Same as it ever was...

The Clinton Administration's 1993 Pesticide Reduction Policy in Perspective

Richard Wiles • Kenneth A. Cook • Kert Davies • Christopher Campbell

Environmental Working Group™

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The Boston Globe

STICKY WICKED
Saturday: Mostly sunny, humid, 90
Sunday: Hazy, humid, 85-90
High tide: 5:39 a.m., 6:11 p.m.
Full report: Page 85

SATURDAY, JUNE 26, 1993

US sets goal to cut pesticides

Widespread residues found in children's diet

By Richard A. Knox
GLOBE STAFF

Reacting in advance to reports warning of toxic residues in the diet of American children, the Clinton administration yesterday declared its intention to reduce the nation's use of pesticides.

A joint announcement by the heads of the Environmental Protection Agency, the Department of Agriculture and the Food and Drug Administration marks "the

White House declares bid to reduce pesticide use in US

■ PESTICIDES
Continued from Page 1

they argue that the nation's food supply could be made safer than it is.

One report, by the private nonprofit Environmental Working Group, found that low levels of many pesticides, some of them known to cause cancer in animals, "pervade America's foods, in particular the foods that little kids eat most," such as fresh fruit and vegetables.

Analyzing previously unpublished government test results on more than 20,000 food samples from 1990 to 1992, the Environmental Working Group discovered that traces of two or more pesticides

'I don't think people should be feeling anxious about what they're feeding their kids right now.'

DR. BARBARA BOARDMAN
BCH pediatrician

culated a letter by John Peter Wargo, a Yale University environmentalist, who criticized the report as "not well grounded in the current scientific literature on risk assess-

Pesticides in fruits, vegetables

The percentage of supermarket warehouse samples of fruits and vegetables heavily consumed by young children with pesticide residues (1990-92).

	Percent with residues of:			
	zero pesticides	1 pesticide	2 pesticides	3 or more pesticides
Apples	21.6	34.5	18.1	25.8
Apple Juice	44.0	40.0	16.0	–
Bananas	63.6	13.6	14.1	8.7
Carrots	50.4	32.9	10.7	6.0
Cauliflower	60.0	30.8	6.2	3.1
Celery	25.4	44.7	18.4	11.4
Grapes	[illegible]	[illegible]	[illegible]	[illegible]

kids in terms of said one congress... with the issue. The federal said they "stand our food supply, would "look at improve the health." "We expect reports of the Sciences and Working Group ticides as a legislative and implement "principles." Mike Espy

ST. LOUIS POST-DISPATCH

MONDAY, JUNE 28, 1993

Pesticide Cutback Urged

...ar Study Cites ... For Children

The New York Times

NEW YORK, SUNDAY, JUNE 27, 1993

U.S. IS TAKING AIM AT FARM CHEMICALS IN THE FOOD SUPPLY

EMPHASIS IS ON CHILDREN

Policies of Three Agencies and a New Study Signal a Shift in Government's Stance

By MARIAN BURROS
Special to The New York Times

WASHINGTON, June 26 — The Federal Government has decided to reduce the use of chemicals in the production

Learning From Farmers?

"The Administration is committed to reducing pesticides," he said, and is now endorsing the ... pest management," ... that substitutes the ... insects and crop rot... ticides.

Dr. Kessler said ... strategy underlying ... announcement is ... mark in the history ...

Until now, critics ... in the Government ... over agricultural ch... ent years, especial... gan and Bush Adm... has been no effort ... use.

Going Sepa...

Until now, there h... nated effort among ... cept when concern... pesticides have rai... Otherwise, the envi... has dealt with analy...

VIA SATELLITE

USA TODAY
Life

MONDAY, JUNE 28, 1993

COVER STORY

U.S. policy to cut back pesticide use

Threat to kids cited. Pest resistant plants, 1A; pesticide fear, 12A

By Marilyn Elias
USA TODAY

Pesticide Use Would Be Cut Under U.S. Plan

By ROSE GUTFELD
Staff Reporter of THE WALL STREET JOURNAL

WASHINGTON — The Clinton administration announced a commitment to cut pesticide use in the U.S., and a National Academy of Sciences report called for improved data and regulatory procedures to protect children better from chemicals.

In a joint statement, Agriculture Secretary Mike Espy, Environmental Protection Agency Administrator Carol Browner and Food and Drug Administration Commis... ...ored their ...od supply. ...op a pack... ...ing the use ...gricultural ...e pest-con...

...e goals of ... pesticides ...y of ensur... children," ...ed several ...ncies. The ...rently re... ...on several

A18 THE WALL STREET JOURNAL MONDAY, JUNE 28, 1993

Los Angeles Times
June 26, 1993

3 U.S. Agencies Announce Joint Plans to Curb Pesticides

4061

■ Health: Statement comes in advance of scientists' report on how insect controls affect children. Farmers will be urged to use safer methods.

By MELIS...
TIMES STAF...

WASI... Adr... moved to ... environme... announcin... duce their ... tainable a...

promote the development and use of safer pesticides through incentives and educational programs. It also said that federal agencies will work with farmers to help test and apply 'safer pest management methods, some of which are already in use.

Administration officia...

told The Times. "But today's announcement is remarkable not only for its commitment to reduction but for the fact that we're working together in a way that frankly hasn't happened before at the federal level."

In addition to proposing ...

Group found that many fruits and vegetables it had tested bore residues of several pesticides at once. Study director Richard Wiles said the group's findings argue for reduction in the use of potentially dangerous pesticides.

THE WASHINGTON POST SATURDAY, JUNE 26, 1993 A5

3 U.S. Agencies Announce Joint Commitment to Cut Pesticide Use

By Tom Kenworthy and John Schwartz
Washington Post Staff Writers

The Clinton administration, anticipating the release next week of a major scientific study on the health effects of pesticides, yesterday pledged to reduce the amount of the chemicals used in U.S. food produc-

tration is "committed to reducing the risks to people and the environment that are associated with pesticides."

"This is a very significant commitment," said Browner. "There has been a lot of inaction at the federal level."

At the same time they pledged to reduce pesticide use, the three of-

standards, because they are based on adult dosages, may underestimate the health risks to children.

"We are not saying that food is unsafe," said Kessler. "What we're saying is that we can do better. There is no reason for a scare, and there is no reason for alarm. . . . There's no doubt that the benefits of fruits, vegetables and grains far

atives' to reduce pesticide use. About 900 million pounds of pesticides are used annually on U.S. food crops.

In addition to the overall goal of reducing pesticide use, the three officials said the administration would seek to promote alternative pest control methods (such as exploiting various natural biological

thorough review this year of federal policies on pesticides.

EPA is grappling with a court decision last year invalidating its policy of permitting the use of chemicals that pose only a negligible risk of causing cancer. And Congress is considering legislation to establish a single risk standard for pesticides rather than the two dif-

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Contents

Foreword

What to make of Vice President Gore's sudden and dramatic intervention in pesticide policy on April 8, 1998?

At the behest of pesticide companies and farm groups the Vice President personally issued an odd "directive" to EPA Administrator Carol Browner and Agriculture Secretary Dan Glickman. In four, single-spaced pages of stereotypically wonky detail, the Vice President instructed his two distinguished cabinet officials to...well, to obey federal law, perform their duties intelligently and diligently, hold tons of public meetings, and work together well. Not a word about dress codes or neatness.

Or was there more to it than that? The pesticide lobby guardedly thanked Mr. Gore's staff at the special White House event where the document was released. They feigned relief that at last *someone* in government was listening to their plea to slow down an ill-conceived, unscientific, headlong rush by Ms. Browner to ban dozens of pesticides by May 15, with the implied goal of ending American agriculture 'round about Memorial Day.

No such EPA effort was underway, of course. The trumped up May 15 rumor was one of several straw men fabricated by the pesticide lobby to stir up political opposition to EPA well before the agency could take any significant regulatory action against organophosphate insecticides. This a group of several dozen particularly toxic, widely used, and outmoded insect killers that contaminate much of the food supply. Nine out of ten American children between the ages of 6 months and 5 years consume organophosphates every day. Over a million of those children, by our estimate, are getting an unsafe dietary dose of the chemicals—which are neurotoxic to humans and bugs alike.

The "OPs" top EPA's list of chemicals to be evaluated under the tough new standards of the Food Quality Protection Act of 1996. The law is explicitly written to protect children from pesticides, and it has pesticide companies and farm groups extremely worried. The problem was never that the pesticide lobby was in the dark about EPA's procedures. Their legions of lobbyists and lawyers knew perfectly well the trouble that organophosphate

What to make of Vice President Gore's sudden and dramatic intervention in pesticide policy on April 8, 1998?

