NAICCC Interaction with Federal Regulators & Policy Makers

James Todd
Todd Ag Consulting, LLC
Lubbock, Texas

Allison Jones
Executive Vice President
NAICCC
Background

- Crawfish Boil on the Hill
- GAC
СВОН
How does NAICC Identify Issues?

- Membership
- Glenn Ludke
- Crop Life America
- PPC
- Other DC Contacts
CLA-Government Policy Weekend

- Attended past two years
- Allows interaction between commodity groups, professional organizations and CLA staff to understand the issues we each are facing and how to better effectively get our message out.
• Tim Lust, National Sorghum Producers
  • Was told to be relevant in Washington, DC your organization must have an annual budget of greater than $10 million.
Independence Matters

• NAICC represents one of the only “independent” voices of farmers.
  • Our members are engaged with farmers on a daily basis.
  • No one knows farmers daily struggles better than our crop consultants
  • Researchers provide excellent insight into operations of EPA and where changes need to be made.
NAICCC Success Story

- Bt below ground refuge requirements
  - EPA proposed several changes to Bt below ground traits in regards to refuge and resistance management.
  - NAICCC was able to explain why these were not feasible.
What EPA thinks modern Planters Look Like
What EPA thinks modern Planters Look Like

What the general Public thinks modern Planters Look Like
What EPA thinks modern Planters Look Like

What the general Public thinks modern Planters Look Like

What a modern Planter Really Looks Like!!
Current issues
Current issues

- WPS
- PRIA 4
- Above Ground PIP Bt SAP
- Organo-phosphate reviews
WPS Revisions

- Final revisions announced 2015
- Complete rule effective January 2, 2018
Changes to WPS-Exemptions

- Only certified crop advisors are exempt from labeling PPE and WPS requirements as specified in exemption.

- Certified crop advisor employees are no longer exempt and must use label-required PPE while working in a field during an REI, and employer must provide all required WPS protections or rely on the PPE substitutions allowed under the crop advisors.
"WHERE'S THE BEEF?"
NAICC’s Beef

• Need flexibility to determine PPE based:
  • On task the employee is performing
  • Exposure
    • Crop stage/height
    • Time in field
    • Total exposure time
  • Chemical applied
Is Anyone Trying to Fix WPS

- American Farm Bureau wants to change the change section of WPS that allows workers to have a designated representative
- NAICC wants the Certified Crop Consultant/Adviser exemption for early entry employees reinstated.
Light at the end of the tunnel?
Ray of hope?
New Certified applicator rules

- Last week EPA dropped its efforts to make changes to the certified applicator rule
- This may open the door to some changes to WPS.
"The bad news is that Republicans have cut our budget by a third. The good news is that we've been declared an endangered species."
PRIA 4

- PRIA 3 expired in December 2018
- Hope was to attach PRIA 4 to the Farm Bill but many wanted it decoupled from the Farm Bill cycle
- EPA dropping certified applicator changes may allow Congress to move on PRIA 4
What does PRIA 4 delay mean?

- Crop Consultants
  - Slows the registration process so new tools to help fight resistant weeds & insects will be delayed getting to market place.

- Researchers
  - Further hinders staffing at EPA
Above ground PIP Bt refuge

- Jim Steffel presented NAICC’s position in July to the EPA-Scientific Advisory Panel (SAP)
- SAP minutes and recommendations were published in October 2018
Organophosphates

- Chlorpyrifos
- OP Reviews by EPS
  - Acephate
  - Folex
- NAICC will be ready to submit comments when EPA opens comment period.
Who does NAICC visit in DC?
Thank you!!