

US EPA ARCHIVE DOCUMENT

Protecting Children's Health

THE NATIONAL PESTICIDE PROGRAM

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Introduction

The mission of the U.S. Environmental Protection Agency's (EPA's) Office of Pesticide Programs (OPP) is to protect human health and the environment from potential risks associated with pesticide use. When used properly, pesticides can help control disease-causing organisms and foster a safe and abundant food supply. It is OPP's goal to ensure that pesticides marketed in the United States are sold, distributed, and used in a way that is protective of people's health, particularly that of vulnerable populations like children. This requires that the Office use the best available science when reaching regulatory decisions, find ways to communicate those decisions effectively, develop educational and training opportunities to help pesticide users make informed choices, and ensure proper implementation of pesticide statutes.

Protecting children's health is a priority for this Administration. EPA and other agencies place priority on addressing environmental health risks that disproportionately affect children. There are a number of unique challenges to ensuring that pesticide regulatory decisions are protective of children. In its 1993 publication, "Pesticides in the Diets of Infants and Children," the National Research Council stated that children are not "little adults." Important differences include:

- Children's metabolic rates are more rapid
- Children process toxicants differently
- Children pass through critical developmental stages
- Children consume more food in proportion to body size (as well as different types of food)
- Children's exposure patterns differ from adults'

Many of the recommendations outlined in "Pesticides in the Diets of Infants and Children" were incorporated in the Food Quality Protection Act of 1996 (FQPA), which ensures greater protection of children from pesticide risks. Consistent with these mandates, OPP has established policies, procedures, and requirements to expand the protection of children.

This document is designed to educate readers about the foundation for children's health protection that has been established in our national pesticide program, which encompasses the work of OPP and its regulatory partners, including states, tribes, and other federal agencies. This foundation consists of comprehensive, interconnected activities that address critical needs related to children's health. In addition to current activities, the document outlines how the program is working to expand the protection of children in the future.



"By building on past successes, responding to changes in science and statutes, and focusing on areas that still need improvement, we protect future generations while providing access to safe and useful pest control technologies."

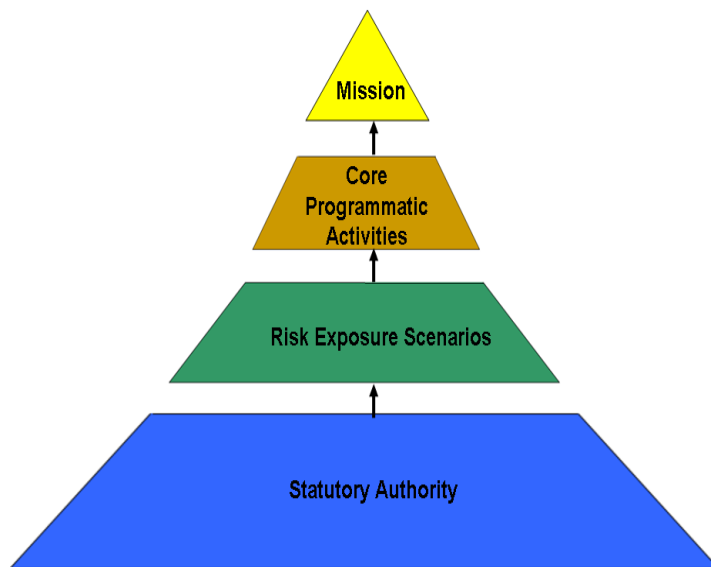
Steve Owens,
Assistant Administrator,
EPA's Office of Chemical Safety
and Pollution Prevention

Mission Statement

Administrator Lisa P. Jackson stressed the importance of children when she stated that “protecting children’s environmental health is central to our work at EPA.” In keeping with OPP’s broader mission and the Administrator’s statement, OPP has developed the following mission statement for children’s health protection:

Protecting children’s environmental health in all communities will be a routine part of OPP’s programmatic activities.

OPP uses a comprehensive, tiered, and linked approach to accomplish this mission. Our actions are built on the foundation of relevant **statutory authorities**, which provide a framework for efforts to protect children. These authorities are implemented based on an informed appreciation of the **multiple risk exposure scenarios** that potentially impact children. Understanding these scenarios allows meaningful, risk-based priority setting and activity planning. The Office’s children’s health protection activities are grouped in **core programmatic components** that encompass activities to address the key risks in the various exposure scenarios and allow the program to focus on areas that provide the most impact. These concepts are discussed in detail in subsequent sections.



“EPA will use a variety of approaches to protect children from environmental health hazards. Those approaches will include regulation, implementation of community-based programs, research and outreach.”

EPA Administrator Lisa P. Jackson



Statutory Authority

Focus of Activities – Fully utilizing relevant statutes to protect children, including the development of appropriate regulatory actions and the use of data call-in authority to require studies where needed to address data gaps.

