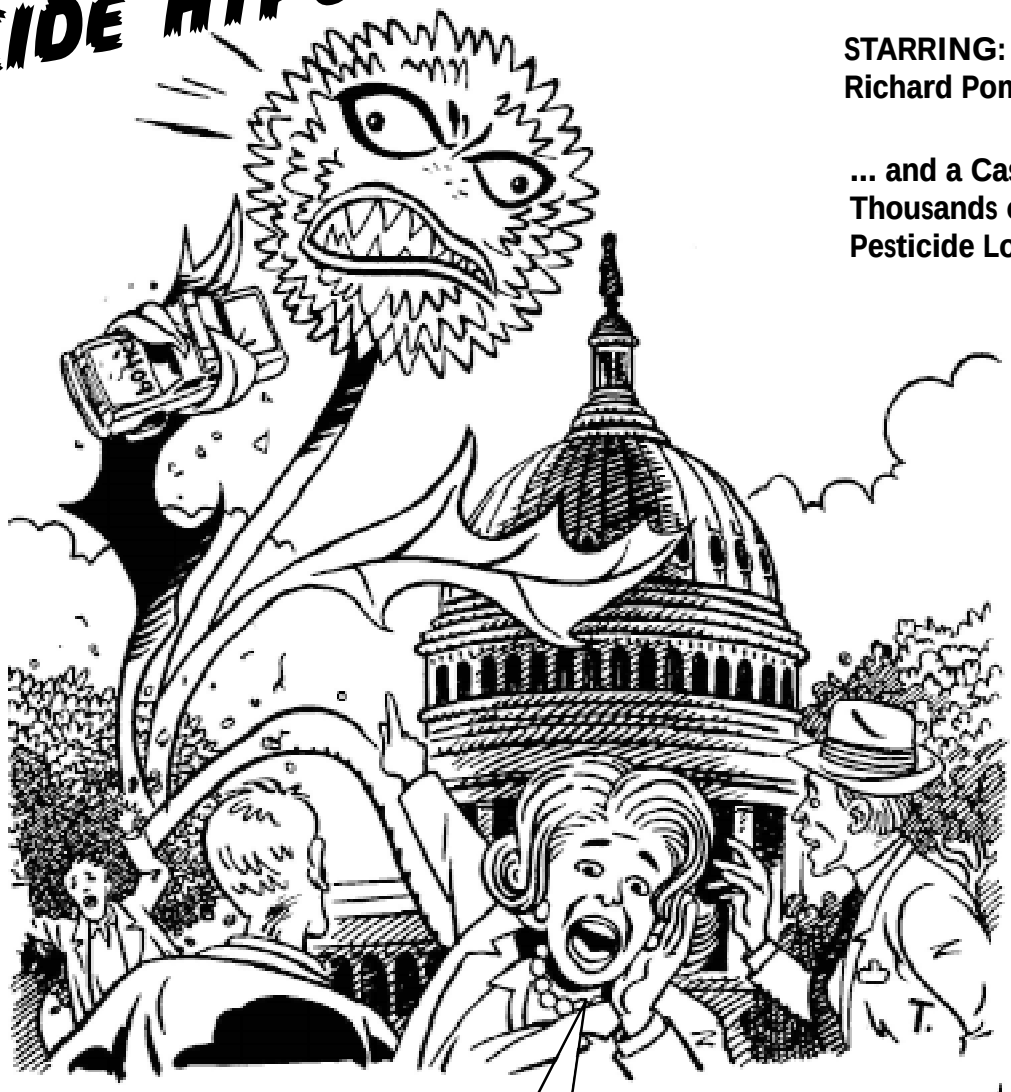
ATTACK OF THE KILLER WEEDS
PESTICIDE HYPOCRISY ON CAPITOL HILL

STARRING:
Richard Pombo (CA-11)

... and a Cast of Thousands of Pesticide Lobbyists



QUICK, SEND A SECTION 18 EMERGENCY EXEMPTION OR WE'RE DOOMED!!!

ENVIRONMENTAL WORKING GROUP™

TODD HETTENBACH
RICHARD WILES

Acknowledgments

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Contents

Foreword

Hypocrisy on Capitol Hill? Not exactly a stop-the-presses rarity, we admit. But the example documented in this report has a quality and scale that distinguish it, in our view at least, from the day-to-day dissimulation and doublespeak the public has come to expect from politicians in Washington. We are talking about hypocrisy in the service of pesticide companies and at the expense of the health and safety of America's kids.

The story begins three years ago when, with front-page fanfare, both the House and Senate unanimously passed a landmark law to tighten pesticide regulation in order to protect children. At the time politicians of every stripe bragged about their support for the Food Quality Protection Act of 1996 (FQPA). Republicans, in particular were strenuous in calling voters' attention to the new law. They saw FQPA as voting booth balm to soothe political wounds they had inflicted on themselves in the early months of the Gingrich revolution, before their many votes against the environment came to be seen as a serious electoral liability, especially with women voters.

By the end of 1999, however, dozens of "pro-FQPA" legislators in both parties have endorsed a bill that for all intents and purposes repeals FQPA. The bill would severely hamstring and delay the Environmental Protection Agency (EPA) from enforcing FQPA. Why the turnabout? Because pesticide companies have demanded it. And they sweetened the demand with sacks of re-election money.

The pesticide industry never much liked the law, though they have become more candid about their views in the past year. They especially do not like the way the EPA has begun to implement it in ways that could be very good for kids, but very bad for the pesticide business. Industry's lobbyists have mounted a disturbingly effective campaign to stop the law's implementation (an effort painstakingly detailed in a five-part series by the *Portland Oregonian* available by visiting the paper's home page, www.oregonlive.com)

Not wanting to suggest they oppose protecting children, pesticide companies have instead supplied politicians with a sound bite, attacking EPA at every turn

for failing to use "sound science" and insisting that the agency forestall all regulatory action until pesticide companies have submitted endless more studies and "real world data" on health and safety effects. These arguments undergird he bill to weaken FQPA.

It turns out that many of these same politicians have lobbied EPA on behalf of chemical companies and farmers to permit the "emergency" use of dozens of pesticides, even though the health effects of the chemicals have not been fully studied, on crops that routinely end up on kids' plates. In a number of cases the emergency has consisted of weeds sprouting in farmers' fields year after year after year.

That's the hypocrisy EWG analyst Todd Hettenbach uncovered when he pored through reams of publicly available congressional correspondence to EPA from recent years. Politicians vote to protect kids with tougher pesticide regulation. Then they pressure EPA to allow incompletely tested pesticides to be sprayed on apples, pears, potatoes and other foods kids eat every day&hurried behind-th-scenes prcess that circumvents standard regulatory procedure&. And then they rake in reelection money from the coalition of pesticide and agribusiness groups that wrote the bill that would destroy the original law protecting kids.

And what do they call this bill?

"The Regulatory Openness and Fairness Act of 1999."

We hereby submit it and its supporters as our entry in the Congressional Hypocrisy Hall of Shame.

Kenneth A. Cook
President,
Environmental Working Group
Washington, D.C.

Executive Summary

Section 18 of the Federal Insecticide Fungicide and Rodenticide Act allows the U.S. Environmental Protection Agency (EPA) to grant "emergency" and "crisis" exemptions from pesticide health and safety standards for farmers facing sudden and potentially catastrophic pest infestations. By definition, granting these exemptions is a hurried procedure, accompanied by less than a full scientific study of the health risks of using the pesticide. The program, historically fraught with abuses, has been roundly criticized for granting repeated exemptions in response to ill-defined emergencies by at least three Congressional and General Accounting Office investigations (GAO 1978, GAO 1981, Guerrero 1991). The GAO raised specific concerns about granting exemptions for pesticides in the absence of a complete understanding of these chemicals' effects on human health and the environment.

