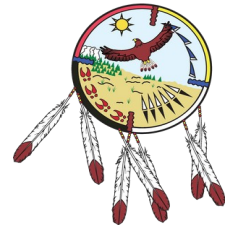


Tribal Pesticide Program Council - Full Council Meeting
EPA Headquarters, Washington, DC, and virtual
Meeting Notes
DAY ONE, Wednesday, March 4



Traditional Opening Ceremony

Jefferson Biakeddy, Navajo Nation gave the opening prayer

Welcome and TPPC Opening Remarks

Renee Keezer, White Earth Nation and TPPC Chair, gave opening remarks. She thanked the EPA for hosting TPPC and to everyone who made the time to travel, and recognized the important work being done at the conference.

ITEP Opening Remarks

Mark Daniels, Institute for Tribal Environmental Professionals (ITEP) and TPPC Coordinator, spoke about a recent change in leadership at ITEP, with former co-director Mehrdad Khatibi's move to different position for a year, and Nikki Cooley now directing ITEP and serving as the principal investigator on TPPC grant. Mark noted that ITEP has been around for over 30 years and has worked with tribes around the country on various environmental issues.

EPA Welcome Remarks and Q&A with Liz Vizard, OPP Deputy Director, and Ed Messina, OPP Director

Liz Vizard, Deputy Director for the Office of Pesticide Programs (OPP), spoke about the following:

- Administrator Zeldin's Pillars—most of the OPP work falls under pillars 1 and 3
 - Pillar 1: Clean air, land, and water for every American
 - For example: Refining Pesticide Use Limitation Areas (PULAs) to protect listed species and critical habitat under the Endangered Species Act (ESA)
 - Pillar 3: Permitting reform, cooperative federalism, and cross-agency partnership
 - For example: Work on reducing the backlog of Pesticide Registration Improvement Act (PRIA) and non-PRIA actions and continued transparency on industry performance metrics
- Pesticide licensing programs overview
 - Registration and registration review

- Continuous improvements to reduce backlog of pesticide registration actions—make things more efficient and modernized
 - Continue ESA implementation in registration of new pesticides and registration review of currently registered pesticides
 - Implement obligations from Make America Healthy Again (MAHA) strategy
- Process improvements— more efficient and modernize; there is a large backlog that needs to be cleared
- MAHA strategy—a government-wide strategy to identify your role where you have a place to make something healthier
 - Reduce risks and improve people’s health and well-being
- Ideas OPP put forward in line with MAHA strategy include: process improvements, agency restructuring, pesticide review procedures, new precision agriculture technology (GPS sprayer)
- Jasmine Courville, Confederated Salish & Kootenai Tribes asked about direct supervision and gave an example of a person who was remotely supervising GPS systems in other states and Liz noted that technology is moving faster than they can think about it
- Reenee asked where is EPA with implementing drone application regulation?
 - Liz noted that they have a group working on it, it is a case by case basis. Some of the words on labels are vague and say aerial but that could include drones
 - Drone-specific labeling is something that is being considered
- PRIA 5 implementation FY 25 activities—specific things they are working on:
 - PRIA Annual Report, bilingual labeling implementation, third party process assessment, training Gaps analysis (2 reports they put out recently), work-force analysis
 - MyPest Dashboard—recently launched in the last year. It gives more immediate feedback and includes a tracker.
 - Jasmine asked about criteria list for what constitutes as minor change versus major in relation to chemical change? Check out EPA label review manual.
 - Recent Endangered Species Act activities: a major activity she highlighted was the new draft Fungicide Strategy which will be coming out soon and the webpage where they have a lot of resources.
 - Pesticide Program Dialog Committee (PPDC) update: EPA is expeditiously working to recharter the PPDC

Ed Messina, OPP Director stopped by and spoke with the group as well:

- Ed spoke about drone labels and mentioned they are in the data gathering stage

- o He noted that drone applications result in less exposure versus a backpack sprayer, which is promising. Some drones generate less drift while others create greater drift, depending on type of drone used; droplet size is a key parameter
- o If the label allows aerial applications, please work with your local jurisdiction and their policies
- o More people able to fly drones now as certification is all done on paper, not a physical flying exam
- o Jasmine mentioned she would like training on drones and inspections, the label rates are confusing and not clear.
 - o Ed noted that some label requirements do not make sense for drones
- o Renee noted that she is concerned over the safety and risk assessment. What policies and procedures does the EPA have in place when a risk assessment was compromised and retracted, so what do they have in place to reevaluate this product to make sure it's not compromised?
 - o Ed says what was retracted was a meta study not a specific study; the risk assessment is currently fine; the agency is continuing to study glyphosate—tumor growth studies fed rats amounts way above rates exposed relative to being exposed from an aerial application; the majority of jurisdictions say it's not carcinogenic except this one study
 - synergistic effects is what EPA risk assessors look for—not seeing it; they test at extremely large amounts, and he emphasized it takes about 200 studies in order to register a chemical

Office of Enforcement and Compliance Assurance (OECA) Updates

Emma Cross, OECA

- o Spoke about the FIFRA Cooperative Agreement Guidance and mentioned that they do not see any substantive changes occurring for FY2027 so grantees can begin drafting FY2027 Work Plans.
- o The Pesticide Inspector Residence Training (PIRT) courses which are being offered in March (Worker Protection), May (ESA Draft Inspector), July (Agricultural Use Concerns), and October (Inspector Basics) of this year.