The primary statutes regulating pesticide use in the United States are the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) and the Federal Food, Drug, and Cosmetic Act (FFDCA). FIFRA gives EPA the authority to regulate the registration (licensing) and use of pesticides, and FFDCA governs the establishment of tolerances (also known as maximum residue limits) on food and animal feed. In order for a pesticide to be registered under FIFRA, it must be demonstrated that the pesticide's use will not result in "unreasonable adverse effects" on human health or the environment. FIFRA provides EPA with authority to make pesticide regulatory decisions necessary to ensure the safe use of pesticides and to require any data the Agency determines are needed to reach those decisions. FIFRA also requires the periodic review of existing registrations, during which EPA can use the same data call-in authority associated with the registration process.

FFDCA governs the establishment of tolerances, requiring that these levels are sufficient to ensure a "reasonable certainty of no harm" from pesticide use. FFDCA contains specific requirements related to children as a result of the Food Quality Protection Act (FQPA) amendments of 1996. Specifically, when establishing or modifying a tolerance, EPA must consider available information about the consumption patterns of infants and children, the special susceptibility of infants and children to pesticide residues, cumulative effects of exposure (not just to the pesticide being considered for the tolerance but to other pesticides with a common mechanism of toxicity), and aggregate exposure from all possible routes of exposure. FQPA also requires that EPA apply an additional tenfold safety factor when establishing tolerances for foods consumed by children, unless reliable data indicate that a lesser factor would be protective.

Multiple Risk Exposure Scenarios

Focus of Activities – Taking steps to ensure that OPP's activities are protective for all exposure scenarios, using sound science and the best available data.

In modern society, pesticides have widespread uses and, therefore, have the potential to impact children in a variety of settings (see below). Effectively protecting children requires assessing each of these exposure scenarios independently as well as in the aggregate, identifying scenarios resulting in unacceptable risk, and mitigating those risks.

Possible Exposure Scenarios Affecting Children



Home – Children may be exposed to pesticides used in the home to control pests or through the food they eat. Risk assessments and pesticide registration actions take account of these potential pathways.



School – Children may be exposed to pesticides at school.



Play – Children may be exposed to pesticides where they play.



Work – Some children are employed in agriculture and others may be present in fields or exposed to pesticides brought home on the clothes of parents.



At Home

A child's diet is a potential source of pesticide exposure, but it may not be the only potential source within the home. Children may also be exposed to pesticides through lawn and garden products, insect repellents, antimicrobial products, or other pest control practices within the residence. To address these exposures, OPP has:

- Concentrated on reducing pesticide dietary risk from foods most consumed by children;
- Given priority to registration applications for pesticides that pose less risk to human health and the environment than existing conventional pesticide alternatives;
- Improved risk assessments to better characterize potential exposure to children and account for children's behavior (e.g., crawling and placing objects in their mouths).

OPP has also partnered with the Department of Housing and Urban Development and others on a National Integrated Pest Management (IPM) in Housing Strategy to help bring IPM to families living in public housing.

Integrated Pest Management programs rely on a combination of common-sense pest control practices and not just use of pesticides. IPM strategies make use of information regarding the biology of pests in combination with available pest control technologies to manage pests economically and with the least possible hazard to people, property, and the environment. IPM programs take advantage of all appropriate non-pesticide pest management strategies, with the judicious and careful use of pesticides when necessary.







