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*Keeping an Eye on Washington*

**December 2011**

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**EPA Unveils Pesticide Chemical Search Web-based Application**

EPA has unveiled a new web-based application, titled Pesticide Chemical Search that will allow users easy access to chemical-specific information from the web site of the Office of Pesticide Programs (OPP) and several other sources. EPA states that Pesticide Chemical Search is designed to consolidate information related to pesticide chemicals (active ingredients), making it easier to find related regulatory and scientific information.

The Agency explains that the new application collects existing web pages on specific chemicals found on the OPP web site and allows users access to this information through a single portal. Users will also be able to quickly find the current status of a chemical and where it is in the review process. EPA adds that another key feature is the ability to determine if there are any dockets open for public comment for a given chemical.

Other key features of Pesticide Chemical Search include:

- Access to more than 20,000 regulatory documents such as fact sheets and REDs;
- Links to over 800 dockets found in [www.regulations.gov](http://www.regulations.gov);
- Links to important information, including pesticide tolerances in the e-CFR;
- Web services that provide a wide variety and depth of information about a particular chemical; and
- More than 100,000 chemical synonyms to power the search engine.

EPA expects to expand Pesticide Chemical Search in the near future to include pesticide product labels and other relevant information.

The Pesticide Chemical Search tool may be accessed at [www.epa.gov/pesticides/chemicalsearch](http://www.epa.gov/pesticides/chemicalsearch).

## **EPA Invites Public Comment on ICR Renewal for Export of Unregistered Pesticides**

EPA has announced a public comment period through January 30, 2012 on the renewal of an Information Collection Request (ICR) titled "Foreign Purchaser Acknowledgement Statement of Unregistered Pesticides." This ICR is scheduled to expire on July 31, 2012. Entities affected by this ICR include parties that manufacture and export unregistered pesticides as well as those that reformulate or repackage and export unregistered pesticides.

Section 17(a)(2) of FIFRA requires an exporter of any pesticide not registered under FIFRA Section 3 or sold under FIFRA Section 6(a)(1) to obtain a signed statement from the foreign purchaser acknowledging that the purchaser is aware that the pesticide is not registered for use in, and cannot be sold in, the United States. A copy of this statement, which is known as the Foreign Purchaser Acknowledgement Statement (FPAS) must be transmitted to an appropriate official of the government in the importing country. This information is submitted in the form of annual or per-shipment statements to EPA, which maintains original records and transmits copies, along with an explanatory letter, to appropriate government officials of the countries which are importing the pesticide. In addition to the export notification for unregistered pesticides, FIFRA requires that all exported pesticides include appropriate labeling. EPA explains that there are different requirements for registered and unregistered products. The Agency notes that export labeling requirements meet the definition of third-party notification. The Agency states that in the interest of consolidating various related information collection requests, this ICR includes burden estimates for the FPAS requirement for unregistered pesticides, as well as the labeling requirement for all exported pesticides, both registered and unregistered.

EPA states that it will consider the comments it receives and amend the ICR as appropriate. The Agency will then send the final ICR package to OMB for review and approval and will then publish another *Federal Register* notice to announce the submission of the ICR to OMB and the opportunity to submit additional comments to OMB.

## **EPA Invites Public Comment on "Non-Cropland" Labeling Issue Paper**

EPA is seeking comment on an issue paper, developed by the OPP Labeling Committee, which examines the question of whether the term "non-cropland" is appropriate as a use site on pesticide labels. The Agency states that the terms "non-cropland" and "non-crop areas" have been used on numerous pesticide labels for years. Yet, there is no clear definition of what sites are included or excluded from these terms. EPA explains that the term "non-crop" is subject to broad interpretation and could be taken to possibly include residential and even indoor uses. The Agency adds that the use of the term "non-crop" on labels could lead to an expansive risk assessment which might include many areas that are not intended use sites, but that cannot be excluded because of the broad scope of the label language. As such, EPA is seeking comment on whether the Agency should allow the use of "non-crop" terms on pesticide labels or should it require more specific use sites. Comments on the issue paper must be submitted by December 31, 2011. The issue paper, including instructions on how to submit comments, may be accessed at <http://blog.epa.gov/enablethelabel/2011/10/>.