Michael Bauman, OECA spoke about inspection enforcement data

- o OECA funded tribal cooperative agreement should have an EPA federally certified inspector

- o In terms of FIFRA inspection and enforcement activities in Indian Country, most inspections are routine agricultural or non-agricultural use
- o For the notices of warning, cases referred to EPA, and cases where penalties are assessed, most of the cases came from the routine non-agriculture inspections as opposed to routine agriculture inspections
- o EPA inspection and enforcement activities: EPA directly implements pesticide programs in Indian Country where tribes do not have an OECA-funded cooperative agreement

Matt Castelli, OECA

- o A tribal facility is one that is owned managed or operated by a Tribal government, department, or corporation. The Tribal government is responsible for compliance.
- o Compliance monitoring communication: notice should be given at least 7 days before announced civil inspections, and in cases where it is unannounced, as soon as practicable. EPA invites Tribal leaders/environmental directors to attend.
- o They want to work cooperatively with Tribes by offering compliance assistance to Tribal facilities when appropriate, providing timely information about, and the opportunity to consult with EPA on, informal and formal administrative enforcement actions, and communicating with the Tribe based on the Tribe's status as a party or outside party to an enforcement matter.
- o Consultation vs. coordination
 - o Consultation is formal government to government engagement with Tribes. The EPA consults on civil administrative enforcement actions (*see EPA Policy on Consultation with Indian Tribes*) following the 4 steps in the consultation process (identification, notification, input, and follow-up), and they try to share as much as possible but cannot share confidential information.
 - o Coordination includes all other types of engagement they have including civil inspections, informal communications, and offering support for any consultations Tribes might be interested in.
- o Informal vs. formal enforcement
 - o Informal-less serious violations (warning letters, notice of noncompliance, etc.)
 - o Formal-more serious violations (administrative order on consent, complaint, etc.)
- o Underground Storage Tank (UST) data
 - o Using these tools (increased communication with Tribes, offering consultation, etc.) the data showed from 2019-2025 it helped increase compliance rates at all facilities in Indian Country and matched national compliance rate they saw in 2025

- o Jasmine noted that they have 2 week agenda request if they want to seek council so wanted to let Matthew know that timeline in case they wanted to adjust their 1 week notification minimum.

TPPC Coordinator Update

Skipped due to time constraints

Conservation Detection Dogs: Working Dogs for Conservation

Michele Lovara, Working Dogs for Conservation (WD4C) spoke about the organization:

- o The organization adopts/rescues high energy/high-drive dogs from shelters all over the country, and trains them to find specific odors
- o Dogs help to find invasive species for removal, study endangered species, and track poachers and/or intercept contraband
- o Dogs have 1000x better scent capacity than humans and can outperform lab equipment
- o Dogs are non-invasive, non-biased, and they can go everywhere—off path and can find more because they are using scent
- o Dogs are good at detecting cryptic species at a distance
- o In terms of efficacy, research showed that 89% of the time, dogs are a better method, they outcompete humans or whatever traditional method was being used
- o WD4C has 4 pillars they try to focus on
 - o Ecological monitoring—primarily scat work (sometimes buried under grass)
 - o Biosecurity—invasive species and disease
 - o Wildlife crime—anti-poaching work
 - o Environmental Justice—collaborating with Tribes to do searches for environmental contaminants and work to improve food security and sovereignty
- o Michele spoke about how dogs are being used more to sniff out disease in wildlife with 75% detection
- o Some animals that the dogs identified as positive for disease last year did not test as positive then, but now this year's test results shows they are positive
- o In terms of law enforcement, they have a crew out in Africa and they train dogs for them and then bring handlers to US to give additional training
 - o Dogs trained on ivory, leopard fur, ammunition, etc.
- o Michele spoke about environmental justice internships that are paid
 - o If you know students that might be interested, send information to Michele

Ngaio Richards, WD4C spoke about the invasive plant work:

- o They are using dogs for the long-term monitoring and eradication of dyers woad (an invasive weed)
- o In the example provided, it is about 200 acres and they have reduced number of areas of dyers woad considerably
- o Learned from the help of dogs how they needed to tailor where they spray and make applications more effective based on what the dog found
- o Rosettes look different depending on climate and they have adapted search strategy for woads based on dog findings
- o Simultaneous search for invasive and native plants—dogs do not care what it is, they search by scent

Souta Calling Last, Indigenous Vision spoke about the Amskapi Pikuni Project:

- o Souta spoke about looking for mink and otter scat to find heavy metals, pharmaceuticals, and PFAs
- o This was a big disease project looking for how the heavy metal contaminants and diseases are concentrating in their harvesting areas
- o Had the help of a NASA software development model to help identify habitat and came back with results showing no suitable habitat in Black Feet Glacier National Park Territory for mink and otters
 - o Used Traditional Ecological Knowledge (TEK) and found they co-habitat around beavers
 - o Used TEK for site selection
- o Ngaio mentioned they are testing scat, water, and soil and looking for heavy metals, pharmaceuticals, PFAs, and genetics
 - o The mink and people all eat the fish, so they are using the mink scat to try to find out more about how it applies to people who harvest from the land

Association of American Pesticide Control Officials (AAPCO), Association of Structural Pest Control Regulatory Officials (ASPCRO), and State FIFRA Issues Research and Evaluation Group (SFIREG) Updates

Brian Verhougstraete, AAPCO President spoke about updates

- o AAPCO focuses on constant communication and collaboration as key to establishing their mission (regular meetings, SFIREG meeting, standing committees, workgroups, liaisons, and annual meetings)

- o Workgroups can include industry folk and others outside the organization, less formal than work committees
- o See website for list of committees, workgroups, liaisons
- o AAPCO's Annual Spring Meeting and Conference Spring 2027
 - o March 7-10, 2027, Hilton Alexandria Old Town
- o Current issues they are following
 - o Certification and Training Plan Implementation,
 - o Implementation of Endangered Species Strategies,
 - o Pesticide registration actions
 - o Over-the-top dicamba herbicide registration
 - o Digital labeling
 - o Loss of USDA recordkeeping rule
 - o Emerging technology
 - EX. FAA part 108 Drone Regulatory Framework
 - o Legislation (PFAS, Rodenticides, neonics, preemption, etc.)
 - o PRIA 6