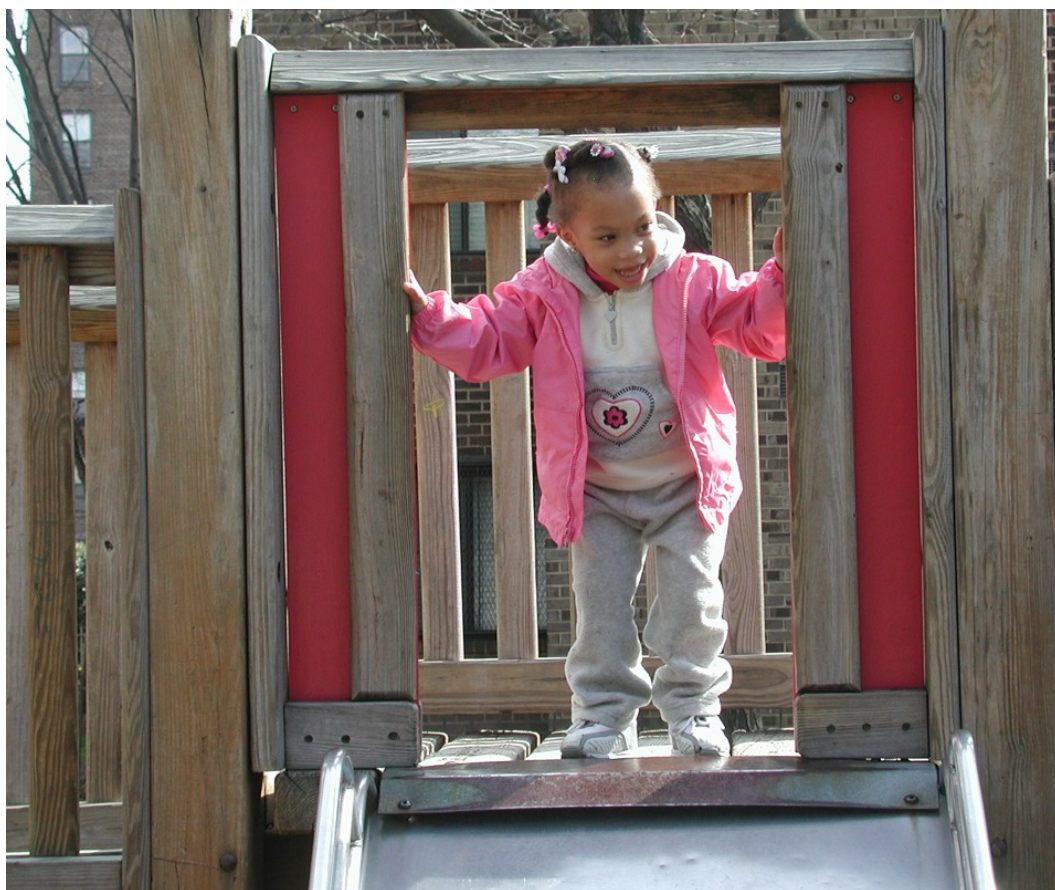
In School

Children may be affected by pesticide use in and around schools and day care centers. OPP has emphasized this potential exposure through initiatives such as IPM in Schools, which seeks to obtain a significant reduction in both pest complaints and pesticide use in schools. OPP, partnering with the National Head Start Association and the Department of Health and Human Services' Child Care Bureau, launched a national awareness campaign on the safe use of pesticides directed at child care center staff and parents.

OPP also manages two grants programs that have historically funded School IPM grants:

- (1) OPP's Pesticide Environmental Stewardship Program (PESP), a voluntary membership and grants program (with over 200 members and \$500,000 a year in grants) that works with the nation's pesticide-user community to reduce human health and environmental risks associated with pesticide use. PESP Regional grants have, over the past decade, funded over 25 IPM in School projects across the country; and
- (2) Pesticide Registration Improvement Act grants, which in the past three years has provided \$500,000 for two projects to foster IPM implementation in all of the nation's schools.

In addition, OPP has partnered with a team of IPM experts from across federal, state, and local governments, as well as non-governmental organizations and the academic community, to promote IPM in schools.





At Play

Children also face the potential for exposure to pesticides outside of the home and classroom.

OPP has taken regulatory action to address these risks, such as eliminating uses of chromated copper arsenate (CCA) on play-structures, decks, and picnic tables.

The Agency is also investigating ways to reduce off-site exposure of bystanders to pesticides through spray drift or volatilization, as discussed elsewhere in this document, and will continue to assess risks where exposure to children may be an issue.

The Office is committed to continuing to take regulatory action as appropriate to ensure the protection of children. Pesticide risk assessments include consideration of the possible exposure to children at play by considering practices such as placing toys or their hands in their mouths and crawling or rolling on lawns.



In the Workplace

The Government Accountability Office, in its 1998 report *Child Labor in Agriculture*, estimated that approximately 120,000 children between the ages of 15 and 17 work in agriculture but acknowledged it is very difficult to develop an accurate figure. Children who work with and around pesticides may not be the only children exposed. Parents who work with pesticides, or who work in or near fields where pesticides have been or are being applied, may bring their children to the fields with them. There may also be second-hand exposure to children of agricultural workers through spray drift or residue on the clothing of parents.

OPP has reached out with Public Service Announcements (PSAs) on Spanish-language radio stations to educate parents about the hazards of bringing pesticide residues home and is working with migrant and worker advocates, states, and farm groups on ways to encourage parents to send their children to school and not bring them to the fields where the parents work.

EPA is seeking to further protect children by proposing to strengthen its assessment of pesticide health risks, including a more thorough assessment of risks to workers (including farmworkers and farm children) and risks posed by pesticides that are not used on food.



Core Programmatic Components

While OPP has always been committed to protecting children, the Office recognizes that more can be done. By taking advantage of new data and scientific advancements and learning from our experiences, OPP is building on past successes to strengthen our efforts to protect children's health. We continue to address existing data gaps and make regulatory decisions that are protective of children.

Realizing OPP's mission to protect children's health involves work in six broad areas:

1. Establishing a sound scientific foundation;
2. Making effective risk assessment and risk management decisions;
3. Developing a strong regulatory framework;
4. Designing relevant education and training for staff, OPP partners, stakeholders, and the general public;
5. Enforcing pesticide laws in a timely and targeted manner; and
6. Forming new, or maintaining existing, partnerships to improve our ability to protect children's health.

