

## Your Voice Matters!

### Influencing Pesticide Registration Review

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### Informing Registration Review

The Arizona Pest Management Center (APMC) uses scientific data and feedback from grower communities to develop comments that inform Environmental Protection Agency (EPA) pesticide registration decisions.

The EPA is required by statute to review each registered pesticide every 15 years to ensure that it meets the standard of “no unreasonable adverse effects” to human health and the environment. EPA scientists conduct risk assessments based on available data and assumptions about pesticide use.

EPA accepts and responds to comments on registration review, and **considers both risks and benefits of pesticide use in its decision process**. The APMC comments on behalf of growers and pesticide users in the Southwest. Our submissions generally include:

- Scientific data (e.g., pesticide use, efficacy, non-target effects)
- Technical information from experts, including Extension Specialists & Agents, growers and pest control advisors

We describe pesticide use patterns, benefits of use, potential alternative products, and factors that impact pesticide choices of users. This **helps EPA make informed decisions that protect people and the environment while supporting productive and efficient agriculture**. For example, EPA may lower its estimates of risk based on use data that indicates less use than their risk models assumed.

### Comments Make a Difference!

Out of 30 comments submitted to EPA between 2012 and 2018, 67% were considered during the registration review process (Fig. 1). EPA indicated they “will consider” or “have considered” comments, depending on whether they were received prior to, or during, a registration decision stage. For 17% of comments, EPA explained how our comments influenced specific registration outcomes.

APMC comments were acknowledged by EPA 77% of the time. Only 3 comments (10%) were acknowledged by EPA but ostensibly not considered in registration review.

### Get Involved

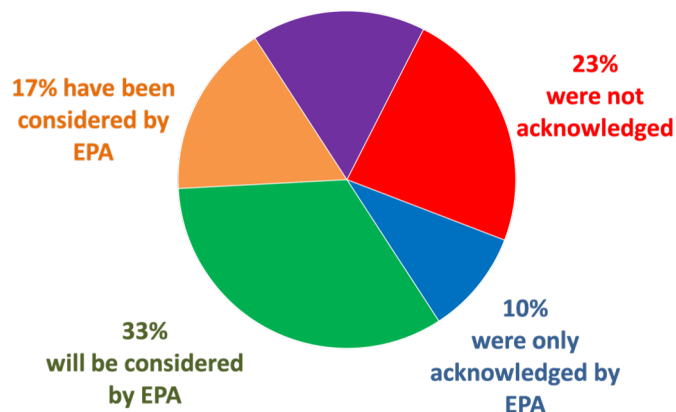
Stay informed about pesticide registration reviews and opportunities to comment. **Join our email list**. Contact Al Fournier, [fournier@cals.arizona.edu](mailto:fournier@cals.arizona.edu), 520-374-6240.



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## Use of APMC Comments in Pesticide Registration Review (2012 – 2018)

17% influenced EPA decisions in specific ways



**Figure 1.** Comments submitted to EPA by the APMC (n=30) were categorized based on the level of information use in registration review.

**Table 1.** Factors commonly cited by EPA during registration review in APMC comments. (n = 20 comments). Because more than one topic can be cited in each comments, percentages are not additive.

Category	% of comments
<b>Benefits of Pesticides</b>	
Efficacy	70%
Resistance Management	25%
Importance in IPM	20%
Economic Factors	20%
<b>Pesticide Use Patterns</b>	
Crops / Use Sites	75%
Application Methods	30%
Mixtures	10%
Use Rates	10%
Application Timing	10%
<b>Other Factors</b>	
Target Pests	60%
Crop Distribution	10%
Local Conditions	10%
Risks of Use	10%
Re-entry Intervals	10%
Pollinators	5%

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