer Services

Zachary Szczukowski, Vermont Agency of Agriculture, Food and Markets

Jason Williams, North Carolina Department of Agriculture and Consumer Services

Natalia Mopeller, Florida Department of Agriculture and Consumer Services

The workgroup is searching for new members, if you or someone with your agency is interested in becoming an active member of the workgroup, please contact Nathan Davis or a member of the technology workgroup.

### **Leadership Transition**

In April 2024, the workgroup chair Dwight Seal with the North Carolina Department of Agriculture and Consumer Services stepped down as chair to prepare for retirement. Dwight recommended workgroup member Nathan Davis with the Office of the Indiana State Chemist to become the next chair of the workgroup. Dwight worked with Nathan to supply pertinent information and documents to continue the mission of the workgroup without interruption.

### **Outreach**

In November 2024, Nathan on behalf of the workgroup presented virtually at the Remote Pilot and Aerial Application Association conference (RPASS), this is the second year RPASS requested the technology workgroup present at the conference. Nathan presented an overview of AAPCO, the technology workgroup and results from the 2024 UAV survey. The workgroup worked with USDA Research Engineer Dr. Dan Martin to coordinate complimentary attendance for pesticide regulators and educators.



In February 2024, Nathan on behalf of the workgroup presented at The Pesticide Stewardship Alliance (TPSA) in Raleigh, North Carolina. This was the first time the workgroup was requested to present at TPSA. Nathan presented an overview of the results from the 2024 UAV survey.

The workgroup has been requested to present at the Spray Drone End Users conference in Mobile, Alabama at the end of March. Nathan will be attending and presenting on behalf of the workgroup, a state regulatory update on pesticide applications with drones.

### **Collaborations**

The workgroup was invited to join the Pesticide Educational Resource Collaborative (PERC) Task Force on Educational Materials Related to Pesticide Applications Using Unmanned Aerial Vehicles (UAVs) lead by Dwight Seal. As chair, Nathan has been attending task force meetings. Dwight requested the results from the 2024 UAV/UAS AAPCO Technology Workgroup Survey to be included in the task force report.

### **Survey**

In 2024, the workgroup worked virtually to create a survey related to drone regulation. This was the third drone regulation survey created by the workgroup in four years. The survey was released in October 2024, the survey received responses from all EPA Regions, 7 tribes, 1 territory, and 35 states. The workgroup is working through the survey result, initial review comparing the survey to the 2022 survey, indicates drone use continues to rise quicker than states are capable of updated regulation.

### **Moving Forward**

The workgroup had a virtual meeting in December 2024 to discuss survey results and plan steps for moving forward. The workgroup plans to reach out to states, tribes, and territories who indicated via survey answers that they were actively working on drone use regulation. The workgroup will use this information to compile a guidance document when creating laws specific to drone use and application. If your agency is currently working on drone regulation and the agency was not when the survey was released, please reach out to the workgroup.

## AAPCO Endangered Species Act Work Group Report

2/24/25

Chairpersons: Harris Walters and Kelly Navinsky-Wenzl

The AAPCO Endangered Species Act (ESA) Work Group has met consistently since its inception in November 2022. The Work Group was originally formed to track ESA related issues associated with potential impacts to pesticide regulatory programs and the grower community at large. Over the course of the past 12 months the Work Group has grown, adding 13 new members. The Work Group is now comprised of 24 members in total, 14 of which represent State Lead Agencies (SLAs) and 10 members representing Industry, Tribes, Federal Agencies, or Academia. SLA participation includes all but two EPA regions, currently lacking representation from regions 2 and 3.

The Work Group has assembled virtually 28 times since December 2022, and Work Group members have met 8 times with EPA pesticide program offices (3 virtual meetings on March 10, 2023, May 25, 2023, August 3, 2023; and 5 in-person meetings on March 6, 2023, January 24, 2024, March 6, 2024, June 4, 2024, and December 11, 2024).

The AAPCO ESA Work Group has had several changes in leadership over the course of the last year. Harris Walters, Florida Department of Agriculture and Consumer Services, and Kelly Navinsky-Wenzl, Kansas Department of Agriculture, currently serve as the co-chairs for the Work Group.

In September 2023, the AAPCO Work Group chairs brought forth a proposal for a third SFIREG joint working committee to focus on ESA strategy implementation. Given the scope and continued expansion of ESA discussions, the previous chairs felt this was necessary and would enable the POM and EQI committees time to adequately focus and address non-ESA pesticide regulatory topics. The new working committee, the SFIREG ESA Strategy Implementation Working Committee (ESI), became active in July 2024. The two groups have some overlap with a few members that participate in both committees/work groups. The AAPCO ESA Work Group is charged with engaging in upcoming ESA issues to come, while ESI remains focused on current strategy implementation.