This section describes the focus of OPP's activities in these key areas and how new efforts are building on a strong foundation to expand the protection of children. This description outlines current protections resulting from completed or continuing work and future activities that will address remaining needs or deficiencies. The details of how these activities are implemented are contained in annual work plans and commitments.



Representative Pesticide Activities and Future Enh

1 Sound Science

Enhanced P

Identify/address data gaps —

- > Identify nature and extent of exposure to children taken into fields and obtain better data on number of children working in agriculture

Seek to increase the amount/nature of data on children working in agriculture as part of worker safety regulation amendments

Analyze incident data for trends in children's exposure

Current Pro

Work with the Tribal Science Council on children's health issues

Continue to use grant programs to attract new investments in research related to children's health

Coordinate closely with state and tribal regulatory partners to identify children's health issues of concern

Enhance enforcement coordination with states/regions to identify children's health issues and possible violations of pesticide laws

Implement soil fumigant decision w/benefits to children

Promote actions to protect children and raise the visibility of programmatic and regulatory (including enforcement) actions to protect children's health.

6 Strong Partnerships

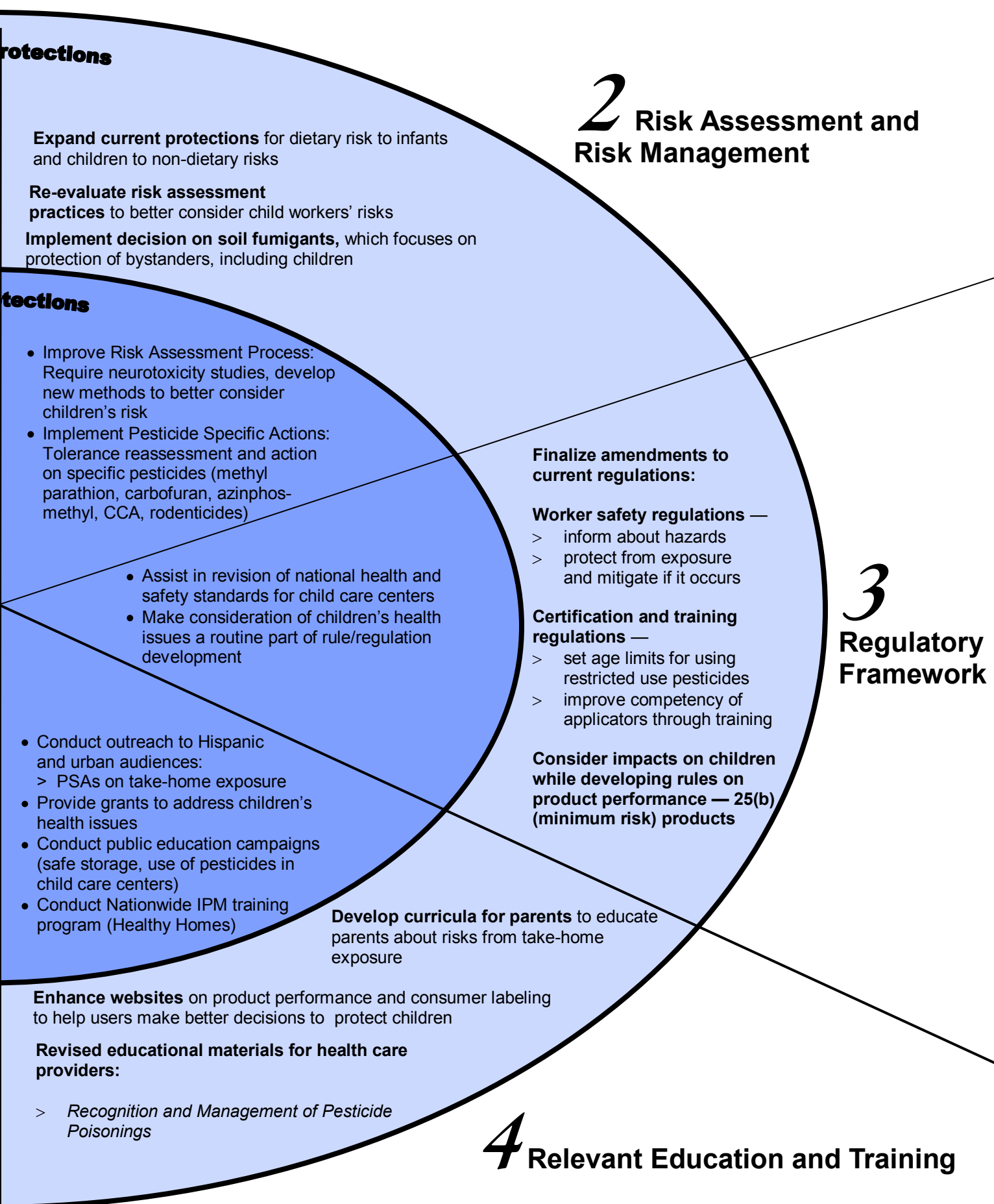
- Provide funds to support Department of Labor's pesticide worker safety survey fund
- Consult on development of National Institute of Occupational Safety and Health SENSOR program (pesticide incident data)