The 1996 Food Quality Protection Act (FQPA) was in part intended to bring more accountability to the exemption process. Since FQPA's passage, however, pesticide lobbyists and their allies in Congress have fought hard to increase the number of Section 18 exemptions, while at the same time blocking implementation of the tough children's health protections in the Act. By spending millions on an aggressive lobbying and misinformation campaign, these efforts have been largely successful.

After three years spent reviewing over 3,000 studies – nearly all authored by pesticide companies Kempter 1999) – the EPA has yet to implement the full children's health requirements of FQPA for even one of the approximately 300 pesticides that are used in more than 20,000 pesticide products. At the same time Section 18 exemptions nearly doubled, from an average of about 300 per year for the three years prior to the Act, to 573 in 1998 (Figure 1). Many of these exemptions are granted year after year and arise from such "emergencies" as an outbreak of weeds.

Since the unanimous passage of FQPA, Section 18 has become little more than a loophole through which pesticide companies market their products while avoiding the children's health and safety requirements of the law.

Since FQPA's passage pesticide lobbyists and their allies in Congress have fought hard to increase the number of Section 18 exemptions, while at the same time blocking implementation of the tough children's health protections in the Act. These efforts have been largely successful.

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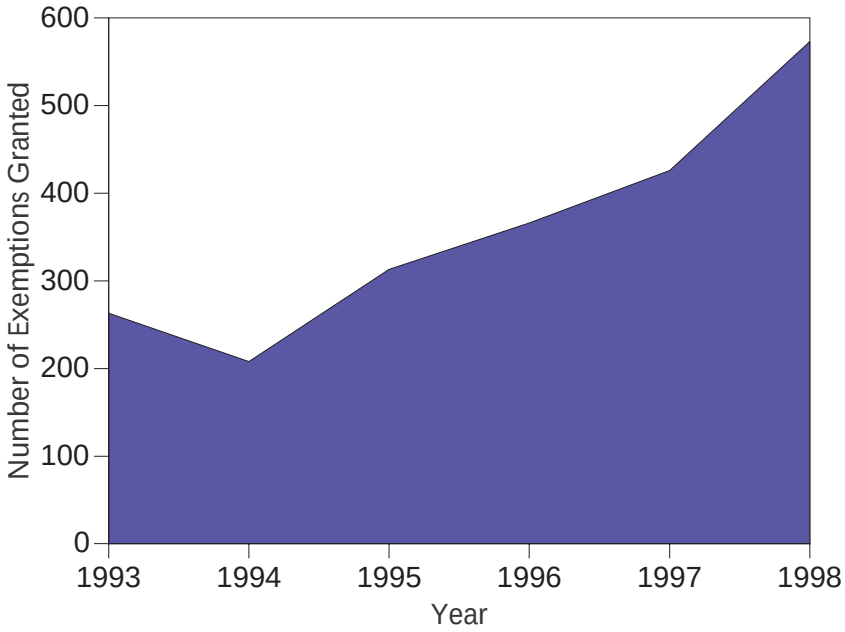
Figure 1. The number of Section 18 exemptions granted has nearly doubled since FQPA was passed



Source: Environmental Working Group. Compiled from US EPA Section 18 database.

Since the unanimous passage of FQPA, Section 18 has become little more than a loophole through which pesticide companies market their products while avoiding the children's health and safety requirements of the law.

Congressional Hypocrisy

Now, 225 members of Congress have co-sponsored legislation written by the pesticide industry that would broaden Section 18 loopholes and further delay children's health protections mandated by the FQPA.

These legislators claim that their support for HR1592 and S1464 is based on a concern for "sound science". Yet for these politicians, "sound science" is a reflexive sound bite meant to debunk all environmental safeguards that industry opposes—in this case pesticide reforms — even in the face of overwhelming evidence that children are at risk.

EWG's analysis of EPA records shows that these lawmakers express no concerns about sound science when it comes to putting more pesticides on the market in the absence of full safety tests. Fifty-three (53) of these co-sponsors have directly pressured the EPA to grant Section 18 exemptions for pesticides, often on foods heavily consumed by children, even though these pesticides are being used without the most rudimentary requirement of sound science: a complete, thoroughly reviewed set of health and safety data.

The Influence of Money

The congressional double standard on pesticide safety makes sense in one context: campaign contributions. Nearly all of these 53 representatives and senators have taken significant amounts of re-election money from the pesticide and agribusiness coalition that actually wrote HR1592 and S1464, the so-called Implementation Working Group—IWG (Table 1). On average, during the two most recent election cycles, these 53 members of Congress received on average nearly four times more money from IWG member PACs ($10,301) than members of Congress who have neither supported Section 18 exemptions nor cosponsored this legislation ($2,693).

Exemptions Put Children at Risk

FQPA was supposed to increase children's health protections in part by tightening restrictions governing emergency

Table 1. Representative Charlie Stenholm (TX-17) received over thirty five times the amount of PAC money than the average member who neither cosponsored the IWG bill nor wrote letters for pesticide exemptions to EPA.

Rank	Name	State or District	Reelection money accepted from agribusiness lobbyists (1998-2000 election cycles)	Comparison to members who neither cosponsored the IWG bill nor wrote letters to EPA for pesticide exemptions
1	Rep. Charlie Stenholm	TX-17	$95,540	35.5 : 1
2	Rep. Calvin Dooley	CA-20	$42,048	15.6 : 1
3	Sen. Paul D. Coverdell	GA	$34,023	12.6 : 1
4	Sen. Rick Santorum	PA	$32,250	12.0 : 1
5	Rep. Gary Condit	CA-18	$32,023	11.9 : 1
6	Rep. William Thomas	CA-21	$28,023	10.4 : 1
7	Rep. Richard Pombo	CA-11	$24,273	9.0 : 1
8	Rep. Jo Ann Emerson	MO-8	$23,523	8.7 : 1
9	Sen. Trent Lott	MS	$21,000	7.8 : 1
10	Sen. Mike Crapo	ID	$20,023	7.4 : 1
11	Sen. John Breaux	LA	$18,623	6.9 : 1
12	Rep. Wally Herger	CA-2	$14,123	5.2 : 1
13	Rep. Sanford Bishop	GA-2	$14,123	5.2 : 1
14	Rep. Henry Bonilla	TX-23	$13,000	4.8 : 1
15	Rep. Robert Matsui	CA-5	$11,023	4.1 : 1
16	Rep. Mac Thornberry	TX-13	$10,939	4.1 : 1
17	Rep. George Radanovich	CA-19	$9,800	3.6 : 1
18	Sen. Larry E. Craig	ID	$8,000	3.0 : 1
19	Rep. John Spratt	SC-5	$8,000	3.0 : 1
20	Rep. Frank D. Lucas	OK-6	$7,000	2.6 : 1
21	Rep. John Doolittle	CA-4	$6,523	2.4 : 1
22	Sen. Conrad Burns	MT	$6,000	2.2 : 1
23	Rep. George Nethercutt	WA-5	$5,625	2.1 : 1
24	Rep. Bennie Thompson	MS-2	$5,367	2.0 : 1
25	Rep. Helen Chenoweth	ID-1	$5,323	2.0 : 1

Source: Environmental Working Group. Compiled from US Federal Election Commission data.

and crisis exemptions from pesticide safeguards. Instead, exemptions for pesticides used on children's food increased steadily since the passage of the Act. This profligate use of the Section 18 program puts children at risk.

