



IR-4 PROJECT

Priority

Designation of Grasses Grown for Seed (GGS) in the list of authorized list of minor crops the IR-4 Project is charged to work on and provide support for.

Background

GGS is one of the top crops of economic significance grown in Oregon, and GGS has historically been considered a minor crop in U.S. agriculture.

The IR-4 Project has played a critical role for Oregon's grass seed industry for decades by providing required data needed to develop and obtain pesticide registrations and labels.

Since GGS is a minor crop, registrants of pesticides often cannot/will not pursue registrations and labels for GGS because our crop does not meet their economic model to warrant their efforts and resources.

Registrants can go through IR-4 to obtain registration of crop protection products for minor crops. The IR-4 route to the Environmental Protection Agency (EPA) with the data waives the Pesticide Registration Improvement Act (PRIA) fees that would otherwise be paid by the registrant. This route to regulatory approval does fit the registrant's economic model for product development on minor crops.

Without the IR-4 Project, Oregon's grass seed industry would be left without nearly all the crop protection products that are available to our growers and needed for optimum crop production.

For decades the EPA has considered GGS a minor crop and has allowed our industry and the registrants to utilize the IR-4 to obtain registrations and labels.

Issue

In April of 2023, the Oregon Seed Council was notified by the IR-4 Project that the EPA would not consider GGS as a minor crop and would not allow the IR-4 Project request for tolerance on an active ingredient that has been progressing through the regulatory process. For context, the process takes approximately four years from initial approval of the request from the growers to the EPA's approval and establishment of tolerance on grass.

Essentially, the EPA has decided to not recognize GGS as a minor crop because our crop is over the acreage limit. The limit is defined as being less than 300,000 acres.



This causes a significant dilemma for Oregon's grass seed industry:

1. We currently have five priority projects working through the process in the IR-4 Project. These projects, which have already consumed substantial investment to bring them to fruition and utilization by our growers, may not be accessible to our growers if the EPA does not allow them to proceed through the IR-4 Project to the EPA.
2. If GGS is not able to utilize the IR-4 Project to assist growers and registrants in obtaining regulatory approval, then our growers will be losing access to critical resources, new active ingredients, or new use patterns of new and established crop protection products. Without the ability for the industry to utilize the IR-4 Project, farming Oregon grass seed will become more challenging, in an already highly regulated environment.

Solution

The Oregon Seed Council is seeking a long-term solution to this regulatory hurdle by adding GGS to the authorization list that IR-4 Project is charged to work on and provide support for.

A direct policy fix would be to add "grasses grown for seed" as indicated below:

Section 2 of Public Law 89-106 (7 U.S.C. 450i(e)).

Inter-Regional Research Project Number 4

(1) The Secretary of Agriculture shall establish an Inter-Regional Research Project Number 4 (hereinafter referred to in this subsection as the "IR-4 Program") to assist in the collection of residue and efficacy data in support of-

(A) the registration or reregistration of pesticides for minor agricultural use and for use on specialty crops (as defined in section 3 of the Specialty Crops Competitiveness Act of 2004 (7 U.S.C. 1621 note)), under the Federal Insecticide, Fungicide, and Rodenticide Act (7 U.S.C. 136 et seq.);

(B) tolerances for residues of minor use chemicals in or on raw agricultural commodities under sections 346a and 348 of title 21; and

(C) **grasses grown for seed**

We appreciate your consideration of our request to secure this critical resource for our industry.

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