## **EPA Announces Conditional Registration of Nanosilver Pesticide Product**

EPA is conditionally registering a pesticide product containing nanosilver as a new active ingredient. The antimicrobial pesticide product, HeiQ AGS-20, is a silver-based product used as a preservative for textiles. As a condition of registration, EPA is requiring additional data on the product to confirm the Agency's assessment that the product will not cause unreasonable adverse effects on human health or the environment, the general standard for a registration under FIFRA.

By way of background, on August 12, 2010, EPA posted a Proposed Conditional Registration to the docket for public comment. The public comments as well as responses to these comments along with the decision document to conditionally register the product can be accessed at [www.regulations.gov](http://www.regulations.gov) (Docket ID # EPA-HQ-OPP-2009-1012). A description of the additional studies and timeline when the data must be submitted is also available in the docket.

## **CPDA President Sue Ferenc Speaks at SCPA Annual Meeting**

CPDA President Sue Ferenc was a featured speaker at the Southern Crop Production Association (SCPA) Annual Meeting held on October 24, 2011 in South Carolina. Speaking before an audience of more than 125 individuals representing the pesticide registrant community, CPDA President Ferenc provided an update on EPA's implementation of the Endocrine Disruptor Screening Program (EDSP), the status of negotiations over the reauthorization of PRIA, the development of EPA's new NPDES Pesticide General Permit, and the Endangered Species Act consultation process in evaluating the effects of pesticides.

### EDSP Update

CPDA President Ferenc began her remarks with an overview of EPA's proposal to expand the EDSP to include screening of priority water chemical contaminants as authorized by the Safe Drinking Water Act and called for in the House Appropriations Committee report for EPA's FY 2010 appropriations. She told the audience that thus far EPA has failed to develop and make public clear, transparent and scientifically supported guidance for the submission of existing data or other scientifically relevant information (OSRI) that would be deemed sufficient to satisfy List 1 chemical testing orders. Dr. Ferenc pointed out that in its Terms of Clearance that qualified approval of the 2009 EDSP Information Collection Request, OMB directed EPA to promote and encourage test order recipients to submit OSRI in lieu of performing all or some of the Tier 1 assays and to accept OSRI as sufficient to satisfy test orders to the greatest extent possible. Dr. Ferenc explained that despite the restrictions imposed by the Terms of Clearance, EPA is seeking to prematurely expand the Tier 1 screening program to include more pesticide chemicals and potential drinking water contaminants.

Dr. Ferenc noted that EPA has rejected a majority of OSRI submissions for Tier 1 screening of List 1 chemicals without clear and transparent justification and emphasized that EPA needs to provide greater clarity on how it will evaluate future OSRI submissions before it issues new EDSP test orders for List 2 chemicals. CPDA President Ferenc emphasized that EPA should

allow for completion of the first phase of EDSP screening and then make necessary modifications to the Tier 1 battery before ordering additional EDSP screening so as to maximize the efficiency and minimize the burden of its testing program (please see related story on the EDSP in this issue of “*CPDA Keeping an Eye on Washington*”).

### PRIA 3

Dr. Ferenc next addressed ongoing efforts to reauthorize the Pesticide Registration Improvement Renewal Act (PRIA). She told SCPA meeting attendees that CPDA and other members of the PRIA Coalition are actively engaged in negotiating several EPA proposals including extended due date product review timelines, fees for inert ingredient approval, changes in maintenance fees, and footnote language. She reported that a number of work groups have been formed to address issues specific to EPA’s Registration Division, Antimicrobial Division, and Biopesticide and Pollution Prevention Division. Dr. Ferenc reported that the work groups and teams are hoping to reach a consensus by November with the ultimate goal of having a reauthorizing bill drafted by next January.

### NPDES

In her other remarks, CPDA President Ferenc addressed EPA’s efforts to finalize its Pesticide General Permit (PGP) for discharges of certain pesticide applications on, over, or near U.S. waters. As had been announced during the October PPDC meeting, EPA issued the PGP by the court-ordered deadline of October 31, 2011 with an effective date of November 1, 2011. It is now available on the Agency’s web site, but is not subject to further public comment. The PGP is identical to the pre-publication version of the draft final PGP released on April 1, 2011 with the exception that the final permit includes a set of conditions in response to the recommendations made by the National Marine Fisheries Service in its June 17, 2011 draft Biological Opinion (BiOp) pursuant to Section 7 of the Endangered Species Act (ESA). EPA has signaled that once the U.S. Fish and Wildlife Service has completed its consultations with the Agency and developed its BiOp recommendations, the PGP may be subject to further revision.