In the three years immediately prior to the passage of the Act, from August 1, 1993 through July 31, 1996, the EPA granted an average of 163 exemptions per year for fruits and vegetables heavily consumed by children (Table 2). In the equivalent three-year period after the passage of FQPA, EPA granted 241 exemptions per year for these same foods, an increase of nearly 50 percent. By definition, none of these Section 18 exemptions are fully evaluated

In the three-year period after the passage of FQPA, EPA granted 241 exemptions per year for fruits and vegetables heavily consumed by children, an increase of nearly 50 percent.

Table 2. Twenty-two fruits and vegetables commonly eaten by children received 10 or more Section 18 pesticide exemptions since 1993.

Food	Number of exemptions granted since 1993	States that received the greatest number of exemptions	Percent of exemptions granted after FQPA was passed*
Potatoes	383	Minnesota (20), North Dakota (19), Idaho (18), Nebraska (18) Wisconsin (18)	59
Tomatoes	103	Florida (21), California (19), New Jersey (12)	55
Peas	95	Washington (23), Idaho (18), Oregon (16)	55
Strawberries	70	California (13), Washington (12), Oregon (10)	80
Cucurbit Group	67	California (18), Texas (13), Arizona (9)	86
String Beans	66	New York (11), Pennsylvania (9), Oregon (8)	27
Wheat	66	North Dakota (13), Arkansas (9), Minnesota (7), Washington (7)	76
Rice	64	Louisiana (19), Texas (12), Arkansas (10)	72
Apples	63	Michigan (11), Washington (9), Oregon (7)	68
Corn	50	Idaho (7), Nebraska (4), Oregon (4), Texas (4), Washington (4)	63
Watermelon	50	Maryland (10), Delaware (9), Virginia (9)	65
Leafy Vegetables	24	Texas (12), California (4), Arizona (2), Florida (2), Georgia (2), Tennessee (2)	61
Lettuce	24	Arizona (9), California (9), Florida (5)	15
Pears	22	Washington (5), California (3), Oregon (3), Pennsylvania (3)	27
Citrus Fruit	20	Florida (12), California (7), Texas (1)	80
Broccoli	17	California (11), Arizona (5), Texas (1)	0
Sugar Beets	17	California (6), Idaho (3), Minnesota (2), North Dakota (2)	76
Melons	16	Arizona (11), California (3), Texas (2)	8
Cucumbers	14	Maryland (3), Virginia (3), Delaware (2), Washington (2)	10
Sugarcane	13	Louisiana (12), Texas (1)	50
Squash	11	Texas (5), Maryland (2), New Hampshire (1), Oregon (1) South Carolina (1), Virginia (1)	22
Stone Fruit	10	California (4), New Jersey (2), South Carolina (3)	100
Grapes	9	Washington (4), California (1), New York (1), Ohio (1), Pennsylvania (1), Texas (1)	43
Sweet Potatoes	8	California (5), Louisiana (3)	50
Lima Beans	7	California (4), Tennessee (2), Illinois (1)	86
Oranges	6	California (6)	20
Soybeans	6	Delaware (3), Maryland (2), Arkansas (1)	100
Carrots	4	California (4)	67
Peaches	3	Georgia (2), Alabama (1)	33
Peanuts	3	Oklahoma (2), Texas (1)	83
Bananas	2	Import Only	0
Beans	2	Florida (2)	100
Cantaloupe	2	Georgia (1), Texas (1)	100

** The time period for this analysis is the three years prior to FQPA becoming law (8/1/93 - 7/31/96) and the three subsequent years (8/1/96 - 7/31/99).*
Source: Environmental Working Group. Compiled from US EPA Section 18 database.

for their health risks to children. Strawberries, apples, and potatoes — crops that already deliver relatively high pesticide doses to children –-have been granted an average of 103 pesticide exemptions each year since August 1, 1996, compared to 61 per year in the three years prior to the Act.

Many pesticides granted exemptions are extremely toxic. Some are considered probable

human carcinogens by the U.S. EPA, others are potent neurotoxicants that can damage the fragile developing nervous systems of children. Many have been used year after year for the same "emergency," while the manufacturers have postponed the scientific scrutiny that full government registration would entail.

Abuses of the Program: Chronic Emergencies

Our analysis of EPA records revealed 90 situations where states requested Section 18 exemptions to use the same pesticide on the same crop in at least five of the last seven years. Sixty-six (73 percent) of these requests were granted. Twelve of these "emergencies" lasted seven years in a row, 17 were for six of seven years, and 61 were for five of the last seven years. The enactment of FQPA accelerated this trend. States have applied 144 times for the same exemption during the three years since FQPA was passed.

Another commonly abused provision is the "crisis" exemption, which allows states to authorize the use of pesticides for two weeks with *no* EPA review at all. Since 1993 the number of crisis exemptions issued per year has risen by 160 percent, from 51 to 133**.** This trend also accelerated after FQPA was passed (Figure 2). EPA granted 225 crisis exemptions from August 1, 1993 to the July 31, 1999 for 59 different pesticides sprayed on 32 fruits and vegetables heavily consumed by children. Twice as many were granted after FQPA was passed (155), as before (70).

Crisis exemptions vividly demonstrate the vague criteria for an emergency or a crisis. More than one-quarter of all 'crisis' exemptions each year are for control of weeds.

Conclusions and Recommendations

After successfully halting the delivery of the benefits of the FQPA to the public, pesticide lobbyists are now going farther. They have authored and won support for a bill to effectively roll back the law altogether. This bill would delay children's health

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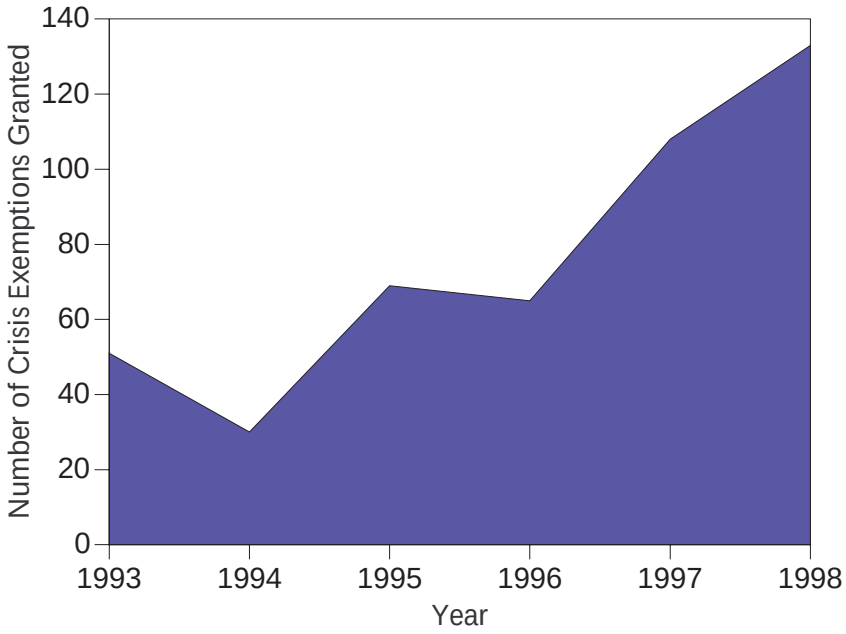
Figure 2. The number of Section 18 "crisis" exemptions granted increased sharply after FQPA was passed.



Source: Environmental Working Group. Compiled from US EPA Section 18 database.

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protections and broaden loopholes for exemptions from these rules. All this in the name of "sound science."

There is no such concern about "sound science" when it comes to the accelerated abuses of the Section 18 program – a program that by its definition avoids rigorous, sound scientific examination of pesticide use. The program today is a well greased escape chute through which pesticide companies avoid the full children's health requirements of current law. Children bear the risk of the untested pesticides, while pesticide companies reap the profits. Nothing better illustrates the phony essence of the program than the surge in emergency and crisis exemptions granted for control of weeds.