- Work with EPA's Office of Children's Health Protection on GAO recommendations and task force on children's health
- Participate in national disinfection workgroup
- Work with other federal agencies to promote use of IPM and IPM education and training initiatives

- Expedited response to child-related exposure incidents:
- Provide medical personnel with pesticide information
- Request results if testing is conducted, and collect statements from authorities
- Improve coordination, response, timing in support of enforcement case development

5 Timely and Targeted Enforcement

Recommendations to Expand Protection of Children



1 Sound Science

Focus of Activities – Promoting use of sound science and continued investment in new scientific approaches to improve our understanding of the potential risks to children from pesticide use and develop a blueprint for future advancements.

Because science is always advancing, OPP periodically updates and changes the way it approaches pesticide risk assessments. Under FIFRA and FFDCA, the national pesticide program is one of the most data-rich programs at EPA, providing significant information upon which to make pesticide decisions. Our goal is a more comprehensive and consistent evaluation of potential risks of pesticides, including all potential routes of exposure. For example, OPP is moving to apply risk assessment techniques for food-use pesticides, developed in implementing FQPA, to any pesticide risk assessment as long as application of the risk assessment technique is consistent with good scientific practice and is not otherwise prohibited by law. This will include reporting potential risks for individuals who had not been explicitly considered, specifically workers 12 – 17 years of age and children taken into agricultural fields while their parents work. OPP will continue improving data requirements to allow for the collection of more relevant data on children's exposure.

Current Protections:

- Revised data requirements for conventional, biological, and antimicrobial pesticides to increase available information on human health and environmental effects;
- Began explicitly reporting risks for child workers and children taken into agricultural fields;
- Supported the Department of Labor's National Agricultural Workers Survey that provides national information on health and demographics of agricultural workers;
- Provided funding and consultation to the National Institute of Occupational Safety and Health to increase the number of states in the Sentinel Event Notification System for Occupational Risk (SENSOR) Program and to expand occupational illness and injury surveillance capacity within state health departments in areas of the country with sizable agricultural worker populations;
- Improved methods to ensure that pesticides intended to control vector-borne diseases (West Nile virus, Lyme disease, etc.) are efficacious;
- Received peer review from the FIFRA Scientific Advisory Panel, an independent scientific panel, to determine how to address potential risk from pesticide volatilization;



- Conducted a “Bed Bug Summit” that brought together experts to discuss possible areas for research and to recommend approaches to address bed bug infestation. As a follow-up activity, OPP distributed information on best practices for controlling bed bugs; and
- Supported the Centers for Disease Control and Prevention (CDC) National Health and Nutrition Examination Survey, which provides up-to-date food consumption data for children.

Future Activities:

Strategic Approach — Enhance data and scientific tools to improve decisions and target actions to protect children.

Specific Actions

- *Identify and Address Data Gaps* — Determine if there are areas where additional data are needed to better inform our decisions (for example, several changes are being made to the risk assessment process that are discussed in the next section);
- *Analyze Available Data on Pesticide Incidents* — Ascertain if certain pesticides, or pesticide use patterns, are more likely to result in risks to children;
- *Develop Integrated Testing Strategies* — Building on previous work, integrate concepts such as computational toxicology to allow for more timely and effective risk assessments, which will facilitate quicker regulatory decisions; and
- *Reduce Non-Target Exposure From Pesticide Spray Drift* — Work with the U.S. Department of Agriculture (USDA) and stakeholders to finalize a protocol to identify and verify technologies to reduce spray drift in the environment, which will reduce health risks to children from off-target deposition of pesticides.



2 Risk Assessment/Risk Management

Focus of Activities – Ensuring that risk assessment and risk management processes consider the uniqueness of children and inform decisions that are protective of children.

Pesticide risk assessments cover all endpoints of concern. OPP updates risk assessment methods as science evolves or new information becomes available, and has worked to improve protection of children's health. There has been an increased emphasis on toxic effects unique to children. OPP requires advanced toxicity testing to assess possible effects on the fetus and developing young, including developmental neurotoxicity and reproductive studies. OPP has required specific studies to evaluate comparative sensitivity of adult and young experimental animals, and has focused on child-specific diets, residential exposures (playing on lawns and hand-to-mouth behavior), and aggregate risks (risk of exposure to several pesticides that act in the same manner). Post FQPA (1996), OPP added an extra tenfold uncertainty factor when establishing tolerances where there is a lack of reliable data on children's health effects and exposures. OPP is also improving occupational risk assessments, which have not routinely considered some child-specific exposure scenarios.