The pesticide lobby...knew perfectly well the trouble that organophosphate pesticides were in at EPA, by dint of the chemicals' toxicity and children's exposure. They just didn't *like* what they knew about the direction of EPA's decision making.

So they banged on Mr. Gore's door.

The track record of the Clinton-Gore administration on pesticides falls far, far short of the dramatic commitments that the administration announced with incredible fanfare five years ago.

pesticides were in at EPA, by dint of the chemicals' toxicity and children's exposure. They just didn't *like* what they knew about the direction of EPA's decision making, and feared that tough organophosphate regulation would set dangerous precedents for dozens of other pesticide decisions over the next few years. So they banged on Mr. Gore's door.

Having thanked the Vice President for the victory he gave them, pesticide companies and farm groups promptly took his directive to the media and Capitol Hill, where they have used it ever since to demonize the science, motives and actions of Ms. Browner's EPA.

All the while, Administration officials sought to reassure environmental, consumer, and farm worker groups that the directive was little more than a policy placebo for the pesticide lobby. The pace and course of pesticide regulation, we were told, would be unaffected. Some officials went even further, arguing that the directive actually would hasten tough government action by providing an early, high profile forum to air and detoxify complaints from pesticide companies and agribusiness groups.

But six weeks after the directive was issued, it is clear that Mr. Gore's words and actions have indeed interfered with and delayed EPA's ability to move forward on restricting organophosphate exposure and use. The Vice President's gesture not only bolstered and emboldened opponents of pesticide regulation and sustainable agriculture. It also has demoralized and derailed EPA's pesticide program staff. Their Sisyphean grind of pesticide evaluation has been further weighed down by a heavy and unnecessary load of "stake holder" blather and busy work. A number of people within the agency now wonder if the White House will back them up if they do make tough calls to regulate organophosphates and other pesticides under the new law.

They have every reason to wonder. As this report documents, the track record of the Clinton-Gore Administration on pesticides falls far, far short of the dramatic commitments that the administration announced with incredible fanfare five years ago.

The purpose of this report is to remind people—starting with the Administration itself—what President Clinton and Vice President Gore told the world they were going to do back in 1993: reduce pesticide use in agriculture, protect children from pesticides in food, take dangerous pesticides off the market and aggressively promote safer, sustainable farming methods.

None of that has happened. In fact, our review shows that some pesticide trends are getting worse. It will take dramatic action over the next few months

for the Clinton-Gore Administration to make good on any of its 1993 goals by the year 2000, much less meet the legal requirements and deadlines of the new pesticide law.

Both agency and White House staff request faith and patience on the part of public interest groups working to reduce pesticide usage and risks. They point out that no previous Administration has attempted to make such significant changes to pesticide regulation and policy. Fair enough. But neither has any previous administration enjoyed the political and policy advantages this one received for pesticide policy making. The massive, laudatory publicity that attended the announcement of its pesticide reduction policy in 1993. The scientific rationale provided, just days later, by the 1993 National Academy of Sciences report on the risks of pesticides to kids. And a legal framework that enshrined the NAS report in 1996. Plenty to work with, including public support.

Still, it is not at all clear if the Administration will use these advantages to do what it promised to do. Or will it back down in the face of pressure from pesticide companies and farm groups? It's time for the media and the public to tune in and watch carefully. To be on the safe side, we recommend that parents and everyone else concerned about pesticides consider how to do more on their own to reduce exposure and risks. Just in case.

Kenneth A. Cook
President, EWG

Still, it is not at all clear if the Administration will use these advantages to do what it promised to do. Or will it back down in the face of pressure from pesticide companies and farm groups? It's time for the media and the public to tune in and watch carefully.

Executive Summary

"As you know, the Clinton Administration has just announced a dramatic shift in the government's approach to the use of pesticides on food. For the first time ever, the federal government has committed to real reductions in pesticide use."

—EPA Administrator Carol Browner
Speech to the National Press Club
June 30, 1993

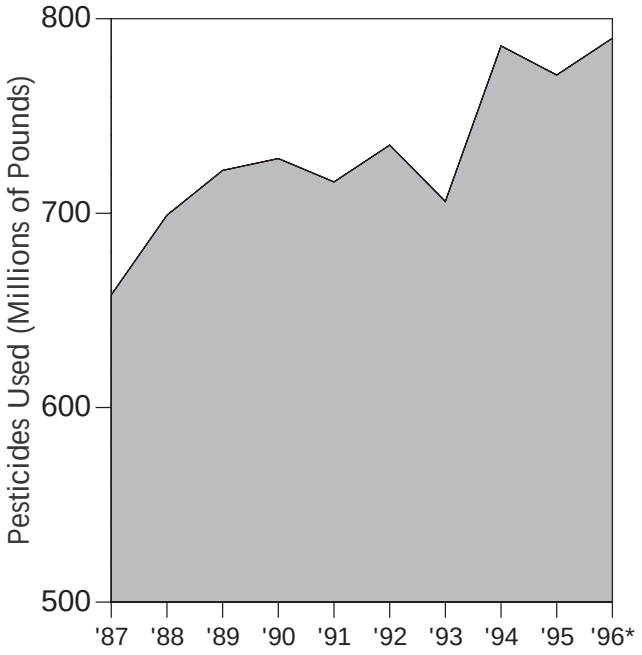
On June 25, 1993, the Clinton–Gore Administration made headlines when it announced a bold new national policy to cut pesticide use in agriculture and make the protection of children the paramount consideration in federal pesticide regulation.

Top Administration officials characterized the new policy as "a watershed in the history of pesticide use," "a landmark in food safety," a "dramatic shift" and "a very significant commitment" on the part of the government to reduce pesticide usage and risks.

This report examines what has happened in the five years since the policy was announced, based on an extensive Environmental Working Group review of federal agency data and actions.

We conclude that the U.S. government has done almost nothing materially to reduce pesticide use or to lower children's exposure to pesticides during the past 5 years. By nearly every measure, children and the rest of the population are no better off today than they were five years ago with respect to the risks posed by pesticide use and exposure. We can find no compelling evidence that the government intends to take, or will take, actions to reduce significantly either pesticide usage or risks before the end of the Clinton-Gore Administration, despite powerful new regulatory tools Congress provided when it unanimously passed the Food Quality Protection Act in July, 1996.

Figure 1. Agricultural pesticide use increased sharply under the Clinton Administration.



** Pesticide usage data for 1996 are estimates based on communications with pesticide industry analysts.*

Source: Environmental Working Group. Compiled from EPA 1997, Pesticide Industry Sales and Usage. Does not include usage of sulfur or petroleum/oils.

Findings

- **Farmers are using more pesticides, not cutting back.** Pesticide sales skyrocketed after 1993, and pesticide use in agriculture also increased substantially. Farmers sprayed 70 million pounds more pesticide in 1995 than in 1993—a 10 percent jump (Figure 1). Based on current trends, far from being reduced, pesticide use could actually reach record levels during the Clinton-Gore Administration. Belying its headline-making 1993 policy, the Administration never developed any plan to achieve "real reductions"—or *any* reductions—in agricultural pesticide use. Just a month short of the 5-year anniversary of its pesticide reduction policy, the government does not even have a plan to develop a plan to reduce pesticide use overall, or to curb systematically the use of the riskiest pesticides, such as organophosphate insecticides.

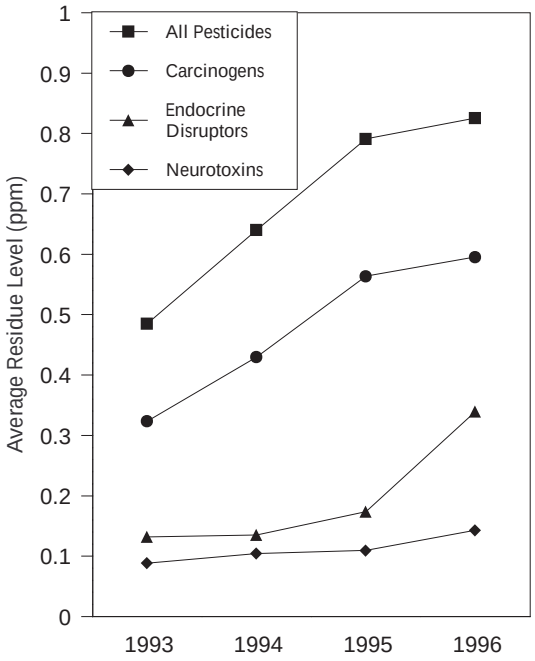
- **Children's exposure to pesticides in food is not reduced.** Foods heavily consumed by children are just as contaminated with pesticides today as they were in 1993 (Figure 2). Analysis of the most recent USDA data (for 1996) shows that 67 pesticides were found in just 12 fruits and vegetables heavily consumed by children, compared to 58 found by USDA in 1993. Although hundreds of pesticide food tolerances have been dropped by manufacturers or revoked by the EPA since 1993, most of these were for little-used products. Analysis of the most recent federal residue monitoring data shows that in 1996, the pesticides found in fruits and vegetables heavily consumed by children were essentially the same as those found in 1993. Worse, levels of cancer-causing pesticides in these important children's foods appeared to increase significantly between 1993 and

1996. Levels of neurotoxic and hormone-disrupting pesticides remained about the same. Between 1993 and 2000, tens of millions of children between the ages of 0 and 5 will have been exposed to continuing high levels of pesticides in food while the Clinton-Gore Administration studies children's pesticide exposures and risks with no plan in place to reduce them.