The Work Group roughly kept to a monthly meeting schedule during this time period, with some months requiring additional meetings in order to complete selected efforts. Work Group meeting discussions have been wide-ranging, with topics covering state level conservation plans, EPA's Mitigation Menu, concerns with EPA's Bulletins Live! 2 (BLT), state level invasive species response issues, EPA's most recent pesticide registrations and how the new ESA process impacted these actions, offset projects, the USFWS proposed monarch listing, Atrazine, Glufosinate-P, Pesticide Use Limitation Areas and the refinement process, and an ESA Education/Training Collaboration Forum.

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Work Group Projects Since Previous Report (Active and Finalized):

**September 2024**

The Work Group elected to submit a comment to EPA's *Draft Insecticide Strategy to Reduce Exposure of Federally Listed Endangered and Threatened Species and Designated Critical Habitats from the Use of Conventional Agricultural Insecticides*. [Docket EPA-HQ-OPP-2024-0299](#). The comment was focused on three main components, addressing issues related to the Strategy's clarity and direction, technical challenges, and the overall complexity of the proposed ESA process.

**December 2024**

The AAPCO ESA Work Group and ESI have collaboratively agreed to initiate an ESA Education/Training Collaboration Forum. The goal of this national forum would be to help define roles and identify education and outreach needs related to new label requirements. The forum would bring together the major players involved in this ESA revamp in order to open lines of communication between the groups and to identify roles and set expectations. This would potentially provide a pathway that would allow everyone involved to establish their roles in this process and move forward on a more collective and efficient front.

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The AAPCO Work Group members remain interested in building future opportunities for AAPCO membership to engage in a regular dialogue with EPA, SFIREG, industry and other relevant regulatory agencies involved in pesticide program impacts from the endangered species act. Please reach out to the work group co-chairs if you have questions or interest in the work group (Harris Walters [Harris.Walters@FDACS.Gov](mailto:Harris.Walters@FDACS.Gov) and Kelly Navinsky-Wenzl [Kelly.NavinskyWenzl@KS.GOV](mailto:Kelly.NavinskyWenzl@KS.GOV)).

**2025 REPORT TO AAPCO**  
**E-COMMERCE WORKGROUP**

While e-Commerce and pesticides are not something new, with the pandemic, several related issues came to light. These issues include EPA's differentiation between an "inspection" vs "offsite compliance monitoring" and reporting of these activities under the Cooperative Agreement and the routine incorporation of "virtual" activities as part of inspections/ investigations by several states/ tribes/ territories well before the pandemic.

To address these and related issues, in 2022, the AAPCO Board put together a small workgroup including states and EPA's Office of Enforcement and Compliance Assurance (OECA) to identify and discuss the issues. A survey was developed and distributed in 2023. From the information collected from the survey, in addition to discussions at the 2023 AAPCO Annual Conference and Pre-SFIREG and SFIREG Meetings, the following were identified as focus areas for consideration:

1. Including e-Commerce as a Picklist in FY26-29 Cooperative Agreement Guidance;
2. Identifying Interim Reporting - how best for SLAs to report e-Commerce activities for current grant cycle;
3. Developing eCommerce Inspection Guidance; and
4. Messaging to Regions and Grantees Regarding e-Commerce and Grant Negotiations.

Current participants include:

**State Lead Agencies**

Pat Farquhar, North Carolina Department of Agriculture and Consumer Services

Kristen Lashley, Alabama Department of Agriculture and Industries

David Huber, Vermont Agency of Agriculture, Food and Markets

Garret Creason, Office of the Indiana State Chemist

Toby Primbs, Oregon Department of Agriculture

Trisha Leaf, Minnesota Department of Agriculture

Otto Oemig, Wisconsin Department of Agriculture, Trade and Consumer Protection

Jacob Addison, Department of Pesticide Regulation Public Service and Agriculture, Clemson University

**EPA Office of Enforcement and Compliance Assurance:**

Helene Ambrosino

Royan Teter

Christina Cobb

Michael Bellot

Michael Bauman

Liz Vizard

Looking ahead, it is hopeful the workgroup can continue to expand to include additional EPA Regions.