Meanwhile, CPDA has been working collaboratively with its industry partners in support of H.R. 872, legislation that would exempt FIFRA registered pesticide products from the requirement for an NPDES permit. This measure was included in the base text of the Interior & Environment Appropriations bill. However, Congress has not been able to enact H.R. 872 largely due to the ongoing battle regarding overall federal government spending (please see related story in this issue of “*CPDA Keeping an Eye on Washington*”).

### ESA Consultation

Dr. Ferenc told SCPA meeting attendees that the broken ESA consultation process between the Services and EPA remains a major concern for the pesticide industry. She noted that the failure of the U.S. Fish and Wildlife Service and the U.S. National Marine Fisheries Service (the “Services”) to complete consultations with EPA in a timely manner has led to the successful

filing of a series of lawsuits by environmental groups and the imposition of “interim measures” arbitrarily set by the courts.

Meanwhile, this past October, the National Academy of Sciences’ National Research Council (NRC) initiated a study to examine scientific and technical issues related to the methods and assumptions used by EPA, FWS, and the NMFS in determining the risks to endangered and threatened species and critical habitats associated with the use of pesticides.

To access a copy of the presentation made by CPDA President Sue Ferenc click [here](#).

### **CPDA, HSIA and PETA Join Forces to Submit Petition on EDSP Requesting that EPA Comply with the Paperwork Reduction Act**

On December 7, 2011, CPDA along with the Halogenated Solvents Industry Alliance, Inc. and People for the Ethical Treatment of Animals submitted a petition to EPA requesting that the Agency comply with the requirements of the Paperwork Reduction Act (PRA) and the Office of Management and Budget’s Terms of Clearance for the approved Information Collection Request for 67 pesticide chemicals under the Endocrine Disruptor Screening Program (EDSP). The petition requests that EPA demonstrate the practical utility of this information collection before expanding the EDSP to include screening of additional chemicals. CPDA and the other co-petitioners make two specific assertions as follows: 1) the Agency has not demonstrated that the EDSP Tier 1 screening information collection is non-duplicative of information already available to EPA, and 2) by failing to provide the scientific support on which to make the necessary distinction that a chemical “may” or “may not” have the potential to interact with the endocrine system, the Agency has not demonstrated that the Tier 1 assays have practical utility. By extension, EPA’s failure to meet these requirements impedes its ability to administer the EDSP in a sound, scientific manner as called for under the Federal Food, Drug & Cosmetic Act.

The petitioners argue that to ensure compliance with the mandates of the PRA, EPA must demonstrate that any proposed collection of information is not duplicative of information otherwise accessible to the Agency. The petitioners maintain that while EPA did provide List 1 test order recipients the opportunity to submit existing data or other scientifically relevant information (OSRI) in accordance with OMB’s directive, the Agency failed to provide adequate guidance in a timely manner that would clearly articulate the scientific basis for assessing the sufficiency of OSRI. The petitioners explained that all initial List 1 chemical test order responses, including OSRI, were due to the Agency by the spring of 2010. However, EPA’s final Weight-of-Evidence (WoE) Guidance document was not issued until September 2011. During that intervening period, EPA rejected 323 of 412 (78%) OSRI submissions reviewed. The petitioners emphasized that without having published the Guidance prior to its review of OSRI submitted in response to List 1 chemical test orders, the Agency cannot justify the OSRI determinations it made at that time. The petitioners also questioned the adequacy and practical utility of the Tier 1 Battery referencing the lack of scientific consensus on the validity of the Tier 1 assays. The petitioners emphasized that unless the Tier 1 assays can be shown to be scientifically supportable, reliable, and sufficient to provide the information EPA needs to make a “may” or “may not” determination on whether a chemical has the potential to interact with endocrine systems, the practical utility of the assays cannot be demonstrated. In addition, the

petitioners called upon EPA to revise the WoE Guidance so as to ensure that it provides a reproducible, transparent, and science-based approach to evaluating OSRI and screening assay results across reviewers, chemicals and laboratories. Finally, the petitioners recommended that EPA review and revise the Tier 1 Battery, including the use of OSRI, before requiring the screening of additional chemicals. To read a copy of the petition, click [here](#).

