

Hopefully by now any superintendent reading this will have heard about the impact that the implementation of the Food Quality Protection Act may have on the agriculture and turf industries. People need to be aware that mosquito control, commercial and residential structural pest control, lawn care operators and golf courses will also be affected.

It is ironic that 80 percent of the purchase and use of residential pesticides are by homeowners and they may not even be considered.

The main focus of FQPA is to protect the public from residues in dietary and non-dietary sources. Some provisions:

- A single, health-based safety standard for pesticide residue tolerances

in both raw and processed food.

- An explicit determination that residue tolerances are safe for children.
- Consideration of (1) aggregate exposure to residues of pesticides (including food, drinking water and residential use) and (2) exposure to all other pesticides with a common mechanism of toxicity, when setting residue tolerances.

Using these guidelines will profoundly change the way tolerances are determined. For example, since all organophosphate (OP) insecticides have the same mechanism of toxicity, EPA must consider their cumulative effects on an aggregate basis when setting a residue tolerance level for one of them.

What does all this mean? The example of a "risk cup" is used to describe aggregate exposure estimates. A full cup represents the level of exposure that a person could receive every day for 70 years without

experiencing appreciable risk.

This is determined through animal studies where a no-effect exposure amount for the pesticide is identified for rats. This amount is reduced by a hundredfold factor to determine the daily/lifetime safe exposure for humans. FQPA requires that an additional safety margin up to tenfold be applied for infants and children.

Before FQPA, there was one risk cup for each pesticide active ingredient based on the exposure associated with its use on food crops and how they act on human health. Now, the same cup must hold the risks from dietary exposure plus the risks from any exposure to residues in drinking water, residential use, commercial lawn and ornamental care, commercial pest control, sports turf, golf courses and mosquito control programs (aggregate exposure).

Result: The cup fills more quickly. There is less room for new and even existing pesticides and uses.

Pesticide manufacturers could:

1. Make label or formulation changes so the pesticide is safer. This means the pesticides or uses require less room in the cup.
2. Drop pesticides and/or uses from the cup. This will make room for other products and uses.

All pesticide tolerances must be reviewed by EPA by the year 2006, but the deadline for organophosphate and carbamate food-use tolerance is August, 1999. Minor crops like fruit and vegetables, turf management of parks, sports fields, home and commercial lawns and golf courses are at risk for label restrictions and loss of product registration. If you manage such crops or green spaces, be aware that your pesticide options may change over the next few years.

What can you do?

- Be informed about FQPA and its impacts on pesticide use. This can translate into lower crop productivity, using more expensive, less effective

Your FQPA 'Risk Cup' Runneth Over

D.O.C NOTES



Joel Jackson, CGCS
Director of
Communications
FGCSA

*While we
support the
FQPA, we
cannot
abide the
use of
flawed
science...*

alternative products in greater quantities and more dependence on foreign sources for minor crops.

- Determine what pesticides are important to you in producing the crops you grow or areas you manage. Communicate these needs to the FGCSA, GCSAA, USDA and EPA. Write your senators and congressmen voicing your concerns about the impact of FQPA on your business.
- Respond to university- or commodity-sponsored pesticide-use surveys. This information is needed to make informed decisions about pesticide registrations, new uses and tolerances.

I strongly urge you contact either me or your local chapter's external vice president. We have names and addresses of all of Florida's legislators in Washington. We need to be persistent with our message to

them that, while we support the FQPA, we cannot abide the use of flawed science or excessively conservative and restrictive estimates and assumptions.

Our letters and spokespersons have had an effect on Congress. Numbers do count. EPA officials are now publicly stating they will not disregard our concerns. Henry Kissinger had a saying about disarmament talks that fits this situation, "Trust, but verify!"

While EPA's assurance is encouraging, the implementation process for minor crops and turf uses remains unclear and political pressure from activists continues to mount.

The debate is not over. Remain vigilant. Educate and involve others. Answer when called and be heard before your portion of the risk cup runneth over and there is nothing left for you to use.



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