In 2024, the workgroup focused on #1 & #2. Regarding #2, a proposed e-Commerce picklist item was included in the *draft* FY26-29 Cooperative Agreement Guidance. Members of the workgroup along with others submitted written input into the draft guidance. The workgroup also had two additional follow-up meetings during the Fall of 2024 with EPA to further discuss input regarding the proposed e-Commerce picklist language. For #3, the workgroup began the process of summarizing existing inspection guidance from survey respondents that are currently conducting e-Commerce inspections. Those seeking to conduct e-Commerce activities have indicated that they would like guidance. Ideally, guidance could be developed for use by both EPA and grantees or at least developed in parallel. Work on #3 will continue into 2025. In addition, along with exploring guidance the workgroup is also looking for ways to increase coordination and communication with those that are conducting e-commerce activities. Finally, for #4, assuming the e-Commerce picklist is in the final FY26-29 guidance and grant funding can be used for e-Commerce activities, there will be a continued need for messaging from EPA HQ to all Regions and grantees about the ability to negotiate these as part of their cooperative agreements and encourage them to do so (assuming the grantee is interested in conducting e-Commerce inspections). Central to this is EPA

allowing states to use their grant funding to support these activities (i.e.: reduce in person marketplace and add some e-Commerce inspections).

Respectfully Submitted,  
Toby Primbs  
Pesticides Program Manager  
Oregon Department of Agriculture