### **EPA Approves Streamlined Confidential Statement of Formula Process for End-Use Products and Manufacturing Use Products**

On December 14, 2011, EPA announced the availability of an updated guidance memo on a streamlined process for the submission of Confidential Statements of Formula, Form 8570-4, specific to end-use products and manufacturing use products formulated from a registered source of active ingredient. Under this new approach, instead of providing multiple, alternate CSFs reflecting each potential formulation site, each potential country where production may occur, and each potential supplier of a specified inert ingredient, the Agency will accept attachments to a basic or an alternate CSF.

As part of the registration process for pesticides, registrants must submit a Confidential Statement of Formula, Form 8570-4, which lists all the components and their percentage by weight in a pesticide product, and other information about the formulation. The CSF is a crucial element of submissions related to new pesticide products.

EPA explains that in the past, registrants may have submitted separate Confidential Statements of Formula to reflect different inert ingredient suppliers and each country in which the product is produced. The Agency's new approach will allow EPA reviewers to accept from registrants an attachment to the Confidential Statement of Formula for end-use and manufacturing use products that lists additional inert ingredient suppliers and additional countries in which the pesticide may be produced, provided the criteria in the guidance are met. In addition, the guidance to EPA reviewers clarifies that it is acceptable for companies to list the name and address of the appropriate company contact for production-related questions in lieu of each production location.

EPA states that this streamlined process for end-use and manufacturing use products, along with the streamlined process for CSFs for technical grade active ingredients that was announced on July 29, 2011, will not only reduce paper and registrant burden, but will also provide useful information to EPA staff and reduce handling and tracking of many unnecessary pages. The guidance memos addressing end-use products, manufacturing-use products and technical grade active ingredients are available on the Pesticide Registration Manual Web page at: <http://www.epa.gov/opprd001/registrationmanual/appendix-a.html>.

### **EPA Releases PRIA 21-Day Initial Content Screen Data Requirements**

EPA has added data requirement checklists to help registrants determine whether all necessary studies have been submitted in meeting the individual component requirements of the PRIA 21-day initial content screen. The checklists may be accessed on EPA's web site at [http://www.epa.gov/pesticides/fees/data\\_require\\_check.html](http://www.epa.gov/pesticides/fees/data_require_check.html). Within each checklist, registrants will find a link to the individual stud guidelines listed. EPA is also encouraging applicants to

submit study summaries electronically following the guidance in its “Study Profile Templates” which may be accessed at [http://www.epa.gov/pesticides/regulating/studyprofile\\_templates/studyprofile\\_templatelist.htm](http://www.epa.gov/pesticides/regulating/studyprofile_templates/studyprofile_templatelist.htm). The study profile templates describe the layout and scope of information that should be included within a data submission and can serve as a guide for the preparation of study documents. EPA adds that applicants may include additional information beyond that prescribed in a particular study profile. If so, it should be done in such a way that the format and content of the template is not affected or changed.

### **Congress Fails to Include Language Negating EPA’s NPDES Pesticide General Permit Rule in Final Spending Bill**

Despite substantial advocacy work by the pesticide industry, state regulators, vector control practitioners, and agricultural interests, Congress could not find the will to include in the final spending bill language similar to H.R. 872, which would have nullified the EPA’s Pesticide General Permit regulation. The language was included in the Interior and Environment Appropriations bill that came out of the House of Representatives, but it was not included in the Senate version of that bill and when negotiators merged the two versions the specific provision was dropped.

In spite of a concerted lobbying effort that has convinced an overwhelming majority of Senators to support H.R. 872, Majority Leader Harry Reid (D-NV) remains opposed to bringing the bill to the floor or, apparently, attaching it to other legislation. The two Democratic Senators that have stopped the bill from advancing by placing a procedural hold on the bill, Sens. Barbara Boxer (D-CA) and Ben Cardin (D-MD), remain opposed to the bill. Despite attempts to broker a compromise, their demands were too high for all the interests to accept. CPDA and fellow advocates are still pressing to include the legislative language in other bills that may make it through Congress before the end of the year. Unfortunately, the lone remaining bill appears to be caught up in a partisan fight.

### **EPA Releases Endocrine Disruptor Screening Program Work Plan**

EPA has released a summary overview of a proposed Endocrine Disruptor Screening Program management initiative, known as the EDSP21 Work Plan which describes the Agency’s proposed approach for using computational or *in silico* models and molecular-based *in vitro* high-throughput (HTP) assays to prioritize and screen chemicals to determine their potential to interact with endocrine systems. The Agency states that by incorporating these scientific advancements into evaluating chemicals under the EDSP, EPA will be able to prioritize and screen chemicals with greater speed, efficiency, and accuracy, while minimizing the use of laboratory animals.

