

Office of Pesticide Programs Updates

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U.S. Environmental Protection
Agency
September 10, 2024**



Discussion Topics

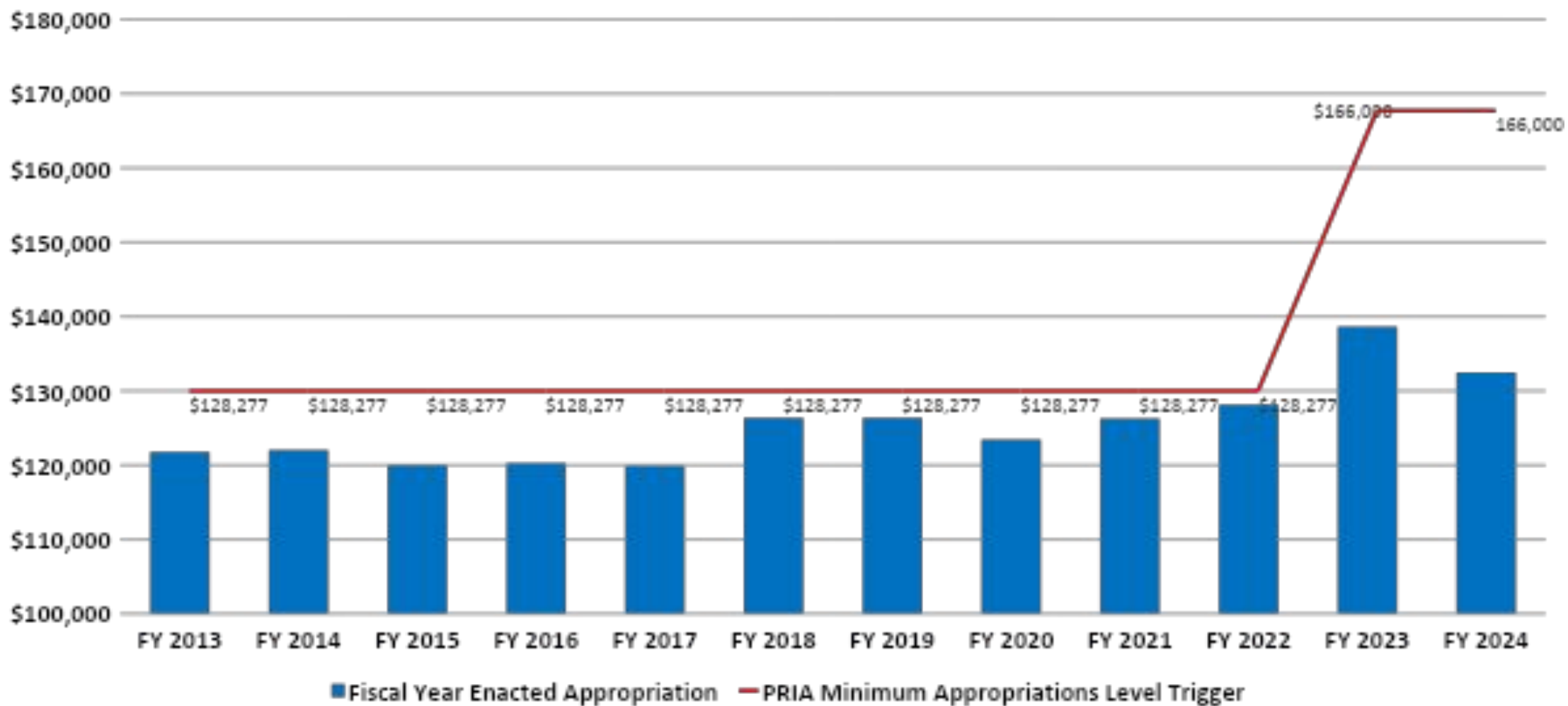
- Appropriations and budget
- OPP registration and PRIA 5
- Registration review and updates on specific chemicals
- Endangered Species Act implementation
- Minor Use and Emergency Response Branch – 2024
- IR-4 public interest findings
- Stoplight analysis