# American Association of Pesticide Safety Educators (AAPSE) Report

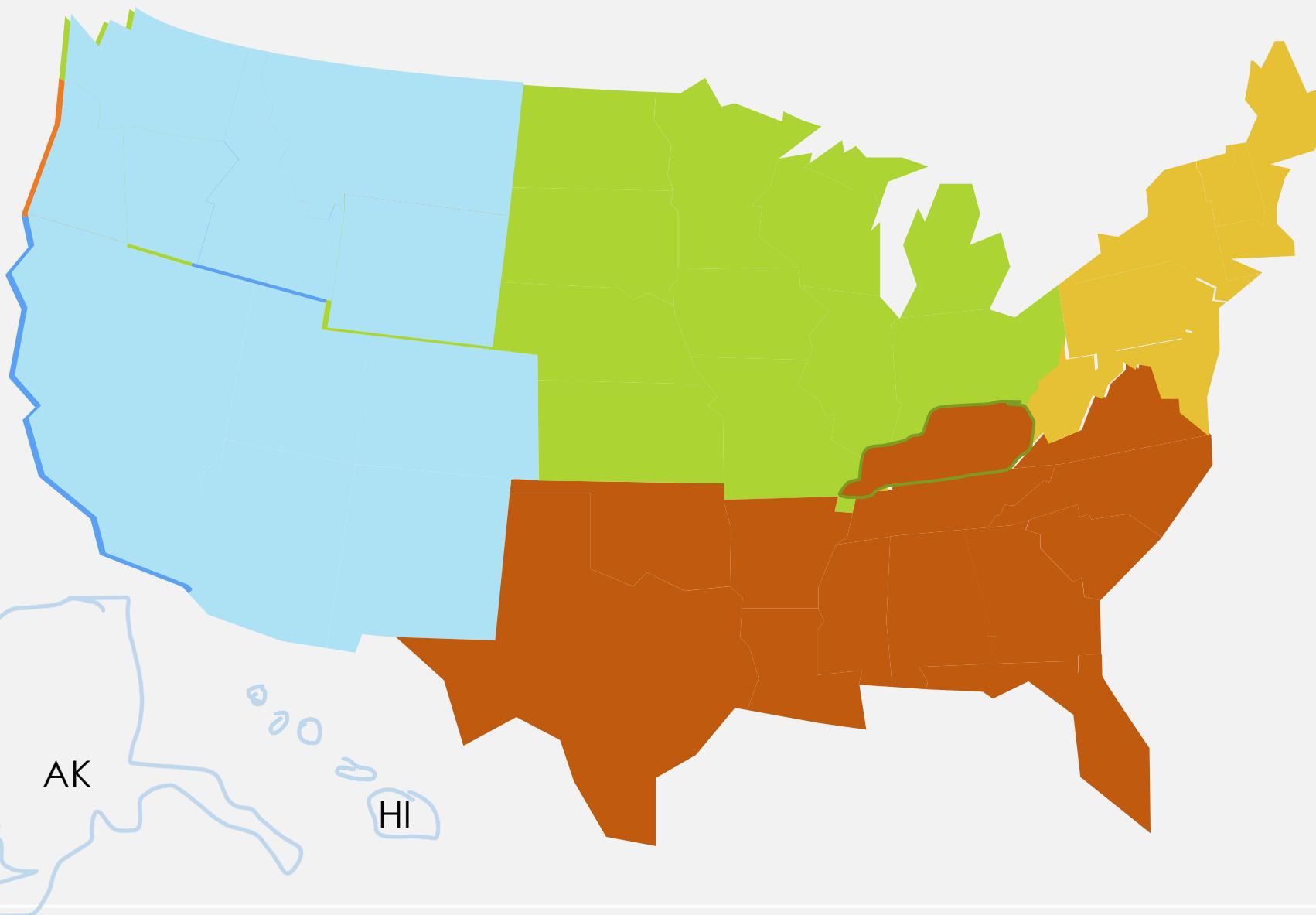
MARCH 3, 2025

# Current Executive Committee 2024-25

- New officer installation, Gulfport, MS, July 2025

- President: Eugene Merkl
- President-Elect: Sherman Takatori
- Secretary: Frannie Miller
- Treasurer: Sonja Thomas
- Past President: Amanda Bachmann
- Webmaster: Sarah Kingsley-Richards

# AAPSE Regions



237 members  
-SLAs  
-Industry  
-PSEPs  
Extension Specialists

- Northeast
- North Central
- Southern
- Western

# The Journal of Pesticide Safety Education (JPSE)

- Online
- Open-Access
- Peer-Reviewed
- Publishes annually

**Mike Weaver - Editor-in-Chief**

Professor Emeritus of Entomology; retired director of VT Pesticide Programs, Virginia Tech

**Fred Whitford - Associate Editor**

Clinical Engagement Professor & Director of Purdue Pesticide Programs, Purdue University

**Susan Terwilliger - Assistant Editor**

Retired publications manager & editor, VT Pesticide Programs, Virginia Tech

**Dean Herzfeld - Contributing (Legacy) Editor - AAPSE Legacies and History**

Collaboration Team & Education Facilitator, National Pesticide Safety Education Center; retired PSEP Coordinator, University of Minnesota

**Dan Wixted - Contributing (Article) Editor - Short Commentaries and Non-Research Articles**

Extension Support Specialist, Cornell University

**Jason Ferrell - Contributing (Review) Editor - Book and Media Reviews**

Director, Center for Aquatic and Invasive Plants/Pesticide Information Office, University of Florida

**Andrew Martin - Contributing (Science) Editor of Science and Research-Based Articles**

Exam Development Specialist, Office of Indiana State Chemist, Purdue University



## Professional Development

- Pollinator Protection Webinar
- Beating Burnout Webinar
- ESA Webinar
- Resource Roundup

## NEW INVOLVEMENT!

- Certification and Training Leaders (CATL)
- SFIREG/EPA/ESA Workgroup
- USDA/EPA/WSSA/ESA Discussion Group
- AAPSE/ESA Member Survey



## Upcoming Events

- ▶ **Annual Membership Meeting and Conference**  
Gulfport, Mississippi July 28-31, 2025
- ▶ **Regional meetings**  
Southern Region – June 9-12, 2025, Bentonville, AR
- ▶ **Webinars**  
Endangered Species Act Overview – 3/12/ 2025, 1-2pm EST  
Beating Burnout – 5/21, 2025, 1-2pm EST  
Pollinator Protection – DATE TBD



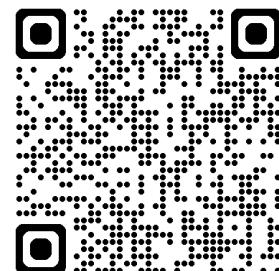
# Vision for 2025 and Beyond

- ▶ **Affirm AAPSE's Leadership in Certification and Training Programs**
- ▶ **Optimize Collaboration to secure PSEP funding**
- ▶ **Expand AAPSE Influence with Stakeholders**
- ▶ **Provide Permanent Hosting / Administration for CTAG**



**Gene Merkl - AAPSE President**

Email: [gm53@msstate.edu](mailto:gm53@msstate.edu)



**American Association of Pesticide Safety Educators**



## **ASPCRO Report to AAPCO**

### **March 3, 2025**

The following items reported herein highlight ASPCRO's activities since March 2024. ASPCRO hereby submits the following report for consideration.

#### **ASPCRO Board of Director's:**

The composition of ASPCRO's Board of Directors (BOD) was updated during the Report to Membership and by election at the August 2024 annual meeting. The following individuals comprise the current BOD:

- Allison Cuellar (TX) – President
- John Pitcock (KY) – Vice-President
- Courtney Frasier (FL) - Secretary
- Grant Bishop (WV) – Treasurer
- Ryan Okey (SC) – Past President
- David Huber (VT) – At Large member
- Matt Lopez (CO) – At Large Member
- William "Bill" Reid (IN) – At Large Member

#### **Meetings and Trainings**

##### **2024 Midyear Board of Directors Meeting:**

ASPCRO held its midyear meeting in person at the Westin Portland Harborview in Portland, ME on April 23, 2024. The meeting was attended by states and industry partners. Committee meetings held included Building Code, Inspector Training Committee, Pest Management in Schools, Public Health, Rodenticide, and Structural Fumigation. All the committee meetings were well attended. The meeting featured topics related to sulfuryl fluoride label changes, insulation making pesticide claims, pest management in schools survey, and the rodenticide proposed biological evaluation and proposed interim decision. Attendees were updated from our industry partners at NPMA.