The EPA has put itself in a downward spiral where each emergency exemption helps to create the need for future ones.

The EPA has put itself in a downward spiral where each emergency exemption helps to create the need for future ones. As a first step toward reform, EPA must resist pressure from the pesticide lobby and its allies and reign in its impulse to grant 'emergency' exemptions. In the words of former congressman James Scheuer, EPA must stop "rolling over dead in the face of these repetitive, painfully repetitive, predictable applications" (Scheuer 1992).

To close the Section 18 loophole without denying farmers a legitimate emergency exemption process, EPA needs to:

- Develop core minimum health and safety data requirements for pesticides granted Section 18 exemptions. FQPA requires an affirmative finding that Section 18 exemptions are safe for infants and children. EPA cannot make this finding without a core set of health and safety studies on the pesticides receiving the exemptions; including, at a minimum, studies on acute, subchronic and chronic toxicity, developmental and reproductive toxicity, carcinogenicity, developmental neurotoxicity, metabolism and residue levels on treated crops.

- Require manufacturers to monitor residue levels of Section 18 compounds on treated food, particularly food consumed by children. Many of the pesticides receiving Section 18 exemptions are based on sophisticated chemistry that is not detectable by FDA's commonly-used analytical methods. Indeed, the FDA has never tested any food for many of the Section 18 compounds that EWG examined. The government cannot guarantee the safety of children in the complete absence of inspections.

- Stop approving the same emergency exemptions

year after year. Agency regulations require that exemptions be denied after three consecutive years if a pesticide company is not making progress toward registration of the pesticide. These regulations need to be enforced. The agency must notify every manufacturer of a pesticide granted a Section 18 exemption two years in a row, that the third year will be denied unless the company commits to the studies needed to secure a full registration of the compound.

- Crack down on states' frequent use of exemptions. The EPA should audit the states' exemption evaluation processes and revoke a state's authority to certify 'emergencies' and 'crises' if that state files exemptions for situations that don't truly threaten farmers.

- Apply the additional FQPA children's tenfold safety factor to all Section 18 tolerances. By definition Section 18 pesticide uses lack the data required to make a determination of safety to infants and children, and thus must receive the additional tenfold factor required by law.

In the words of former congressman James Scheuer, EPA must stop "rolling over dead in the face of these repetitive, painfully repetitive, predictable applications."

Note

[1] The time frames compared in the analysis are August 1, 1993 through July 31 1996, and August 1, 1996 through July 31 1999. President Clinton signed the Food Quality Protection Act on August 3, 1996.

Introduction

On August 3, 1996 Congress unanimously passed the Food Quality Protection Act (FQPA), enacting sweeping new protections from pesticides for infants and children. Less than a week later, EPA installed a team of regulatory specialists to ensure the smooth functioning of Section 18 of the nation's pesticide law (US EPA 1996), a provision that provides exemptions from nearly all health and safety standards for the use of unregistered, banned, or restricted pesticides on food crops where they otherwise would be prohibited.

Prompt action seemed necessary because FQPA, for the first time, required that emergency exemptions meet the same safety standard as all other pesticide uses, and that the EPA issue a limit, or tolerance, for pesticide residues in food that would result from these exemptions. Prior to the FQPA, no tolerances were required for Section 18 exemptions and children's health was not a consideration.

Because of the complexity of the new children's health protections required by the FQPA, Congress gave the EPA three years to issue its first set of regulations under the new law. As the three-year deadline passed on August 3, 1999, the EPA had completed refined children's risk assessments for exactly 2 pesticides. Even these reviews did not fully meet the standards of the law. EPA only examined the dietary risk of single pesticides, not fulfilling the FQPA requirement that all routes of exposure be considered and that risks from pesticides with common toxic mechanisms be combined.

Three years was not enough time for EPA to revise regulations for pesticides to comply with the children's health standards of FQPA. Yet somehow, less than 3 weeks after enactment of FQPA, the EPA granted its first Section 18 exemption, theoretically in compliance with the broad new FQPA requirements to protect children's health (US EPA 1996)

Proposed new rules for the Section 18 program make it clear, however, that these exemptions were not supported by complete and adequate data necessary to determine the full risk of the pesticide to children as required by FQPA. For fully registered pesticide uses, a complete scientific database proving safety for chil-

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dren is required by rules formalized in volume 40 part 158 of the Code of Federal Regulations. In contrast:

> The Agency recognized that adhering rigidly to all data specified in 40 CFR part 158, as they currently exist and as they may be modified in the future, would effectively remove Section 18 as a mechanism to address emergency pest situations. Review and decisions would not be made in a timely or responsive fashion, and the process of data collection, submission and review would be equivalent to that required to establish a permanent tolerance. This would be unduly burdensome to the applicants that request emergency exemptions (USEPA 1999).

Congressional Double Standards

In the past 6 years, at least 107 different members of Congress have written letters to the EPA requesting that the agency grant or expedite emergency pesticide use exemptions for growers in their states. Of these 107, 84 are still in the Congress, and of these, 53 are cosponsors of HR1592 and S1464, legislation written by the pesticide industry that would drastically curb EPA's authority to protect children from pesticides, even in the face of overwhelming evidence of hazards (Appendix 1).

The Section 18 exemptions these members seek allow a pesticide to be used without complete science to support an assessment of its safety for children. In contrast, the legislation they cosponsor, HR1542 and S1464, would forbid the EPA from restricting any use of a pesticide if the agency used any of a number of generally accepted, routinely employed, peer-reviewed, risk assessment assumptions. Even in cases where the agency did not use conservative assumptions, the bills would require EPA to wade through a new and time-consuming bureaucratic morass before it could act to restrict a chemical, regardless of the preponderance of the evidence that the pesticide is unsafe for children. Specifically, before taking any action to protect a child from a pesticide, the agency would be forced to issue formal "data call-in" notices for any outstanding information, wait years for the data to be generated, analyze the data and issue a formal report on it before taking action to protect children.

Further, HR1542 and S1464 would actually ease the already flimsy rules for emergency exemptions by amending FQPA to allow the Administrator to issue a tolerance for an exemption "without regard to other tolerances for that pesticide and before reassessing [the risk to children from] those other tolerances" (Section 8(b)) [brackets added]. The EPA registered strong opposition to these new requirements in a letter to the Chair of the House Agriculture Committee on August 13, 1999 (Appendix 3).

Over 100 members of Congress have written to the agency on behalf of Section 18 requests from their states. Members of the Idaho congressional delegation sent the most letters urging action on a Section 18 exemption, with Senator Larry Craig filing 13, followed by Senator Mike Crapo with 12 letters, and Representative Helen Chenoweth with 11. California topped all states with the most cosponsors requesting Section 18 decisions, with 18, led by Representatives Cal Dooley and Gary Condit with four each during the six years analyzed (1994-1999).