John Pitcock, ASCPRO President gave update:

- o Goal is to be the most responsive and reliable unifying voice of state, territorial, and tribal nonagricultural pest control regulatory officials
- o Officers and at-large members serve 2 year terms, meet monthly, work collaboratively with EPA and other federal agencies, state extensions services, academia/research, industry, and professional associations and affiliate groups
- o Technical working committees (Public Health, Inspector Training, Structural Remediation, School IPM, Label Stewardship, Communications, Structural Fumigation, Termiticide Label Review, Termiticide Standards, Rodenticides, and Building Codes)
- o ASCPRO Inspector Training—the new model they are using is going well and they are in their 6th month of webinar sessions
 - o There are 10 monthly webinar sessions in total and an in-person training and practical at the annual meeting
- o Mid-year meeting April 20-21, 2026
- o Annual conference is in August 10-14, 2026

Steven Dwinell, SFIREG Chair

- o Committee of AAPCO, composed of representatives from each of the EPA regions
- o Three working committees

- o Pesticide Operations and Management Working Committee is focusing largely on dicamba
- o Environmental Quality Issues Working Committee is focusing largely on water quality, looking at pesticides in water
- o Endangered Species Act Strategy Implementation is focusing on technical aspects of the implementation of EPA's ESA strategies
- o Clarified that mitigation points on label based on risk assessment for the product and PULAs based on consultations for specific species
- o 2026 Meetings coming up, Tribes are always welcome: April 7-8 in Austin, June 1-3 Full SFIREG virtual, September 15-16 in Scottsdale, December 8-9 in Washington DC
- o Planning to do a PIRT workshop—it is by invitation only on May 18th and if interested, reach out
- o Discussion about Bulletins Live! Two (BLT) issues
 - o Mention of Acre Blitz as a system that will make BLT and EPA's ESA strategies easier to navigate
- o Renee asked if EPA could set up training or webinar to go through the mitigation menu

Where the Wild Bees Are

Jonathan Koch, University of Hawaii at Manoa spoke about wild bees:

- o Pollinators as well as many other organisms are predicted to become extinct
 - o Extinctions are linked to diverse stressors and this includes stressors that insects face such as pesticide misuse, droughts, pollution, global warming, etc.
- o Conservation biology is a mission-oriented science that focuses on how to protect and restore biodiversity, or the diversity of life on earth
- o Why do we conserve biodiversity?
 - o Our human value system and relationship to future generations
 - o Food security
 - o We value the right of an organism to persist despite challenges inflicted upon them
- o Bumble bees have about 260 species
 - o Bumble bees are significant pollinators
 - For example, grizzly bears eat fruit that is pollinated by bumble bees and fruit can only be produced through pollination
 - Pollinators of agriculture, more than 20 crops benefit from bumble bee pollination

- What makes a bumble bee, a bumble bee?
 - Hairy, round abdomen, larger than most other bees, visiting flowers often when you see them, carry lots of pollen on hind legs (corbiculate bees), long tongue (allows them to probe deep for nectar), buzz pollination (buzz plant rapidly), and they are good at working in greenhouse settings as compared to honeybees
- They looked at bumble bees in the wild throughout the USA and documented 39 of 46 North American bumble bee species detected in the study
- Globally, bumble bees tend to be found in alpine or temperate areas
- o The circle of bumble bee life
 - o Queen emerges in the Spring from hibernation, finds nesting site, the brood is incubated and eventually hatch, daughters forage and take part in mating flights and incubating brood, colony switches to producing sexuals, mated future queen overwinter
- o Non gyne cell are workers or males and gyne cells are the queens
- o Patterns of mating not clear but there is one bumble bee species in which the males can do brood care, sit, and incubate
- o Bumble bee decline is linked to lots of stressors, including urbanization, pathogens, monoculture, climate change, land-use change, pesticides (misuse)
- o Western bumble bee occupancy decline
 - o As neonicotinoid application increases, occupancy declines for this specific species
- o A case study in Wilsonville, Oregon, United States found that neonicotinoid pesticides cause mass fatalities of native bumble bees
 - o 596 colonies were impacted in some way from this event
- o Some organizations with missions to support pollinator conservation include Pollinator Partnership, Pollinator Habitat, and Pollinator Conservation Program

Hot Topics Discussion with TPPC Members

Cricket (Joe) Herrea, Yakama Nation: Four drift cases and one was drone, full year of nitrate sampling, Quality Assurance Project Plan (QAPP), and 3 of the cases were across state border inspections.

Nina Hapner, Kashia Band of Pomo Indians: Gave topic ideas for this conference (Jonathan Koch and WD4C), wants to make sure that we focus on making a list of priorities where we list out what we want to focus on each year—what do we want to accomplish and where do we

want to be, wants to continue to help Mark with agenda and what we want to see and how to interact with EPA, now a certified scuba diver, can park and drive boats up to 19 feet, and the Tribe is moving forward with abalone restoration and there is discussion and support for the Tribe to open an abalone farm.

Brad Humphrey, Gila River Indian Community: working on in use inspection, learning more about agriculture inspections, and has some trainings coming up.

Joseph Picotte Jr., Standing Rock Sioux Tribe: Started back in July and attended PIRT training and going through credentials right now and finishing those up.

Renee Keezer, White Earth Nation: In the process of working with company for a non-point source management plan, working on 319 TAS, will be working on implementing new water standards with some of the proposed new legislation, septic system inventory, and the support of TPPC helped with the issues they faced revolving around the Minnesota DNR and permitting.

Brian Parker, Gila River Indian Community: Learning about regulations, conducting inspections, and looking forward to attending PIRT training soon.

