

Letters..

...to the Editor

Food Quality Protection Act

GCSAA Role

I attended the Western Crop Protection Association conference on FQPA, and am coming to realize that the use of pesticides on golf courses will not be part of the risk cup analysis, i.e., while we knew applicator (occupational) exposure will not be included, I think exposure to golfers will not be included either. That doesn't mean the outcomes of the EPA analysis won't affect us as manufacturers decide what to do! But I think EPA won't be using any data from golf courses.

Your interaction with IWG (via Florida FQPA Working Group) allows you to keep up on these things — what do you think?

How is your model survey coming along? Is it something that I can/should share with our leadership? The Government Relations Committee meets in October, and I have on the agenda to discuss what more GCSAA could/should be doing. Could you make me a list of your ideas? I would appreciate it very much. I'm not sure RISE is doing enough for us, and may be depending too much on ACPA (American Crop Protection Association).

Do you have plans to attend the RISE annual meeting in West Palm Beach? Let me know if you need program information.

Cynthia Kelly Smith, JD, CAE
Government Relations Counsel,
GCSAA
(Email)

While it is heartening that golf courses may not be included in risk and exposure analysis, the danger lies in manufacturers possibly limiting labeled uses of pesticides to achieve EPA tolerance reassessment approval. Only when we can be assured that manufacturers will not have to eliminate labeled uses for minor crops — turf and

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ornamentals — can we relax our vigilance in the FQPA implementation process.

I had advised Ms. Smith that superintendent response to the Organophosphate Use survey has been disappointing so far. Should we be placed in the position to demonstrate the minimal impact golf courses have on risk and exposure, we do not have any survey results or facts to back up our claims. Please talk to your chapter's external vice president and get a copy of the form which asks you to document OP and Carbamate use from May 1997 to May 1998. Sources will be kept confidential.

Tim Hiers will be making a presentation at the RISE annual meeting and has agreed to discuss the golf course position with the director of RISE. Based on Tim's comments, we may be able to provide GCSAA with some more ideas on how best to address the FQPA issue.

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Senator Weighs In

Thank you for contacting me regarding the Food Quality Protection Act (FQPA). It was good to hear from you.

The President signed the FQPA into law on August 3, 1996. Previous laws prohibited the use of any pesticide or food additive that had been found to cause cancer in humans or animals, no matter how low the estimated possible threat. Modern technology, which makes chemical traces noticeable up to parts per billion, has made this absolute standard unworkable and nearly impossible to implement. The Food Quality Protection Act of 1995 amends the Federal Insecticide, Fungicide and Rodenticide Act and reforms the 1958 "Delaney clause" to allow the Environmental Protection Agency to ensure a

"reasonable certainty of no harm."

I believe that a large and burdensome system of government regulations usually does more harm than good. Before the late Congressman Delaney passed away, he expressed his wish that these conditions be flexible as scientific discovery progressed. Since 1958, our knowledge of the effects of these chemicals has grown tremendously, making the "Delaney clause" both obsolete and a hindrance to American competitiveness.

I have heard from many Floridians concerned with the manner in which the Environmental Protection Agency will collect data and make decisions. It is my sincere hope that the FQPA will lead to practical, scientifically based standards incorporating data made available by both the people who make and use pesticides.

Again, thank you for taking the time to contact me. Knowing your thoughts about this important issue helps me better represent you and the state of Florida here in the United States Senate.

Connie Mack
United States Senator

This is the second letter I have received from Senator Mack on the FQPA subject. I share it to provide you with talking points about the original reasons and intent of the FQPA law. Words like flexible and practical and scientific are in the letter of the law. It remains your responsibility as a citizen and pesticide user to make sure the bureaucrats do not cloud the issue and alter the intent with personal and political agendas. See the FQPA Update article in the Official Business section for other developments on the FQPA issue.

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