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## Comment Coordinators: Connecting Stakeholders and Regulatory Agencies

Jane M. Thomas

*Washington State University*, [jmthomas@tricity.wsu.edu](mailto:jmthomas@tricity.wsu.edu)

Catherine H. Daniels

*Washington State University*, [cdaniels@wsu.edu](mailto:cdaniels@wsu.edu)



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## Comment Coordinators: Connecting Stakeholders and Regulatory Agencies

### Abstract

The Western Regional Integrated Pest Management (IPM) Center uses a new approach to provide effective and timely stakeholder input to USDA and EPA regarding pesticide use. The Western IPM Center has funded two positions, termed "Comment Coordinators," to gather regional information to address use questions that arise as pesticides undergo re-registration review. Through this process, growers and Extension agents also become aware of potential issues with their crop-protection tools. Providing a voice for stakeholders within regulatory agencies strengthens existing Extension efforts. The concept of a dedicated interface between stakeholders and regulators is valuable in situations where stakeholder input is desired.

### Jane M. Thomas

Pacific Northwest Comment Coordinator  
Richland, Washington  
[jmthomas@tricity.wsu.edu](mailto:jmthomas@tricity.wsu.edu)

### Catherine H. Daniels

Director, Washington State Pest Management Resource Service  
Puyallup, Washington  
[cdaniels@wsu.edu](mailto:cdaniels@wsu.edu)

Washington State University

Four regional Integrated Pest Management (IPM) Centers, located at seven land-grant universities, have a charter closely linked to Extension. In order to enhance responsiveness to critical pest management challenges, the centers are tasked with increasing coordination of IPM research, education, and Extension efforts. They accomplish this by providing methods of interactive communication that complement and strengthen existing IPM programs and activities, including those conducted by agriculture experiment stations and Extension services.

Accordingly, the Western IPM Center has created an innovative, low-cost program that greatly enhances stakeholder input on pesticide use to both the United States Department of Agriculture (USDA) and the Environmental Protection Agency (EPA). The Western IPM Center funds two part-time Comment Coordinators to provide regional responses to USDA and EPA information requests about grower practices. Comment Coordinators directly connect local stakeholders with these federal regulatory agencies by using existing Extension infrastructure to gather and report data. This concept could be broadly applied to many Extension programs whose stakeholders need a more compelling voice within their regulatory agencies.

## Background

The EPA regularly evaluates the risks posed to humans and the environment by continued use of the active ingredients in pesticides. To do so, the EPA must understand how a pesticide is used:

- What crops rely on the pesticide?
- How many applications are made per season?
- How much acreage is treated?
- How is the pesticide applied?

- Are alternative pesticides usable?

The outcomes of these reviews are critical to agricultural stakeholders. However, in the absence of detailed pesticide use information, EPA uses default assumptions that typically overstate risk. When this happens, more restrictive regulations may be adopted. This upsets stakeholders by potentially changing entire crop practices, but in the absence of actual use information, EPA has little recourse.

In discussing its pesticide review process in the July 13, 2005 *Federal Register* (Procedural Regulations, 2005), EPA stated that the value of stakeholder input and public participation was one of the lessons learned from the current pesticide re-registration program.

## **Traditional Information Gathering**

When EPA needs detailed pesticide use information, it turns to USDA and the regional IPM Centers, who in turn contact individual states. The IPM Centers provide resources such as crop profiles and pest management strategic plans (PMSPs) and fund State Liaisons, primarily at land-grant institutions, who work with the centers.

These resources, while available to EPA, are problematic for several reasons. Looking at national apple production, for example, there are 22 crop profiles and three regional PMSPs. For EPA to glean pesticide use information from the profiles and PMSPs, the agency would need to review and summarize 25 documents--a time-consuming, inefficient practice prone to error. Also, when EPA sends out broad requests for information from individuals, the agency can be flooded with disparate and even conflicting information that does not explain use differences across regions.

Despite broad agreement that EPA information requests are important, individual state responses historically have been sporadic. In some cases, states only covered crops blessed with active and well-organized grower groups or Commodity Commissions. Because input regarding pesticide use on smaller, specialty crops was difficult and time-consuming to obtain, states often omitted this input from their responses--with predictable consequences.

## **A New Approach**

In 2002, the Western IPM Center's Pacific Northwest Workgroup met to discuss a more efficient mechanism for providing stakeholder input to EPA. The states represented by the workgroup produce more than 250 specialty crops that depend heavily on pesticide registrations. State liaisons felt it was duplicative to reply individually to information requests when they shared so many crops and stakeholder groups in common. The five state liaisons requested grant funds from the Western IPM Center for a half-time position tasked with responding to information requests. This was the origin of the Comment Coordinator concept.

The Western IPM Center currently funds two part-time Comment Coordinators serving Alaska, Idaho, Montana, Oregon, Utah, Washington, Hawaii, Guam, the Commonwealth of the Northern Mariana Islands, American Samoa, the Federated States of Micronesia, the Republic of Palau, and the Marshall Islands. As of May 2007, these two positions had submitted 112 responses to information requests.

When they receive an information request, Comment Coordinators contact individual growers, land-grant university personnel, or Commodity Commissions. Such contacts were developed through prior working relationships or introductions from trusted Extension personnel and continue to be developed in this manner.

In addition, contacts may also take the form of cold calls, in which Comment Coordinators depend upon the reputation of Extension in a community to invoke the trust necessary for stakeholders to provide information normally withheld from outsiders. In practice, stakeholders willingly provide information requested by Comment Coordinators. Once collected, the information is reviewed and summarized for a response submitted to EPA or USDA. Through this process, the Comment Coordinators provide real-world information for pesticide risk assessments.

## **Benefits**

### **Regulatory Agencies**

Through a regional point of contact, USDA and EPA receive more detailed pesticide use information, particularly for specialty crops, as well as an explanation of use differences across regions. The process provides an effective mechanism for direct stakeholder input during the review process.

### **Stakeholders**

Comment Coordinators provide an unbiased voice for growers unrepresented by Commodity Commissions, grower groups, or other organizations. In addition, grower input comes exactly when

critical decisions affecting their industry are being made.

## Extension


The Comment Coordinator program expands the capacity of busy Extension personnel to serve stakeholders by providing their input to USDA and EPA without preparing individual submittals. At the same time, Extension personnel become exposed to pesticide re-registration issues that affect their clients. Overall, the Comment Coordinator program strengthens Extension's role in building links between stakeholders and regulatory agencies.

## Conclusion

The Comment Coordinator program gives growers more effective and timely input into federal policies that affect their livelihoods. This resource-consolidating approach for providing stakeholder input may prove useful in other Extension situations that lack organized means for providing such feedback.

## References

Procedural Regulations for Registration Review, 70 Fed. Reg. 40251 (2005). (to be codified at 40 C.F.R. § 155.40).

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