



# PPC

## PESTICIDE POLICY COALITION

A Coalition Working for Sound Pest Management Policies

**July 21, 2006**

Mr. Alex Wolfe  
Environmental Protection Agency  
Office of the Chief Financial Officer  
1200 Pennsylvania Ave 2710A  
Washington, DC 20460

**[[wolfe.alex@epa.gov](mailto:wolfe.alex@epa.gov)]**

**Re: Pesticide Policy Coalition Comments on EPA's Draft Architecture  
of the 2006 – 2011 Strategic Plan**

Dear Mr. Wolfe:

The Pesticide Policy Coalition (PPC) is pleased to provide comments on EPA's most recent Draft Architecture of the 2006 - 2011 Strategic Plan. EPA had asked for comments to be submitted by July 17, 2006. We apologize for late submittal of these comments and respectfully request that they be given the fullest possible consideration under these circumstances. The PPC also submitted comments on the February 2006 draft of the Plan. Many of our comments here represent further development of what we offered earlier this year, in light of the greater level of detail and specificity of the metrics added to the latest draft, as they pertain to pesticides.

### **Introduction**

The PPC represents food, agriculture, pest management and related organizations that support transparent, fair and science-based regulation of pest management. PPC members include: nationwide and regional farm, commodity, specialty crop, and silviculture organizations; cooperatives; food processors and marketers; pesticide manufacturers; pest- and vector-control operators; research organizations; and other interested parties. PPC serves as a forum for the review, discussion, development and advocacy of pest management policies and issues important to our members.

The Pesticide Policy Coalition's mission is to ensure the availability of safe, affordable pest management tools. We support development and implementation of public policies and laws that utilize the best available science and technology assuring protection of human health and the environment. The members of the Pesticide Policy Coalition appreciate EPA's involvement of stakeholders in the early stages of development of the 2006 – 2011 Strategic Plan.

In general, the Plan seems more focused than previous plans. Still, the Plan in its current form is quite long. We believe the Plan could be improved with further refinements and an overall reduction in the number of strategic targets.

### **Comments on Specific Strategic Objectives and Targets:**

***Sub-objective 4.1.3: Protect Human Health from Pesticide Risk.*** *Through 2011, protect human health by implementing our statutes and taking regulatory actions to ensure pesticides continue to be safe and available when used in accordance with the label.*

#### **Strategic Targets:**

- *By 2011, reduce the concentration of pesticides detected in the general population by 50 percent. Baselines are determined from 1990–1992 Centers for Disease Control-National Health and Nutrition Examination Survey (NHANES) data.*

**PPC comments:** As we indicated in our comments on the February 2006 draft of this Plan, we strongly encourage EPA to exclude this target from the Strategic Plan. Such a measure does not accurately reflect or conform with EPA's core statutory responsibilities relative to pesticides. As discussed explicitly in the narrative discussion in the draft Plan, "EPA reviews significant data prior to registering a pesticide and, when needed, implements use restrictions and directions that ensure when a pesticide is used according to label directions it will not result in **unreasonable risk**. This pre-market review includes consideration of human health and environmental concerns and the pesticide's potential benefits." (P. 10 of the public review draft; emphasis added.) The aforementioned strategic target is not in alignment with the Agency's two-part "risk-benefit" mandate.

The percentage of population with detectable levels of a chemical's metabolites is only an indication of exposure, not a measure of the risk associated with exposure to the chemical. In some cases, detection of a chemical metabolite, which may have no toxicological significance, is merely a reflection of exposure to the metabolite itself and not an indication of exposure to the parent compound. The development of policies aimed at reducing these detections would have no measurable public health benefit, but may have

dramatic negative societal impacts; an outcome inconsistent with the “risk-benefit” mandate.

It is also important to consider that this strategic target is confounded by analytical and technical factors. For example, increases in sensitivity of analytical methods will result in an apparent increase the percentage of the population with detectable metabolites. In addition, an increase in the number of metabolites measured by the Centers for Disease Control or other organizations will impact the apparent cumulative total that EPA wishes to assess. For all these reasons, a performance measure based on detections alone is not an indicator of whether or not EPA’s is meeting its statutory responsibilities or achieving relevant performance goals. We respectfully encourage the development of measures in this Plan that conform to those responsibilities.

- *Through 2011, protect those occupationally exposed to pesticides by improving upon or maintaining a rate of 3.5 incidents per 100,000 potential risk events. Baseline: There were 1385 occupational pesticide incidents in 2003 out of 39,850,000 potential pesticide risk events/year.*

- *By 2011, improve the health of those who work in or around pesticides by reaching a 50 percent targeted reduction in moderate to severe incidents for six acutely toxic agricultural pesticides with the highest incident rate: chlorpyrifos, diazinon, malathion, pyrethrins, 2,4-dichlorophenoxy acetic acid (2,4-D), and carbofuran. Baselines will be determined from the Poison Control Center (PCC) Toxics Exposure Surveillance System (TESS) database for 1999-2003.*

**PPC comments:** Our comments on the previous draft Plan indicated concerns with the metric proposed for this purpose, which was centered on the concept of measuring “pesticide-related illnesses” pertaining to occupational exposure. We pointed out that there was no sound basis available for identifying and measuring “pesticide-related illnesses” and as such this particular metric would either fail to indicate performance or mislead the agency as to how it was performing. We were particularly concerned that the information that the Agency currently collects on this subject includes unverified reports, suggestions, and speculations about causal relationships between illness and pesticide exposure that simply do not exist or cannot be demonstrated.

