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Draft Insecticide Strategy to Reduce Exposure of Federally Listed Endangered/Threatened Species and Designated Critical Habitats from the Use of Conventional Agricultural Insecticides: U.S. Environmental Agency Issues Draft Document

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The United States Environmental Protection Agency ("EPA") released on July 25th a document titled:

Draft Insecticide Strategy to Reduce Exposure of Federally Listed Endangered and Threatened Species and Designated Critical Habitats from the Use of Conventional Agricultural Insecticides. ("Draft Strategy").

The Draft Strategy is stated to focus on developing implementing early protections for federally threatened and endangered species.

Designated critical habitats from potential exposure from the use of conventional insecticides with agricultural uses in the lower 48 states is also addressed.

The Draft Strategy was developed by the following EPA Offices:

- Office of Pesticide Programs.
- Office of Chemical Safety and Pollution Prevention.

The Draft Strategy addresses:

- Conventional insecticides.
- Insect growth regulators.
- Miticides.

Mitigation that are stated to intend to provide early protections for the U.S. Fish and Wildlife listed species are addressed.

The intent is to provide similar consistent mitigations for insecticides with similar characteristics such as:

- Exposure.
- Toxicity.
- Application method.

Included in the Draft Strategy is what is described as a three-step framework that EPA uses in considering Federal Insecticide, Fungicide, and Rodenticide Act actions for insecticides:

- 1. Step One Establishes the potential for population-level impacts to the listed species as not likely, low, medium, or high.
- 2. Step Two The potential population impacts to invertebrates are used from Step One to identify level of mitigations needed to reduce spray drift and runoff/erosion to non-target habitats.
- 3. Step Three EPA identifies where in the contiguous United States the mitigations identified in Step Two would apply.

EPA states that the Draft Strategy when finalized will not be self-implemented. The document explains EPA's plans in terms of applying the Draft Strategy.

A copy of the Draft Strategy can be downloaded <u>here</u>.