Q&A from Webinar on EPA's Insecticide Strategy Hosted by FIFRA Endangered Species Task Force – May 23, 2025

Q: Can EPA publish the PULA GIS feature layer so that the public can use it? Currently, it is published in ArcGIS Online Web Map format, with which users cannot query and select specific features.

A: The EPA has made core maps available online here: Core Map Layer-Public - Overview. As for the PULA GIS layer (available here Advanced Resources for Bulletins Live! Two | US EPA), we can relay your feedback to EPA.

Q: In the Final Insecticide Strategy, it said that "Importantly, EPA intends to implement the Insecticide Strategy only for species that have refined maps." Any indication if this is also the case for the Herbicide Strategy species/PULA groups?

A: EPA's core map website provides a bit of insight into this question: "EPA has identified species needing core maps to support PULA development related to its Endangered Species Act Strategies and regulatory actions. EPA intends to develop core maps for all species that may need PULAs but recognizes that developing maps for hundreds of species will take time. Therefore, EPA is prioritizing species with respect to timing of core map development with highest priority species identified as needing mitigations through a new active ingredient registration process and species included in Herbicide Strategy PULAs followed by species in Insecticide and Rodenticide Strategy PULAs." Process EPA Uses to Develop Core Maps for Pesticide Use Limitation Areas | US EPA

Keep in mind, however, that some core maps may end up being the same as the current range map (e.g., species with already refined range maps).

Q: Do you think EPA will be expanding the list of qualified conservation programs?

A: Yes - they do intend to expand this list and are developing a process to handle evaluating and qualifying additional programs moving forward. Expect more information on this process later in 2025.

Q: Any idea how many new EPA ESA approved FIFRA labels will be in the market for 2026 season?

A: The new herbicide glufosinate-p has ESA language on the recently approved labels, as will the labels for the new insecticide isocycloseram once it receives final registration (proposed decision is currently out for public comment). EPA is working on ESA language for other new active ingredients and new uses for existing active ingredients and may approve more of these labels before 2026. The addition of ESA language to existing registrations of older pesticides through the registration review cycle will take longer to be fully implemented and will involve multiple public comment periods, so these are unlikely to occur for the 2026 season.

Once EPA finalizes a new registration decision, there is a time lag for products to complete state registrations and finally enter the market. While it is difficult to directly pinpoint timing, in 2025, EPA has already issued ESA draft/final decisions on the following new active ingredients:

- Veratrine (new active ingredient) - non-ag uses only, Final registration decision January 2025, no additional ESA language
- Metamitron (new active ingredient) - Final registration decision March 2025, no BLT or Mitigation Menu

- Florylpicoxamid (new active ingredient) - Final registration decision May 2025, additional BLT language
- Cyclobutrifluram (new active ingredient) - DRAFT registration decision April 2025, no additional BLT or Mitigation Menu identified in draft decision
- Isocycloseram (new active ingredient) - DRAFT registration decision May 2025, additional BLT and Mitigation Menu language identified in draft decision

EPA's registration review schedule can be found here: Upcoming Registration Review Actions | US EPA.

There are some pesticide products on the market that already have ESA language requiring users to visit the BLT website to check for PULAs even though these products have not gone through full consultation with the U.S. Fish & Wildlife Service. As a result, it is always important to read the label to check for ESA language.

Q: As Leah has so nicely overviewed, there is still so much involved with these processes. How in the world is all of this to be legitimately understood and comprehended by someone at the farmer level? And then similarly how is someone who is already busy farming full time everyday going to make sure they are in compliance with all of this? It's looking like food safety or sustainability situations, where the farm organization will have to hire someone to focus on and perform all of the farm's ESA's activities.

A: This will be a slow implementation process. There have been efforts to educate growers and provide support to help with this process, but how complicated implementation is will be dependent on the characteristics of individual locations. At this point, state lead agencies and university extension will likely take on more grower education and implementation, and this is where more support and resources should be allocated.

Q: "Medium" and "medium to coarser" are ambiguous (in the context of spray droplet sizes). Any more precise definitions for spray droplets?

A: ASABE 572.1 is a droplet classification system that defines these terms. Information on how these qualitative droplet size categories correspond to specific droplet sizes can be found online in various locations, for example: https://pesticidestewardship.org/pesticide-drift/understanding-droplet-size/.

Q: When do you expect we will see the new carbaryl (and chlorothalonil) labels that will also have mitigation and bulletin language?

A: In June 2024, EPA accepted labels with mitigations and Bulletin language from the NMFS Biological Opinion (e.g. US EPA, Pesticide Product Label, DREXEL CARBARYL 5% BAIT,06/27/2024). Last month, the Final Biological Opinion from FWS on carbaryl was released, "As stated in the FWS final biological opinion, EPA will request that carbaryl registrants submit amended labels to EPA reflecting the mitigations identified by the final biological opinion and by the registration review Interim Decision (ID) within 60 days of the issuance of the carbaryl ID. The carbaryl ID is currently scheduled for completion in late 2025." More info is on EPA's website: EPA Announces Multiple Actions to Protect Endangered Species from Insecticide Carbaryl | US EPA.

Q: Is the wind directional buffer language, do you know if EPA is following the recommendations of NAAA?

A: My understanding is that NAAA has been supportive of wind-directional buffers, which EPA has utilized for ESA spray buffers. EPA is still using omni-directional buffers in the case of human health-related spray drift buffers. The utilization of wind-directional buffers is just one example of an issue where EPA has been very responsive to the work of NAAA and other stakeholders.

Q: How is seed tag language enforced?

A: EPA has indicated that it would be pulled from FIFRA language requirement on active ingredient. If language is not on product, it doesn't need to be transferred to the seed tag. Under the Federal Seed Act USDA is technically responsible for regulation of seeds, but there is some uncertainty (practically and legally) as to how this plays out in the context of pesticide-related language on seed tags.

Q: Are you concerned that you will create more insecticide resistance because part of the field cannot be sprayed, meaning insects will escape to those areas?

A: The untreated area could be a refuge area with untreated insects, so there may be a decrease in resistance potential. Also depends on the insect.

Q: So, the golf course isocycloseram mitigations. Do the Strategies not stipulate that the required mitigations would only apply to conventional agriculture? Why are these mitigations now included for non-ag? Are these requirements related to VSAP PULA overlaps? Is this a separate issue?

A: The scope of both the Insecticide Strategy as well as the Herbicide Strategy were limited to agricultural uses. However, EPA must assess all use sites in their Biological Evaluations, including non-agricultural use sites, before granting a registration decision. The isocycloseram label provides an example of how the mitigation approach established through the Strategies could be adapted for non-ag uses. But it's the only example we have right now, so it's not clear.

Q: For commercial applicators, what will they have to do to ensure compliance when they aren't the ones responsible for implementing some of the mitigations? What will they have to do to verify with the grower that the grower has implemented the mitigation options?

A: This seems to depend on each individual state. However, it will change the conversation the commercial applicator is having with the grower they are applying for.

Q: Do you have options for people who do not have internet?

A: The answer to this is not clear but it is a frequent topic of discussion between EPA and stakeholders. EPA is aware of this concern and potential issue.