- **Water supplies are still contaminated with pesticides.** Weed killers, bug killers and other pesticides still contaminate thousands of water supplies nationwide. For hundreds of Midwestern communities, pesticide runoff to rivers and streams produces tap water commonly contaminated with five or more weed killers during peak runoff each spring and summer. Communities using reservoirs are exposed to these mixtures year-round. Everyone who drinks the water is affected, including millions of babies who consume pesticides when parents feed them infant formula reconstituted with tap water. EPA's "special review" of the pesticide that most commonly contaminates tap water—the carcinogenic weed killer atrazine––has stalled, despite the fact that the chemical now contaminates some 1,500 drinking water systems in 20 states, from New York to Hawaii, and has been banned in many European countries. Most efforts to reduce levels of weed killers in tap water have come literally at the end of the pipe: clean up actions by local water suppliers, paid for by their customers.

- **The Administration has taken only one pesticide off the market.** Despite its high-profile 1993 commitment to take the highest-risk pesti-

Figure 2. Levels of pesticides increased on fruits and vegetables heavily consumed by infants and children between 1993 and 1996.



Source: Environmental Working Group. Compiled from USDA AMS Pesticide Data Program 1993-1996 and FDA Pesticide Monitoring Program, 1993-1996. PDP foods include apples, carrots, grapes, green beans, oranges, and peaches. FDA foods include cherries, cucumbers, head lettuce, loose leaf lettuce, pears, peas, tomatoes, strawberries, and sweet peppers. Average residue levels were calculated by averaging the mean residue concentrations in each of the PDP and FDA foods.

Because of governmental inaction, the same array of older, more toxic chemicals used in 1993 still predominates on farms in 1998.

cides off the market to reduce risks and make room for "safer" pesticides, in five years the Clinton-Gore Administration has taken just one pesticide, phosdrin, off the market. This action was taken to provide much-needed protection to farmworkers. The benefit to the public at large, and to children, however, has been negligible. In contrast, Ronald Reagan banned 12 pesticides for food use in his 8 years in office, and George Bush banned 4 during his term—including Alar.

The Clinton EPA did sign a phase-out agreement with Dupont company to end use of the weed killer cyanazine by the year 2003. Currently, however, 25 million pounds of this pesticide are used each year and it remains a significant tap water contaminant. Because of governmental inaction, the same array of older, more toxic chemicals used in 1993 still predominates on farms in 1998.

- **The government allowed a record number of new pesticides onto the market.** The net result of pesticide regulatory actions during the Clinton-Gore Administration is that there are actually more pesticides in commerce today than ever before; more than 875 active ingredients were registered for use as of 1997. EPA has approved a record number of pesticides since 1993—81 in all. Fully half of these newly approved pesticides *did not* meet the EPA's "safer" designation as promised in the 1993 policy statement. Notable among the "non-safer" approvals is the weed-killer acetochlor, a probable human carcinogen that was contaminating tap water throughout the Midwest only two years after EPA approved it in 1993. The Administration of Gov. George Pataki banned acetochlor in New York in 1997. The 40 "safer" pesticides that EPA approved between 1993 and 1995 provided no measurable benefit to human health and the environment because farmers continue to rely on more toxic, outdated compounds that EPA has allowed to remain on the market.

- **The Administration has stymied sustainable agriculture.** It took the Clinton-Gore Administration five full years to propose national standards for organic food, a cornerstone of sustainable agriculture policy. But the proposal that finally emerged was the regulatory equivalent of a near-death experience for the organic industry. In fact, the proposal was so objectionable to organic food producers and consumers that it generated a

record 200,000, mostly negative public comments to the Agriculture Department. Bowing to public pressure, the USDA rejected the use of food irradiation, genetically modified organisms (biotech), and sewage sludge in organic food production.

Even so, final national organic standards may be delayed for another year or more. Administration budgets for sustainable agriculture research and technical assistance related to pesticides have been wholly inadequate, going from $9 million in 1993 to just $11 million last year (out of a total budget of $1.9 billion). The USDA announced in 1994 that one of its primary "sustainable agriculture" goals would be to get 75 percent of U.S. farmland under "integrated pest management" by the year 2000. Just nineteen months short of the deadline, however, the government is unable to describe what it means by its "IPM" goal; how progress toward the goal might be measured; or whether the goal, if achieved, would reduce pesticide use or risks to human health and the environment.

Conclusions

- For all its drama and acclaim, the Clinton-Gore Administration's 1993 pesticide reduction policy achieved nothing of practical significance to protect American children from pesticides during the past 5 years. Judged against performance indicators that measure the impact of pesticide policy on real people, the 1993 policy did not mark a dramatic shift, watershed, or landmark in pesticide policy or regulation, as the Administration claimed.

- Pesticide use patterns, exposure levels, and policy decisions have continued overwhelmingly to favor the interests of chemical companies over children. Same as it ever was. We can point to no clear indications that these circumstances will change over the next two years.

Recommendations

- Organophosphate insecticides present a crucial, immediate test of the Administration's resolve to make good on its 1993 policy, and make use of the clear and powerful regulatory authority provided by the Food Quality Protection Act of 1996. Organophosphates are neurotoxic insect killers widely used for decades in agriculture, and in gardens, homes, schools and other places. Because they routinely contaminate many foods that children eat daily—including baby foods—and many homes, EPA has put organophos-

Pesticide use patterns, exposure levels, and policy decisions have continued overwhelmingly to favor the interests of chemical companies over children. Same as it ever was.

As a first step in making good on its claim to protect children, the Administration must indicate publicly how it intends to reduce exposure to organophosphate insecticides in accord with Food Quality Protection Act mandates.

phates at the top of the list of pesticides to be regulated under the tough new standards of the FQPA. According to recent EWG estimates, more than 1 million children aged five and under are exposed to unsafe levels of organophosphate insecticides each day. As a first step in making good on its claim to protect children, the Administration must indicate publicly how it intends to reduce exposure to organophosphate insecticides in accord with Food Quality Protection Act mandates.

- As a precautionary measure, parents or anyone else concerned about pesticide exposure must assume that the government of the United States will not act any time soon to reduce the risks of pesticides, even though government scientists publicly and privately state that the risks are excessive. Parents in particular should take steps to reduce children's pesticide exposure through food, water, in the home and at school. Many of these steps are easy and without cost; others, unfortunately, present costs that parents must bear because the government will not act.

- Socially responsible companies should modify their products and services to help consumers reduce pesticide risks in lieu of meaningful government action.

- Food companies in general, and baby food companies in particular, should accelerate and document efforts to reduce pesticide residues in food. The food industry should expand organic food product lines to meet the standards of respected public and private certifiers who at least meet California's organic standards, unless or until the federal government finally develops acceptable national organic standards.

- Garden supply stores and pest control services should voluntarily phase out the sale and use of organophosphate insecticides and other highly toxic pesticides.

- Pesticides that contaminate drinking water sources should be banned, and manufacturers of pesticides, not water customers, should pay for testing and cleanup of pesticides that pollute tap water.

- Consumers concerned about pesticide levels in food or water can express their opinions directly to EPA by calling 1-800-858-7378.

The 1993 Pesticide Use Reduction Policy

With the 1993 publication of *Pesticides in the Diets of Infants and Children*, mainstream science reached a consensus that the unborn and the very young need special protection from pesticides, and that the regulatory system in place at that time did not provide these safeguards. This consensus report provided the scientific underpinnings for a series of policy initiatives and executive orders by the Clinton Administration, each one proclaiming commitment to protecting the nation's children from pesticides and toxic substances.

On June 25, 1993, just days before the release of the National Academy of Sciences (NAS) study and in anticipation of its publication, the White House issued a major policy statement on pesticides. The statement began:

> **The Clinton Administration today announces its commitment to reducing the use of pesticides and to promote sustainable agriculture.**

Signed by three federal agencies—the Environmental Protection Agency, Food and Drug Administration, and the U.S. Department of Agriculture—the two-page policy statement said that "the Clinton Administration is committed to reducing the risks to people and the environment that are associated with pesticides while ensuring the availability of cost-effective pest management tools for agriculture and other pesticide users." The statement promised: "We will intensify our efforts to reduce the use of higher-risk pesticides and to promote integrated pest management, including biological and cultural control systems and other sustainable agricultural practices, under the leadership of the USDA...We are committed to the goals of reducing risk associated with pesticides for all Americans and especially of ensuring appropriate protection for children."