Erica Taylor, Cherokee Nation: Still being introduced to everything and learning what it all means.

Steve Anderson, Choctaw Nation: Working on POC list, making progress on FIFRA inspections, and if anyone has inspections forms they would be willing to share, it would be appreciated.

Dan Hoyt, Gila River Indian Community: They had an agricultural establishment that was inundated with gophers, so he got certified with state for soil fumigation. He got certified for restricted use pesticide. He got weevil-cide and a piece of equipment, Gopher General, that would violate the label. The company is out of Canada and wants others to be on the lookout for this piece of equipment/applicator. They have 2 aerial/drone applicators-- one recently obtained permitting with them and made some applications in their community.

Josh Villanzana, Nebraska Extension: Part of Nebraska Extension, a year into position and trying to learn and trying to foster better understanding of everything, and the Winnebago Tribe is hiring a circuit rider.

Africa Dorame-Avalos, Inter Tribal Council of Arizona (ITCA): The new grant cycle coming up for next 5 year Performance Partnership Grant (PPG) and last grant cycle she proposed inspector training WPS and national IPM training, both were well attended. Africa wants to know what trainings the TPPC might be interested in when she applies for grant (soil health was suggested). They got a grant and they will begin doing outreach to NM and AZ Tribes. She is on the State and Tribal advisory board U of A Extension programs, working on an IPM workshop and Food Safety that will take place in Window Rock on April 8th. Africa is confident she will get awarded for a special project so wants to know TPPC needs. Lastly, was conducting a compliance

assistance and came upon a commercial applicator but the product was RUP, but they did not have federal certification. **Send ideas to Africa about training you might want.**

Katlyn Santos, Confederated Salish and Kootenai Tribe : Working on Bachelor's degree and starting credentials and pushing through inspections.

Amanda Holm, White Earth Nation: Will be federally credentialed next week and that has been the main focus.

Eric Gjevre, Coeur d'Alene Tribe of Idaho: Redoing QAPP and busy with a lot of non-ag use inspections.

Brenda Pusher-Begay, White Mountain Apache Tribe: Tribe is strong at protecting ground water and drinking water, schools and home pesticide use being monitored closely, and many lakes closed down with forest closure.

Tacy Jensen, Gila River Indian Community: Busy training two new inspectors (Brad and Brian) other than that on planning committee for Emerging and New Technology and getting requests for different trainings and planning committees to be a part of but focused on getting in to new role.

Jessica Raspitha, Saint Regis Mohawk Tribe: Last week pesticide program got new PPG (next 5 years) and over the last year they have been working on implementing a compliance plan by doing outreach with community at large and working to include enforcement matrix.

Melanie Kirby, Institute of American Indian Arts: Focusing on National Institute of Food and Agriculture (NIFA) new discover grant, has money left and wants to focus on education and is open to collaboration; non-lethal monitoring of bees; nutritional analysis; beekeeping curriculum will be available soon on hub site; made a VR video like you are in garden; flower path conservatory—CEC grant building seed sanctuary, pollinator workshops in May and June, Melanie is on planning committee; Native seeds in Tucson event in May

Jasmine Courville, Confederated Salish and Kootenai Tribes: Shared the spreadsheet from 2023 and then Montana specific spreadsheet for rodenticide

Camilo Perez, Salt River Pima-Maricopa Indian Community: reviewing pesticide forms to make sure up to date, standard operative procedures (SOPs) reviewing, pesticide training coming up for ITCA at end of month; got guidance letter from EPA

Theodore Puetz, Ak-Chin Indian Community: looking to update ordinance, started this year; WPS focus for ag inspections; greenhouse operation; compliance assistance; looking forward to ASPCRO virtual training

Jefferson Biakeddy, Navajo Nation: Sent violation to Region 9 on issues of repacking and label violation using product that was not labeled; potential WPS violation operating on commercial farm Navajo Mesa Farm sold company to outfit from Nebraska; joint inspection from region 9 on rodent control; working on QAPP and has Jasmine and Renee helping on his side; update MOU; hot topic for him is soil health

Curry Blankenship, Muscogee Creek Nation: Got rain garden going; butterfly garden all native pollinators; applying for grants;

Jaclyn Listo, Tohono O'odham Nation: No updates to share with the group

Tison Gill, Gila River Indian Community: No major updates, still helping with WPS trainings

DAY TWO, Thursday March 5

Welcome and TPPC Opening Remarks

Renee gave welcome remarks and highlights of yesterday.

AAPCO Meeting Highlights from TPPC Members in Attendance

Camilo: shared that when states approve labels even they have issues to coming to agreement; it was impressive to see Ed Messina jump in and put them in line to make sure they work together and labels get approved by each state. The weight that EPA has with states was impressive.

Theodore: appreciated hearing about the ASPCRO structural pest control 10-month virtual program, followed by in person training; more emphasis on non agricultural part and that information was helpful to have.

Cricket: National Agricultural Law Center was a resource that seemed it would be helpful in the future

Eric: ESA panel was good and thoughtful and seems there is a long ways to go. Casey Buhl from National Pesticide Information Center (NPIC) presented and the group would be interested in a presentation from her in future.

Melanie: panel on last day but no industry representation.