Chapter 2

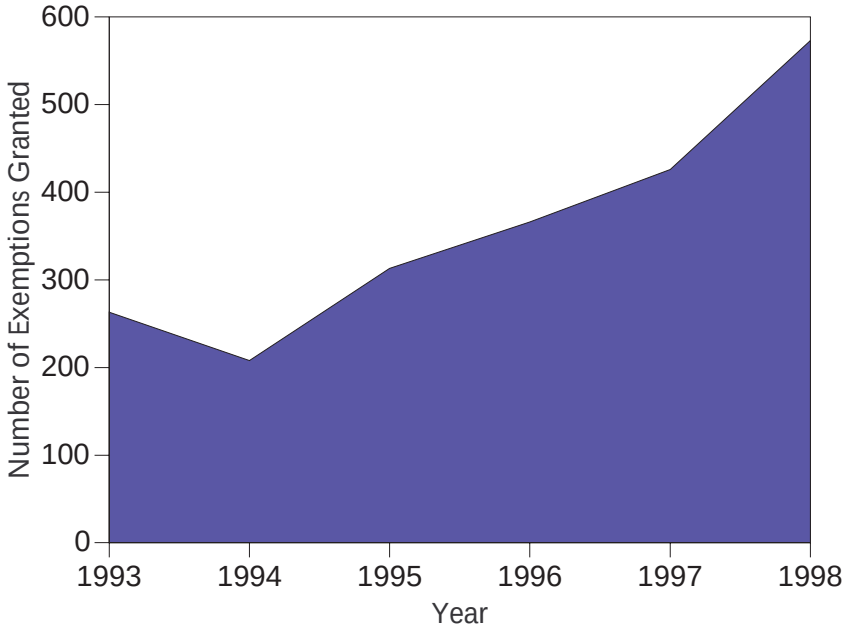
Abuses of the Program

"Emergencies" are Increasing

There is no standard set of health studies required to prove the safety of pesticides granted emergency or crisis exemptions under Section 18 of FIFRA. Decisions to allow a Section 18 use are made on a case by case basis. And as noted above, Section 18 exempts state and federal officials requesting them from all provisions of pesticide law (40 CFR 166). Since the passage of FQPA, the EPA has granted fewer Section 18's for some groups of pesticides known to present significant risks to children, including probable human carcinogens and organophosphate insecticides. Overall, however, the flow of exemptions has increased dramatically since the passage of the new law.

EWG's analysis of recent data from the EPA shows that the agency issued an average of 308 emergency exemptions from pesticide rules each year during the three years prior to the passage of FQPA – August 1, 1993 through July 31, 1996. Earlier agency records show that the EPA issued about the same number of Section 18 exemptions per year from 1989 through 1992. Since passage of the new law and its supposed tougher restrictions on Section 18 uses, the number of emergency exemptions has nearly doubled, to 366 in 1996-97, 426 in 1997-98 and 573 in 1998-99 (Figure 3). Large agricultural states, not surprisingly, received the most Section 18 exemptions. Since 1993, California was the top recipient with 253, followed by Washington

Figure 3. The number of Section 18 exemptions granted has nearly doubled since FQPA was passed.



Source: Environmental Working Group. Compiled from US EPA Section 18 database.

If pesticide uses are repeatedly needed, their risks should be fully evaluated under the children's health provisions of FQPA.

with 201, Oregon with 174, Texas with 135, Idaho with 120 and Florida with 116 (Table 3).

Chronic "Emergencies"

Section 18 of the Federal Insecticide Fungicide and Rodenticide Act is designed to get pesticides with incomplete health and safety reviews into the hands of farmers faced with real emergencies that would threaten the viability of their crops. Many of the so-called "emergencies", however, are highly suspect. None are more dubious than the repeated "emergency" use of the same pesticide on the same crop year after year. Repeated emergencies suggest that the pest infestation is routine, and not an unexpected emergency event. If pesticide uses are repeatedly needed, their risks should be fully evaluated under the children's health provisions of FQPA.

EWG's analysis of EPA records reveal 90 situations where states requested exemptions to use the same pesticide on the same crop in at least five of the last seven years; 66 of these were granted (Table 5). Twelve of these "emergencies" arose seven years in a row, 17 were for six of seven possible years, and 61 were for five of

Table 3. California, Washington, and Oregon have received a combined total of more than 650 exemptions since 1993.

State	Number of exemptions granted since 1993	Crops that received the greatest number of exemptions	Percent of exemptions granted after FQPA was passed*
California	267	Tomato (19), Cucurbit Group (18), Cotton (13), Strawberry (13)	55
Washington	203	Potato (16), Mint (15), Hop (14)	64
Oregon	178	Grass (seed) (19), Hop (16), Potato (15)	59
Texas	146	Cotton (15), Cucurbit Group (13), Rice (12), Sorghum (12)	61
Idaho	122	Potato (18), Hop (14), Mint (13)	67
Florida	108	Tomato (21), Potato (15), Citrus Group (12), Cotton (12)	47
North Dakota	92	Canola (21), Potato (19), Wheat (13)	72
Minnesota	84	Canola (21), Potato (20), Wheat (7), Wild Rice (7)	68
Louisiana	79	Rice (19), Cotton (18), Sugarcane (12)	67
Michigan	71	Asparagus (16), Potato (14), Apple (11)	63
Arkansas	62	Cotton (17), Rice (10), Wheat (9)	59
Montana	62	Canola (22), Potato (11), Mint (7)	71
Maryland	61	Potato (12), Tomato (10), Watermelon (10)	64
New Jersey	60	Potato (13), Tomato (12), Blueberry (8)	67
Wisconsin	60	Potato (18), Ginseng (9), Cranberry (6), Spinach (6)	60
Arizona	56	Melon (11), Cucurbit Group (9), Cotton (6), Spinach (6)	45
Georgia	54	Cotton (12), Grass, Bermuda (7), Tobacco (5)	60
Virginia	54	Potato (12), Watermelon (9), Apple (6)	60
Pennsylvania	51	Potato (13), Bean, Snap (9), Tomato (8)	51
Mississippi	47	Cotton (22), Rice (8), Grass, Bermuda (4), Wheat (4)	60

Source: Environmental Working Group. Compiled from US EPA Section 18 database.

the last seven years. The passage of FQPA did nothing to stop this trend; states have applied 144 times for the same exemption during the three years since FQPA was passed.

Phony Crises

Another commonly abused provision is the crisis exemption, which allows states to authorize the use of pesticides for two weeks with no EPA review at all. Since 1993 the number of crisis exemptions issued per year has risen by 160 percent, from 51 to 133. This trend accelerated after FQPA was passed (Figure 4).

What makes this increase even more suspect is the increase in the number of crisis exemptions for weeds. These exemptions for weeds increased nearly 70 percent after the passage of the FQPA. By 1998, nearly a fifth of all 'crisis' exemptions were for weeds.

Table 4. Many "emergencies" drag on for years.

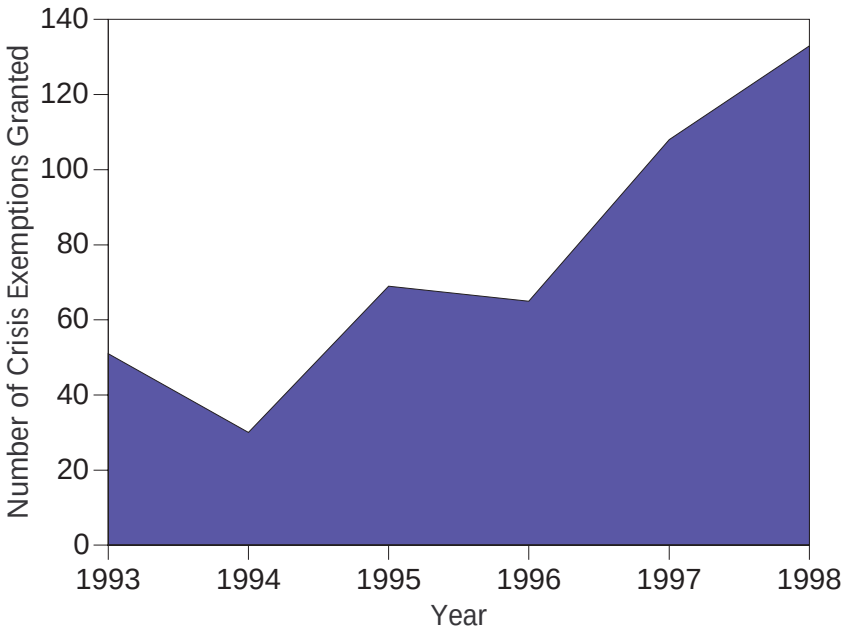
Crop	State	Pesticide	Number of times EPA granted the exemption in the last 7 years
Apple	Michigan	Oxytetracycline	7
Apple	Washington	Oxytetracycline	7
Asparagus	Michigan	Chlorothalonil	7
Cucurbit Group	California	Bifenthrin	7
Ginseng	Wisconsin	Mancozeb	7
Wild Rice	Minnesota	2,4-D	7
Bean, Snap	Arkansas	Fomesafen	6
Bean, Snap	New York	Fomesafen	6
Citrus Group	Florida	Imidacloprid	6
Grass (Seed)	Oregon	Oxyfluorfen	6
Grass, Bermuda	Alabama	Norflurazon	6
Grass, Bermuda	Texas	Norflurazon	6
Raspberry	Oregon	Bifenthrin	6
Spinach	Maryland	Metolachlor	6
Spinach	Oklahoma	Metolachlor	6
Spinach	Texas	Metolachlor	6
Spinach	Wisconsin	Metolachlor	6
Strawberry	California	Myclobutanil	6
Tomato	California	Myclobutanil	6
Walnut	California	Maneb	6
Watermelon	Maryland	Clomazone	6
Watermelon	Virginia	Clomazone	6