The Clinton-Gore Administration announcement made headlines nationwide. Nearly all that was written characterized the Administration's policy as a bold and dramatic policy shift, a view that was bolstered by the observations of Administration officials.

Dr. David Kessler, then Commissioner of Food and Drugs, told *The New York Times* in a

front-page story ("U.S. Is Taking Aim At Farm Chemicals In The Food Supply," June 27) that the announcement will "create incentives for the development of safe pesticides" and "remove those pesticides that pose the greatest risk from the market." Dr. Kessler called the announcement "a major landmark in the history of food safety." EPA Administrator Carol Browner observed to *The Washington Post* ("3 U.S. Agencies Announce Joint Commitment to Cut Pesticide Use", June 26): "This is a very significant commitment...There has been a lot of inaction at the federal level." In the *Wall Street Journal*'s coverage ("Pesticide Use Would Be Cut Under U.S. Plan," June 28), Dr. Kessler called the report "a watershed in the history of pesticide use." Administrator Browner told the *Los Angeles Times* ("3 U.S. Agencies Announce Joint Plans to Curb Pesticides," June 26): "We've been working on this almost since day one....But today's announcement is remarkable not only for its commitment to reduction, but for the fact that we're working together in a way that frankly hasn't happened before at the federal level."

In the days and weeks that followed the Administration received dozens of highly favorable editorials for its new pesticide reduction policy (See Sidebar: The 1993 Pesticide Reduction Policy: How It Played).

At the National Press Club the following week (June 30), Administrator Browner observed: "As you know, the Clinton Administration has just announced a dramatic shift in the government's approach to the use of pesticides on food. For the first time ever, the federal government has committed to real reductions in pesticide use."

Subsequently, the Clinton Administration announced two major additional policy initiatives intended to protect children from pesticides and toxic substances in the environment. President Clinton issued an Executive Order on Children's Environmental Health and Safety on April 21, 1996, which was followed by EPA's National Agenda to Protect Children's Health from Environmental Threats in September of that year. These two proclamations pledged the EPA to setting all public health and environmental standards specifically to protect children, and committed the government to expanded research on children's exposure and susceptibility to environmental pollutants, including pesticides.

The Food Quality Protection Act of 1996

In 1996 the Congress unanimously passed the Food Quality Protection Act, radically transforming the nation's pesticide law. Prior to FQPA, pesticide law did not require any special protections for children, nor were any implemented. Indeed, before FQPA, the law required

THE 1993 PESTICIDE REDUCTION POLICY: HOW IT PLAYED

Clinton-Gore Administration officials hailed their pesticide use and risk reduction initiative as a fundamental policy shift. More than 120 newspapers serving big cities and small towns throughout the nation gave the announcement prominent and very favorable coverage. And editorial pages praised it.

Los Angeles Times (Editorial, July 5, 1993) "New Echoes of That Silent Spring" Subhead: United States must move away from pesticide use in food"

> Three federal agencies last month announced plans to reduce the use of chemicals in the production of the nation's food. In their place, the government will promote sustainable agricultural practices that rely on nature's own forces to control pests. This change of direction is wise, if long overdue...The announcement represents a major change in U.S. pesticide policy...

Seattle Post-Intelligencer (Editorial, July 9, 1993) Headline: "Clinton targets risky pesticides"

> The Clinton Administration has made an important and wise decision that could improve the way food is grown in this country...Top officials from the Environmental Protection Agency, the Food and Drug Administration and the Department of Agriculture have announced a new federal policy that will put a premium on reducing the use of risky farm chemicals that may pose a particular danger to children...

The Washington Post (Editorial, July 5, 1993) Headline: "Pesticide Politics"

> ...The Clinton Administration, readying itself for the publicity the NAS report would generate, stated it intends to reduce the use of unsafe pesticides. If it can, such a step would mark a change from the Reagan and Bush Administrations, which had scant interest in a coordinated, health-oriented approach....

Democrat and Chronicle (Rochester, NY) (Editorial, June 30, 1993) Headline: "A (chemically free) apple keeps the doctor away"

> The Clinton Administration's plans to encourage a reduction in the use of pesticides on crops could eventually mean the food on your table will be even healthier than it is now...

The Houston Post (Editorial, July 13, 1993) Headline: "Focus on Children" Subhead: Fruits, vegetables vital to diet despite pesticides"

> ...So when the EPA decided to focus primarily on health considerations in regulating pesticide tolerance levels, it made a bold and intelligent move in the interest of children. The EPA was joined in the decision by the Department of Agriculture and the Food and Drug Administration. This marks the first time all three federal agencies have merged forces to work toward this common goal... ❖

EPA to balance farmer profits against the risks to public health, with no specific requirement to protect children, before making a regulatory decision on a pesticide. The only health and safety standard that broadly applied to foods at that time was that the adverse effects of pesticide use that were foisted upon the public could not be "unreasonable."

Now, the FQPA requires a specific finding that the pesticide is safe for infants and children, including effects that may occur from in-utero exposure, before a pesticide is allowed in or on food**.** Safe is defined as a "reasonable certainty of no harm to any exposed individual." In addition, food tolerances for a single pesticide must include an assessment of exposure to other pesticides with a common mechanism of toxicity and an assessment of risk from all routes of exposure to these pesticides as well.

FQPA was in large measure a response to the 1993 report from the National Academy of Sciences, *Pesticides in the Diets of Infants and Children*, that urged tougher protections from pesticide for the very young. A review of a wide range of federal data on pesticide use, registrations and exposure shows that these additional protections are needed as much today as they were when the NAS issued its recommendations five years ago.

Pesticides in Food

The Environmental Working Group's analysis of pesticides in food is based on the most recent data from the U.S. Department of Agriculture Pesticide Data Program (PDP) and additional data from the routine pesticide surveillance program of the Food and Drug Administration.

The Pesticide Data Program results are unique because all samples are washed and prepared for consumption prior to analysis, and because the sampling program reflects different patterns of pesticide use in the regions where food is grown. PDP foods are specifically selected because they are heavily consumed by infants and children, and further, PDP technicians analyze for low levels of residues that are not found by other monitoring programs including the Food and Drug Administration routine monitoring program.

Although PDP data provide a better picture of pesticide levels in food as eaten, FDA data provide a reliable if slightly less thorough view of residues on foods at the wholesale level. While not optimal for dietary risk assessment, there is no reason to believe that the trends revealed by the FDA data do not accurately reflect the trends of exposure in the food as eaten (as opposed to the actual amounts).

EWG analyzed only crops with sufficient samples from at least three consecutive years of testing, from 1993 through 1996, the latest year for which data are available.

USDA technicians found a total of 67 different pesticides in just 12 fruits and vegetables tested.

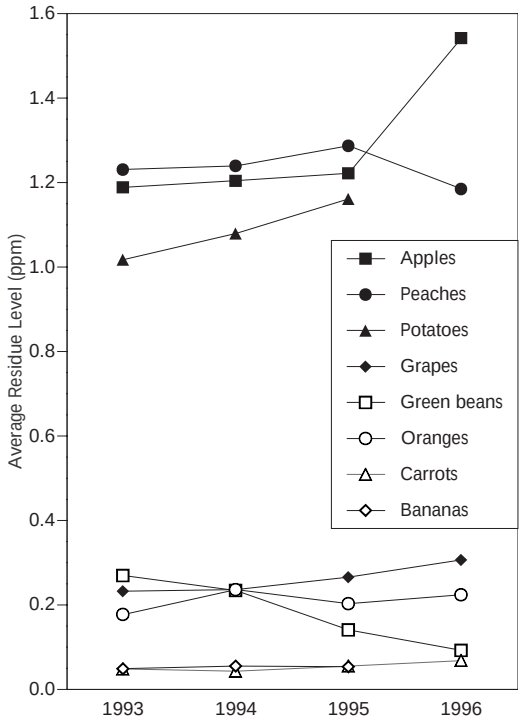
The Pesticide Data Program

According to data from the PDP the risks to children from pesticides in the diet have not decreased, and may have increased slightly, since 1993.

The Most Recent Data — 1996

In April, 1998, the U.S. Department of Agriculture quietly released data from its Pesticide Data Program (PDP) for the year 1996. For that year, PDP technicians found a total of 67 different pesticides in just 12 fruits and vegetables tested, virtually the same number of compounds (61) as found on average over the three preceding years. In 1996, these findings included 12 pesticides in a single sample of spinach, 10 pesticides on single samples of apples, 9 on single samples of peaches, and green

Figure 3. With one exception (green beans) pesticide levels remained steady or increased slightly on fruits and vegetables heavily consumed by children* between 1993 and 1996.