The Planning Committee also spent the remainder of the week visiting event sites and performed site visits to potential hotels in the Portland area.

## **2024 Annual Meetings:**

The Annual Conference was held from August 19-24, 2024, in Lexington, KY at the Hilton Lexington Downtown. The annual meeting consists of ASPCRO committee meetings, non-agricultural inspector training (see further in the report for more information), ASPCRO Board of Directors (BOD) meeting and general sessions. Our general sessions including technical topics such as, “Caverns of Concrete” and new study regarding the efficacy of insecticides marketed to consumers. Regulatory topics included:

- Deregulation;
- Endangered Species Act biological assessments and labeling;
- rodenticide panel with SLA, EPA and industry; and
- updates from our EPA partners.

The site of the next annual meeting will be in Portland, ME and scheduled for August 25 – 29, 2025 at the Holiday Inn by the Bay.

## **Inspector Training at Annual Conference:**

The BOD held inspector training as a part of the annual conference on August 20, 2024, at the Hilton Lexington Downtown in Lexington, KY. The training focuses on non-agricultural pesticide compliance issues. The training included inspectors from 17 inspectors. The training featured 9 different speakers covering topics such as label interpretation from SLA and industry perspective, industry perspective panel on inspector etiquette highs and lows, penalty matrices and administrative law, e-commerce challenges, de-escalation, sampling, photography techniques and a case study. Feedback from the 2024 training was overall. For 2025, the Inspector Training Committee (ITC) is switching it up. Nominations for the ITC 2025 training were requested in August 2024 and inspectors selected in September. Beginning in October 2024, monthly webinars are held. The monthly webinars will culminate at the in-person training inclusive of a practical mock investigation in Portland, ME on August 25<sup>th</sup>, 2025, at the Holiday Inn by the Bay. At successful completion of the training, Inspectors will “graduate” and be given a certificate from ASPCRO. ITC is also building a library of recorded webinars for future cohorts to use these videos as training modules for future inspector training cohorts with plans to revisit and update the webinars with the same speakers.

## **2025 Midyear Meeting:**

ASPCRO will be hosting the 2025 midyear meeting on April 22, 2025, at the Antler’s Hotel in Colorado Springs, CO. Registration is currently open for the meeting.

## **Board of Directors & ASPCRO Activities**

- ASPCRO supported Rodent Day in April 2025. Rodent day was training to support EPA decision makers. The training featured speakers from industry and public health on how

rodent control practices and rodent control tours at Gallaudet and the National Portrait Gallery.

- Mike Page retired as ASPCRO Executive Secretary in the summer of 2024. Linda Johns is the current Executive Secretary of ASPCRO.
- Governing Documents Review: The BOD has completed a review of the by-laws per the ASPCRO's administrative policies. The proposed updates to the bylaws will be shared with membership prior to the annual meeting. Bylaw modifications will be voted on by membership at the annual meeting in August.
- Board is working on improvements to ASPCRO website and meeting registration process and reviewing systems and vendors to facilitate these changes.

Submitted by:



Allison Cuellar, ASPCRO President

## NASDA Liaison Report - 2025

Prepared by: Gretchen Paluch

AAPCO has been working cooperatively with our valued partners at NASDA and appreciates their efforts to support programs and policies that impact AAPCO members. Notably, for 2025, NASDA members have chosen pesticide regulation again as one of their five primary policy focus issues. Another important focus for 2025 is State Cooperative Agreement Funding. A copy of NASDA's pesticide policy information is attached to this report.