Source: Environmental Working Group. Compiled from US EPA Section 18 database.

Crisis exemptions avoid even the cursory health and safety review applied to normal Section 18 exemptions. Yet like regular emergency exemptions, they could produce significant exposure for children, and they have increased significantly since August 1, 1996. Thirty-two (32) fruits and vegetables heavily consumed by children received 225 crisis exemptions for 59 different pesticides from Aug 1, 1993 to the July 31, 1999. Twice as many were granted after FQPA was passed (155), as before (70). Strawberries received 23 crisis exemptions since 1994, but nearly half of those were granted in 1998. Potatoes received 19 with over half (12) of those granted in 1999, and blueberries received 13 with 9 of those granted in 1998, green beans received 9 during the same period.

Crisis exemptions avoid even the cursory health and safety review applied to normal Section 18 exemptions.

Figure 4. The number of Section 18 "crisis" exemptions granted increased sharply after FQPA was passed in 1996.



Source: Environmental Working Group. Compiled from US EPA Section 18 database.

Chapter 3

Safety Exemptions for Pesticides used on Children's Foods

Many of these chronic emergencies have allowed pesticides without complete health risk assessments to be used on foods heavily consumed by children. Twenty-two (22) fruits and vegetables heavily consumed by children received 10 or more emergency or crisis exemptions in the past seven years (Table 5). Seven of the top 10 crops receiving Section 18 exemptions during that time were foods that children frequently eat. Children's foods with pesticide exposure that is known to be high, including strawberries, apples, and green beans each received between 63 and 70 pesticide emergency exemption uses since 1993. Potatoes received 383 emergency exemptions over the past seven years.

In spite of FQPA's mandate to protect children, exemptions for pesticides sprayed on children's food increased dramatically after the law was passed. From August 1, 1993 through July 31, 1996, the EPA granted an average of 163 exemptions per year for fruits and vegetables heavily consumed by children. In the equivalent three-year period after the passage of FQPA, EPA granted 241 exemptions per year for these same foods, an increase of 48 percent. By definition, none of these Section 18 exemptions are fully evaluated for their health risks to children. Strawberries, apples, and potatoes — crops that already deliver relatively high pesticide doses to children –- have been granted an average total of 103 pesticide exemptions each year since August 1, 1996, compared to 61 per year in the three years prior to the Act.

In spite of FQPA's mandate to protect children, exemptions for pesticides sprayed on children's food increased dramatically after the law was passed.

Potatoes

The pesticide sprayed most on children's food via Section 18 exemptions (148 times since 1993), is propamocarb hydrochloride, a fungicide that is fully registered only for use on turf grass and ornamental plants. According to a thorough EPA review of the pesticide published in 1995, "As propamocarb hydrochloride is not a food use chemical, a dietary analysis is not needed" (USEPA 1995). The same year that the agency published that conclusion, it granted 24 exemptions for propamocarb on potatoes and tomatoes. The Food and Drug Administration (FDA) still has not developed a routine testing program to study

Table 5: Twenty-two fruits and vegetables commonly eaten by children received 10 or more Section 18 pesticide exemptions since 1993.

Food	Number of exemptions granted since 1993	States that received the greatest number of exemptions	Percent of exemptions granted after FQPA was passed*
Potatoes	383	Minnesota (20), North Dakota (19), Idaho (18), Nebraska (18) Wisconsin (18)	59
Tomatoes	103	Florida (21), California (19), New Jersey (12)	55
Peas	95	Washington (23), Idaho (18), Oregon (16)	55
Strawberries	70	California (13), Washington (12), Oregon (10)	80
Cucurbit Group	67	California (18), Texas (13), Arizona (9)	86
String Beans	66	New York (11), Pennsylvania (9), Oregon (8)	27
Wheat	66	North Dakota (13), Arkansas (9), Minnesota (7), Washington (7)	76
Rice	64	Louisiana (19), Texas (12), Arkansas (10)	72
Apples	63	Michigan (11), Washington (9), Oregon (7)	68
Corn	50	Idaho (7), Nebraska (4), Oregon (4), Texas (4), Washington (4)	63
Watermelon	50	Maryland (10), Delaware (9), Virginia (9)	65
Leafy Vegetables	24	Texas (12), California (4), Arizona (2), Florida (2), Georgia (2), Tennessee (2)	61
Lettuce	24	Arizona (9), California (9), Florida (5)	15
Pears	22	Washington (5), California (3), Oregon (3), Pennsylvania (3)	27
Citrus Fruit	20	Florida (12), California (7), Texas (1)	80
Broccoli	17	California (11), Arizona (5), Texas (1)	0
Sugar Beets	17	California (6), Idaho (3), Minnesota (2), North Dakota (2)	76
Melons	16	Arizona (11), California (3), Texas (2)	8
Cucumbers	14	Maryland (3), Virginia (3), Delaware (2), Washington (2)	10
Sugarcane	13	Louisiana (12), Texas (1)	50
Squash	11	Texas (5), Maryland (2), New Hampshire (1), Oregon (1) South Carolina (1), Virginia (1)	22
Stone Fruit	10	California (4), New Jersey (2), South Carolina (3)	100
Grapes	9	Washington (4), California (1), New York (1), Ohio (1), Pennsylvania (1), Texas (1)	43
Sweet Potatoes	8	California (5), Louisiana (3)	50
Lima Beans	7	California (4), Tennessee (2), Illinois (1)	86
Oranges	6	California (6)	20
Soybeans	6	Delaware (3), Maryland (2), Arkansas (1)	100
Carrots	4	California (4)	67
Peaches	3	Georgia (2), Alabama (1)	33
Peanuts	3	Oklahoma (2), Texas (1)	83
Bananas	2	Import Only	0
Beans	2	Florida (2)	100
Cantaloupe	2	Georgia (1), Texas (1)	100

** The time period for this analysis is the 3 years prior to FQPA becoming law (8/1/93 - 7/31/96) and the three subsequent years (8/1/96 - 7/31/99).*
Source: Environmental Working Group. Compiled from US EPA Section 18 database.

residues from this pesticide even though it has been used on the potato crop for 6 straight years.