Source: Compiled from USDA Pesticide Data Program, 1993 through 1996.

** Residues measured after foods are washed, peeled, cored and prepared for normal consumption.*

beans and 8 on single samples of grapes and tomatoes. These maximum multiple residue combinations have been essentially unchanged since 1993.

Neither the EPA nor the pesticide industry has tested these pesticide combinations for the risks they might present to infants, young children, or anyone at all. This is critical because infants and children are exposed routinely to multiple pesticides on single foods, and to the multiple pesticides found in the variety of foods that they eat each day. In 1996, half or more of the ready-to-eat apples, carrots, grapes, peaches, and spinach eaten in the United States were contaminated with from 2 to 12 pesticides.

Looked at another way, when an American child eats an apple he or she is more likely to eat 9 pesticides than to eat none at all. For other crops the numbers are just as shocking. With peaches, the average child is more likely to eat 6 pesticides than to eat none, with grapes and carrots the same child is more likely to eat 3 pesticides than to eat none.

Pesticide Data Program Trends 1993 - 1996

An analysis of PDP data for eight fruits and vegetables the years 1993 through 1996 reveals that:

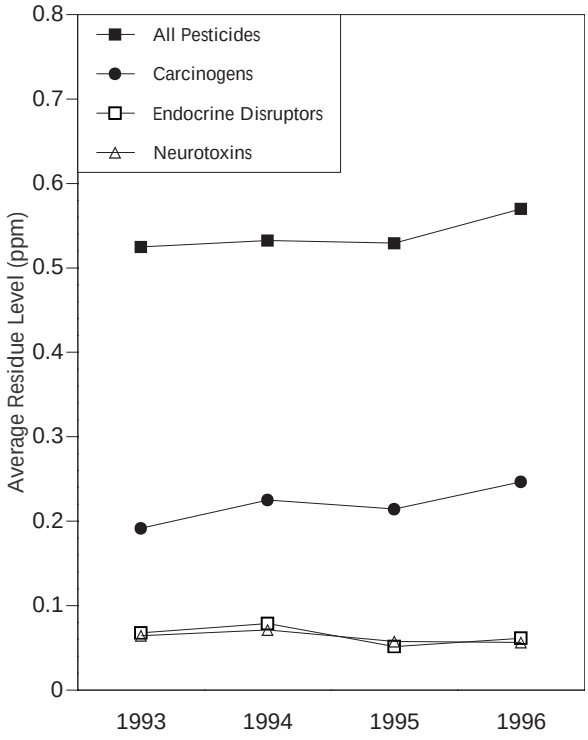
- The number of pesticides detected in fruits and vegetables that children consume heavily was essentially unchanged from 1993 to 1996, rising slightly from 58 in 1993 to 67 in 1996. As described above, there is no evidence that this combination of pesticides is safer now than it was five years ago.

- For the eight crops with adequate data for analysis, one crop — green beans — shows a decrease in residues, compared with 7 crops that show either no decrease or a significant increase in pesticide resi-

due levels between 1993 and 1996 (Figure 3).

- Overall, concentrations of cancer-causing pesticides on these same six fruits and vegetables appear to have increased slightly, while levels of neurotoxic, and endocrine-disrupting pesticides remained unchanged (Figure 4).

Figure 4. Overall, pesticide levels appear to have increased slightly on fruits and vegetables children consumed heavily, from 1993 through 1996.



Source: Compiled from USDA Pesticide Data Program, 1993 through 1996. PDP foods include apples, carrots, grapes, green beans, oranges, and peaches. Average residue levels were calculated by averaging the mean residue concentrations in each of the PDP foods.

** Residues measured after foods are washed, peeled, cored and prepared for normal consumption.*

FDA Data

The PDP program does not sample some heavily consumed crops. Pesticides on these foods, however, can present significant risks to children. To gauge the status and trends in pesticide levels on these crops we analyzed data from the Food and Drug Administration's Pesticide Residue Monitoring Program.

FDA Trends 1993 - 1996

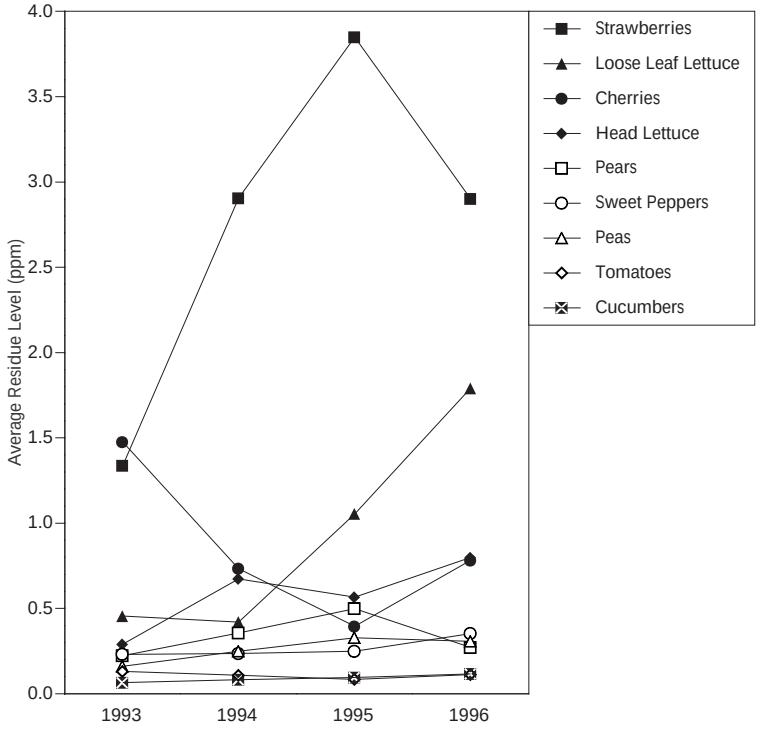
Our analysis of FDA data for ten foods for the years 1993 through 1996 confirms the trends found in the PDP data for the same years:

- The number of pesticides in nine fruits and vegetables that children consume heavily was essentially unchanged from 1993 to 1996 at 55 and 60 respectively.

- Between 1993 and 1996, for the nine crops analyzed, pesticide concentrations appeared to increase dramatically on strawberries and leaf lettuce, decrease slightly on cherries, and remain basically unchanged on the remaining seven crops (Figure 5).

- Overall, concentrations of cancer-causing pesticides on nine crops analyzed appear to have increased substantially between 1993 and 1996. Levels of neurotoxic and endocrine-disrupting pesticides remained unchanged (Figure 6).

Figure 5. FDA tests of individual fruits and vegetables showed no decrease in pesticide levels from 1993 through 1996.



Source: Compiled from Food and Drug Adminisotration routine surveillance data.

** Residues measured prior to washing or peeling.*

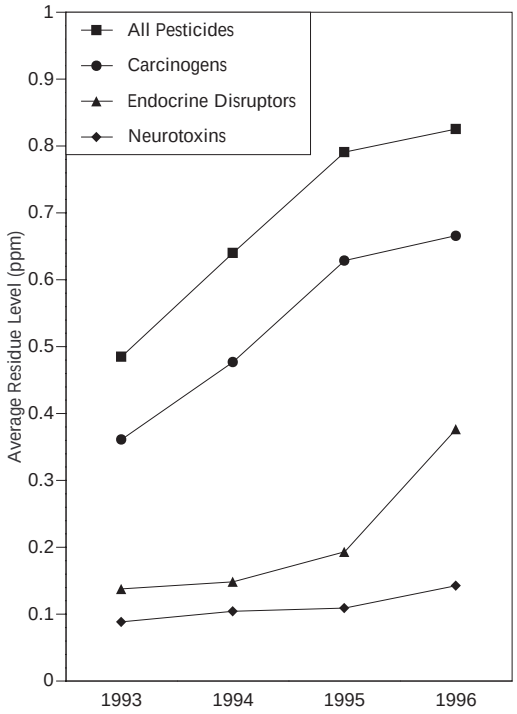
Pesticide "Reregistration"

In 1988, the Congress amended the Federal Insecticide Fungicide and Rodenticide Act (FIFRA) to require that all pesticides conform with the data requirements published by the agency in the Code of Federal Regulations. In the ensuing process, known as pesticide "reregistration," many manufacturers of little-used pesticides simply decided not to pay for the needed studies and dropped the registrations and food tolerances for their products. In a much smaller number of cases, manufacturers brought their pesticides into compliance with more modern scientific standards.