The Montana Pesticide Stewardship Partnership Program

Jasmine spoke about The Montana Pesticide Stewardship Partnership Program (PSPP)

- o Started in 2023 but it really took off this year
- o Flathead Lake Biological Station not Tribal but one of the longest running lake monitoring programs (over a century)
 - o Hub for aquatic science for over 125 years, partner with University of Montana in Missoula
 - o Good partnership for them because they have a huge network Jasmine can tap into
- o Grant total project: \$8.8 million was funded in Oct 2023
 - o Reducing toxins in the Upper Columbia river basin of Montana through a pesticide stewardship partners program

- o EPA Categories/priorities: eliminate or reduce pollution, improve water quality, and promote citizen engagement or knowledge
- o EPA Priorities: agriculture best practices to reduce toxics, green infrastructure to reduce stormwater and improve water quality, and community education and outreach to help the public take actions to reduce toxics in the basin
- o Community education and outreach big focus: one example is “Science on Tap” where they go to breweries to educate people
- o Why does this matter? Many people float the river, cultural reasons, fish, etc. It is important to keep water clean or they won’t be able to use it
- o Community events frequently—one example was of the ribbon cutting for mobile septic filtering system
- o Jasmine’s project focuses on fish tissue—food chain focused. Project name is Assessing Pesticides in Insects and Fish Tissue within the Flathead Reservation of Montana.
- o Major Subaward recipients: Montana Department of Agriculture, Montana Department of Environmental Quality, Montana Watershed Coordination Council, Montana State University Extension, Confederated Salish and Kootenai Tribes, and City of Missoula
- o Money to continually bring on more sub-recipients and partners
- o Systems that recycle and reuse the same water—going into water shortages so this is an idea they want to try and encourage
- o Native pollinator seed gardens—finally seeing native plants come back on roadsides and different areas
- o 31+ pesticides detected in areas like the Marion Drain, Yakima Nation
 - o Smoked fish seems to contain higher residues of polycyclic aromatic hydrocarbons (PAHs)
- o Salmon have not been seen in 200 years and they are trying to reconnect the system that used to exist
- o Surface water sampling—Jasmine presented a long list of what they find in their surface water and the theory was what they should find it in their fish
- o Fish tissue sampling round 1 found legacy pesticides and current pesticides
 - o 4,4 DDE; PCB BZ; 4,4 DDD; 2,4 D; Dicamba
- o Fish consumption guidelines for mercury—lake trout in Flathead contain elevated levels of mercury
- o If interested in getting involved, they have a monthly newsletter, monthly zoom meetings, annual in-person meeting, and volunteer opportunities to collect samples
- o Cricket asked if there are any mines or corporations around stream and Jasmine mentioned there are some mines above them and in Libby, but they’re not active currently

Endangered Species Act (ESA)

Natalie Bray, EPA OPP

- o The agency is trying to use the FIFRA framework to get closer to meeting the Endangered Species Act requirements
- o Divided up based on different types of pesticides: Herbicide strategy, Insecticide strategy, Vulnerable Species Action Plan, Fungicide Strategy (forthcoming, draft April 2026 and final November 2026, webinar will be coming and they will be seeking feedback and public comment), Rodenticide Strategy, Hawaii Strategy is under development
- o Jasmine confirmed that the current strategy is focused on agriculture use only even though EPA focuses on wider net. Natalie said they are trying to look at the non agricultural world. They are trying to meet obligations for agricultural uses but it's starting to overlap with non-agricultural use sites.
- o Melanie asked about a timeline. Natalie said it's moving along with the process of registration and registration review, so it needs to go through a whole framework before a new label is published with the new types of mitigations. A few new active ingredients (AI) are registered every year, probably less than 5. For registration review, which covers the products people are already using, it is the same but has to move through the whole process of registration review until label gets updated with these new mitigations.
- o Nina spoke about Fish and Wildlife and their mapping for critical habitats. Nina would like to learn more about Fish and Wildlife maps they are using. Natalie says they are trying to revamp this mapping process, and they are asking more people to weigh in through a more collaborative process—the first stepping up are chemical companies because they have the resources to do so. This can skew the results and she would like to get the Tribes involved.
- o Jasmine noted they have had fish die off and birds die off but the Fish and Wildlife have set such a high number of deaths that is required to trigger an incident and they have not reached that threshold. Natalie was surprised to hear that is the case because she was under the impression if there is any chance a death could be related to pesticide they would be addressing it, even if it was a small number.
- o Nina noted that Tribal communities are not involved in conversation even though they are dealing with endangered species. Group consensus that they need this collaboration and want to know how to get this to change.
- o Natalie asked if TPPC meets with Fish and Wildlife but they do not; the consensus that they want to.
- o Jefferson spoke about reviewing pesticide use proposals and noted the process takes a long time to get back to his office.

- o Renee asked if the fact that these mitigations are being implemented along with registration review means another 15 years until they come into compliance with ESA? Natalie said no because they haven't completed the first round of registration review, they have until October 2026, most still on the table to be reviewed and final decisions have not been made. However, if it was just reviewed before court decisions—then it has another 15 years. Renee is concerned if there is a product that was recently registered prior to the court decision, and it is possible it could be causing lots of damage to species, we won't know because it will be another 15 years before it is reviewed. Natalie said the strategies are meant to expedite this process.
- o Natalie shared an image of pesticide registration review process with the ESA Consultation process—lengthy process but they are trying to inject the endangered species assessment earlier into process, so it is a more streamlined process (see presentation slides for more information).
- o Theodore said if there are indicators that a compound is detrimental to species then at minimum we should push biological assessment first. Natalie spoke about monarch butterfly issues as an example of what Theodore said. Issue because they are not listed yet and they migrate between countries.
- o Natalie said that certain companies go off label in certain areas and they make that choice ahead of time, EPA does not make that choice for them. Natalie said they are assigning windows of time when you can't use pesticide at all (example—when the monarchs are in certain area, you can use it for a specific range of time, down to the day).
- o Jasmine said that is what they do on their bison range and they wait for animals to migrate out to other pasture, then they use the spray
- o Natalie mentioned that plants, unlike animals, do not move—and some are endangered. This presents an added layer of complexity.
- o Theodore asked how they decide what they prioritize. Natalie noted that in registration review they can call in monitoring data. She gave an example where Fish and Wildlife can require them to do reasonable and prudent measures (RPM), this is a mitigation. How it works is the agency needs to deliver information to Fish and Wildlife. In the example she gave for malathion, they are required to report to Fish and Wildlife every year for any monitoring data they might receive.
- o Steve Anderson asked a question on the communication with companies and if the line of communication get dropped if one gets over taken by another company? Yes.
- o Jasmine asked if EPA could override Fish and Wildlife? For example, if an endangered species dies, and it gets reported to EPA, and enough of this happens and they do not want to wait for Fish and Wildlife to determine or recommend to EPA, can EPA override things? Technically, yes, they could pull a pesticide off because they control the labels. In

terms of endangered species status, that is on Fish and Wildlife—they produce the list of endangered species. It's a push-pull relationship.