Current Protections:

Risk Assessment

- Completed reassessment of all (over 9,700) tolerances (maximum residue levels in food), giving special consideration to consumption patterns and special susceptibility of infants and children;
- Required additional studies (developmental neurotoxicity, immunotoxicity, and special comparative toxicity studies such as comparative cholinesterase, thyroid, and immunotoxicity studies) to better understand how pesticides may affect children;
- Implemented pesticide screening in the endocrine disruptor screening program to better understand and address possible pesticide effects on the human endocrine system; and
- Used new tests/risk assessment methods to target factors unique to infants and children.

Risk Management

- Took significant action on individual pesticides, or groups of pesticides, where risks to children had been identified, including:
 - > Canceled major children's food uses of methyl parathion and all tolerances for carbofuran, resulting in a significant reduction of acute dietary risk to children;
 - > Eliminated virtually all residential uses of organophosphate pesticides;
 - > Negotiated elimination of virtually all residential uses of chromated copper arsenate (CCA), including play structures, decks, picnic tables, fencing, and patios;

- Established new restrictions for phosphine fumigants, prohibiting use around residential areas, increasing buffer zones for treatment around non-residential buildings that could be occupied by people or animals, and creating more protective product labeling;
- Gave registration priority to reduced risk pesticides designed to replace or reduce reliance on more toxic pesticides (e.g., organophosphates and carbamates);
- Established new safety measures for 10 rodent-control products to require that they be enclosed in bait stations, making the pesticides inaccessible to children;
- Required label changes to indoor fogger products to reduce the potential for misuse; and
- Mandated child-resistant packaging when certain toxicity triggers are met.

Future Activities:

Strategic Approach — Take aggressive action to improve risk assessment/risk management activities to better protect children.

Specific Actions

Risk Assessment

- *Expand Assessment Methods* — Expand scientifically based protections for infants and children by applying additional safety factors for non-food use pesticides where data are incomplete;
- *Enhance Scientific Basis for Decisions* — Improve consideration of children in the risk assessment process by seeking data on the transfer of pesticide residues to children and youth in pesticide-treated fields, the number and age distribution of youth under the age of 18 working in agriculture, the extent to which non-working children are taken into pesticide-treated fields, and the likelihood/extent of exposure from work in agricultural settings in addition to other sources of exposure; and
- *Increase Use of Incident Data* — Increase scrutiny of incident data to identify areas of concern and take more targeted actions.

Risk Management

- *Target High Risk Uses* — Implement 2009 soil fumigants decision, focusing on protecting children and others living, going to school, and working near fields treated with soil fumigants (e.g., buffer zones between treated fields and schools);
- *Address Risks of Concern* — Take timely action on pesticides where data indicate an unacceptable risk to children; and
- *Improve the Quality of Pesticide Labels* — Work with states and manufacturers to ensure pesticide labels effectively convey use directions so pesticide users avoid unnecessary risk.



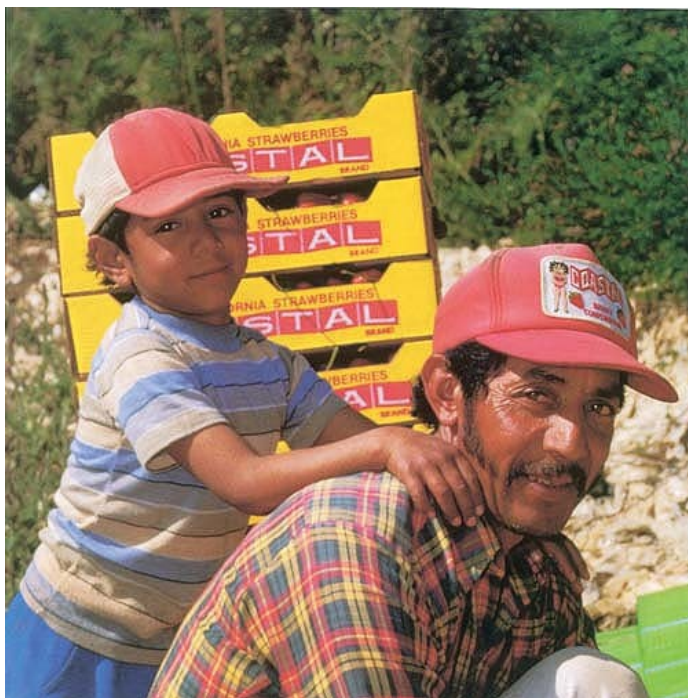
3 Regulatory Framework

Focus of Activities – Establishing rules, regulations, and policies that promote the protection of children from pesticide risks.

Effective implementation of regulatory decisions relies on a strong regulatory framework, including clear, focused, and effective rules, regulations, and policies. Development and communication of these documents are crucial in educating pesticide registrants and users and changing behavior in a manner that promotes the safe use of pesticides. Many of the actions outlined in the risk assessment and risk management section were implemented by developing rules and regulations. In addition to those actions, OPP is engaged in additional areas that will positively affect protection of children's health.