AAPCO values the continued dialogue and contributions from NASDA staff including CEO, Ted McKinney and Senior Director of Public Policy, RJ Karney. This includes participation at the 2024 AAPCO Annual meeting and ESA workshops. The 2024-2025 year was also a time for staffing transitions, which allowed AAPCO to work with both Josie Montoney-Crawford, and then Patrick Wade, when he joined as NASDA Director of Public Policy in November 2024. Both Josie and Patrick provided timely updates as part of the Full SFIREG meetings. Further, AAPCO Directors and the SFIREG Chair have attended virtual and in-person NASDA conferences this past year and benefited from on-going discussions of various topics that enhance the agricultural industry. A general summary of topic activities for the past year include:

- EPA Endangered Species Strategies including Herbicide, Insecticide, and Rodenticide
- STAG Funding
- WPS, including the AEZ
- Farm Bill - Pesticide Labeling Uniformity
- PFAS in Pesticides

The AAPCO President, President-Elect, and immediate Past President held routine meetings with NASDA throughout the 2024-2025 year. Many of the agenda topics are listed above, and there was emphasis placed on how these directly involve and/or impact many of the AAPCO member states. On multiple occasions there was a need for more technical expertise to inform the issues, and the liaison role shifted to organizing discussions directly with SFIREG (Chairs and JWC), as well as AAPCO workgroups.

AAPCO looks forward to continued engagement in the future.

### **Other highlights:**

In July 2024, NASDA did participate in the House Ag Committee Hearing, "Examining the Consequences of EPA's Actions on American Agriculture". There were statements made related to ESA and pesticide programs, including BLT.

<https://agriculture.house.gov/calendar/eventsingle.aspx?EventID=7786>

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EPA accepted public comments on the draft Insecticide Strategy up to mid-September 2024. The AAPCO ESA Workgroup, SFIREG Chair, and SFIREG ESI JWC submitted separate comments. The level of coordination in these comments demonstrates how the different groups prioritized specific topics and provided technical feedback in needed areas relevant to state pesticide programs.

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September 25, 2024, Steve Dwinell provided an update to the NASDA Plant Agriculture and Pesticide Regulation Committee. The meeting took place as part of NASDA's 2024 Annual Conference.

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On October 25, 2024, there were two AAPCO members invited to participate as panelists in the Developments In Pesticide Law and Policy Meeting organized by the American Bar Association and CropLife America. This was an opportunity to highlight AAPCO/SFIREG work and connections.

**Current Federal Insecticide, Fungicide, and Rodenticide Act Enforcement (FIFRA) Issues -**  
*Dr. Gretchen Paluch, President, Association of American Pesticide Control Officials and Pesticide Bureau Chief at Iowa Department of Agriculture and Land Stewardship*

**Endangered Species Act (ESA) Process for Pesticide Registration Decisions - Steve Dwinell,**  
*Director, Public Health and Agricultural Resource Management Division, Vermont Agency of Agriculture, Food, and Markets and SFIREG Chair, Association of American Pesticide Control Officials*

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February 25, 2025, Gretchen Paluch provided an update to the NASDA Plant Agriculture and Pesticide Regulation Committee. The meeting took place as part of NASDA's 2025 Winter Policy Conference.

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Please reach out if you have questions (Gretchen Paluch [Gretchen.paluch@iowaagriculture.gov](mailto:Gretchen.paluch@iowaagriculture.gov) ).

# PESTICIDE REGULATIONS

Predictable, enforceable, science-based pesticide regulatory frameworks are essential to achieving food security, minimizing impacts to the environment and endangered species, and meeting agricultural sustainability goals. NASDA encourages the U.S. EPA to adopt the best available science and adhere to FIFRA's risk-benefit mandate when registering new pesticide products and re-registering existing pesticide products.

With respect to the Endangered Species Act Workplan, NASDA encourages the EPA to develop a robust compliance strategy that meaningfully incorporates concerns raised by state departments of agriculture about its current enforceability challenges.



*Scan to learn more about NASDA's pesticide regulations policy work.*



## BACKGROUND

### EPA AND ENDANGERED SPECIES ACT BACKGROUND

Under the Federal Insecticide, Fungicide, and Rodenticide Act, the EPA is required to assess a wide variety of potential human health and environmental effects when considering a pesticide product for registration or re-registration. Under EPA's Endangered Species Protection Program, the Agency must also evaluate if the pesticide "may affect" a listed species or designated critical habitat, as determined by the U.S. Fish & Wildlife Service under the Endangered Species Act. If so, a lengthy and intensive consultation process between EPA and U.S. Fish and Wildlife Service is triggered.

EPA has struggled to keep up with its increasingly demanding ESA workload for years. Consequently, EPA has faced escalating, often successful, legal challenges alleging that the EPA has failed to comply with its FIFRA obligations with respect to ESA. In 2022, in response to these challenges, EPA published "Balancing Wildlife Protection and Responsible Pesticide Use," known as the ESA Workplan.

The ESA Workplan constitutes EPA's efforts to develop a systematic, holistic approach to bringing its pesticide regulations under ESA-FIFRA compliance. To date, under the ESA Workplan, EPA has published a final Herbicide Strategy, a draft Insecticide Strategy, a final Rodenticide Biological Evaluation, and a final Vulnerable Species Pilot Project. A draft Fungicide Strategy is also expected in 2025.

