

91. FOOD QUALITY PROTECTION ACT

The Food Quality Protection Act (FQPA) provides the foundation for ongoing approval of substances used in food and agricultural production. It is imperative that agricultural groups ensure the FQPA is being reviewed and implemented as originally intended.

The U.S. Environmental Protection Agency (EPA) must:

1. Commit to use science, as intended by Congress, in fulfilling the FQPA mandate.
2. Establish a fair and transparent decision making process.
3. End the practice of using unduly conservative end points, safety factors, and default assumptions.
4. Give higher priority to making scientific decisions rather than completing final tolerance reassessments by statutory deadlines. Sound science requires good data and valid methodologies, which require time to develop.
5. Avoid removing uses that pose theoretical risk based on unreasonable, worst case assumptions.
6. Abandon the idea of wholesale revocation of tolerances for the organophosphate insecticides.
7. Develop proposed policies and methods for risk allocation, and submit them for public notice and comment review.
8. Redress the current resource imbalance between tolerance reassessment and new chemical/new use registration and accelerate the pace of making decisions on new products and uses.
9. In the event of registration cancellation, allow time for pesticide users to make a reasonable transition to alternative products.