The EPA granted more exemptions for propamocarb hydrochloride on potatoes than for any other food. The Agency granted these exemptions in 35 states, with Idaho, Maine, Michigan, Minnesota, New Jersey, New York, North Dakota, Oregon, Washington, and Wiscon-

sin receiving them for the most number of years. The EPA also granted exemptions for this pesticide on tomatoes in 8 states, with New Jersey, California, Maryland, and Florida leading that group.

Apples and Pears

Other pesticides routinely granted exemptions for use on children's foods like apples and pears could be particularly risky for kids. A sampling includes avermectin, a potent neurotoxicant with 93 exemptions since 1993 and fenoxycarb, a probable human carcinogen, that has been heavily sprayed on pears. Another heavily-used pesticide, chlorfenapyr, is a persistent and dangerous environmental poison. None of these pesticides have been through a thorough FQPA reassessment that would ensure their safety to children and the environment. Nonetheless, EPA keeps granting Section 18 exemptions and adding potential exposures.

Avermectin is an insecticide made by the Swiss agrichemical giant Novartis that is highly toxic to the brain and central nervous system. Recognizing that fact, the World Health Organization (WHO) set the Acceptable Daily Intake (ADI) for this chemical at 0.002 milligrams per kilogram of bodyweight per day, indicating that it is one of the more toxic pesticides currently in widespread use (WHO 1997). In addition to neurotoxic effects, avermectin causes birth defects (club foot and cleft patate), fetal death, stillbirths and a decrease in both infant viability and birth weight (USEPA 1999b).

Because children face a far greater risk from this pesticide, the EPA took the rare step of applying an extra safety factor, and reducing the amount of the pesticide to which people are exposed (USEPA 1999b). While laudable, the EPA has not yet taken the next critical step of demanding a developmental neurotoxicity study for this compound, even though it exhibits potent neurotoxicity in adult test animals. Instead, the agency has allowed the pesticide to be sprayed on dozens of different food crops—including children's foods like apples and pears—and has registered it for use around the home.

According to the U.S. Department of Agriculture, 21 percent of the U.S. apple crop in 1997 was sprayed with avermectin (USDA 1998). Yet according to federal records, the Food and Drug Administration did not test even a single apple for the pesticide during that year. In fact, publicly available records show that neither the FDA nor the USDA's Pesticide Data Program have ever tested *any* food to find out how much avermectin it contained.

Residue data isn't the only information that the EPA is missing for avermectin. The

Other pesticides routinely granted exemptions for use on children's foods like apples and pears could be particularly risky for kids.

In fact, publicly available records show that neither the FDA nor the USDA's Pesticide Data Program have ever tested *any* food to find out how much avermectin it contained.

Agency does not have any of the information that the 1996 Food Quality Protection Act required the agency to consider in setting pesticide limits:

- Common Mechanisms of Toxicity: Different chemicals have been shown to affect the body in the same way and the EPA is required to add up exposure from all of those chemicals. Ivermectin, a close relative of avermectin that is suspected of having a common mechanism of toxicity, is a widely-prescribed medicine, yet the EPA has no information regarding the risk that a child faces when he or she eats an apple while on this medicine.

- Multiple Route of Exposure: People can be exposed to pesticides in many ways, not just through food. Avermectin, for example, has approximately 40 registered uses, including home and school insecticide usage. The EPA, however, has no information on the total amount of this pesticide that children can be exposed to from all this different routes of exposure.

- Increased Sensitivity of Children: According to the National Academy of Sciences, children can face greater risk from pesticides. Although avermectin is known to be a potent neurotoxicant, the EPA does not have any information on the neurological effects on developing animals.

The EPA has allowed increasing use of avermectin and has even registered it for use on a number of children's foods even though agency scientists have no idea how great a risk existing uses of the pesticide pose to children. Under provisions of the HR1592 and S1464, however, the EPA would be barred from restricting these new uses of this dangerous pesticide because the company that makes the pesticide, Novartis, has failed to supply the EPA with sufficiently reliable data on every aspect of the chemical's toxicity.

Fenoxycarb, another insecticide made by Novartis, is only registered for use on turf and around the home. Although this pesticide is not registered for use on food, the EPA has allowed Novartis to sell the pesticide for use on pears in a number of states over the past few years. Fenoxycarb has been shown to cause lung and other cancers in animals and is considered a probable human carcinogen by the EPA's Office of Pesticide Programs (Burnam 1998).

Fenoxycarb is on the agency's priority list of chemicals to study under the Food Quality Protection Act because of concern for children exposed to the pesticide (USEPA 1997).

As is the case with avermectin, the EPA has large gaps in its knowledge of the

risks posed by fenoxycarb. The agency does not know anything about common mechanisms of exposure, does not know how different routes of exposure—including drinking water—can affect children, and has not yet received a developmental neurotoxicity study. In addition, the EPA has no idea if fenoxycarb can cause birth defects since Novartis has not sent the Agency a two-generation reproduction study, one of the core requirements for pesticide registration. Despite this lack of health information, the EPA has approved 8 exemptions for the use of fenoxycarb on children's foods.

Chlorfenapyr is an insecticide that was recently developed by American Cyanamid, a subsidiary of the international chemical giant American Home Products. This pesticide kills bug by disrupting enzymes in their mitochondria, the part of the cell that turns food into energy. Although there are few known risks to humans from the chemical at this time, there is mounting evidence chlorfenapyr can affect other animals in the same way that it affects insects and could have significant impacts on migratory bird populations. Like DDT, chlorfenapyr persists in soil and water for a long time, disrupting the environment years after it is sprayed on crops. According to Edward Sones, a German chemical industry scientist, "I would never consider even continuing research on compounds representing this level of environmental hazard" (Williams 1999).

American Cyanamid recently petitioned the EPA to allow the use of chlorfenapyr in homes and schools and hopes to be able to spray the pesticide on dozens of other crops, including foods eaten by children like apples, in the coming years. Over 45,000 pounds of chlorfenapyr were used on cotton under Section 18 exemptions in 1998 according to the U.S. Department of Agriculture (USDA 1999).

Conclusions and Recommendations

The Section 18 program is a fraud that has mushroomed far beyond the legitimate need to help farmers control emergency pest infestations. The program has little to do with real pest emergencies and has become a test marketing program for pesticide companies through which they avoid the full children's health requirements of FQPA. Children bear the risk of the untested pesticides, while pesticide companies reap the profits. Nothing better illustrates the phony essence of the program than the surge in emergency and crisis exemptions granted for control of weeds.

After repeated unfavorable audits by the GAO and the congress, the 1996 Food Quality Protection Act required the EPA to evaluate each Section 18 request to ensure that it meets the strict children's health standards of the new law. This requirement has not been met. Indeed, since the passage of the law, the agency has failed to implement the full children's health requirements of the FQPA for even one pesticide. Exemptions meanwhile, have more than doubled to nearly 600 a year.

EPA needs to be much more judicious in its approval of 'emergency' exemptions. To restore integrity to the process and fulfill the intent of the law, the EPA needs to:

- Develop core minimum health and safety data requirements for pesticides granted Section 18 exemptions. FQPA requires an affirmative finding that Section 18 exemption are safe for infants and children. EPA cannot make this finding without a minimum set of health and safety studies on the pesticides receiving the exemptions; including, at a minimum, studies on acute, subchronic and chronic toxicity, developmental and reproductive toxicity, carcinogenicity, developmental neurotoxicity, metabolism and residues levels on treated crops.

- Require manufacturers to monitor residue levels of Section 18 compounds on treated food, particularly food consumed by children. Many of the pesti-

cides receiving Section 18 exemptions are based on sophisticated chemistry that is not detectable by FDA's commonly used analytical methods. Indeed, the FDA has never tested any food for the handful of Section 18 compounds that EWG examined. The government can not guarantee the safety of children in the complete absence of inspections.