Although hundreds of pesticide food tolerances have been dropped or revoked in the reregistration process since 1993, most of these were for little-used products. Analysis of the most recent federal residue monitoring data shows that in 1996, the pesticides found in fruits and vegetables heavily consumed by children were essentially the same as those found in 1993. Worse, levels of cancer-causing pesticides in these important children's foods appeared to increase significantly between 1993 and 1996.

The requirements for pesticide reregistration must not be confused with meeting the new children's health standards of the Food Quality Protection Act. While an important step forward, FIFRA 88 did not in any way alter the broadly applicable risk/benefit standard in the law at that time, which was that the pesticide risks borne by the public must not be "unreasonable".

Figure 6. Total pesticide concentrations* in nine fruits and vegetables appear to have increased significantly between 1993 and 1996.



Source: Compiled from Food and Drug Adminisotration routine surveillance data. FDA foods include cherries, cucumbers, head lettuce, loose leaf lettuce, pears, peas, tomatoes, strawberries, and sweet peppers. Average residue levels were calculated by averaging the mean residue concentrations in each of the FDA foods.

** Residues measured prior to washing or peeling.*

Drinking Water: Making a Bad Problem Worse

America's drinking water was heavily contaminated with pesticides when President Clinton took office in 1993. Since then the problem has not improved at all, and indeed it may have gotten worse.

Recent data from the U.S. Geologic Survey show that in addition to the well-documented problem of weed killers in tap water, neurotoxic organophosphate insecticides (OPs) also commonly contaminate surface water. Half of over 5,000 samples drawn from 20 different watersheds detected at least one OP, with a maximum of 13 OPs found in a single sample. Millions of individuals drink tap water from rivers and streams in these watersheds. As with herbicides, conventional sand-bed filtration drinking water treatment systems do not reduce levels of these insecticides in tap water. Special water treatment techniques, involving the use of carbon as a cleansing agent, are needed.

Most infants and children who drink this water are no better shielded from the multiple pesticides in their tap water than they were in 1993. Where the situation has improved somewhat, credit goes to local water suppliers who have taken steps to reduce contamination. The EPA, in contrast, has taken no effective steps to reduce pesticide levels in tap water.

EPA's Slow-Moving Triazine Special Review

A group of cancer-causing weed killers — the triazine herbicides — are the most important pesticide contaminants in drinking water. These pesticides have been found in over 1500 water supplies. In November, 1994, EPA placed the triazine herbicides — atrazine, cyanazine, and simazine — into a special regulatory review due to concerns that the compounds all cause cancer and that they all were toxic to the endocrine system. Soon after EPA announced the special review, DuPont, the manufacturer of cyanazine, decided to voluntarily phase out sales of cyanazine, and replace it with a newer, cheaper, and safer alternative. This phase-out is ongoing, and should be complete in the year 2000. Presently cyanazine continues to contaminate drinking water throughout the Midwest.

Most infants and children who drink this water are no better shielded from the multiple pesticides in their tap water than they were in 1993.

In 20 states, from New York to Hawaii, atrazine was detected in over 50 percent of all drinking water supplies that use surface water.

The special review of atrazine and simazine remains stalled. Since initiating the review in 1994, the EPA has done nothing to protect infants and children from the steady stream of multiple herbicides flowing from taps throughout the Midwest, and in many other parts of the nation. According to the most recent studies the problem is worse than previously thought:

- Atrazine contaminates over 1,500 drinking water systems in 20 states, according to the most recent data provided to EPA by Novartis (the manufacturer of atrazine). In these 20 states, including states like New York and Hawaii that were previously not thought to have a problem, atrazine was detected in over 50 percent of all drinking water supplies that use surface water (Clarkson, et al 1997).

- An internal pesticide industry study in 1997 found pesticides in 96 percent of all Midwestern towns studied — 374 drinking water systems in all (Hackett 1997).

- The triazines are often found at concentrations that pose significant health risks, and that exceed new FQPA standards. By EWG's estimate, in 1996-97 cancer risks from atrazine and simazine in tap water exceeded the new FQPA "one-in-one-million" standard in 245 communities in 8 states, with a total population of over 4.3 million Americans (EWG 1997).

- Infants and children continue to be exposed to multiple pesticides in tap water. This is a particularly acute problem when this tap water is used to reconstitute infant formula. EWG found ten weed killers in a single sample of tap water collected in Williamsburg, Ohio, in 1997. This is one more than EWG found in the tap water of Fort Wayne, Ind. in 1995. According to data from state drinking water agencies and pesticide manufacturers, in 1996, 3.3 million people in 104 Midwestern communities were served tap water contaminated with five or more cancer-causing weed killers (EWG 1997).

Acetochlor - Adding a Carcinogen to Tap Water

During the 1980s, Monsanto Corp. tried in vain to register their new corn herbicide, acetochlor. Because this weed killer is a probable human carcinogen, and was certain to contaminate tap water supplies, both the Reagan and Bush Administrations refused to allow it on the market. That all changed with the Clinton Administration, and in 1993, the EPA signed an agreement with Monsanto that put acetochlor in the hands of America's corn growers.

The agreement ostensibly set strict binding criteria designed to ensure that acetochlor did not contaminate water supplies and that the use of other cancer-causing pesticides would be reduced substantially. The agreement has been an abject public health failure.

- Since the EPA-Monsanto agreement was signed, overall use of the top seven agricultural herbicides has decreased slightly: about 14 million pounds between 1992 and 1997 (USDA NASS 1998). This reduction is far short of the 66 million pound annual reduction that was required in the agreement within five years of acetochlor's registration in 1993. Worse, use of the major weed killers that contaminate drinking water shows no decrease at all. Farmers used about 132 million pounds of alachlor, atrazine and metolachlor in 1992, the year before acetochlor was put on the market. In 1996, four crop years after acetochlor was added to the mix, use of the four herbicides totaled 135 million pounds.

- In the space of just a few years of introduction, acetochlor has become a common contaminant of Midwestern tap water. In the summer of 1995, just one growing season after acetochlor was first used, tests by the Iowa State Hygienic Lab, commissioned by EWG, found acetochlor in finished tap water in 15 of 29 Midwestern water supplies (EWG 1995). Data collected by the manufacturers of acetochlor in 1996-1997 found the weed killer in 20 percent of all finished tap water samples, and in 74 of 178 (42 percent) of all water systems tested (Hackett 1997).

- In 1997, acetochlor was detected in groundwater in Illinois, Iowa, and Kansas. EPA scientists determined that these were not random detections, but instead were indicative of a "pattern of movement" toward groundwater. The EPA/Monsanto pact calls for automatic suspension if mitigation measures are not agreed upon after such a "pattern of movement" for acetochlor is detected in any single state or location. After numerous meetings between the registrant and the government, Monsanto agreed to no mitigation measures, yet the Administration took no action to suspend or curtail use of the compound (Water Policy Report 1997).

- In April 1997, the Administration of Gov. George Pataki banned acetochlor in the state of New York. The New York State Department of Environmental Conservation (DEC), cited the

Since 1993, use of major weed killers that contaminate drinking water shows no decrease at all.

chemical's toxicity and the significant likelihood that it would contaminate drinking water. According to the New York State DEC:

"... a comparison of the toxicological and environmental fate properties of acetochlor versus those of the six corn herbicides shows that acetochlor has toxicological and environmental fate profiles comparable to, and in some cases worse than, those of the other compounds. Acetochlor also has an application rate comparable to or greater than some of these compounds, suggesting that its use may not result in greatly reduced environmental loading (Nosenchuck 1997)."

Pesticide Use is Rising

Despite the Clinton-Gore Administration's widely publicized policy in 1993 to reduce pesticide use in agriculture, the opposite has happened in the past five years. In fact, trends point toward increasing use in the years ahead (Figure 7).

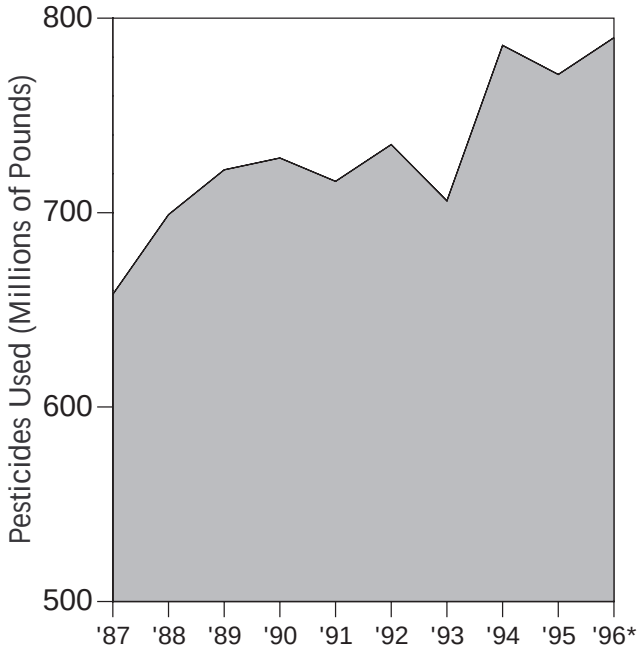
Two pieces of evidence point to ever-increasing pesticide use. One is the fact that no pesticides have been taken off the market since 1993. When combined with analyses of federal residue monitoring programs, indicates that farmers are mostly using the same pesticides that they were in that year. The second is information on pesticide sales, which indicates that farmers are spending record amounts on these same "crop protection chemicals" each year.