- o Natalie shared the rest of the slides and went over resources that are available on Bulletins Live! Two (BLT). When directed by product label, pesticide applicators are required to visit the BLT website and follow any mitigations specified for the intended application area and product. You must check if you are in PULA; if not, you comply with label.
- o Natalie went through an example of Isocycloseram, a new active ingredient that just went through process
 - o Went over label and downwind ecological buffer and how to reduce it, showed how you can use mitigation methods to knock down buffer
- o Africa asked about agricultural use and golf courses—if product used in a golf course, the label can separate out turf and grass
- o Natalie pulled up website example and GIS data
 - o **Nina wants link to the website for GIS data**

Endocrine Disruptor Screening Program (EDSP)

Catherine Aubee, EPA OPP gave update on the Endocrine Disruptor Screening Program (EDSP):

- o Federal Food and Drug and Cosmetic Act, FIFRA, and Safe Drinking Water Act come together to establish their charge with EPA and the EDSP
- o The law states that they must screen pesticide chemicals for effects in humans that are similar to a naturally occurring estrogen
 - o Authorized EPA to go beyond that to look at other types of chemicals and other types of endocrine effects beyond estrogen
 - o When EDSP was established, it originally looked at estrogen, androgen, and thyroid effects in humans and invertebrate wildlife
- o New strategic plan developed in Oct 2023
 - o First, determine how many they already have risk assessment data for that covers estrogen, androgen, and thyroid (Group 1)
 - o Then, determine if the data shows something for androgen or estrogen and if yes, they listed it as a high priority to look at and if not, it went lower on agenda
 - o The other group they don't have data on yet (Group 2), they are working on that
 - o New element to strategy was looking at new pesticide active ingredients
 - o Example of comments and submissions they received: technical corrections and additional data, concerns that EPA might be narrowing the scope of EDSP (they are prioritizing AIs and human health first), discussion of new approach

methodologies (NAMs) pros and cons, concerns about endocrine pathways beyond estrogen, androgen, and thyroid

- o Jasmine asked if there was a timeframe for data. Catherine said there's no time limit.
- o Evolution of EDSP two-tiered framework
 - o Some data has NAMs alternatives but need new estrogen and androgen receptor models to test chemicals without existing ToxCast data
 - o Larval Amphibian Toxicity Test (LATT) would provide single test alternative for non-mammalian thyroid
- o Jasmine asked if still focused on children or how do they transfer this information to children. Catherine answered that this is done in the human health risk assessment (example: looking at life stage sensitivity and on the thyroid side, they will sometimes recommend a comparative thyroid assay)
- o Thyroid NAMs is a work in progress
 - o EPA continues research to develop medium- and high-throughput screening assays for thyroid-relevant processes and molecular targets
- o The Endocrine Disruptor Science Policy Council (EDSPC) is cross-divisional peer review of exemption and waiver requests that looks at the use of NAMs and other scientifically relevant information (OSRI), and other questions of data sufficiency/needs for estrogen, androgen, and thyroid pathways
- o Enhancing infrastructure—there is a lot that happens behind the scenes
 - o They built a new system for digital information
- o EPA status of EDSP data call in notice for group 1, 2, and 3 is available on the website; the group 1 page is going to be the most interesting for the near term since those are the ones where they have issued the data call-ins (DCIs), where other groups are behind
 - o They've committed to updating this information quarterly
- o See presentation slides for links to documents
- o Nina asked what to do when people in community see changes in landscape based on what has happened due to outside factors, where do they go with this information?
 - o Catherine said it is valuable information for them and they do try to do field visits and crop tours. If Tribes notice changes, the first point of contact should be Linsey Walsh (TPPC Project Officer) as a resource. If something is specific at certain site, there is a way to report it online. Crop tours are done about five times a year. The group would like them to include Tribal members on the crop tours and include Tribal community sites. Nina wants it to be more real time and see what happens in community.
- o Linsey suggested that what the group is talking about is traditional ecological knowledge (TEK) Indigenous knowledge

EPA Regions Tribal Pesticide Updates

Bryan Irwin, EPA Region 6 gave updates

- o Tribal Pesticide HQ and Regional Calls are led by the national sub lead (Mr. Irwin), and the goal is to share updates and brainstorm ideas about regional collaboration and direct implementation
- o Region 1
 - o The Mashpee Wampanoag worked on a Pollinator Protection Project; the site will be developed with native and culturally significant plants
- o Region 2
 - o The St. Regis Mohawk Tribe had significant pollinator related work and they are growing their enforcement program; they performed a lot of outreach on pollinators and integrated pest management
 - o Seneca Nation was a new grantee for 2026 and received funding to build programmatic capacity, created an application permitting and tracking system, utilized GIS to track all pesticide applications on each parcel of Tribal Land, and received pesticide specific program funding for the first time
- o Region 3:
 - o No new interactions with any of the tribes to report
- o Region 4:
 - o Miccosukee Tribe's FY 26 \$42,000 Pesticide Grant continued the removal of Brazilian peppertree and control of an invasive population of water lettuce
- o Region 5:
 - o Saginaw Chippewa Indian Tribe of Michigan is continuing their grant since 2023; Tribal staff are assessing the priority level of pesticides with the tribes current agenda
 - o White Earth Nation is continuing a grant since 1991; hired new Pesticide Coordinator to perform federal and tribal inspections in September 2025, and they are training to perform inspections and in the process of getting credentialed
- o Region 6:
 - o The Choctaw Nation of Oklahoma created and distributed a handout to agricultural associates about Application Exclusion Zones, certified applicator responsibilities, and employer responsibilities, Environmental Protection Services hosted beginning beekeeping classes to the public, they planted wildflower seeds along highway, and worked with the Tribe's Grounds