- Stop approving the same emergency exemptions year after year. Agency regulations require that exemptions be denied after three consecutive years if a pesticide company is not making progress toward registration of the pesticide These regulations need to be enforced. The agency must notify every manufacturer of a pesticide granted a Section 18 exemption two years in a row, that the third year will be denied unless the company commits to the studies need to secure a full registration of the compound.

- Crack down on states' frequent use of exemptions. The EPA should audit the states' exemption evaluation processes and revoke a states' authority to certify 'emergencies' and 'crises' if that state files exemptions for situations that don't truly threaten farmers.

- Apply the additional FQPA children's tenfold safety factor to all Section 18 tolerances. By definition Section 18 pesticide uses lack the data required to make a determination of safety to infants and children, and thus must receive the additional tenfold factor required by law.

Chapter 5

Methodology

The Environmental Working Group used a number of data sources in the creation of this report. The analysis of the number and trends of Section 18 exemptions was conducted using the US EPA's internal Section 18 database that we requested from the Office of Pesticide Programs. This database was broken down into a pre-1993 table and a post-1993 table. Agency staff were able to attest to the validity of the post-1993 data. They did not believe that there were any errors in the pre-1993 data; however, in the interest of research accuracy, we restricted our analysis to the more recent data.

We collected letters from members of Congress by culling the files of the Office of Pesticide Programs' Field and External Affairs Division. Although our search was comprehensive, it is entirely possible that some letters were not filed properly or were not identified in our search.

Finally, our campaign finance analysis was conducted using data collected from the Federal Election Commission's campaign finance disclosure database.

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Appendix 1

IWG Members

Agrevo
Agricultural Retailers Association
American Agri-Women
American Crop Protection Association
American Dehydrated Onion & Garlic Association
American Farm Bureau Federation
American Forest And Paper Association
American Nursery & Landscape Association
American Soybean Association
Animal Health Institute
Arkansas Farm Bureau
BASF
Bayer Corporation
California Grape And Tree Fruit League
California Prune Board
California Strawberry Commission
Chemical Manufacturers Association
Chemical Producers And Distributers Association
Operatives
National Food Processors Assocation
National Grange
National Onion Assocation
National Pest Control Association
National Watermelon Association
Northwest Horticulture Council
Novartis
Professional Lawn Care Assocation Of America
Rhone-Poulenc
RISE
Rohm & Haas
Texas Citrus Mutual
Uniroyal Chemical
United Fresh Fruit And Vegetable Association
US Apple Association
USA Rice Federation
Valent
Western Growers Association
Wild Blueberry Comm. Of Maine
Zeneca

Appendix 2

List of Pesticide Double-Dealers

Name	District or State	Name	District or State
Rep. Bud Cramer	AL-5	Sen. Thad Cochran	MS
Rep. Spencer Bachus	AL-6	Sen. Trent Lott	MS
Rep. Earl Hilliard	AL-7	Rep. Bennie Thompson	MS-2
Rep. Richard Pombo	CA-11	Sen. Conrad Burns	MT
Rep. Gary Condit	CA-18	Rep. Walter B. Jones	NC-3
Rep. George Radanovich	CA-19	Sen. James M. Inhofe	OK
Rep. Wally Herger	CA-2	Rep. Frank D. Lucas	OK-6
Rep. Calvin Dooley	CA-20	Sen. Rick Santorum	PA
Rep. William Thomas	CA-21	Sen. Ernest Hollings	SC
Rep. John Doolittle	CA-4	Sen. Strom Thurmond	SC
Rep. Ken Calvert	CA-43	Rep. Floyd Spence	SC-2
Rep. Robert Matsui	CA-5	Rep. Lindsey Graham	SC-3
Rep. Duncan Hunter	CA-52	Rep. John Spratt	SC-5
Sen. Wayne Allard	CO	Rep. Jim Clyburn	SC-6
Rep. Bob Schaffer	CO-4	Rep. John Thune	SD-ATLARGE
Rep. Charles T. Canady	FL-12	Sen. Phil Gramm	TX
Rep. Dan Miller	FL-13	Rep. Chet Edwards	TX-11
Sen. Paul D. Coverdell	GA	Rep. Mac Thornberry	TX-13
Rep. Sanford Bishop	GA-2	Rep. Ruben Hinjosa	TX-15
Sen. Larry E. Craig	ID	Rep. Charlie Stenholm	TX-17
Sen. Mike Crapo	ID	Rep. Lamar Smith	TX-21
Rep. Helen Chenoweth	ID-1	Rep. Henry Bonilla	TX-23
Sen. Pat Roberts	KS	Rep. Norman Sisisky	VA-4
Sen. John Breaux	LA	Rep. Doc Hastings	WA-4
Rep. James McCrery	LA-4	Rep. Nethercutt	WA-5
Rep. Pete Hoekstra	MI-2	Sen. Craig Thomas	WY
Rep. Jo Ann Emerso	MO-8		

Appendix 3

Letter from US EPA to House Agriculture Committee

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CONGRESSIONAL AND INTERGOVERNMENTAL RELATIONS

AUG 13 1999

The Honorable Larry Combest
Chairman
Committee on Agriculture
U.S. House of Representatives
Washington, D.C. 20515

Dear Mr. Chairman:

Thank you for your correspondence to Administrator Browner, dated May 12, 1999, requesting the Agency's recommendations on H.R. 1592, the Regulatory Fairness and Openness Act of 1999. This legislation would amend the Food Quality Protection Act of 1996 (FQPA) and impose new procedures on the Environmental Protection Agency (EPA) when assessing risks and evaluating data for pesticide use decision making. The Administration strongly opposes this legislation.

The FQPA decision making process for pesticide tolerance reassessments currently provides the flexibility needed to strengthen public health protection, especially for infants and children, while maintaining appropriate crop protection tools that will enable our domestic agricultural producers to maintain an abundant, affordable, and safe food supply. As you know, EPA and United States Department of Agriculture (USDA) are taking advantage of current flexibility in the law by working with a range of interested constituencies to ensure that FQPA is implemented according to the principles articulated in Vice President Gore's April, 1998 memo to EPA and USDA: sound science, transparency, full public participation, and reasonable transition for families and ranchers.

Specifically, Sections 4 and 5 of H.R. 1592 would weaken EPA's ability to reassess pesticide tolerances in a timely manner by limiting the Agency's ability to use sound scientific judgement concerning the adequacy of data necessary to make decisions. It potentially provides interested parties with unlimited time to submit additional data before tolerance reassessment decisions could proceed. While the Agency encourages the submission of additional data to improve the quality of our risk assessments, decisions made by using sound scientific data should not be postponed. EPA's weight of evidence approach gives the Agency a science based process for evaluating all reliable and available data when making risk determinations. Where additional information may be useful in refining a risk assessment, EPA makes case by case decisions on whether such information is reasonably required to maintain a tolerance.

The Administration urges the sponsors of H.R. 1592 to support the balanced approach to FQPA implementation initiated through the Tolerance Reassessment Advisory Committee (TRAC). The TRAC process has provided significant public input as EPA conducts risk assessments for organophosphates pesticides, and has provided an appropriate forum for reviewing other aspects of FQPA implementation. In addition, EPA is seeking public participation on developing science policies that are key to FQPA implementation and tolerance reassessment.

This open process has been achieved without undermining the schedule Congress established for EPA when it enacted FQPA. EPA completed 33% of the 9,728 tolerance reassessments by the August 3, 1999 statutory deadline. H.R. 1592 would undermine this progress, and could effectively defeat future FQPA deadlines.

The Office of Management and Budget advises that there is no objection to this letter from the standpoint of the President's Program.

Sincerely,

Diane E. Thompson
Associate Administrator