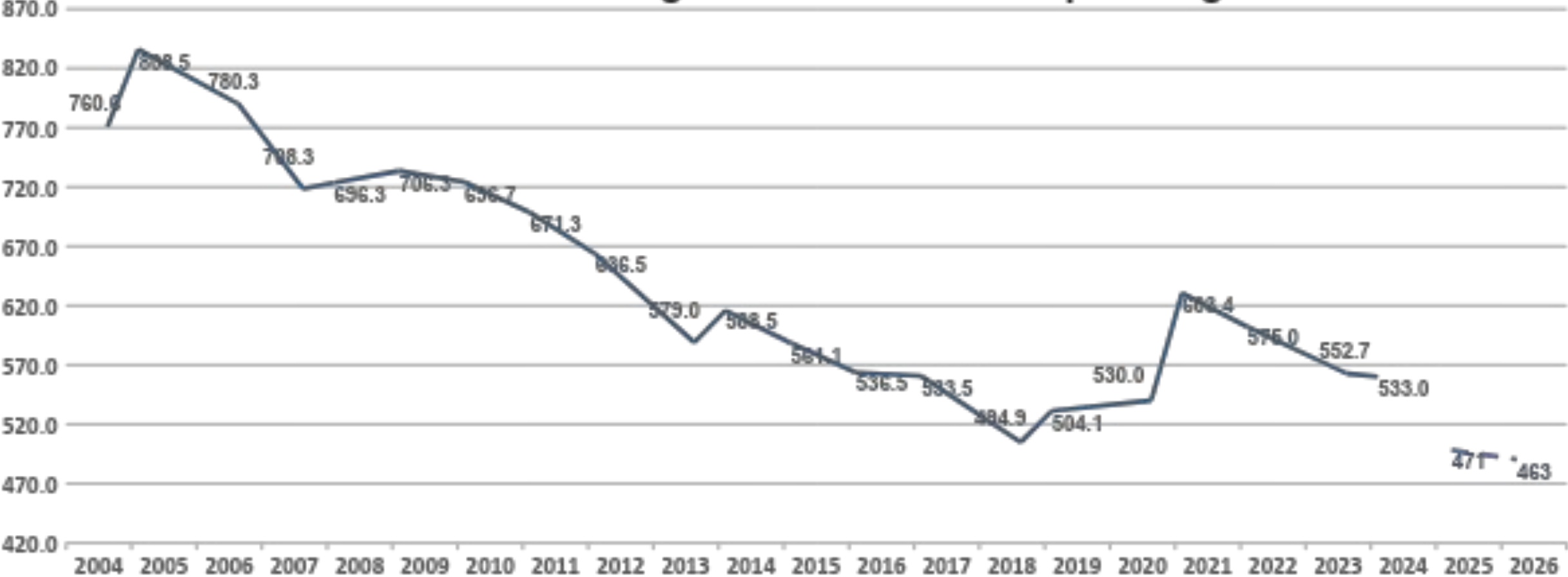
Appropriations

- PRIA minimum appropriations level: **\$166,000,000**
- FY 2023 Final budget: **\$138,646,000**
- FY 2024 Final budget (projection): **\$132,464,000**
- FY 2025 President's budget: **\$175,027,000**
 - STAG: \$14,027,000
 - EPM: \$150,000,000
 - S&T: \$11,000,000

Pesticides Enacted Appropriations by Fiscal Year, FY 2012-2024 (Dollars in Thousands)

