

NASDA's 2002 FARM POLICY INITIATIVE
WORKING DOCUMENT FOR THE PESTICIDE REGULATION COMMITTEE
JULY 2000

OPPORTUNITIES/CONSTRAINTS ANALYSES	2
PRODUCTION	2
Management Skills	2
STEWARDSHIP	2
Safe Food	2
Residues	2
Sound Science and Risk Assessment	2
Food Quality Protection Act (FQPA)	3
Pesticide Data and Research Needs	4
Section 18 Emergency Uses	4
Worker Protection	4
Certification and Training	4
Harmonization of Pesticide Regulations	4
Minor Uses	5
Pathogens	2
Emergencies	2
Environmental Resources	2
Water	2
Pesticide Management Plans	5
TECHNOLOGY	
Research and Development	
Geographic Information Systems	
Internet	

U.S. Agriculture Profile STEWARDSHIP - Issue Description	Tools to Succeed - Policies & Options	Comments/Recommendations
Management Skills <i>(The Marketing and International Trade Committee has lead responsibility for this issue)</i> Successful farming requires a solid management foundation. Training resources and programs should be made readily available for producers.		

U.S. Agriculture Profile STEWARDSHIP - Issue Description	Tools to Succeed - Policies & Options	Comments/Recommendations
Safe Food - Residues - Pathogens - Emergencies U.S. Agriculture has an opportunity to market foods as safest, wholesome, abundant, and affordable. There is a need to increase guidance and education on pesticide policy. Harmonization of pesticide policy and tolerances among trading policies is another important goal. These goals are hampered by incidents of food-borne illness, unreasonable public health concerns, and reports of pesticide dangers and food scares (ex: Alar). EPA reexamination of pesticides under the 1996 Food Quality Protection Act (FQPA) may result in restrictions or bans on pesticides. Policies may also be used as a trade barrier.		

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Sound Science and Risk Assessment Pesticide regulation must be based on sound science and realistic risk estimates.	Proposed legislation would require EPA to use actual data and scientifically sound information when modifying or revoking tolerances. The legislation also requires EPA to issue general policies and procedures and guidelines specifying the types of information required to support a new or existing tolerances. NASDA Policy 9.1 and 9.5 addresses pesticide risk determinations and methodology, and data needs.	

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<p>Food Quality Protection Act (FQPA) The 1996 Food Quality Protection Act (FQPA) fundamentally revises the way pesticides are regulated by the Environmental Protection Agency (EPA), requiring the consideration of substantial amounts of new data and new procedures for assessing scientific data and making decisions.</p> <p>In implementing these new standards, EPA is using the “risk cup” as the conceptual framework to describe the total amount of acceptable risk from exposure to a pesticide, the upper limit of which is the reference dose. EPA has historically determined tolerances by summing the residues for individual pesticides across commodities and comparing the intake rates with the reference dose determined from chronic animal studies. The FQPA requires that other environmental exposures be included in this exposure assessment. When the “risk cup” is full, the reference dose is equal to the total exposure.</p> <p>Farmers are likely to have fewer pest control options, especially for minor crops, due to cancellations of registered uses as the “risk cup” fills and manufacturers make economic decisions on which uses to retain and which to cancel. Consumers, while provided with an increased margin of safety for infants and children, may pay higher prices for food and be confused by information presented to the public with respect to the risks posed by the use of various pesticides. State pesticide regulatory agencies must respond to federal actions to cancel uses of pesticides or to deny tolerances as a result of FQPA.</p>	<p>NASDA Policy 9.5 addresses implementation of FQPA.</p> <p>Legislation has been introduced in the House (H.R. 1592) and the Senate (S.1464) which embodies many NASDA goals, including the following:</p> <ul style="list-style-type: none"> • Open and predictable regulatory process based on sound science and reliable data, • Continued availability of effective products to growers and pest control users, • Harmonization of pesticide policies, • Allowing Section 18 emergency uses <p>Other policy options include:</p> <ul style="list-style-type: none"> • Establish a new, permanent Pesticide Advisory Committee to provide advice to EPA and assume functions of the temporary Tolerance Reassessment Advisory Committee (TRAC). <p>The American Crop Protection Association (ACPA) and the American Farm Bureau Federation and others have filed a lawsuit to have EPA specify data requirements, collect reliable data to replace default assumptions, publish the revised Tolerance Reassessment Schedule for pesticides, and establish clear policies through rulemaking.</p>	

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<p>Pesticide Data and Research Needs</p> <p>USDA has proposed two programs for FY2000 - the Crops at Risk (CAR) program and the Risk Avoidance and Mitigation Program (RAMP) - which will join the existing USDA Pest Management Alternatives Program (PMAP) to fund short-term research projects.</p>	<p>NASDA Policy 9.5 addresses pesticide data needs.</p> <p>NASDA has no specific policy on the Crops at Risk (CAR) program or the Risk Avoidance and Mitigation Program (RAMP) NASDA Policy 9.4 generally addresses state-EPA partnerships and funding.</p> <p>The American Crop Protection Association (ACPA) and the American Farm Bureau Federation and others have filed a lawsuit to have EPA specify data requirements, collect reliable data to replace default assumptions, publish the revised Tolerance Reassessment Schedule for pesticides, and establish clear policies through rulemaking.</p>	
<p>Section 18 Emergency Uses</p> <p>EPA issued regulations regarding Section 18 emergency exemptions in 1999, but has set no date for proposing more comprehensive Section 18 reforms.</p>	<p>NASDA and AAPCO have proposed a comprehensive set of recommendations for Section 18 reform.</p> <p>NASDA Policy 9.6 also addresses Section 18 reform.</p>	
<p>Worker Protection</p>	<p>NASDA Policy 9.9 addresses worker protection goals, but does not address specific issues regarding proposed new standards.</p>	
<p>Certification and Training</p>	<p>NASDA Policy 9.8 addresses certification and training.</p>	
<p>Harmonization of Pesticide Regulations</p>	<p>NASDA Policy 9.3 deals with U.S./Canadian Harmonization</p>	

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Minor Uses	NASDA Policy 9.5 addresses pesticide use on minor crops and recommends organization of a USDA minor use office to complement activities of the IR-4 program.	
Pesticide Management Plans	NASDA Policy 7.4 Implementation of the Clean Water Act water quality standards addresses pesticide management and groundwater. Issue is currently listed under jurisdiction of NASDA's Natural Resource and Environment Committee.	

U.S. Agriculture Profile TECHNOLOGY - Issue Description	Tools to Succeed - Policies & Options	Comments/Recommendations
Research & Development		
Geographic Information Systems		
Internet		