### NASDA INVOLVEMENT

In 43 states and Puerto Rico, the state department of agriculture is a co-regulatory partner with EPA and is responsible for administering, implementing and enforcing the production, labeling, distribution, sale, use and disposal of pesticides under FIFRA.

As co-regulators, NASDA represents a uniquely critical perspective in the pesticide regulatory space. Our priorities and recommendations are grounded in a commitment to developing regulatory policies that are science-based, transparent and enforceable.

# PESTICIDE REGULATIONS



## REGULATORY ACTION

NASDA is grateful for the significant time and energy EPA has dedicated to bringing its pesticide regulations into ESA-FIFRA compliance and we respect the difficulty of designing a novel and holistic approach to achieve this goal.

Nevertheless, as identified in submitted public comments on the draft versions of the published strategies, NASDA remains deeply concerned that the proposed mitigation measures are overly restrictive and lack transparency. Compliance will be prohibitively costly for growers, reasonable enforcement will be unworkable for state lead agencies, and there are insufficient resources for training and education, among many other issues.

- [NASDA Comments on Draft Herbicide Strategy](#)
- [NASDA Comments on Draft Insecticide Strategy](#)
- [NASDA Comments on Draft Vulnerable Listed Species Pilot Project](#)

## NASDA POLICY

Pesticides are an essential component within many agricultural and horticultural crop production systems that result in the production of a safe, abundant and affordable food supply. Pesticides are also critical tools in a variety of public health activities. NASDA supports the scientifically-sound development, review, registration and re-registration of crop protection technologies and uses to enable growers to produce our nation's food, fiber and fuel. In situations where requirements of other environmental statutes overlap with FIFRA, NASDA supports incorporating those requirements into the FIFRA registration process in a science-based, transparent manner that allows for the complete examination of the risks and benefits of the proposed action.

NASDA believes EPA and U.S. Fish and Wildlife Service must establish a collaborative, transparent and streamlined consultation process for pesticide registrations. The process should include clearly communicated criteria between EPA and U.S. Fish and Wildlife Service, be based on the best available science and eliminate any duplicative steps. Any decisions made between the agencies should not place unreasonable requirements on registrants and farmers and should include adequate time for implementation and robust opportunities for input from state departments of agriculture and other stakeholders.

January 2025

**AAPCO Report to Membership**  
**Pesticide Program Dialogue Committee Liaison Report**  
**Brian Verhougstraete, AAPCO Director**  
**February 21, 2025**

AAPCO continues to represent the interests of state lead agencies on the Pesticide Program Dialogue Committee (PPDC). Brian Verhougstraete currently serves as the AAPCO liaison and representative on PPDC.

The PPDC met twice in 2024, once in June and once in November. Both meetings were held virtually due to Agency budget constraints. Full meeting agendas, notes and presentations are available on [EPA's PPDC website](#)

**June 5 -6, 2024, Meeting Highlights:**

**OPP Update**

- George Parker of the National Agricultural Aviation Association commented about the lack of UAV language on pesticide labels and encouraged the agency to provide clarification on the issue as applicators feel they are operating in a grey zone.

**Emerging Pathogen Implementation Committee (EPIC) Update**

- The updated Emerging viral pathogens (EVP) guidance is fundamentally complete but won't be released until after EPA releases the sanitizer guidance document (expected sometime in 2024).
- Committee proposes to use QR codes on labels to convey EVP language via registrant-owned website. This recommendation is on hold as EPA considers QR Code Policy options.

**Endangered Species Update**

- EPA indicated they are currently settling the last ESA-related lawsuit.
- Nathan Donley of the Centers for Biological Diversity indicated there was some concern that species were losing protections as the agency refined its process and strategies. Several EPA officials responded with statements indicating species protection was of the highest importance to the agency and directed Mr. Donley to share any specific instances where he believed protections were compromised.

**Farmworker Workgroup Update**

- This is a new workgroup that was approved at the November 2023 meeting.
- Brian Verhougstraete (AAPCO and Michigan Department of Agriculture) is a representative on the workgroup.

- Generally, the workgroup is focused on ensuring EPA understands real-world scenarios of agriculture pesticide use and that the agency is considering farmworker perspectives when conducting risk assessments, evaluations, policies, and making decisions.
- Draft charge questions were presented for discussion.