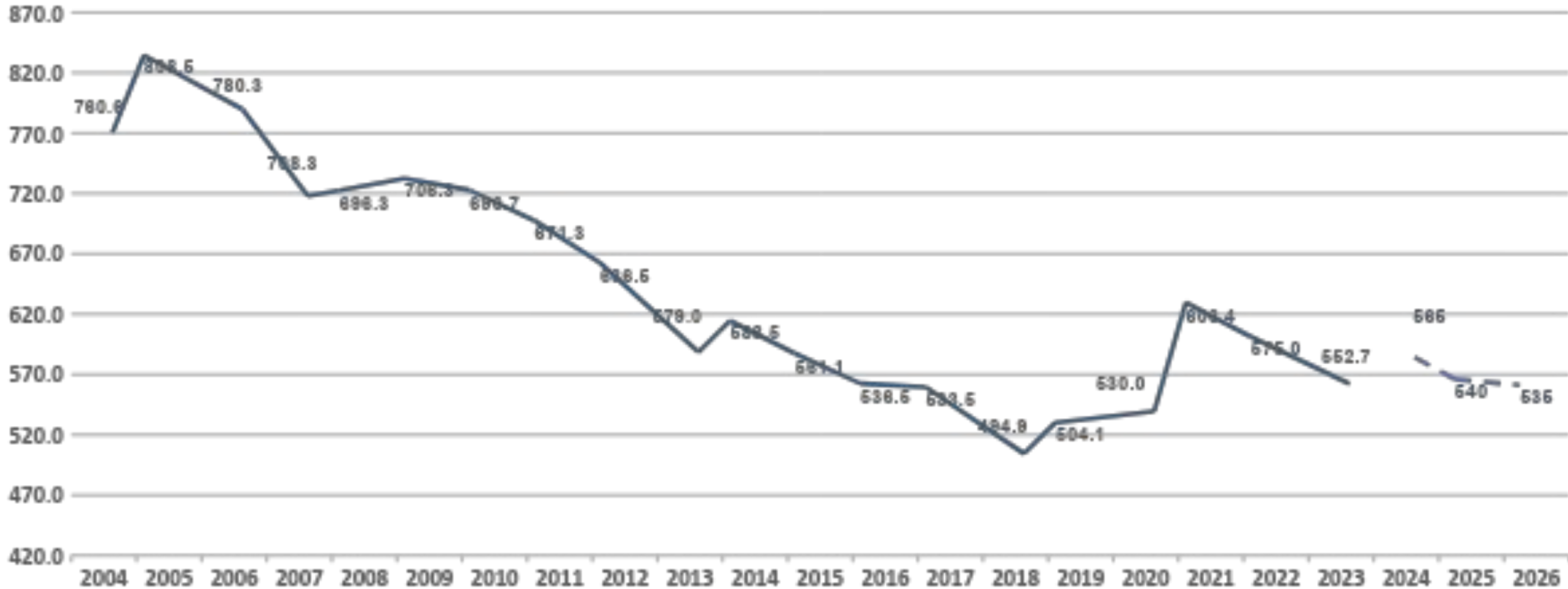


EOY Total FTE Usage Assuming FTE Cuts and Holding Current Contract Spending Constant



95 FTE deducted from the OCSP Program funding levels to normalize the data to reflect OCSP Reorganization and those FTE being moved to OPS.

EOY Total FTE Usage Assuming FTE Cuts and \$34M Contract Reduction (40%) from FY24-FY26

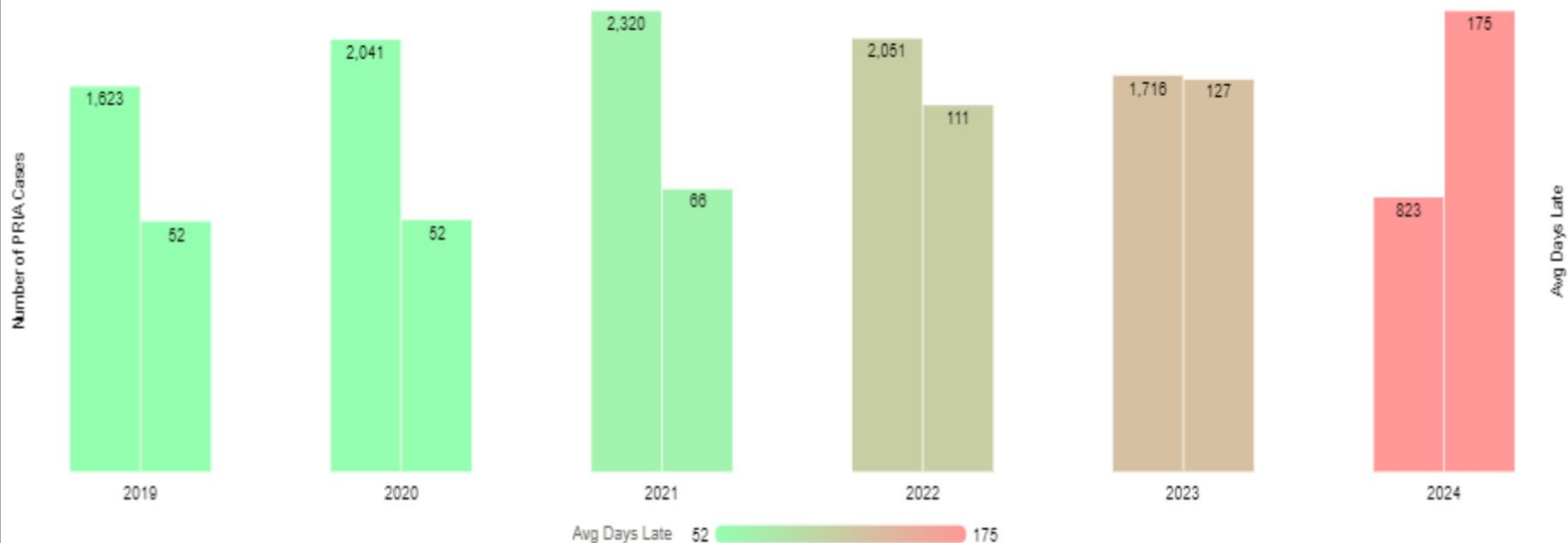


95 FTE deducted from the OCSPP Program funding levels to normalize the data to reflect OCSPP Reorganization and those FTE being moved to OPS.

Immediate FY 24 Budget Impacts

- Virtual Pesticide Program Dialogue Committee (PPDC) meeting
- Virtual FIFRA Scientific Advisory Panel (SAP) meetings
- Crop Tours
- IT Development Timing
- Significant Impacts to Hiring/Backfilling Staff
- Significant Cuts to Contracts
- Significant Delays to Registrations (upwards of 6 mo to 1 yr)
- Delays to other PRIA and Non-PRIA Actions

PRIA Completed Cases Last 5 FY and Average Days L...



