

US EPA ARCHIVE DOCUMENT

Policy paper on revised risk assessment methods for agriculture workers, children of workers in agriculture fields, and pesticides with no food uses (11/2012)

In its 2009 policy paper on harmonizing risk assessment approaches for pesticides, EPA indicated that it intended “. . . to apply risk assessment techniques developed in the implementation of the FQPA to any pesticide risk assessment, whether falling under the FQPA or not, so long as application of the risk assessment technique is consistent with good scientific practice and is not otherwise prohibited by law.” As mentioned in the hand-out at the PPDC meeting in May 2012, we are moving ahead on a series of science fronts to implement this policy, as well as to explore whether or how we need to revise some of our human health risk assessment methods. A revised document explaining what EPA is changing will need to go through an internal review, followed by a clearance process through upper level agency management. We anticipate issuing this policy along with a response to comments after the completion of these steps. At the same time we have begun implementing aspects of that policy on a case-by-case basis.

Among other issues, OPP's policy paper indicated that, when determining a “safe” level of exposure, EPA would, to the extent permitted under law and consistent with good science, approach the use of uncertainty/safety factors in the same manner in all of its risk assessments, regardless of the mandate (FIFRA or FFDCA). Consistent with the policy paper, EPA has worked to harmonize its approaches to the application of uncertainty/safety factors in occupational and residential risk assessments for non-food use pesticides with the approach employed under the FFDCA. Thus, in recent years, EPA has been considering the same set of possible uncertainty factors for all of the pesticide exposure scenarios and population groups for which it is assessing risk. The use of any particular uncertainty/safety factor does not depend on the legal authority governing EPA's regulatory decision, but rather on the amount, type and content of available data relevant to the scenario. Consequently, when assessing comparable scenarios – such as inhalation exposure to adults in homes from residential use of a pesticide and inhalation exposure to workers during application or post-application activities – EPA employs the same point of departure and applies the same uncertainty/safety factors, resulting in the same level used to evaluate safety for both scenarios. It should be noted that, because of this practice, the points of departure and uncertainty factors used in current risk assessments should be consistent with how we expect the final policy will be formulated.

We're continuing the process of extracting and analyzing more exposure data for youth workers from field studies. To address environmental justice concerns and improve children's health protection, we continue to examine the degree to which current occupational exposure assessment methods account for youth workers. So far, and as previously reported, statistical analyses demonstrate the exposures of working children are similar to or lower than exposures for adults engaged in the same activities. Therefore, the methods we use to calculate exposures for adults appear to account for the exposures of working children doing the same job. HED is revising a timeline for completion of this project.

As previously discussed, given the complex nature of the different elements of *Revised Risk Assessment Methods for Workers, Children of Workers in Agricultural Fields, and Pesticides with No Food Uses*, some of our efforts will be on a longer timeline (e.g., aggregate and cumulative risk assessments). Stakeholder input will be solicited in a public process as the Agency moves forward in these areas. We will continue to review NAWS (1993-2009 National Agricultural Workers Survey) data and to analyze the remaining Youth in Agriculture data. As elements of this policy are completed, we will make all related documents available on our docket.