### **November 13-14, 2024, Meeting Highlights:**

#### OPP Update

- A third-party lean process evaluation to improve efficiency of OPP is planned for 2025.
- Registration Division launched Salesforce to track and assign all PRIA/non-PRIA work for conventional products.
- Project a 60% cut to contracts and grants due to budget cuts.
- Digital Transformation:
  - New portal and customer experience for submitting and tracking applications.
  - E-CSF and e-Label projects
  - CRM analytics (improve analytics and metrics)
  - Data call-in (DCI) modules (endocrine related communication)
- Agency expects less involvement in crop tours dues to budget cuts.

#### Emerging Pathogen Implementation Committee Update

- PPDC voted to submit the final report to EPA and sunset the workgroup.

#### Pesticide Resistance Management #2 Workgroup Update

- PPDC voted to submit final report to EPA and sunset the workgroup.

#### Pesticide Label Reform Workgroup Update

- Shared an example of structured label (agricultural) to be posted on PPDC website in near future.
- FIFRA would need to be amended if digital labels were to be required.
- Presentation included a detailed map of the process and multiple recommendations.
- Recognition of SLA's and their individual processes for registering pesticides.
- Next Steps: Formalize recommendations and present at Spring 2025 PPDC meeting.

#### Endangered Species Act Activities and Outreach Update

- PULA refinement process to be released in Dec. 2024.
- Final Rodenticide BE and mitigation strategy released end of Nov.
- Statement that states, PSEPS, extension, all lack resources and that the Agency needs to obtain/allocate more resources for training, outreach, education if they want ESA to be successful.
- Multiple comments from members regarding the need for training and the overall magnitude of the ESA changes on growers/applicators/industry.

### Drone Risk Assessments and Spot Treatments

- Update presented by Amy Blankinship - EFED
- EPA is still operating under an interim policy for UAV's but is working toward a permanent policy.
- EPA wants to minimize barriers to adaption of UAV's.
- Priority for EPA to understand exposure risks from UAV's compared to traditional equipment.

### Biocontrol Including Jurisdiction Issues

- Overview of EPA's engagement with other agencies relevant to biocontrol.
- [Unified Website for Biotechnology Regulation](#) (EPA, FDA, USDA)



**TPSA Liaison Report**  
Rob Hofstetter, MD Dept. of Ag  
02/18/2025

The Pesticide Stewardship Alliance (TPSA), founded in 2000, is a non-profit organization of federal, state and local governmental agencies, educational and research institutions, public organizations, private corporations and individuals that are actively involved in different aspects of pesticide stewardship. The goals of TPSA are to increase the effectiveness, efficiency and longevity of various pesticide stewardship efforts. Please visit the [TPSA web site](#) for more information.

### 2025 Annual Conference

TPSA celebrated its 25<sup>th</sup> anniversary in Raleigh North Carolina at the Renaissance Raleigh North Hills, February 4-6, 2025. The conference started off with two tours. Participants could pre-register for a tour of the North Carolina State University Plant Sciences Building. The Plant Sciences Building is a 185,000 square foot research-focused building that opened in 2022 to support agriculture and the environment. More info can be found [here](#). Participants could also pre-register to tour the North Carolina Department of Agriculture's (NCDA) Steve Troxler Agricultural Sciences Center. The facility opened in 2021 and houses the regulatory laboratories for NCDA. Visit <https://www.ncagr.gov/divisions/agricultural-sciences-center> for more information.

The opening day keynote address was given by Adrian Percy of North Carolina State University. Adrian addressed the grand challenges in agriculture through interdisciplinary science and technology. The second day began with a keynote address by Alexandra Dapolito Dunn, Esq., Crop Life America. Alexandra focused her address on pesticide stewardship issues. Following the keynote address on both days participants could choose from two meeting tracks. The two tracks focused on stewardship issues around PFAS, container management, pesticide disposal, insecticide and herbicide stewardship, invasive species, endangered species and more.

As always, one of the highlights of the conference is the annual stewardship awards. This year's winners were:

Outstanding Member Award: Melissa Rosch, Office of Indiana State Chemist  
President's Award: Scott Birchfield, Syngenta and Angie Martin, Heritage Environmental  
Leader in Product Stewardship (The Pizzy Award): Bart Clewis, Syngenta

## 2026 Annual Conference

Please join us for our conference next year at the Francis Marion Hotel in historic downtown Charleston, South Carolina. The conference is scheduled for February 4-6, 2026. If you have attended a TPSA conference in the past, you know the value of this conference and the wonderful networking opportunities. We hope to see you in February.

For more information about TPSA please visit: <http://tpsalliance.org>. You will find information about past and current activities including the State Pesticide Disposal Database Map, pesticide application information, mini bulk and IBC container management, the TPSA Adviser Newsletter and more.