Priorities

- PRIA 5 Implementation
- Registration and Registration Review
- ESA Efficiencies and Progress on our ESA Obligations
- Implementation of Agency Priorities
 - Environmental Justice
 - Climate Change
- Advancing State of the Art Science
 - PFAS – EDSP – NAMs
- Rule-Making, Guidance, Litigation, OIG, and Petition Responses
- Advancing Digital Transformation
- Employee Experience/Organizational Development /Process (GP2W) (People, Processes, and Technology)

OPP FY24 Highlights to Date

- Over 7,000 submissions via Portal
- **PRIA**
 - 1,654 applications received
 - 1,080 applications completed
- **Non-PRIA** (notifications, fast track amendments)
 - 2,454 applications received
 - 4,832 applications completed

PRIA 5 Implementation

- EPA continues to make progress implementing requirements of PRIA 5 - for example, OPP:
 - Continues outreach to a broad array of stakeholders regarding bilingual labeling implementation, including accessibility of labels to farmworkers; stakeholders include farmworkers and farmworker advocacy groups, industry, EPA environmental justice and pesticide federal advisory committees, states, and EPA regions;
 - Has made progress reducing the backlog of non-PRIA actions and implementing process changes to review these types of actions according to their timeframes;
 - Continues development of IT system for electronic registration submission and application tracking;

Pesticide Registration Review

- The FY 2023 omnibus set a new deadline of October 1, 2026, for completing the first phase of registration review.
- There are 789 registration review cases due by October 1, 2026 - 726 cases registered prior to FY 2007 that carried forward, and 63 new active ingredients registered after FY 2007 with registration review due dates that fall before October 2026.
- Of the 789, through June 2024 there were:
 - 718 cases (or 91%) for which draft risk assessments are completed (71 remain)
 - 624 cases (or 79%) for which final or interim decisions are completed (173 remain).



*After publication EPA generally holds a 60-day public comment period.

DCPA Update

- On August 2, EPA Administrator Michael Regan issued an emergency order of suspension for all registrations of the herbicide DCPA, or Dacthal under FIFRA Section 6, which took effect upon issuance.
- This means that no person in any state may distribute, sell, ship, or carry out other similar activities for any pesticide containing DCPA. The only exception is for returning existing stock to the registrant, AMVAC. It also means that no person can continue using existing stocks of those products.
- EPA has taken this emergency action to address the imminent hazard to unborn babies whose pregnant mothers are exposed to DCPA. EPA is concerned that unborn babies whose pregnant mothers are exposed to DCPA could experience changes to fetal thyroid hormone levels, and these changes are generally linked to low birth weight, impaired brain development, decreased IQ, and impaired motor skills later in life.
- EPA intends to issue a notice of intent to cancel the DCPA products within 90 days of the emergency order issuance date.

Chlorpyrifos Update

- On December 28, 2023, the U.S. Court of Appeals for the Eighth Circuit vacated EPA's August 2021 rule revoking all tolerances.
- On February 5, 2024, EPA issued a Federal Register notice to amend the Code of Federal Regulations to reflect the court's reinstatement of those tolerances.
- At this time, all the chlorpyrifos tolerances have been reinstated and are currently in effect.
- On March 15, 2024, EPA issued an amendment to revise the existing stocks provisions for three Adama chlorpyrifos pesticide products at the request of the registrant following the reinstatement of the tolerances.

Chlorpyrifos Update

- In June 2024, EPA amended the existing stocks provisions in the May 4, 2023, and August 31, 2022, cancellation orders for three chlorpyrifos products from Winfield Solutions and two chlorpyrifos products from Liberty Crop Protection.
- In June 2024, EPA issued a final cancellation order on the voluntary cancellation of the chlorpyrifos product “Dursban 50W in Water Soluble Packets,” and all but 11 food uses in certain geographical areas for Gharda’s chlorpyrifos technical and two chlorpyrifos end use products.
- In June 2024, the [updated chlorpyrifos FAQ](#) were posted to the Agency’s website.
- EPA expects to implement the NMFS Biological Opinion for all remaining labels which contain food uses.
- EPA expects to issue a new proposed rule to revoke the tolerances associated with all but the 11 food uses for which EPA could make a safety finding in the 2020 PID.

Acephate Update

- On April 30, 2024, EPA released a proposed interim decision (PID) to cancel all but one use of the pesticide acephate.
- This decision is based on EPA's updated human health draft risk assessment (HH DRA) and drinking water assessment (DWA) that were released last year, which showed significant dietary risks from drinking water for currently registered uses of acephate.
- EPA also identified worker, homeowner, and ecological risks that would be mitigated by the proposed cancellations.
- The Agency is proposing to maintain the use of acephate for tree injection because it does not contribute to drinking water exposure, there are no risks for workers, and, with label changes, would not pose risks to the environment.
- The revised HH DRA and DWA were released in August 2023.
- The PID released in April 2024 was available for public comment until July 1, 2024.