Farmers spent more money on agricultural pesticides in 1996 than ever before. In fact agricultural pesticide sales took their sharpest jump in years after 1993, going from $6.1 billion to an estimated $8.2 billion in 1996.

Herbicide sales jumped significantly and, for the first time in more than a decade, insecticide sales increased substantially (Figure 8). While government information is limited, it is clear that the sales boom has translated into an overall upward trend in usage since 1993.

Agricultural pesticide use in the United States peaked at the end of the 1970s at about 843

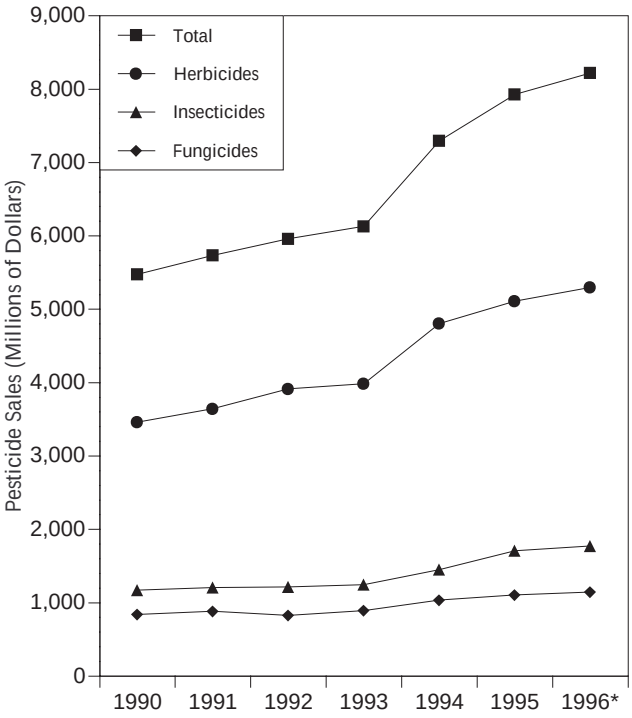
Figure 7. Agricultural pesticide use increased sharply under the Clinton Administration.



** Pesticide usage data for 1996 are estimates based on communications with pesticide industry analysts.*

Source: Environmental Working Group. Compiled from EPA 1997, Pesticide Industry Sales and Usage. Does not include usage of sulfur or petroleum/oils.

Figure 8. Pesticide companies enjoyed record sales under the Clinton-Gore Administration.



** Pesticide sales data for 1996 are estimates based on communication with industry analysts.*

Source: Environmental Working Group. Compiled from EPA 1997, Pesticide Industry Sales and Usage.

EPA has in effect promoted methyl bromide use by granting numerous "section-18" emergency use exemptions on crops where methyl bromide was not previously used in significant amounts.

million pounds per year, according to EPA. After 1979 usage trended downward, with some year-to-year variations, falling to a low of 658 million pounds in 1987—roughly the same level it had been in the mid-1970s.

Since 1987, however, the overall trend has been upward and has continued through the Clinton-Gore Administration. Agricultural pesticide use jumped to 786 million pounds in 1994—an 80 million pound increase (11 percent) from 1993 (Figure 8). In 1995 it dropped back down slightly, to 771 million pounds, but in 1996 farm pesticide usage went up again, to between 790 to 800 million pounds for the first time since 1984.

In California, the nation's number one agricultural and pesticide-using state, pesticide use increased by 12 million pounds between 1993 and 1995, a particularly ironic state of affairs in a state with the nation's finest agricultural research establishment and many of the nations leading practitioners in alternative pest control systems (CPR 1997).

Methyl bromide provides yet another example of the Clinton-Gore Administration's failed pesticide use and risk reduction policies. Methyl bromide is a highly toxic and ozone-depleting soil fumigant and the fourth most widely used pesticide nationwide. In 1993, less than 15 million pounds were used in California, the only state for which there is accurate use data. Use of the fumigant has risen under the Clinton Administration in spite of an impending 2001 ban on its production. This total rose to 17.6 million pounds by 1995 and shows no signs of slowing.

Nationwide, EPA has in effect promoted methyl bromide use by granting numerous "section-18" emergency use exemptions for methyl bromide use in sweet potatoes, watermelons and carrots, among other crops. Issuing "emergency" use permits for methyl bromide on crops like these where it was previously not used

Table 1. Some of the most popular pesticides in use today date back to the 1940s.

Rank	Pesticide	Primary Manufacturer	First Product Registered	Estimated Total Use (pounds)
1	Atrazine	Novartis	1959	**70,500,000**
2	Metolachlor	Novartis	1977	**61,500,000**
3	2,4-D	Rhone Poulenc	1948	**53,000,000**
4	Metam Sodium	Zeneca	1955	**51,500,000**
5	Methyl Bromide	Great Lakes Chemical	1947	**48,500,000**
6	Glyphosate	Monsanto	1986	**43,000,000**
7	Dichloropropene	DowElanco	1960	**40,500,000**
8	Cyanazine	Dupont/ Griffin	1971	**26,500,000**
9 (tie)	Pendimethalin	American Cyanamid	1975	**25,500,000**
9 (tie)	Trifluralin	DowElanco	1963	**25,500,000**
10	Chlorpyrifos	DowElanco	1965	**25,000,000**

Source: EPA Pesticide Industry Sales and Usage: 1994 and 1995 Market Estimates, August 1997.

vividly illustrates the lack of any coherent program within the Administration to promote sustainable agriculture, integrated pest management, or to reduce the use of pesticides.

Pesticide Registration: In With The Old and In With the New

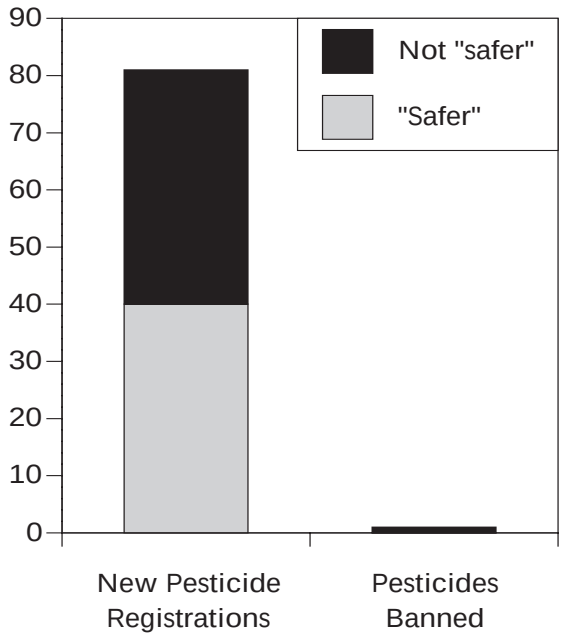
Despite its high-profile 1993 commitment to take the highest-risk pesticides off the market to reduce risks and make room for "safer" pesticides, in five years the Clinton-Gore Administration has managed to ban just one pesticide, phosdrin, and "schedule" the ban of another, cyanazine. The phosdrin ban has produced no measurable broad public health benefits (it was banned to provide much-needed protection for farmworkers) and the cyanazine ban, such as it is, will not go into effect until the year 2003. (Farmers currently use about 25 million pounds of this "banned" pesticide each year.) President Reagan banned or forced voluntary cancellations of 12 pesticides for food use in his 8 years in office, and President Bush banned or forced cancellation of 4 during his term—including Alar.

Because of governmental inaction, the same basic array of older, more toxic chemicals used in 1993 predominate on farms in 1998. Indeed, the chemicals that prevail in American agriculture today are the same ones that have been in the forefront of "modern scientific agriculture" for decades (Table 1).

In order to adequately protect children from pesticides, EPA must ban or severely curtail the use of many of these older, high-

President Reagan banned or forced voluntary cancellations of 12 pesticides. The Clinton/Gore Administration has managed to ban just one.

Figure 9. The Clinton Administration put 81 new pesticides on the market, but banned only one.



Source: Environmental Working Group. Compiled from U.S. EPA Pesticide Industry Sales and Usage, 1994 and 1995 Market Estimates, August 1997 and communications with EPA staff.

risk pesticides. Taking these steps, however, will hardly spell the end of American agriculture, nor will it leave farmers with fewer pesticide options.