The EDSP21 Work Plan encompasses the recommendations made by the National Research Council (NRC) in a 2007 report on toxicity testing. EPA states that since it is required to complete registration review of registered pesticides by October 2022, new tools are needed to more quickly and efficiently screen and assess these pesticides. The Agency adds that development and validation of these new tools will span a multiyear period. “As these new tools

become ready for use,” EPA states, “the EDSP will transition to rely on computational toxicology methods and high throughput screens to more quickly and cost effectively assess potential chemical toxicity while minimizing the use of conventional whole animal studies. The work plan summary describes this transition.”

The EDSP21 Work Plan may be accessed at <http://epa.gov/endo/>.

### **House Passes Legislation Aimed at Reducing Regulatory Burden**

On December 2, 2011 the U.S. House of Representatives passed bi-partisan legislation, H.R. 3010, the Regulatory Accountability Act of 2011, by a vote of 253-167. Introduced on September 22, 2011 by House Judiciary Committee Chairman Lamar Smith (R-TX) and 36 co-sponsors, the bill would amend the Administrative Procedure Act to revise and expand the requirements for federal agency rulemaking by mandating that agencies, in making a rule, base all preliminary and final determinations on evidence and consider the legal authority under which the rule may be proposed, the specific nature and significance of the problem the agency may address with the rule, any reasonable alternatives for the rule, and the potential costs and benefits associated with such alternatives. In addition, the legislation requires agencies to publish advance notice of proposed rulemaking for major rules and for high-impact rules (rules having an annual cost on the economy of \$100 million or \$1 billion or more, respectively), which shall include a written statement identifying the nature and significance of the problem the agency may address with a rule, the legal authority under which the rule may be proposed, and a solicitation for written data and comments from interested persons. In its other provisions, the bill sets forth criteria for issuing major guidance defined as guidance that is likely to lead to an annual cost on the economy of \$100 million or more, a major increase in cost or prices, or significant adverse effects on competition, employment, investment, productivity, innovation, or ability to compete.

The measure also expands the scope of judicial review of agency rulemaking by allowing immediate review of rulemaking not in compliance with notice requirements and establishing a substantial evidence standard for affirming agency rulemaking decisions. A companion bill has been introduced in the Senate by Sens. Rob Portman (R-OH) and Mark Pryor (D-AR).

In a November 29, 2011 Statement of Administration Policy, the Obama Administration expressed its opposition to the measure emphasizing that it “would impose unnecessary new procedures on agencies and invite frivolous litigation” which would seriously undermine the ability of agencies to execute their statutory mandates. The Administration stated that H.R. 3010 would “require cumbersome ‘formal’ rulemaking for a new category of rules, for which agencies would have to conduct quasi-adjudicatory proceedings. It would impose unnecessary new evidentiary standards as a condition of rulemaking. It would subject the regulatory process to unneeded rounds of litigation. Finally, the Regulatory Accountability Act would eliminate the Executive Branch’s ability to adapt regulatory review to changing circumstances.”

In other action aimed at providing regulatory relief, on December 1, 2011 the full House passed H.R. 527, the Regulatory Flexibility Improvements Act, by a vote of 263-159. Introduced on February 8, 2011 by Rep. Lamar Smith and House Small Business Committee Chairman Sam

Graves (R-MO), the measure would require federal agencies to examine the impact of their proposed and final rules on small businesses. If the proposed rule or final rule is determined to have a significant economic impact on a substantial number of small businesses, the agency is required to examine less burdensome alternatives.

Following House passage of H.R. 527, Rep. Graves issued the following statement:

*“According to an [October Gallup poll](#), small business owners cited compliance with government regulations as the most important problem facing them today, and according to a [2010 Small Business Administration study](#), small firms bear a regulatory cost that is 36 percent higher than the cost of regulatory compliance for large businesses. Economic recovery begins with our small businesses but this will not happen unless we rein in the mass of regulations coming from Washington.*

*“The federal government has gone too far on many nonessential regulations that are harming small businesses. It is our responsibility to remove these barriers and make sure the government carefully considers regulatory consequences on our most robust job creators before finalizing them. That’s why our Committee brought the Regulatory Flexibility Improvements Act of 2011 to the floor for a vote. This bill will help small companies by forcing federal agencies to fully examine the impact of their proposed regulations on small businesses and consider less burdensome alternatives if those impacts are significant. I hope the Senate will put politics aside and take up this legislation, and the more than 20 other House-passed jobs bills, so that we can give small businesses the certainty and relief they need to help our economy grow.”*

CPDA supports passage of H.R. 3010 and H.R. 527 and is generally supportive of regulatory reform legislation that aims to eliminate duplicative, unnecessary rulemaking that provides nothing in the way of increased health, safety or environmental benefits.