Organophosphates Registration Review Update

- 18 Organophosphates Currently in Registration Review.
- Decisions scheduled to be completed by 2027.
- Recent Actions
 - Acephate Proposed Interim Decision (PID) – April 2024.
 - Dicrotophos Proposed Interim Decision (PID) – June 2024.
 - Dimethoate Proposed Interim Decision (PID) – June 2024.
 - Malathion Proposed Interim Decision (PID) – July 2024.
 - TCVP (Tetrachlorvinphos) Interim Decision (ID) – June 2024.

Endangered Species Act

- Can't **jeopardize** species existence
- Can't destroy **critical habitat**
- Federal agencies must **consult**



Court strikes down EPA approval of streptomycin as citrus pesticide

Chris Dall, MA, December 19, 2023

Topics: [Antimicrobial Stewardship](#)



SHARE

A coalition of public interest, environmental health, and farmworker advocacy groups are hailing a decision by a federal appeals court that struck down the Environmental Protection Agency's (EPA's) approval of the medically important antibiotic streptomycin for use on citrus crops.

The **ruling** by the United States Court of Appeals for the Ninth Circuit vacated the EPA's amended registration of streptomycin for use as a pesticide against citrus diseases, saying that it did not satisfy the requirements of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) and Endangered Species Act (ESA). It also sent the amended registration back to the agency so that it could address the defects.

The EPA in 2018 authorized the spraying of streptomycin, which has been labeled as "critically important" to human medicine by



nine_far / iStock

It's déjà vu all over again. EPA comes before this court once more because of **its failure to abide by the law**....EPA cannot flout the will of Congress—and of the people—just because it thinks it is too busy or understaffed.

Center for Food Safety v. Regan, Dec. 2022, 9th Circuit

“Before registering a pesticide, EPA must consult with the statutorily specified agencies that have expertise on risks to species’ survival. **But for decades EPA routinely skipped that step when it registered pesticides**....”

Center for Biological Diversity v. EPA, Dec. 2022, DC Circuit

EPA has long had a **fraught relationship with the ESA**. It has made a habit of registering pesticides without making the required effects determination.

In re: Center for Biological Diversity and Center for Food Safety, Nov. 2022, DC Circuit

Herbicide and Insecticide Strategies

- Presents a framework to more efficiently determine whether, how much, and where mitigations may be needed to protect listed species
- Focus on reducing spray drift and runoff/erosion transport to the listed species most likely impacted (plants for herbicides, invertebrates for insecticides)
- Scope: Agricultural uses of conventional pesticides in Lower 48 States
- Incorporates public comments and input from draft herbicide strategy released last year (2023)

3 Step Framework Described in Strategies

1. Mitigations needed?

- Assess impacts to species (population level).
- Specific to chemical, use and rate

2. Identify Mitigations

- Runoff, erosion, and drift mitigations
- Identify mitigations, as needed, such that potential population-level impacts are unlikely

3. Implementation

- General vs spatially explicit
- Allows for emerging technologies and new science
- Programmatic

Runoff/Erosion Mitigation Menu

Subject of considerable discussion


- Menu is expected to continue to evolve

- **Field Management**
 - Contour farming
 - Cover crop
 - Grassed waterway
 - In-field vegetative filter strip
 - Irrigation water management
 - Mulching with natural materials
 - Residue tillage management
 - Terrace farming
- **Field Characteristics**
 - Application to sand, loamy sand, or sandy loam soil without a restrictive layer
 - Flat or nearly flat field (<3% slope)
 - Fields in western farmland
- **Application Parameters**
 - Rate reduction
 - Soil incorporation
- **Adjacent to the Field or In-between field and Habitat**
 - 30-ft vegetative filter strip
 - Riparian area
 - Vegetated ditch
- **Other Mitigations**
 - Water retention system
 - Both on-field and adjacent to the field mitigation utilized
- **Additional Points** for distance from habitats, conservation programs, and some runoff control practices


Where Could Mitigations Apply?

- Mitigations may be described directly on labels and would apply anywhere labels identify
- Mitigations may also be geographically limited to protect particular species or types of species
- Strategies attempt to target mitigations in locations important for species conservation by:
 - If the strategy identifies impacts only to some types of plants (*e.g.*, grasses) then mitigations may only apply where those types of listed plants are located
 - Refining maps used to define relevant areas for mitigation for species protection/ conservation
- Spatially limited mitigations would be communicated using Bulletins Live! Two

Endangered Species Protection Bulletin

 Application Month: November 2023
Product: MALATHION 8E INSECTICIDE (34704-452); "CLEAN CROP MALATHION 8E INSECTICIDE"

1 Areas where pesticide use must be limited are identified on the map. A legend is located beside the map to help pinpoint these locations.



