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International Turfgrass Society, Crop & Soil Environmental Sciences, VPI-SU, Blacksburg, VA 24061-0403; (703) 231-9796.

National Arborist Association, The Meeting Place Mall, P.O. Box 1094, Amherst, NH 03031-1094; (603) 673-3311.

National Golf Foundation, 1150 South U.S. Highway One, Jupiter, FL 33477; (407) 744-6006.

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Turf and Ornamental Communicators Association, 8400 Normandale Lake Blvd., Suite 500, Bloomington, MN 55437; (612) 832-5000.



## Is the struggle for 2,4-D finally nearing a climax?

Now, almost 12 years after the initial data call-in for the popular herbicide 2,4-dichlorophenoxyacetic acid (2,4-D), a frightening prospect looms for all of us.

That prospect is that we'll lose, one by one, chemical compounds that contribute to the well-being and happiness of just about everyone in the United States.

We'll lose these compounds not because anybody can conclusively prove that their proper use poses any real health risk to any of us. But because of the astronomical expense of proving—over and over again—that they don't pose *any* risk.

We'll lose them for a very wrong reason: money.

That's why the battle over 2,4-D has been so protracted. Industry has been willing to put up the money to prove that the compound deserves to remain on the market. Otherwise, 2,4-D would have been long gone. You can bet on that.

Sales of 2,4-D are substantial, so substantial that manufacturers and suppliers feel they can afford to defend it. The compound, available since 1948, is the most widely used herbicide in the world.

The Industry Task Force on 2,4-D Research Data, now known as Task Force I, spent \$4 million to develop data required by the U.S. EPA's 1981 data callin on the acid form of the compound. Originally there were 13 manufacturers or formulators in that group.

In 1988 when the EPA issued a data call-in on the acid, ester and amine salt forms, Task Force II—now only six members strong—figured to shell out an additional \$10 million.

Today, the remaining four members on the 2,4-D Task Force expect to spend \$21 to \$22 million (over the \$4 million spent by Task Force One) defending the herbicide and meeting EPA's study requirements. Even, so the herbicide's survival is hardly assured.

Obviously, other compounds with

much smaller uses will never survive the reregistration process, with or without challenges to their safe use.

The next step in the 2,4-D saga: the U.S. Environmental Protection Agency says it will convene a review panel in 1993 to consider several National Cancer Institute (NCI) farm worker studies that suggest a link between herbicide use and a rare form of cancer, non-Hodgkins lymphoma. The results of these epidemiological studies have come under increasing skepticism as newer studies raise serious questions about the validity and reliability of the methodology used in the NCI work.

Indeed, 2,4-D is being scrutinized from every possible angle.

There have been over 800 major 2,4-D studies published the past four years, and the number of epidemiological studies pertinent to 2,4-D now exceeds 90.

Obviously, the EPA review panel, to get a complete health risk picture of 2,4-D, must review all pertinent data and not just the suspect NCI studies.

Meanwhile, 2,4-D's defenders, in yet another compromise with the EPA, recently agreed to fund a \$1 million 2,4-D user education effort.

The EPA, like the proverbial butcher with his thumb on the scale, has tipped the balance away from the benefits side of the risk/benefit equation.

That's scary enough, but the enormously expensive, repetitive and unnecessary research studies required for reregistration will likely spell the doom of many less-used chemical products.

