**NRSP Temp4 Proposal Reviewer Comments and Responses**

Page 1

Reviewer 1: Would it also be appropriate to provide an example of a weed/invasive plant since there is a lot of work in this area and some are not aware that the word pest by USDA definition includes weeds and invasive plants as well as insects, fungal and microbial diseases, animal vectors etc.

Revised.

Reviewer 2: Does IR-4 open foreign markets, or help gain access through establishment of MRLs for crop protection products?

Revised.

Reviewer 1: In addition to David’s comment-perhaps could say remove barriers for important international trade markets -also the word lucrative is used twice in this document and I suggest that lucrative be replaced with a broader, different word such as important.

Revised

Reviewer 1: In this USDA section would it also be appropriate to also mention some of the key ARS groups? There is great collaboration and partnership work between IR-4 and National Program 304 (IR-4 projects are part of NP 304) and several other programs in the USDA research and extension that fall into a field to fork pathways.

Revised

Page 2

Reviewer 1: Reference or define New Crop Protection Program.

Revised

Reviewer 1: Replace the word directing with advising or other since the PPDC operates under the rules of FACA and provides advice but would not direct policy

Revised

Reviewer 3: I’ve added growers in a couple of places because the horticultural environmental group doesn’t usually identify as “farmers”. Just trying to cover all of the bases.

Revised

Reviewer: Check on whether SAES has been spelled out previously in document otherwise define

Revised

Reviewer 1: Suggest providing a definition: horticulture that deals with the production of plants for ornamental use in constructed environments, both indoors and outdoors.

See comment from Reviewer 4

Reviewer 4: I think this covers the definition of env. hort. If this definition is expanded, please do not use the term ‘ornamental.’

Reviewer 1: Suggest to also include tribes.

Revised

Page 3

Reviewer 1: I might be missing the significance of the 15 years n looking at the historic record I thought IR-4 has always been focused on good practices and IPM -has it only been over the past 15 years or is this phrase needed –

Revised

Reviewer 1: Include mention of tribal lands?

Revised

Reviewer 1: Do you have examples of which products or uses are anticipated to be cancelled or perhaps this should be reworded to say certain use patterns might be modified or restricted.

IR-4 is aware of potential cancellations and use restrictions and attempts to develop alternatives before the use is removed. It is not appropriate specific examples of products.

Reviewer 3: I added the term emerging/re-emerging pathogens here as that is terminology used for pathogens such as some of the downy mildews such as cucumber downy mildew, bacterial pathogens on new hosts, etc.

Revised

Reviewer 1: Should mention a few examples of invasive plants and aquatic weeds.

Revised

Reviewer 1: Could specifically mention key examples of weed resistance such as the palmer amaranth and glyphosate resistance or one of the many other

Revised

Page 4

Reviewer 1: Not sure what is meant by ethnic crops-please define

Revised

Reviewer 1: Consider this bullet be modified in a positive way to focus on the critical need for specialty crop farmers/growers and land managers to have access to a broad range of tools that improve IPM, health and the environment.

Revised

Reviewer 1: Spell out and also provide link and/or reference to roadmap

ESCOP/ESS is standard terminology for audience. Link to Roadmap added.

Page 5

Reviewer 2: To eliminate, or to promote harmonization of maximum residue levels of pesticide residues based on sound science?

Revised

Reviewer 1: Suggest change to Many scientists expect that climate change will cause

Revised

Reviewer 4 Is there a Challenge 3? It looks like the narrative jumps from 2 to 4…maybe I missed it?

Revised

Reviewer 1: Suggest to also include tribes

Revised

Page 6

Reviewer 2: Pest challenges are continually evolving, infrequently “solved”.

Revised

Reviewer 2: Trade is not conducted domestically.

Revised

Reviewer 3: This seems confusing.

Revised

Reviewer 2: Why change to horticulture here, when throughout the document the focus is on specialty crops?

Revised

Reviewer 2: Not sure what this means.

Revised

Page 7

Reviewer 2: Most of? Not all?

Revised

Reviewer 1: Small edit-As part “of” as many as…? One clarification question on the number of 20 NRSP-4 studies and 50 to 60 field trials each year-In the summary of the cooperative work included in the separate accomplishments word document the table on page 3 showed the average field studies PMC conducted for IR-4 over the past 5 years was 29 and represented 3 to 5 studies each year-l-Perhaps the field trials is each year and the number 20 is over several years? I might not be comparing the full data set referred to here -Thanks for checking

Revised

Page 8

Reviewer 4: Does this also include environmental horticulture crops?

Addressed in Objective 3

Reviewer 2: Hazard or risk; the US EPA uses risk-assessment not hazard assessment, an important distinction.

Revised as per comments of Reviewer 1 below.

Reviewer 1: Suggest using reduced risk or lower risk which is consistent with the use of the language throughout this document and IR-4s mission and US science based regulatory statues

Revised

Reviewer 1: Suggest use alternate wording such as provide support and guidance to effectively complete the steps required in the registration process instead of navigate successfully as the navigation wording might infer to sum that the guidance isn’t clear on the steps

Revised

Reviewer 2: Biopesticides are a sub-category of pesticides, should not use an “or”

Revised

Page 9

Reviewer 4: This word is OK and is used throughout but sometimes the international markets are not that lucrative, per se, but do provide an important avenue to market especially when the US market can’t absorb all that is grown.

Revised

Reviewer 1: Suggest change word lucrative to important or new or additional.

Revised

Reviewer 2: Export markets are limited by the lack of harmonized MRL standards, exemplified by low and/or missing MRLs in many countries.

Revised

Reviewer 1: Effectively follow and complete the registration submission process

Revised

Reviewer 2: Which industry? Crop protection product industry?

Revised

Page 10

Reviewer 2: Isn’t headquarters moving to NC?

The PMC decided to not address the relocation at this time so as to not confuse the issue.

Reviewer 1: Update with new info on move to NC State.

See above

Page 11

Reviewer 2: I suggest stating who these experts were.

Revised

Reviewer 2: What was successful in securing additional funding? The results of the panel review. Unclear.

Revised

Reviewer 2: harmonization of pesticide regulatory approvals, or harmonization of MRLs? Significant difference.

Revised

Page 12

Reviewer 2: Is there an accounting of these contributions? Shows leveraging of $$ being sought.

Revised

Page 13

Reviewer 2: Awkwardly stated, reads as research is conducted to request IR-4’s assistance.

Revised

Page 14

Reviewer 1: Suggest replace the word marketing with education plan consistent with the mission.

Revised

Reviewer 1: A communication tool known as Constant Contact?

Revised

Reviewer 1: I have questions on the use of this messaging phrase-referring to solving the Minor Use Problem-indicating that there is a specific end time-we can discuss.

Revised