2 Look below at the Pesticide Use Limitation Summary Table. This table lists the user selected Active Ingredient(s) (ALs) or Product(s) with pesticide use limitations on the printed map. Locate the Active Ingredient (AI) or Product you intend to apply in this table and identify the code in the last column. This code indicates the specific limitation associated with that AI or Product. A limitation description for each code can be found below in the Codes and Limitations Table. If multiple Pesticide Use Limitation Areas (PULAs) are visible on the map, these tables provide information for the highlighted PULA.

If you are applying a pesticide that contains more than one Active Ingredient, or multiple Products, then multiple codes may apply. Follow the limitations for all codes when using this pesticide.

This document contains legal requirements for the use of certain pesticides. Do not modify any text, graphics or coloration or otherwise alter this document. ESPP Contact: ESPP@epa.gov Phone: 1-844-447-3813

Schedule for Strategies

Insecticide Strategy:

- **Public webinar September 5, 2024 to inform comments**
- **Public comment period closes September 23, 2024**
- **Final strategy scheduled for March 2025**

Herbicide Strategy:

- **Finalized in August 2024**

Rodenticide Strategy and Biological Evaluation

- Covers 11 rodenticides in one grouped biological evaluation (BE) and mitigation strategy
- Evaluated each rodenticide based on use pattern and properties
- Public comment period on draft BE mitigation strategy 12/23 to 2/24
 - Approximately 2000 comments (mostly from letter writing campaign)
 - Incorporating comments now into BE and mitigation strategy
 - Final strategy 11/2024
 - Registration review amended PIDs expected in 2025



Hawaii Strategy

- Draft mitigation framework to reduce potential population level impacts from pesticide uses in Hawaii
 - Agricultural and many non-agricultural use sites
 - Considering potential impacts to ~500 listed species
 - Identify species that may have on-site exposure to pesticides
 - Minimize offsite exposure from spray drift, runoff, or erosion
 - Species covered by FWS
- Improve ESA efforts by making them more timely, efficient, consistent, and predictable
- Type and level of mitigation would be specific to the chemical, use site, and application method to address potential impacts to listed species and critical habitats



Taro, Regina Hidano, USDA NASS

Hawaii Strategy Next Steps

- Additional outreach/follow-up
 - To help fill gaps or follow-up on next steps
 - Review materials from Spring 2024 workshop
- Mitigations:
 - Process to formalize practices occurring on the ground (BMPs, surveying, application methods/equipment etc.)
 - Identify PULA species
 - Options for outreach and education
- Updates to Strategy and release draft for comment (date TBD)

Internal Deliberative, do not cite/distribute



Achatinella sowerbyana, David Sischo, SEPP

Vulnerable Species Overview

- **Goal:** Identify species expected to be particularly vulnerable to potential impacts and appropriate level of protection
- Released draft for public comment (June 2023)
- Released update describing public comments and potential changes (December 2023)
- Provide additional updates, including plan for potential expansion to other species (Planned for September 2024).



Select Ongoing and Upcoming ESA Activities

Early 2024 (completed)

Final methomyl and carbaryl BiOps (NMFS)
Hawaii workshop
Mitigation workshop
Outreach on refining pesticide use limitation areas (PULAs) and begin process of revising PULAs
Updated Enlist mitigation requirements per BiOp
Implement NMFS BiOp on 2 OP insecticides

Late 2024

Final BEs for acetamiprid and dinotefuran
Draft BEs on benzovindiflupyr and bicyclopyrone
Determine if vulnerable species pilot should include additional species and provide additional information on the pilot
FINAL rodenticide BE and mitigation strategy

Finalize herbicide strategy and begin to inform registration and registration review decisions
Release DRAFT insecticide strategy for public comment
DRAFT online mitigation menu

Summer 2024

Finalize insecticide strategy and begin to inform registration and registration review decisions
Begin to develop fungicide strategy
Continue revising PULAs for ESA mitigations
Continue rodenticide registration review
Draft Hawaii Strategy for public comment
may explore developing strategies specific to non-ag uses

2025 and beyond

Minor Use and Emergency Response Branch, Public Interest Findings and Stoplight Analysis



Minor Use & Emergency Response Branch FY 2024

- EPA completed work on 8 IR-4 petitions in FY 2024, establishing tolerances to support 18 new or revised uses, 16 crop group expansions and 13 crop group conversions requested by IR-4.
- Includes 3 joint reviews and 1 workshare with Canada.
- The Minor Use Team completed review of three exclusive use petitions, extending the exclusive use period for those chemicals.
- The new section 3 use of triclopyr on sugarcane negated the need for a Section 18 emergency exemption.

IR-4 Public Interest Finding (PIF)

An application will be presumed to be in the public interest if it is for a **biopesticide** or if the **following criteria** are met:

- 1) The data submitted have been developed by IR-4;
- 2) The active ingredient is already registered for use on a food commodity;
- 3) The active ingredient/crop combination has been pre-screened by EPA prior to the Food Use Workshop and EPA has discussed risk concerns that might hinder registration or the establishment of a tolerance with IR-4 [“stoplight analysis”]; and
- 4) The use is for a minor crop, specialty crop, etc.