Current Protections:

- Assisting in the revision of national health and safety standards for child care centers, resulting in the development of more than a dozen new standards to address emerging environmental health issues; and
- Giving appropriate consideration to children's health issues when promulgating pesticide rules and regulations, including close coordination with EPA's Office of Children's Health Protection and non-governmental organizations in planning rule changes.



Future Activities:

Strategic Approach — Address needs for improved regulatory framework to support children's health protection.

Specific Actions

- *Significantly Upgrade Rules on Worker Protection/Certification and Training* — Propose amendments to Agricultural Worker Regulations (40 CFR, Part 170) and Certification and Training (40 CFR, Part 171) to increase the amount and nature of available pesticide safety information and improve the competency of those applying pesticides in environments where children may be exposed.

- *Consider Impacts on Children in 25*

(b) Product Performance Rules — OPP is focusing on 25(b) (or minimum risk) products, such as insect repellents, to ensure that they are efficacious in protecting children from insects.

4 Relevant Education/Training

Focus of Activities – Implementing communication and training initiatives that effectively inform people, resulting in improvements to children’s health through proper use of pesticides or techniques such as Integrated Pest Management (IPM).

OPP has made a significant investment in improving communication and training efforts related to children’s health. Using the Internet, targeted media spots, and public service posters, OPP promotes a broad array of messages concerning the safe use of pesticides to diverse audiences. EPA is also working with states, tribes, other federal agencies, and external organizations to improve available training opportunities in areas such as the use of IPM.

Current Protections:

- Promoting IPM strategies and supporting implementation of IPM in the nation’s school systems;
- Coordinating nationwide IPM training for affordable housing providers (Healthy Homes Initiative);
- Conducting public education campaigns on (1) safe storage of pesticides (Lock It Up), (2) use of pesticides in child care centers (Play it Safe), and (3) the importance of adhering to pesticide labels directions (Read the Label First);
- Awarding 29 grants (\$1.65 million) to address children’s health issues through programs such as Pesticide Environmental Stewardship and Pesticide Registration Improvement Act partnerships;
- Targeting outreach to urban audiences, including Hispanic families, to raise awareness of potential pesticide risks, such as Spanish-language PSAs designed to educate parents who work in or near agricultural fields on the hazards of exposure to pesticide residues they may bring home; and
- Designing/launching websites with information on protecting children, sharing information on pesticides with children, and designing publications for parents/children on proper pesticide use.

***Future Activities:***

Strategic Approach — Take full advantage of opportunities to improve children's health through education and training initiatives.

Specific Actions

- *Inform Health Care Providers* — Publish a new edition of *Recognition and Management of Pesticide Poisonings*, a valuable resource for health care professionals whose patients include agricultural workers, in both English and Spanish;
- *Educate Parents* — Support development of a curriculum to educate parents who work in agriculture about the risks to children from take-home exposure;
- *Enhance Web Pages* — Strengthen Internet presence so information on issues such as bed bug or cockroach infestation or product performance/consumer labeling is more accessible; and
- *Utilize Social Media* — Use social media to reach targeted audiences with messages on pest control and the safe use of pesticides.

5 Timely and Targeted Enforcement

Focus of Activities – Coordinate with appropriate governmental authorities to ensure necessary action is taken, in a timely manner, to enforce pesticide laws where children’s health and safety may be negatively affected.

OPP’s regulatory process is designed to ensure the safe use of pesticides when they are applied according to label directions. Any use not according to the label is a violation of federal law and may endanger children, adults, or the environment. OPP works closely with EPA’s Office of Enforcement and Compliance Assurance (OECA), EPA regional offices, and states/tribes to investigate misuse of pesticides that results in adverse effects to children, and assist in development and implementation of timely enforcement actions. OECA and OPP’s parent organization (EPA’s Office of Chemical Safety and Pollution Prevention) signed a Memorandum of Understanding that “establishes a framework for productive and efficient collaboration and cooperation” on enforcement issues.

Current Protections:

- Expedited responses to pesticide exposure incidents where children’s health was a concern (such as the deaths of two children in Utah in 2010 following improper applications of fumigant pesticides near the home) and learned from experiences with previous enforcement cases; and
- Improved coordination between EPA Headquarters and Regions to facilitate technical assistance and the exchange of information to support enforcement actions.

Future Activities:

Strategic Approach — Improve coordination with relevant entities to ensure timely and effective enforcement actions to address children’s health issues.

Specific Actions

- *Strengthen Coordination on Enforcement Actions* — Enhance coordination, quality of responses, and timing when supporting EPA, state, and tribal enforcement case development activities; and
- *Raise Visibility of Enforcement Actions* — Work closely with OECA, EPA Regions, states, and tribes to identify cases with children’s health impacts, raise visibility of enforcement actions related to children’s health, and provide expertise to ensure the successful conclusion of enforcement cases.