We find the new metric of seeking to limit the number of occupational exposures to a very low figure and maintain it there to be a significant improvement over the metric in the February draft. While this newer metric shares some of the limitations cited in the metric concerning detectable levels in the general population (exposure does not necessarily equal adverse affect or a problem), the PPC agrees that reducing occupational exposures to such a small number is highly desirable and a practical enough to guide sound and effective policy decisions. And certainly in the case of the specific active ingredients cited,

all can agree that reducing moderate and severe exposures in the occupational community can enhance the safety of workers and other pesticide users.

**Sub-objective 4.1.4: Protect the Environment from Pesticide Risk.** *Through 2011, protect the environment by implementing our statutes and taking regulatory actions to ensure pesticides continue to be safe and available when used in accordance with the label.*

**Strategic Targets:**

- *By 2011, reduce the percentage of urban watersheds sampled by the US Geological Survey's National Water Quality Assessment (USGS NAWQA) program that exceed the National Pesticide Program aquatic life benchmarks for three key pesticides of concern (diazinon, chlorpyrifos, malathion). The 1992 – 2001 baselines as a percentage of urban watersheds sampled that exceeded benchmarks are Diazinon: 40 percent; Chlorpyrifos: 37 percent; and Malathion: 30 percent.*

- *By 2011, reduce the number of agricultural watersheds sampled by the USGS NAWQA program that exceed EPA aquatic life benchmarks for 2 key pesticides (azinphos-methyl and chlorpyrifos). Based on 1992–2001 data, 18 percent percent [sic] of agricultural watersheds sampled exceeded benchmarks for Azinphos-methyl and Chlorpyrifos.*

**PPC comments:** The PPC encourages the Agency to focus its efforts on refinement of environmental risk assessment methodologies before establishing such reduction targets. Current methodologies used to establish aquatic life standards are highly conservative, crude measures that overestimate risk. The Agency should avoid reliance on screening-level or lower-tier risk assessments as the basis for strategic targets or development of risk mitigation strategies to meet such targets. Mitigation strategies should be the result of demonstrable need for risk reduction following a rigorous and realistic assessment of risk.

We encourage EPA to adopt to the fullest extent possible the Risk Assessment Bulletin now being finalized by the Office of Management and Budget. OMB's Bulletin concisely distills some 25 years of recommendations from the National Academy of Sciences' National Research Council, the Presidential/Congressional Commission on Risk Assessment and Risk Management, and other leading authorities. These risk assessment standards reflect both good analytics and common sense, and would raise the quality, objectivity, and transparency of the ecological risk assessment methodologies that would be critical to the proper application of the above performance measures.

- *By 2011, cumulative percentage of Section 3 actions (registrations of new active ingredients and re-registration of existing pesticides) taken by EPA which have fully addressed Endangered Species Act obligations, will reach 60 percent.*

**PPC comments:** The February draft of the Plan proposed a metric relative to threatened and endangered species that sought to reduce the level of pesticide detections in these species by a yet to be specified amount. The PPC encouraged the EPA to reconsider this earlier proposed metric because the appropriate risk mitigation measures for threatened and endangered species should be determined as a part of the consultation process under the Counterpart Regulation. As with human exposure, detection alone is not necessarily an indicator of risk. Risk is a function of the level of exposure and the toxicity of the substance. The metric proposed in February would not reflect nor measure accurately the risks to threatened and endangered species. We suggested as a possible better approach the use of metrics that relate to implementation of the Counterpart Regulation and/or the Agency's Endangered Species Protection Plan.

We appreciate that the new metric proposed for this purpose in the latest draft Plan reflects our suggestion and believe that it is a valid indicator of EPA program implementation that achieves the goals and responsibilities under the FIFRA and the Endangered Species Act.

***Sub-objective 4.1.5: Realize the Benefits from Pesticide Use.*** *Through 2011, ensure the public health and economic benefits of pesticide availability and use are achieved.*

***Strategic Targets:***

- By 2011, avoid \$1.5 billion of crop loss by ensuring that effective pesticides are available to address emergency pest infestations.*
- By 2011, annually avoid \$900M in termite structural damage by ensuring that safe and effective pesticides are registered/re-registered and available for termite treatment.*

**PPC comments:** As noted in our comments on the February draft Plan, the PPC applauds EPA for including an objective formally recognizing the benefits of pesticides. But we are concerned that the scope of the proposed strategic targets in this regard is far too limited relative to the public health and economic benefits of pesticides which the relevant statutory authorities seek to achieve. As noted in the narrative of the draft Plan, pesticides provide enormous public health and environmental benefits above and beyond those dealing with emergency pest or termite infestations. We believe that the metric proposed for termites is equally applicable to a number of other major pest issues and that it is equally important that EPA set as a strategic goal ensuring that "safe and effective pesticides are registered/re-registered and available" for these purposes. In particular, EPA should anticipate the products whose usage could be curtailed or eliminated over the planning period through the re-registration process and

establish as a goal that products covering those similar usages and providing substantial benefits be registered or reregistered for these purposes. Furthermore, the PPC believes that it is critical to the mission of EPA to communicate more effectively to the general public the societal benefits of pesticide products. We encourage a specific performance metric be established dealing with the communication of these benefits to the general public.

The PPC looks forward to working with EPA to further refine and implement the 2006 - 2011 Strategic Plan. Please contact me directly at, 202-406-3663 or [Rebeckah@fb.org](mailto:Rebeckah@fb.org), if you have any questions or concerns related to these comments.

Sincerely,

A handwritten signature in black ink, reading "Rebeckah Freeman Adcock". The signature is written in a cursive style and is positioned to the right of a vertical line that starts at the top of the word "Sincerely," and extends down to the start of the typed name.

Rebeckah Freeman Adcock  
Chairperson, Pesticide Policy Coalition