

Pesticide Reregistration Demystified

By KAREN A. PLUMLEY, Ph.D.

Director, Research and Regulatory Affairs, Cleary Chemical Corporation

'Reregistration', 'mitigation' and "REDs" are on the tips of a lot of tongues lately. What do these terms mean and how will they affect you as a professional turfgrass manager?

What is Pesticide Reregistration?

The Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) provides for federal control of pesticide distribution, sale, and use in the United States. FIFRA has been amended many times over the years since its initial passage in 1947. In 1988, Congress passed an amendment to FIFRA that required the EPA to conduct an exhaustive review of all pesticides registered prior to November 1, 1984. More than 1,150 active ingredients were affected. The EPA organized these active ingredients into about 600 groups, each containing related compounds. The EPA was charged with re-reviewing these active ingredients and reassessing both their

health and environmental effects utilizing contemporary standards. The EPA then made decisions about the future use of these pesticides based on these comprehensive reviews. This process is known as 'reregistration'.

What does the EPA evaluate during reregistration?

For each group of active ingredients, the EPA examined the complete package of health, safety and environmental data. Sometimes these data packages were determined to be 'incomplete'. The registrants then had to decide whether to generate the required data to support reregistration or whether to allow those uses (or products) unsupported by data to be 'unregistered'. EPA evaluated each database to determine that each pesticide did not cause unreasonable risks to human health or the environment when used in accordance with approved label directions and precautions.

How does the Food Quality Protection Act (FQPA) of 1996 fit into this process?

FIFRA, as amended in 1996 by FQPA, requires that all pesticides meet new safety standards. EPA must be able to conclude with "reasonable certainty" that "no harm" will come to infants, children, or other sensitive individuals exposed to pesticides. All pesticide exposures -- from food, drinking water and home and garden use -- must be considered in determining allowable levels of pesticides in food. The cumulative effects must also be considered.

If there are 600 groups of pesticides undergoing reregistration, how did the EPA decide where to start?

The 1988 amendment to FIFRA directed EPA to divide the 600 cases undergoing reregistration into four lists: List A, B, C, and D based on whether the pesticide labels contain food uses (List A) and based on their potential for human exposure and other factors (List B = greater concern and List D = less concern).

What is the process of reregistration?

The 1988 amendment to FIFRA established a reregistration process consisting of five phases, with time frames and responsibilities for both EPA and pesticide registrants:

Phase 1 - List Active Ingredients - EPA published Lists A, B, C, and D in 1989 and asked registrants of these pesticides whether they intended to seek reregistration.

Phase 2 - Declare Intent and Identify Studies - Required registrants to notify EPA whether they intended to reregister their products and commit to providing any necessary new data.

Phase 3 - Summarize Studies - Registrants were required to submit data.

Phase 4 - EPA Review and Data Call-In - EPA reviewed all submissions and required registrants to meet any unfilled data requirements.

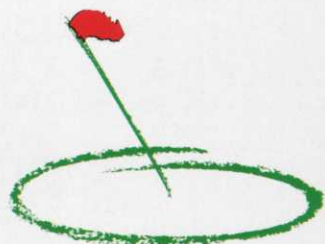
Phase 5 - Reregistration Decisions - In this final phase, EPA reviews all the studies that have been submitted for a case and decides whether or not pesticide products containing the active ingredient(s) are eligible for reregistration and whether or not the pesticide causes unreasonable adverse effects to people or the environment when used according to product labeling. EPA also considers whether the pesticide meets the new safety standard of the FQPA. The results of the review are presented in a reregistration Eligibility Decision (RED) document.

What kind of information is contained in a RED?

REDs contain a summary of the information gathered during the reregistration process, Agency decisions related to their

(Continued on Page 27)

Andersons Fertilizer



Andersons
GOLF PRODUCTS®

Authorized Golf Products Distributor
Program Specialists for all of your turf needs.

MTI DISTRIBUTING, INC.

4830 AZELIA AVE. NO. #100
BROOKLYN CENTER, MN 55429
763-592-5600 800-362-3665



Reregistration—

(Continued from Page 26)

findings, requirement for revised labeling and deadlines for compliance, among other things. Type of information found in REDs:

- + Voluntary cancellation of pesticide
- + Loss of use(s)
- + Limits on amount, frequency or timing of applications
- + Other application restrictions
- + "Restricted Use Pesticide"
- + Personal Protective Equipment (PPE)
- + Restricted Entry Intervals (REIs)
- + User safety requirements
- + Improved use directions
- + Special / tamper-resistant packaging
- + Engineering / production controls
- + Ground / surface water safeguards
- + Spray drift labeling
- + Ecological safeguards

What does it mean to have a 'mitigated' label?

Mitigate (according to Webster's Dictionary): to make soft or mild; to assuage, lessen, abate, moderate.

What is the EPA trying to mitigate?

Risk, in the form of human exposure to pesticides. To have a 'mitigated' label is to have a label that has been reviewed and accepted by the Agency that incorporates all of the provisions set forth in the RED.

When do 'mitigated' labels appear in the field?

Once the Agency has finalized the RED and sets forth the provisions for labeling for each group of active ingredients, the registrants then rewrite their labels to incorporate all of the provisions of the RED. That 'mitigated' label is then submitted to the Agency for review just the same as every label amendment. The Agency reviews the mitigated label and returns it to the registrant stamped accepted (sometimes with comments). Channel of trade for 'unmitigated' labels is laid out in the RED document for each active ingredient and can vary. The EPA decides on that timeline for each group of active ingredients based on a number of factors.

When does the EPA anticipate that reregistration will be complete?

EPA estimates that the reregistration

program will be completed in 2008. The program will be phased out upon completion. EPA maintains a pesticide reregistration calendar on its website where you can check the status of any pesticide undergoing reregistration. If the process is complete, you can find a link to the RED. If the process is incomplete, you will find an estimate for RED completion.

Website

The website is: <http://cfpub.epa.gov/opprereg/status.cfm?show=rereg>.


Will 'newer' pesticides (those registered after November 1, 1984) ever undergo a similar kind of reregistration process?

EPA plans to implement a new Registration Review Program by September 2006. The Registration Review Program was created by the FQPA in 1996. This new program requires EPA to review every registered pesticide on a 15-year cycle to ensure they meet current scientific and regulatory standards.

REDs and RED Fact Sheets

Completed REDs and RED fact sheets are available on the Internet: <http://www.epa.gov/oppsrrd1/REDs>.

TURFCO





The Topdresser You Trust Most.

mti
DISTRIBUTING
Count on us.

MTI DISTRIBUTING, INC.
4830 AZELIA AVE. NO. #100
BROOKLYN CENTER, MN 55429
763-592-5600 800-362-3665

Providing Full Service Golf Course Design



Bonestroo
Architects Of
The Game 

651-636-4600
www.bonestroogolf.com
a division of Bonestroo, Rosene, Anderlik and Assoc.