In fact, there are more pesticides available to American farmers today than ever before in history, in no small part thanks to the Clinton-Gore Administration, which has made more new pesticides available to farmers than any other administration in the past 30 years.

The Administration allowed a record number of new pesticides onto the market since 1993—81 in all through 1995, the highest three-year total ever (Figure 9). The 31 pesticides registered by the Clinton-Gore Administration in 1995 is the second-highest number of new pesticide registrations in a single year since 1975, when Gerald Ford's EPA put 35 new pesticides into commerce. In 1994 and 1995 EPA registered 14 and 15 new insecticides respectively, nearly twice as many as the most ever registered in any single previous year (8 in both 1985 and 1975) (EPA 1997).

Fully half of these newly approved pesticides did not meet the EPA's "safer" designation as promised in the 1993 policy statement. Notable among the "non-safer" approvals is the weed killer acetochlor, a probable human carcinogen that was contaminating tap water throughout the Midwest within two years after EPA approved it in 1993. As noted earlier, Gov. George Pataki banned acetochlor in New York in 1997.

The 40 "safer" pesticides that EPA has approved since 1993 have had a trivial impact on human health and the environment because farmers continue to rely on more toxic, outdated

[1] National Organic Standards Board. 1998. Comments on the proposed National Organic Standards rule. March 28, 1998).

compounds that EPA has allowed to remain on the market.

Sustainable Farming: The Administration's Record on Organic Food Standards, IPM, Research and Technical Assistance

Three key areas of policy making and action define the Clinton-Gore Administration's efforts and successes to date to "promote sustainable agriculture," as the Administration committed to do from the very first sentence of its 1993 policy statement. The overall record on sustainable agriculture is exceedingly poor.

National Organic Standards. In 1990 Congress enacted the National Organic Food Production Act after a lobbying campaign on the part of the organic food industry, consumers and environmentalists. The purpose of the Act was to alleviate concerns that "the lack of consistent standards for organic foods was undermining consumer confidence and thereby the growth of the organic market." (National Organic Standards Board, 1998)[1] The Act set a target date of October 1, 1993 for the issuance of national standards for organic food.

Developing organic standards was seen by the entire sustainable agriculture movement as a primary public policy goal. Organic food is seen as a vital and growing option for consumers who wish to reduce their exposure to pesticides, and who want to support farming systems that do not rely on pesticides. The Act itself was passed over the strong opposition of many farm policy leaders in Congress and mainline farm groups. They objected to the perception that organic food certified by the federal government would be perceived as superior to or safer than conventional food.

The Bush Administration failed to issue any standards. When the Clinton-Gore Administration began, proponents of organic farming had high hopes that the national standards would be proposed and finalized immediately. Those hopes, it turns out, were badly misplaced.

It took five years before the Clinton-Gore Administration managed to issue a proposed set of standards for public comment. Worse, the rules that were finally proposed were something of a regulatory near-death experience for the organic food industry.

The Administration's proposal, among other things, left open the possibility that food irradiation, biotechnology, and sewage sludge could be used in organic food production. This stance generated a record 200,000 letters, e-mails and phone calls from consumers and the organic industry criticizing the rule during the public comment period. Agriculture Secretary Glickman, bowing to this fierce opposition, announced just a week after the comment period closed that the

The Administration's proposed standards for organic food left open the possibility that food irradiation, biotechnology, and sewage sludge could be used in organic food production.

If the Clinton-Gore request for FY 1999 were approved, the sustainable agriculture movement's top priority would be receiving 0.7 percent of the research and extension budget.

"big three" objections would be prohibited in organic food, and the standard would be rewritten and reissued for another round of comment.

It was an impressive win for consumers and the organic industry—in a fight they should never have had to face, and certainly never expected to face from the Clinton-Gore Administration. The defensive victory in the first public round of the organic rulemaking has made organic proponents wary about the next version of the proposal. Many concerns remain to be addressed from the initial proposed rule.

As a consequence, the country still lacks national standards for organic food that would have greatly boosted organic food sales, production and availability had they been issued immediately after the Administration announced its intent to "promote sustainable agriculture." It may be 1999 or 2000 before final standards are put into effect.

Sustainable Farming Research and Extension. For more than a decade, environmental, farm and consumer groups working on sustainable agriculture issues have sought to boost funding for two federal programs explicitly devoted to sustainable farming research and extension work. Because it has been a top priority, sustainable farming proponents were elated when the White House made funding for these efforts an integral part of the 1993 pesticide policy statement.

But in the five years since, the Administration has done next to nothing to boost funding for sustainable agriculture research. According to the Sustainable Agriculture Coalition, funding for the two programs in the first year of the Clinton Administration (FY 1994) simply tracked the Bush Administration request, and totaled $9.9 million. The Administration requested, but did not fight for, modest increases in the budget each year since. In FY 1999, the Administration is requesting $13.3 million, just $3.4 million more than 1994 levels. To put those figures in context, the total budget for agricultural research and extension is about $1.9 billion. If the Clinton-Gore request for FY 1999 were approved, the sustainable agriculture movement's top priority would be receiving 0.7 percent of the research and extension budget.

The Integrated Pest Management Goal. In 1994, the Administration announced that in pursuit of its 1993 pesticide reduction policy it would adopt a goal of bringing 75 percent of the nation's cropland under integrated pest management systems (IPM) by the year 2000. On its surface apparently a progressive move, the announcement was met with concern by sustainable agriculture proponents because of IPM's checkered history.

In its origins decades ago,

classical IPM systems substantially reduced or eliminated reliance on pesticides by utilizing natural predators, crop rotation and other methods to control pests. But over time the integrity of what is meant by IPM was degraded, as more and more "IPM systems" featured heavy use of chemicals. Indeed, proponents of the sustainable end of the IPM spectrum have taken to calling their approach "biointensive IPM" in an attempt to distinguish it from systems that, for all intents and purposes, are simply conventional farming with an IPM label stuck on it. IPM in some contexts means the farmers do little more than look to see if pests are present before killing them with the standard, toxic pesticides, used at standard rates and applied in standard fashion. Many sustainable agriculture proponents—including EWG—believe that the attraction of the 75 percent IPM goal to USDA was precisely that it could mean an increase, decrease or no change whatsoever in pesticide usage.

There has been no major, organized effort on the part of USDA to promote IPM in any form or to follow up to its 1994 commitment. In fact, as of May, 1998, just 19 months shy of the "deadline," Agriculture Department officials haven't even settled on the definition of IPM that they will use to verify how widely it is practiced. Needless to say, with no criteria in place by which to measure IPM adoption, nothing rigorous has been done to determine where the nation is with respect to the 75 percent goal. Most disturbing in the context of the 1993 Administration policy is the fact that no one in the government has the slightest idea how pesticide usage, the environment or human health would be affected by the adoption of USDA's vaguely specified IPM systems, regardless of the degree to which they might have been adopted by farmers.

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Right To Know

The state of government information about pesticide usage in the United States can only be described as primitive. Improving this situation is one of the first things that the Clinton-Gore Administration could and should have done in pursuit of its pesticide reduction policy. It has not happened.

Since the early 1990s the federal government has required farmers to keep records of certain restricted-use pesticides, as mandated by the 1990 farm bill. By any measure the program is a make-work, bureaucratic sham. The public has no access to the records, farmers are not required to submit the records to the government, and the USDA has not collected the records or samples of them to gain any insight from the work it required of farmers.

As an inadequate proxy for actual pesticide usage, EPA collects nationwide estimates on pesticide

sales, which it uses along with other data to estimate usage. Since 1990, the USDA has conducted a nationwide survey of pesticide use on certain selected crops, called the Agricultural Chemical Usage Survey. Estimates of crop specific pesticide use are published on alternating years for Fruit and Nut Crops and Vegetable Crops. Summaries of pesticide use on major crops like corn, soybeans and wheat are published annually. These reports summarize data at the state level (i.e. estimated use of carbaryl on Washington apples).

The absence of a federal pesticide use reporting system stands in sharp contrast to the Administration's overall "right to know" record. The Administration has expanded the public's right to know about industrial pollution by adding new reporting requirements to the Toxics Release Inventory for hundreds of chemicals and nine major industries, not including agriculture. The simple act of reporting to the TRI has led to significant pollution reduction at many individual factories and facilities. In contrast, pesticide use is increasing and neither the public nor the government has any idea of what pesticides are applied where, or in what amounts.

Pesticide use reporting has many benefits. It provides information needed to safeguard water supplies, wildlife and human health. It provides critical information to scientists seeking to improve pest management systems. It allows regulators to track progress on pesticide risk reduction and management, and last but not least, it provides the public with information it needs to participate in pesticide policy making.

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