- Department staff and the Tribal Alliance for pollinators to plan native grasses around tribal headquarters
- o Eight Northern Indian Pueblos Council (ENIPC) assisted 22 Pueblos and Tribes in New Mexico and Texas, continued with pollinator education outreach about species using social media, flyers, and other activities, with a specific focus on the Upper/Mid Rio Grande Region
- o Inter-tribal environmental council (ITEC) is managed by Cherokee Nation, assists 45 Tribes in Oklahoma, Texas, Louisiana, and new Mexico, and they are continuing to assist Tribe's pesticide outreach focusing on providing technical assistance to the lead agency, Cherokee Nation, and ITEC members in EPA Region 6
- o Region 7
 - o The Winnebago Tribe of Nebraska has been awarded a Pesticide Circuit Rider Grant that will provide education and outreach to participating Region 7 tribes
 - o Planning has begun to conduct use observations on aerial applicators and ground rig applicators on the Omaha and Winnebago Reservations during the upcoming growing season
- o Region 8:
 - o Land, Chemicals and Redevelopment Division (LCRD) conducted end of year meetings with the six different tribal pesticide programs, awarded \$692,141 to fund Region 8 pesticide programs for FY26
 - o Three Affiliated Tribes' tribal inspector Chris Ollie received federal credentials after completing Fed Talent On-the-Job training requirements; planning a New Tribal Inspector Training on Standing Rock Reservation the week of May 4, 2026
- o Region 9:
 - o RTOC sessions: In February 2026, the RTOC Pesticide Workgroup co-chair, the Inter-Tribal Council of Arizona (ITCA), hosted a session on available resources joined by EPA Region 9
 - o Enforcement and compliance: In February 2026, EPA issued a show cause letter to Basin Pump & Supply Co. of NM for an alleged violation of distributing a misbranded pesticide to a school in Navajo Nation; in January 2026, EPA inspected agriculture facilities on tribal land with representative from the Cabazon Band of Cahuilla Indians.

- o Restricted Use Pesticides (RUP) Certification and Training: Gila River Indian Community submitted a draft Memorandum of Agreement with EPA for the Certification of RUP Applicators

Region 10:

- o The Coeur d'Alene Circuit Rider Program committed to 15 inspections, investigates complaints and conducts Federal Certification Plan outreach, and hosts an annual all-tribes meeting
- o The Yakama Nation Pesticide Program committed to 15 inspections, investigates complaints and conducts drift and bed bug outreach, hosts an annual all-tribes meeting
- o Pacific Northwest Pesticide Inspectors Training: Held February 23-26, 2026 in Walla Walla, Washington, hosted by EPA Region 10 every 3 years for federal, state, and tribal inspectors.

National Tribal Toxics Council Update Dianne Barton, NTTC Chair

Dianne Barton, National Tribal Toxics Council (NTTC) Chair:

- o The Toxic Substances Control Act (TSCA) was amended in 2016 and now EPA is required to consider potentially exposed or susceptible subpopulations
- o For environmental exposures tribes may represent the potentially exposed or susceptible subpopulations as required by regulation.
- o The tris(2-chloroethyl) phosphate (TCEP) Risk Evaluation 2024 example: in 2024 EPA determined TCEP caused unreasonable risk to human health and the environment and unreasonable risk for people eating fish from TCEP contaminated water
- o Discussion Topics from the NTTC/Office of International and Tribal Affairs (OITA) meeting last week:
 - o OCSPP risk evaluation framework for Tribal Exposures under TSCA
 - o Tribal Partnership Group (TPG) Coordination
 - o Consultation Support
- o In September 2024 EPA came out with the document titled *Draft Considerations and Resources for Assessing Tribal Exposures in TSCA Risk Evaluations*
 - o Provide parameters that need to be used in risk assessment
 - o In addition to fish, they included water ingestion rates and soil and settled dust ingestion exposure factors for Tribal populations based on published data
- o Tribal partnership coordination—we need a regular way to come together with tribal partnerships

- o Engage in TSCA consultation—Tribal Consultation 2026 on Formaldehyde (rescheduled because of the government shutdown)
- o Linsey offered if TPPC wanted to meet with Office of International and Tribal Affairs (OITA) and/or American Indian Environmental Office (AIEO) she can arrange that

Closed Door: TPPC Work Session - 2026 Priorities

Notes are not taken for closed-door sessions.

Closed Door: TPPC Tribal Caucus

Notes are not taken for closed-door sessions.

