



## FQPA Update Vigilance Still Needed Despite Positive Indications

Until procedures for implementation of the 1996 Food Quality Protection Act are formalized, we need to stay vigilant and ready to present the facts and our views on the methodology that the Environmental Protection Agency uses to reassess tolerance levels of all pesticides.

The following communications are mostly positive in nature and show that pesticide users around the nation are being heard in Washington. However, the final determinations have yet to be made and strong opposition to pesticides remains active. From GCSAA correspondence:

- The Florida FQPA Working Group is planning to contact Florida senators and representatives during the August Congressional recess to help them realize the impact FQPA has on all pesticide users, not just food crops.

- EPA is beginning to release preliminary risk assessments on organophosphate (OP) insecticides. As assessments are released, anyone can submit data on the products. Products on the August list include Namacur and Mocap. The set of documents is reportedly more than 1,000 pages and is being analyzed by industry advocates and registrant companies. Industry experts warn that the preliminary

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assessments do not incorporate new required data and are overstated. Refinements will follow. EPA plans to post more information on its web site at two locations: [www.epa.gov/opppsp1/fqpa/](http://www.epa.gov/opppsp1/fqpa/) and [www.epa.gov/oppead1/trac/](http://www.epa.gov/oppead1/trac/). Industry advocates warn that EPA's action will likely prompt activist groups including the vocal Environmental Working Group to release more alarmist reports to the media about the danger of OPs.

- Marcia Mulkey, EPA director of office of pesticide programs, gave an update on FQPA issues at a session in Idaho in late July. She reported that EPA is waiting to see manufacturers' data before issuing a broad data call-in on OP use and exposure data. A consumer information brochure mandated by FQPA was due for release to grocery stores in late August. A draft reportedly had little information about the risks and benefits of pesticides, and focused on children's exposure. Mulkey admitted that EPA is concerned about starting a food scare and losing credibility as it implements the law.

- The National Association of Counties passed a resolution urging EPA to implement FQPA using the best available scientific data on pesticides, residues and toxicity, so that the important pesticide uses are preserved, and called for Congressional oversight of EPA.

- Opinion editorials throughout the country have criticized the new law and EPA's approach to implementation of the new law. Guest editors have said that EPA's "ban now, ask questions later" spells problems for consumers and disaster for farmers, and questioned whether EPA is acting to fix a safety problem that doesn't exist.

- In a recent federal court decision, EPA was strongly criticized for publicly committing to conclusions before scientific research is begun. The court threw out EPA risk assessments on second-hand smoke, and accused the agency of adjusting scientific procedure to validate its public conclusion. In wire reports, predictions were made that other agency efforts based on policy-driven science could face similar scrutiny—including the particulate matter/ozone rules, global warming theories, and phasing out the use of chlorine. Advocates at RISE note that pesticide manufacturers are facing a similar circumvention of science by EPA in the implementation of the Food Quality Protection Act, in particular the debate on OP risk assessments.

- GCSAA's Cynthia Smith reports that recent meetings in Idaho and Washington, D.C. have indicated that golf-course use of pesticides is not being factored into the "risk-cup analysis" for OP tolerance reassessments. This does not mean the turf care industry will not be impacted depending on what manufacturers are forced to do to gain reregistration. 

### FQPA Letter Writing

If you have had good intentions about writing your senators and congressman about EPA's implementation of the Food Quality Protection Act, but just haven't been able to get around to it. Here's an offer you can't refuse. Joel Jackson, director of communications, will prepare a letter for your signature on your club's letterhead. Just send three sheets of your club's letterhead stationery to draft letters to both Florida senators and your congressman/woman and a self-addressed stamped envelope to Joel Jackson, FQPA, 6780 Tamarind Circle, Orlando FL, 32819.

The letters will be returned to you for your signature and mailing to your legislators to keep the pressure on EPA to use good science and common sense in enacting the law.