### **USDA National Organics Program Publishes Sunset Dates for Substances on National List**

The USDA National Organics Program (NOP) has published [NOP 5611, National List Sunset Dates](#), a table of the sunset or expiration dates for all substances included on the National List of Allowed and Prohibited Substances (National List). Under the Organic Foods Production Act of 1990, the National Organic Standards Board must review all substances on the National List every five years and recommend renewing, removing, or changing each listing. This process is commonly referred to as "sunset review." NOP 5611 is intended to provide the public an easy way to identify the sunset or expiration date for all substances included on the National List.

The National List of Allowed and Prohibited Substances identifies substances that may and may not be used in organic crop and livestock production. It also lists the substances that may be used in or on processed organic products. In general, synthetic substances are prohibited unless specifically allowed and non-synthetic substances are allowed unless specifically prohibited. In addition, some substances on the National List may only be used in specific situations or for certain crops or up to a maximum amount.

## **U.S.--Canadian Regulatory Cooperation Council Includes Pesticide Initiative among its Priority Issues**

An initiative on pesticides is included as part of a December 2011 Joint Action Plan which sets forth the issue priorities of a cooperative agreement made between the United States and Canada and was announced by President Barack Obama and Canadian Prime Minister Stephen Harper on February 4, 2011. The U.S.-- Canadian Regulatory Cooperation Council (RCC) was established with a two-year mandate to promote economic growth and job creation through increased regulatory transparency and coordination between the two countries. One of the initial areas of focus of the RCC will be agricultural production including “further alignment of crop protection product approvals and establishment of maximum residue limits (MRLs)/tolerances for major and minor uses of pesticides in both countries.” The Joint Action Plan states, “Increased regulatory cooperation on agricultural products will contribute to increased quality, value, and quantity of products grown and raised in the United States and Canada by allowing greater access for producers to the most effective tools available to manage production problems. Furthermore, these efforts will help to align maximum residue limits/tolerances of pesticides and drugs, facilitating trade in a wider variety of agricultural commodities, and providing consumers in both countries with more choice and predictability at the grocery store. In addition, further alignment will enable new and continued work-sharing and information-sharing between American and Canadian regulators, allowing them to benefit from expertise housed in each country.”

The Joint Action Plan notes that in Canada the damage resulting from past introductions of harmful invasive plant pests on agricultural crops and forestry is \$7.5 billion annually while the value of similar losses to U.S. agricultural crops and forestry is estimated at \$24 billion annually. “Combining efforts on plant protection towards a perimeter approach would help avoid costs associated with damage caused by introduction and spread of harmful plant pests, diseases and invasive alien species,” according to the Joint Action Plan. “A partnered perimeter approach would minimize introductions from third countries and instill confidence in the freedom of products from plant pests, diseases, and invasive alien species coming from the United States and Canada, thus protecting trade relationships. Furthermore, it would reduce the regulatory activities required at the United States-Canada border to ensure species of concern are not being introduced bilaterally.” In a statement regarding the RCC Joint Action Plan, EPA emphasizes, “Under the NAFTA Technical Working Group on Pesticides, EPA and the Canadian Pest Management Regulatory Agency have a long-standing history of exceptional regulatory cooperation in the area of pesticide regulation, and our respective regulatory requirements and approval processes for crop protection products are already highly aligned. However, further convergence could promote greater work-sharing and information-sharing between Canadian and U.S. regulators. This would facilitate more simultaneous access for producers to the most effective production tools and technologies while maintaining our high standards for protection of human health and the environment. It would also help to align MRLs and tolerances of pesticides, facilitating trade of a wider variety of agricultural commodities and providing consumers in both countries with more choice and predictability at the grocery store.” A copy of the RCC Joint Action Plan may be accessed at [http://www.whitehouse.gov/sites/default/files/us-canada\\_rcc\\_joint\\_action\\_plan3.pdf](http://www.whitehouse.gov/sites/default/files/us-canada_rcc_joint_action_plan3.pdf).