<https://www.epa.gov/pria-fees/factors-ir-4-public-interest-finding>

PIF Weight of Evidence Approach

For actions that do not meet the criteria above, EPA will determine if a fee exemption is warranted on a **case-by-case** basis using a **weight-of-evidence** approach considering:

- Insufficient economic incentive for registrant to support the use
- Pesticide provides new mode of action
- Pesticide plays a significant role in IPM program
- Pesticide has characteristics that other registered alternatives do not have
- Insufficient efficacious alternatives
- Reduced risk compared to existing alternatives

Stoplight Analysis

- **Green:** No risks that would impact our ability to register the use and establish the corresponding tolerance(s)
- **Yellow:** There are some risks that could impact our ability to register the use and/or establish the corresponding tolerance(s)
- **Orange:** There are significant risks that could impact our ability to register the use and/or establish the corresponding tolerance(s) but it's not quite red OR there are additional steps/ processes needed that will likely slow down the registration and establishment of the corresponding tolerances
- **Red:** There are significant risks or unknowns that would prevent us from being able to register the use and/or establish the corresponding tolerance(s)
- **Blue:** Neutral response for chemicals that are not registered yet and for new active ingredients that we are actively reviewing. Blue indicates a neutral response; we do not have enough information about the chemical or are conducting our initial FIFRA/FFDCA/ESA assessments and are not ready to assign a color.

Pollinator Data

- 2016 Guidance on Exposure and Effects Testing for Assessing Risks to Bees
 - Tier 1 studies: acute and chronic oral toxicity for adult bees; acute and chronic toxicity studies for larval bees; and the currently required honeybee acute contact toxicity study
 - Tier 2 studies: semi-field effects studies conducted with full colonies and studies quantifying pesticide concentrations in pollen and nectar
 - Tier 3 study: full-field testing
- Pollinator risks are assessed in both PRIA and registration review activities
- Streptomycin decision from the 9th Circuit
- We are looking to shore up missing data especially for pollinator attractive crops

Stoplight Analysis

- **If we need pollinator data:**

- **Yellow** if the Interim Decision (ID) or stoplight analysis input indicates that we need Tier 1 pollinator data
- **Orange** if the ID indicates that we need Tier 2 or 3 pollinator data

- **ESA assessments:**

- **Blue:** generally new active ingredients under review or chemicals that have not been submitted (except metamitron = yellow)
- **Orange:** chemicals under ESA litigation or activity
- **Yellow:** chemicals where EPA has finished the biological evaluation and will need to do ESA for new uses (additional time)

Stoplight Analysis

- **Azoles/triazoles:**

- **Orange:** need to address issues in difenoconazole litigation and issues identified in registration review

- **Red** (removed from nomination list):

- Human pathogen resistance; see docket EPA-HQ-OPP-2023-0445 at www.regulations.gov for proposed framework document
- Neonics: reg review mitigation
- Chemicals that meet EPA OCSPP definition of PFAS; see Unit II of the [January 2024 PFAS Significant New Use Rule](#)
- No registered food uses
- Organophosphates: no new uses until cumulative assessment

Sign-up for OPP Pesticide Updates

Get pesticide news story updates by email:

- Go to [epa.gov/pesticides](https://www.epa.gov/pesticides)
- Go to the “Recent Highlights and Pesticide News” box in the right corner
- Click on “View more pesticide news” at the top
- Go to the “Other Resources” box at the right
- Under, “Get pesticide updates by email,” enter your email address and click “Sign up”



For More Information

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- <https://www.epa.gov/endangered-species>
- <https://www.epa.gov/pollinator-protection/epa-actions-protect-pollinators>
- <https://www.epa.gov/pesticide-reevaluation>
- <https://www.epa.gov/pria-fees/guidance-ir-4-exemptions>
- <https://www.epa.gov/pesticide-registration/minor-uses-and-grower-resources>

Appendix

ESA Priorities

- **Steady progress**, with a recognition we can't solve this problem all at once
- **Increasing efficiency** of BE development and consultation
- **Transparency**
- **Opportunities for Stakeholders** to be part of the solution
- **Refined Maps** to narrow geographic restrictions to only those areas needed to protect listed species
- **Early proactive mitigations** to protect listed species from pesticide exposure
- **Flexible and Implementable** Mitigations for pesticide users
- **Off-sets** as another tool to minimize impact on pesticide users and protect species

Dicamba Update

- On February 6, 2024, the U.S. District Court of Arizona vacated the 2020 registrations for over-the-top (OTT) dicamba products.
- On February 14, 2024, EPA issued an Existing Stocks Order for Dicamba Products Previously Registered for Over-the-Top Use on Dicamba-Tolerant Cotton and Soybean.
- This Order addresses use of the formerly-registered dicamba products and authorizes limited sale and distribution of dicamba products that are already in the possession of growers or in the channels of trade and outside the control of the pesticide companies.
- EPA issued the Existing Stocks Order to allow for limited sale and distribution of dicamba OTT products that were already in the possession of growers or in the channels of trade and outside the control of pesticide companies as of February 6, 2024.

