

PROCESS TO ASSESS A NEW REQUEST FOR BIOPESTICIDE REGULATORY ASSISTANCE

The IR-4 Project Executive Director will assign a staff member who will be responsible for processing new requests for Biopesticide Regulatory Assistance Platform utilizing the following steps:

1. PRELIMINARY ASSESSMENT

- a. Assess if the Request for Assistance (PCR) differs from any existing request.
 - IF YES, establish a new PCR entry in the IR-4 Biopesticide Regulatory Assistance Database (BRAD).
 - If the Request for Assistance is substantially similar to an existing request, add a comment to the BRAD about the submission of a substantially similar request, including additional submitter(s) and additional requesting state(s).
- b. Assess if the PCR is relevant in the IR-4 Biopesticide Regulatory Support platform, which includes
 - Is the Request for Assistance from someone in the public sector or associated with that crop (i.e. commodity association) and
 - Will the technology be regulated by EPA's Biopesticide and Pollution Prevention Division?If YES to both, proceed to Step 2. If NO, seek guidance from the IR-4 Executive Director

2. COMPANY/SUPPORTING GROUP COMMITMENT TO REGISTER

- a. Solicit input from the company that manages the technology to assess if they are willing to cooperate/partner with IR-4 in facilitating the registration, including (but not limited to): providing necessary data required by EPA and their willingness to register the product/use once approved. If the company is willing to cooperate/partner with IR-4, make a note in the BRAD and proceed to Step 3.
- b. If the company that manages the technology has the proposed use(s) as a registration objective or is not willing to cooperate with IR-4, make an appropriate note in IR-4 BRAD and stop further assessment of PCR.

3. SECONDARY VETTING

- a. The Executive Director will establish an ad hoc review team for Secondary Vetting of new requests for biopesticide regulatory support.
- b. The review team members will be asked to complete one or more sections of the "IR-4 Project Biopesticide Regulatory Support Secondary Vetting Survey. This Survey will assist the reviewers in assessing each new PCR on a 0-100 scale. If there are multiple reviews for a section, their scores for that section will be averaged
- c. The review team will provide the Executive Director with a comprehensive score and additional comments.
- d. IR-4 will only provide regulatory assistance if the TOTAL score exceeds 66. The higher the score, the higher the project is in IR-4 Biopesticide Regulatory Assistance Queue. If a PCR is below 66, the stakeholder submitting the PCR can request a reassessment every 12 months.

IR-4 Project Biopesticide Regulatory Support Secondary Vetting Survey

Section 1- Biology

Part A -Does the product effectively control or suppress the target pest? Include documentation or reference to support the conclusion (assign a maximum of 10 points).

Guidelines:

- If deemed "Control" assign between 7-10 points
- If deemed "Suppress" assign between 3-6 points
- If deemed "Not Effective" or no hard data is available, assign between 0-2 points

Part B - What is the importance of the pest (assign a maximum of 10 points).

Guidelines:

- If deemed "Always Damaging," assign between 7-10 points
- If deemed "Under Certain Conditions can be Damaging," assign between 3-6 points
- If deemed "Damage is Limited" or no data is available, assign 0-2 points

Section 2 –Product Support (assign a maximum of 10 points)

Guidelines:

- Product was discovered/developed by a United States public sector entity that is working with a company that is an experienced registrant in the United States (10 points)
- Product was discovered/developed by a private sector entity that is working closely with a public sector scientist and an experienced registrant in the United States (5-7 points)
- Product was discovered/developed by a United States public sector entity that is working with a company that is not an experienced registrant in the United States (3-6 points)
- Product was discovered/developed by a private sector entity that is working closely with a public sector scientist that is working with a company that is not an experienced registrant in the United States (1-4 points)

Section 3-EPA'Experience with Technology (assign a maximum of 10 points)

Guidelines:

- Known technology/Known data requirements(7-10 points)
- Novel technology/with known data requirements (3-6 points)
- Novel technology/with unknown data requirements (0-2 points)

Section 4-Estimate of Financial Support for Product (assign a maximum of 10 points)

Guidelines:

- Company/group has significant resources to develop data needed for registration (7-10 points)
- Company/group has some resources to develop data needed for registration (3-6 points)
- Company/group has no resources available to develop data needed for registration (0-2 points)

Section 5-Path Forward to Registration/Likelihood of Waivers (assign a maximum of 50 points)

Guidelines:

- All required studies are acceptable (50 points)
- Most (>75%) of the required studies are acceptable; other required studies in progress (40 – 45 points)
- Some (<74%) of required studies are acceptable, other required studies in progress (30 -40 points)
- Testing for all studies in progress (25 points)
- Testing for most (>75%) required studies in progress (20 points)
- Testing for some <74%) in progress (5-15 points)
- None of the required studies are available or in progress (0 points)