

Report from the Issues and Evaluation Committee
Progress Report, March 2000 - May 2001

Prepared by Amy Brown, Chair
Issues and Evaluation Committee
May 24, 2001

Section 25(b) labels – Exemption of minimum risk pesticides from regulation

AAPSE's I&E Committee had previously written a letter to Marcia Mulkey (October 1999) expressing concern about state training and certification impacts due to 25(b) pesticides processing and handling at the federal level. In late March 2000, the I&E Committee sent a separate letter to Toby Jones, Gina Davis, and Ed White requesting their support, through AAPCO, of AAPSE's concerns. In June, AAPCO requested that EPA reconsider the issue, supporting AAPSE's concern about the lack of a recognizable registration number on their labels. AAPSE continued to press the issue after publication of PR Notice 2000-6 (May 2000), and Larry Schulze made a presentation to OPP in March 2001. EPA has reported back to AAPSE that the Agency is trying to address the concerns internally, including the consideration of the use of Uniform Product Codes (UPC) as trackable identifiers. Larry Schulze headed up this effort, developed a Powerpoint presentation, and followed up with the Agency.

Draft Executive Order on toxic chemical reductions

Following notice of a Draft Executive Order which called for, among other directives, the elimination of use of organophosphates and carbamates by federal agencies, the I&E Committee (February 2000) sent a letter to George Frampton, Jr., Acting Chair of the Council on Environmental Quality expressing concerns and recommendations. The letter expressed support for the concept of reduction of pesticide exposure but emphasized the desirability of using an educational approach to mitigate risks rather than banning the use of certain products by some sectors. All reference to organophosphate and carbamate insecticides was subsequently deleted from the Order. In addition to Amy Brown, AAPSE members working on this issue included Larry Schulze, Howard Deer, Colleen Hudak, and Barry Brennan.

Allocating production caps as a risk reduction method

In August 2000, the I&E Committee sent comment on Docket Control Number OPP-00666, a proposal to reduce risks through the allocation of production caps among producers. The letter recommended that production caps be linked to stewardship programs.