6 Strong Partnerships

Focus of Activities – Strengthening existing partnerships and developing new relationships that will help OPP provide greater protection for children from pesticide risks.

While OPP is working diligently to protect children from risks associated with pesticide use, we are only one of a number of partners whose work is crucial to success. To maximize protection efforts, OPP has fostered working relationships with other parts of EPA, state and tribal authorities, other federal agencies, and external stakeholders. Partnerships already mentioned include –

- Receiving consumption data for children from the CDC and data on agricultural workers from the Department of Labor and National Institute of Occupational Safety and Health;
- Developing nationwide IPM training in coordination with HUD, requiring consideration of IPM use in public housing, and scoping out national IPM priorities with USDA's IPM Centers;
- Working with PESP partners on issues related to children's health protection; and
- Coordinating with child care providers to develop national health and safety standards.

OPP is committed to continuing these collaborative efforts and developing new partnerships to take advantage of potential synergies and enhance our children's health protection activities.

Current Protections:

- Using OPP's public participation process, developed as part of our effort to reregister pesticides, to collect better information from the public on children's health risks;
- Participating in a national disinfection workgroup, comprised of children's health professionals, to create a set of best-management practices for infection prevention in schools; and
- Working with EPA's Office of Children's Health Protection to implement any recommendations from the Government Accountability Office on Agency efforts to address children's health issues, and helping re-establish the interagency task force on children's environmental health.

Future Activities:

Strategic Approach — Pursue partnerships that will enhance children's health protection.

Specific Actions

- *Improve Children's Health on Tribal Lands* — Consult with the Tribal Science Council, which recently agreed to make children's health protection a priority issue;
- *Identify Issues of Concern* — Coordinate with state/tribal regulatory partners to identify children's health issues of concern and include those issues in performance plans; and
- *Fund Research* — Continue using grant funds to encourage research on children's health issues related to pesticide exposure.

Overview of OPP Partnerships and Activities to Enhance Protection of Children from Pesticide Risks

Stakeholders/NGOs/General Public

Public Education, Migrant Support Groups, Pesticide Environmental Stewardship Program

Work with PESP partners and administer grants to address children's health issues

Focus on underserved and non-English speaking populations through radio and print campaigns, such as the dangers of take-home exposure

Develop applicator training/educational materials

Publish new edition of *Recognition and Management of Pesticide Poisonings*

Implement Pest Management Strategic Plan for School IPM

Coordinate with the medical community to improve OPP's understanding of pesticide risks

Scientific Community

FIFRA Science Advisory Panel, Independent Peer Reviews

Consult SAP and others to ensure that OPP uses the best available science and that risk assessments result in decisions that are protective of human health and the environment, particularly the health of children

Use cutting-edge science in areas such as:

- Approaches to tolerance reassessment – including use of the FQPA 10x safety factor where appropriate
- Addition of comparative neurotoxicity studies to pesticide data requirements
- Revisions in general risk assessment process to provide greater consideration of potential impacts to children's health
- Implementation of risk assessment methods to better protect children in non-food regulatory actions

Governmental Partners

States, Tribes, Federal Agencies (USDA, CDC, HUD, HHS)

Support CDC survey to provide consumption data for children and Department of Labor pesticide worker safety survey to obtain pesticide incident data

Coordinate with states/tribes to identify children's health issues

Implement soil fumigant decision with focus on protecting children

Conduct nationwide IPM training through the Healthy Homes Initiative (w/ HUD, CDC, USDA)

Work with Office of Head Start to help parents and day care providers understand pesticide risks and how to prevent risks to children

Other EPA Offices

EPA Regions and Offices of Enforcement and Compliance Assurance, General Counsel, Research and Development, and Children's Health Protection

Expedite responses to child-related enforcement cases

Raise visibility of child-related enforcement actions

Implement endocrine disruptor screening

Enhance websites on product performance/consumer labeling to help pesticide users make decisions that are protective of children's health

Implement risk management decisions on fumigants, rodent control products, methyl parathion, and CCA

Conclusion

The protection of children's health from the risk of pesticide use is a high priority for OPP. The Office is using available statutory authority and the recognition that children may be exposed to pesticides through multiple scenarios to focus activities in several core programmatic components. OPP is seeking to demonstrate the results of children's health protection activities by establishing children-specific measures in EPA's Strategic Plan and other performance accountability systems. The actions detailed in this document collectively contribute to the mission of making children's health protection a routine part of OPP's programmatic activities.

OPP continues to build on a strong record of protecting children by:

- relying on sound science,
- making regular improvements in the risk assessment and risk management processes,
- establishing a strong regulatory framework,
- developing relevant communication and training initiatives,
- assisting in the timely and targeted implementation of pesticide statutes, and
- working closely with current and future partners.

For more general information on EPA's Office of Pesticide Programs, visit us on the Web at <http://www.epa.gov/pesticides>. For more specifics on OPP's work to protect children see www.epa.gov/pesticides/health/children.htm.



