

CALL TO ACTION: The *Lawn* Quality Protection Act

by TOM DELANEY
PLCAA

Does the loss of any of the following pesticide classes—

Organophosphates or Carbamates—get your attention? How about the following products—Orthene, Dursban, Diazinon, Di-syston, Oftanol, Counter, Sevin—just to name a few? If EPA is allowed to have its way and continues to follow along its current course, these product uses on turf may be limited or lost.

The FQPA of 1996 added several new requirements for testing and risk assessment to the regulatory process for pesticides. EPA must now address aggregate exposure from drinking water, non-dietary residential sources (turf), and residues in food, as well as cumulative exposure from chemicals with a common mechanism of toxicity. These new data requirements call for exposure assessment information not previously considered.

FQPA contains “data call-in” provisions that provide the mechanism for obtaining the data necessary to conduct these new risk assessment evaluations. However, early indica-

tions are that the Agency is not planning to use the “data call-in” provisions of the law, and instead will use the very conservative “default” assumptions about exposure and usage information, which may actually be inaccurate and unreliable, and will likely result in the unnecessary loss of pest control products, especially in the non-food markets like turf.

Companies may be forced to sacrifice non-food products to protect food uses. Once these products are lost, it is unlikely that they will be brought back to the non-food (turf) market, even if new data indicates all uses are safe and available under the new requirements. We are still waiting for EPA to reverse the 2,4-D safety clothing requirements that they mandated be put on the label before the complete testing was done. They have had all the tests for two years now.

The conservative “default assumption” approach will have a very negative impact on the non-food pesticide industry. It is imperative that implementation of FQPA be based on the best information available through current science and accurate data so that valuable and safe pest management products remain available.

Action Needed

Recently, PLCAA and several other association sent a let-

ter to Dr. Lynn Goldman, EPA assistant administrator, to call attention to this problem. But the key to our success is YOU.

Dr. Goldman has said EPA will not use the data call-in provisions of the law to obtain the data needed for the new aggregate exposure and cumulative risk assessment in the same law. We’re asking you to call or write your member of Congress. Tell them to urge EPA to:

► preserve as many valu-

able pest management protection tools as possible;

► obtain the necessary information through “data call-ins” to establish the safety of pesticide products;

► base decisions on actual pesticide use; and

► establish and communicate uniform policies for consistent FQPA implementation.

Delaney is Executive vice president of the Professional Lawn Care Association of America, Marietta, GA.

[DATE]

Honorable [NAME]
U.S. House of Representative/U.S. Senate
Washington, D.C. 20515/20510

Dear Representative/Senator [NAME]:

I am in the lawn care business in [TOWN] and am writing you regarding EPA’s implementation of the new Food quality Protection Act (FQPA). EPA is now in the process of deciding which pesticides will be kept on the market and which pesticides uses will be canceled, as required by law. I understand that EPA is making decisions without considering actual pesticide use practices. Also, I hear that EPA is not waiting for sufficient data to meet the law’s new requirements. This makes no sense to me.

I have been in the pest management business for [X] years and consider myself a good steward. I use pesticides when necessary to control insects and disease, and practice integrated pest management using all available tools. I know that the pesticide manufacturers can supply EPA with all the data needed to support the continued availability of these products, if the Agency properly implements the law. Please urge EPA to implement the law fairly, by using “data call-ins” and science-based decisions.

Sincerely,

[NAME]
[ADDRESS]