DAY THREE, Friday March 6

Welcome and TPPC Opening Remarks

Toxicology on Environmental Fate and Transport of Pesticides

Renee presented on the issues below:

- o Toxicology is the study of the adverse effects of chemical, physical, or biological agents on people, animals, and the environment
- o There are four major environmental compartments: air, water, terrestrial (soil and sediments), and biota (living organisms)
- o Environmental fate and transport of pesticides is determined by their physical and chemical properties, application method, pesticide form (liquid, granular, solid), height of the application, the droplet size, high winds, lack of vegetative cover, pressure, geographic site location, topography, soil characteristics, weather, etc.
- o Factors increasing runoff: High rainfall, saturated soils, impervious soils, sloped topography, soil disturbances, heavy irrigation
- o Factors decreasing runoff: no or low rainfall, pervious soils, no or low slope, no soil disturbances, vegetation buffers, moist soils
- o As temperature increases and biodegradation increases so does solubility of organics
- o Volatility: a volatile substance is one which readily vaporizes; volatile substances typically have a low boiling point and a high vapor pressure
- o Absorption: how leachable is your product in soil—ability to dissolve in soil
- o Bioconcentration—uptake across the membranes (waterborne exposure)
- o Bioaccumulation—accumulation through the food chain
- o Biomagnification—transfer of chemicals via food chain through two or more trophic levels
- o Bioconcentration factor (BCF)—ratio of the concentration of a chemical in an organism to the concentration in the surrounding medium
- o Persistence—longevity of a pesticide and if it breaks down; pH and temperature of water are big determinants of whether it breaks down
- o Application of pesticides—they rarely stay where they are applied
 - o Effects on non-target organisms (fish, birds, humans, etc.)
 - o Effects on target organisms
 - o Effect on soil
- o Hazard vs. risk
 - o Hazard: potential source of danger/harm
 - o Risk: likelihood that harm from a specific hazard will occur

- Things to keep in mind include the substance dose and frequency of exposure
- Dose response curve shows how effects vary with different doses
 - dose response curve can determine lethal dose
- Riffle/Run Southern Streams (Marsh Creek example)
 - 2023 Marsh Creek sample: all the detections did not exceed an aquatic life or human health benchmarks except for Atrazine
- Action of Acetylcholine and Cholinesterase
 - Examples: Fish stop swimming, goose can't lift neck
- Organophosphates accumulate in fat tissue, and it could be a week after exposure before you start to have symptoms
- Muscarinic overstimulation—salivation, sweating, high blood pressure, etc.
- Nicotinic overstimulation—muscle twitching in eye and facial tissues, muscle weakness, respiratory failure, etc.

EPA Enforcement Case Studies

Anna Landis, EPA Region 7 spoke about a case regarding Nebraska Iowa Aviation (NEIA):

- July 28-30, 2025, an aerial pesticide application inspection was conducted on the Winnebago Tribe of Nebraska Reservation.
 - Four violations were found, serious enough to pursue civil enforcement
 - The pesticides used were Veltyma and Sultrus
 - Two counts of application of RUPs without certification in Indian Country (the pilots were certified in Nebraska but not Indian Country)
 - Two counts of use of registered pesticides in a manner inconsistent with its labeling
 - Enforcement steps
 - Planning/coordination with tribes
 - Inspection
 - Prefiling process (negotiation process)
 - Complaint
- NEIA agreed to pay a civil penalty of \$17,421, and both pilots received certification to be an applicator in Indian Country
- The Consent Agreement and Final Order was filed on January 5, 2026
- Through the Tribal Relations efforts in July 2025, 19 Indian Country Pesticide Applicator Certification Applications were received during 4-day observation period

Sherrie Kinard, EPA Region 8 spoke about a case against Black Gulch Aviation

- o The Annual River Honoring Ceremony is a 2-day event that was occurring during the time of spray application
 - o Over 400 school children and others at events along the river were exposed to spray drift from a mixture of two pesticides by a commercial applicator
 - o The applicator did it during lunch time when kids were eating
- o When the applicator was interviewed, he stated he knew he shouldn't be applying due to high winds, but the farmer threatened to hire another applicator if he didn't go ahead with it
 - o Two chemicals were used, but it was the same violation so they could only charge him for one
 - o The applicator was forced to pay a civil penalty of \$4,665 within 30 calendar days after the issuance of the final order
- o This was considered a high priority incident because kids were involved and it occurred on Tribal lands

Julie Jordan, EPA Region 9 spoke about a case against ProChem Tech

- o A routine inspection was conducted by the Navajo Nation EPA Pesticide Program, and the inspection found no EPA Registration Number on the label, no directions for use, and the label was ambiguous ("For industrial use only"); the case was therefore about sale and distribution
- o ProChem Tech International, Inc., a manufacturer of drinking water and other water treatment products in Arizona and Pennsylvania, supplied the unregistered product to treat drinking water at schools on the Navajo Nation
- o The company admitted the error and agreed that they sent out the product without its EPA label
- o The case was given high priority because kids, drinking water, and tribal schools were involved
- o Company settled for \$7,318; sales and distribution have higher penalties under FIFRA
- o The money goes directly to the US treasury, rather than staying with the community or EPA
- o The group would be interested in another presentation like this

Tribal Caucus Report-out /Open Discussion with EPA/Closing Remarks

- Nina asked the group for their likes and dislikes from the meeting agenda

- Renee: the dog presentation was well received, and likes that it involves new tech that is not tech
- Renee: the Dicamba discussion yesterday focused on the lack of communication and how the TPPC found out from news instead of from the agency. Actions like this dwindle away trust, and the group would like to be kept in the loop better and be able to discuss upcoming actions with EPA.
- For the executive committee meetings it would be good to have topics to discuss during the tribal caucus.
 - TPPC members can send agenda items over to Renee, Mark, or Nina so they can be more prepared for meetings
- Dan Hoyt's Gopher General presentation needs to be looked into more, as use of the product appears to involve a violation of rodenticide labels
- Regular meeting with all the TPGs together would be good
- Melanie: a white paper on the issue of keeping Tribes in the loop for consequential actions (like the Dicamba re-registration) would allow group to connect with others who may have parallel efforts and interests to make a clear statement on where we stand
- The group requested a follow-up on the Acre Blitz products that assist applicators and inspectors in understanding compliance with EPA's ESA mitigation strategies
- An agenda item for the next meeting is to start thinking about a location/host Tribe for the Fall meeting

*(Yellow highlighting in the notes above indicates action items)