Dicamba Update

- The order also prohibits the use of these dicamba products except where the use is consistent with the previously approved labeling, which included measures intended to reduce environmental damage caused by offsite movement of the pesticide.
- This Existing Stocks Order is limited in time and scope, allowing for certain sale, distribution, and use of existing stocks of these formerly-registered dicamba products for the 2024 growing season.
- EPA has received ample evidence that millions of gallons of OTT dicamba had already entered the channels of trade prior to February 6, 2024.
- Under this order, end users of existing stocks may only use the formerly-registered products consistent with the previously approved labeling for the products and must stop use of these products by the relevant dates laid out in the Order.

Dicamba Update

- EPA recently received applications from Bayer CropScience LP and BASF for new products containing dicamba. The proposed products includes use of dicamba on dicamba-tolerant soybeans and cotton.
- Because the applications involves a new use pattern for dicamba, the Agency is required to provide a 30-day public comment period on the registration applications consistent with FIFRA. EPA is also seeking comment on the associated draft labeling that was submitted, which is available in the dockets.
- Should EPA determine that registrant-submitted applications including over-the-top dicamba meets the standard for registration of a new use under FIFRA, EPA will provide a separate opportunity for public comment on the proposed decision at a future time.

Atrazine Update

- Final report from the August 2023 SAP was released in November 2023.
- EPA's response to the SAP was released in March 2024.
- EPA will release the revised CE-LOC and updated mitigation maps, along with the next steps and timeline related to proposed mitigation to protect aquatic plant communities in 2024.
- EPA anticipates releasing a revised proposal for mitigation by the end of 2024. It will incorporate:
 - New CE-LOC.
 - New WARP-MP (Watershed Regression for Pesticides for Multiple Pesticides) model runs to address public comments and errors noted.
 - Newly available atrazine monitoring data.
 - Public comments on the mitigation strategies proposed in 2022.

Paraquat Update

- In September 2021, several NGOs, including the Michael J. Fox Foundation and Earthjustice, filed a Petition challenging the EPA 2021 Interim Decision.
- In November 2022, EPA and the Petitioners agreed to hold the case in abeyance while EPA considered the issues raised by the Petitioners.
- EPA released an initial draft of its reconsiderations in February 2024 and opened a 60-day public comment that closed in April 2024.
- A final document describing the next steps and timeline must be completed by January 17, 2025, based on agreement with Petitioners.
- The final document will reflect:
 - Consideration of additional information/data, including new studies submitted by petitioners.
 - Consideration of public comments received on the draft document.
- EPA is committed to transparency and continues to monitor the best available science on paraquat to remain informed on adverse health outcomes, including Parkinson's Disease.

Glyphosate Update

- As part of registration review, a Glyphosate Interim Decision (ID) was published in February 2020.
- The ID was challenged in the Ninth Circuit which resulted in:
 - Vacating the human health portion of the ID.
 - Granting EPA's request for voluntary remand of the ecological portion of the ID but with an October 2022 deadline for a new ecological portion of the ID.
 - The court held that the ID triggered ESA Obligations.
 - In response EPA withdrew the ID as it was unable to meet the October 2022 deadline
- EPA's underlying scientific findings regarding glyphosate, including its finding that glyphosate is not likely to be carcinogenic to humans, remains the same.
- In 2026 EPA plans to complete a Proposed Final Decision, which will:
 - Revisit and better explain the carcinogenic potential of glyphosate.
 - Revisit risk analysis related to in-field effects on the monarch butterfly and revisit the ecological risks versus benefits balancing in light of recent court decisions for other herbicides.
 - Complete ESA consultation and respond to an administrative petition before issuing a final decision for glyphosate.

Rodenticides Update

- The Proposed Interim Decisions (PIDs) for the rodenticides were published in November 2022 and the draft Biological Evaluation (BE) was published in November 2023.
- There were over 22,000 comments on the PIDs, represented largely by the main themes below:
 - Concerns over non-target wildlife exposure, incidents, and protection of listed species;
 - Misuse;
 - Benefits of rodenticide control;
 - Questions on feasibility, enforceability, and effectiveness of proposed mitigation (e.g., carcass search);
 - Concerns related to proposing RUP designation;
 - Field use restrictions;
 - PPE; and
 - Refining mitigation further by rodenticide type, other costs and impacts of mitigation.
- The PID and BE comments are all being considered as EPA works towards the final BE which will be issued November 2024 and will include the rodenticide strategy.
- Amended PIDs will begin to be released in early 2025.