

Regional IPM Centers' Response to "The Critical Need for IPM Support of Pesticide Safety Education: A Statement of the National Stakeholder Team for PSEP Funding"

The Regional IPM Centers received a statement entitled "The Critical Need for IPM Support of Pesticide Safety Education: A Statement of the National Stakeholder Team for PSEP Funding." The statement contains a number of recommendations for strengthening the ties between IPM and pesticide safety education (PSE). The Regional IPM Centers welcome greater communication, collaboration and cooperation with pesticide safety education programs (PSEP) since we have overlapping goals, similar and sometimes identical stakeholders, and often overlapping human and other resources for deployment of Extension programs.

IPM is a science-based decision-making process that identifies and reduces risks from pests and pest-management tactics using multiple pest-management tools. The goals of the Regional IPM Centers are to improve the cost-benefit analyses of adopting IPM practices and to reduce the environmental and human health risks associated with pests and pest-management tactics. IPM is an integrated approach to pest management and does not favor nor eliminate any single component or tactic of an integrated pest management strategy. PSEP uses education as a method to "promote the protection of human health and the environment" (AAPSE, Strategic Plan, March 10, 2002). Since pesticides are one of the pest management tools in IPM programs and PSE is critical to the safe and effective application of pesticides, we concur that PSE plays an important role in successful IPM programs. Furthermore, since pesticide applicators have the greatest exposure and therefore the greatest potential health risk from pesticide applications, PSE is critical to the IPM goal of reducing the human health risks associated with pest management. In addition, PSE is critical to reducing the environmental risks of pesticide application. Since PSE helps ensure the effective use of pesticides, reduces health risks to pesticide applicators, and protects the environment from risks associated with pesticide applications, PSE is essential to the continued success of IPM programs.

The four Regional IPM Centers have competitive grants programs to promote adoption and implementation of IPM. The stakeholders in each of the regions determine Regional IPM Center RFA priorities. Although PSE as a specific educational program has not been a specific stakeholder priority to date, PSEP personnel do qualify, and have always qualified, to submit competitive proposals and receive grants. The Regional IPM Centers have funded a number of projects and Signature Programs that include PSE as a component of a well-rounded, science-based pest management program. This year, the Western IPM Center received two pesticide safety education proposals, although neither was from PSEP staff. Language in IPM RFAs that specifies an objective of "adopt(ing) alternative pest management practices" does not exclude PSE, and therefore the RFAs are not in need of revision. "Alternative pest management practices" are in response to agricultural practices that originally developed in the mid-1940s with DDT and other pesticides being used on a routine basis as the sole method of pest control. IPM practices may include alternative, reduced-risk pesticides or alternative pesticide application techniques, in addition to all other practices that are effective and economically feasible,

while minimizing the risk to human health and the environment. Alternative practices are generally scored highly in the panel review process if they promote the Regional IPM Center goals of improving the economics of adopting IPM practices and reducing risks to human health and the environment. The Regional IPM Centers welcome PSE proposals that focus on our shared goals of safe and effective use of pesticides and reduced human health and environmental risks associated with pesticide application.

IPM and PSE both face funding challenges in the current budgetary environment. The Regional IPM Centers congratulate the National Stakeholder Team for Pesticide Safety Education Program Funding for obtaining industry support for the PSEP Improvement and Modernization Initiative. We note there is significant overlap between the National Stakeholder Team for Pesticide Safety Education Program Funding and the stakeholders of the Regional IPM Centers. The ability of PSEP to attract industry support is a win-win-win, because it provides financial support for PSEP, directly benefits the industry partners, and benefits IPM by supporting safe and effective use of pesticides.

PSEPs originate from FIFRA authorizing EPA to certify applicators of restricted-use materials and are therefore established in regulation. IPM originates from USDA and land-grant universities and is a science-based decision-making process. Despite these very different backgrounds, PSE and IPM share the goal of reducing human risks associated with pest management practices. The Regional IPM Centers are broadly inclusive of all safe and effective pest management strategies and welcome PSEP personnel to join with us to achieve common goals and objectives. IPM is a diverse program and we are happy to communicate, collaborate and cooperate with any group that shares our goal of reducing the environmental and human health risks associated with pests and pest-management tactics.