

## Pesticides and Other Biocides: Consensus Questions

### Guiding principles and methods for our pesticide use & regulation decision-making

1. Unintended negative impacts from registered pesticides have already been identified. Are currently required tests sufficient for initial registration?

Yes

No

Other Comments:

2. Testing cannot cover all possible scenarios and may result in uncertainty about whether a certain exposure is safe or harmful.

- a. If there is uncertainty in whether or not a certain exposure (e.g. amount of exposure, population exposed) is safe or toxic, should we assume safety or toxicity?

Yes, exposure to registered products should be assumed safe until harm is proven (status quo).

Sometimes. While exposure to registered products should be assumed toxic until safety is proven, emergency uses should be permitted (e.g. to prevent invasive species spread, natural disasters, disease vectors).

No, exposure to registered products should be assumed toxic until safety is proven (precautionary principle).

Other comments:

- b. If there is uncertainty in whether or not a certain use of registered pesticides will result in toxic exposure, should that use be permitted?

Yes, under all circumstances. Users should be allowed to make the decision based on their local situation.

Yes, under some circumstances. Please select all that apply:

1.  The federal government should permit these uses, but states and local governments should restrict as needed based on their local situation.

2.  Emergency uses should be permitted (e.g. to prevent invasive species spread, natural disasters, disease vectors).

No, under no circumstances.

Other Comments:

3. How should pesticide regulations keep pace with advancements in science and technology? Please select all that apply. After initial registration:

No further review is needed.

When a complaint is filed (e.g. new research reveals potential toxicity, individuals claim harm from legal exposure).

Regular review (e.g. every 15 years, status quo). Please specific timeframe (e.g. 15 years, more than 15 years, less than 15 years):

Constant review. Regulations should be designed with maximum flexibility to respond to new research as it becomes available.

Other comments:

4. Who bears the burden of proof for safety or toxicity from exposure?

Registrant (company manufacturing the product)

User (businesses or organizations applying the product)

Exposed community (exposed individuals, their community, or organizations representing them / the environment)

Government (please specific federal, state)

Other Comments:

5. The following factors may be considered when determining whether or not to approve a pesticide application. Mark each factor as: Very important, moderately important, slightly important, not at all important.

Risk to humans

Risk to vulnerable human populations (e.g. children, farmworkers, disproportionately exposed groups)

Risk to animal populations (e.g. fish, pollinators)

Risk to environment (e.g. soil, water)

Potential economic harm

- Potential cost to businesses (e.g. cost of using alternatives vs cost of using the pesticide in question, cost of loss of crops due to pests, cost of infrastructure damage due to pests, etc.)
- Impact to food security (i.e. this pesticide is necessary to ensure sufficient food is grown)
- Potential invasive species spread (i.e. this pesticide is necessary to prevent further spread of invasive species)
- Potential disease spread (i.e. this pesticide is necessary for disease vector control)

Other comments:

6. How should we balance disclosure of ingredients in products vs business interests to maintain trade secrets?

- Manufacturers should be trusted to reveal the ingredients the public needs to know about.
- Manufacturers should be required to reveal all ingredients to the government during registration, and the government should determine which must be revealed to the public (e.g. active ingredients are revealed on the pesticide label and hazardous ingredients are revealed on the SDS as in the status quo).
  - i.  The government should err on the side of protecting business interests unless there is a public health interest.
  - ii.  The government should err on the side of transparency unless the manufacturer can show a compelling business interest.
- Manufacturers should be required to reveal all ingredients to the government during registration, and to the public once the product is available.
- Manufacturers should be required to reveal all ingredients to the public as soon as registration is applied for.

Other comments:

7. How should regulations and best practices relating to pesticide use be disseminated?  
Please select all that apply.

Pesticide labels should:

- Cover all regulations restricting use.
- Include information about hazards of use.
- Cover best practices that minimize use and potential contamination/drift.
- Be easy for users to quickly understand.

- Be available in multiple languages.
- Use graphics to improve understanding.

And:

- To improve understanding and legibility, there should be multiple ways to access the label (e.g. on the physical product, in a smartphone app, on a webpage, as a printed packet accompanying the product).

Training should:

- Be available in multiple languages.
- Require continuing education and retesting for certification.
- Include information about hazards of use.
- Include information on best practices to minimize pesticide use (e.g. Integrated Pest Management).
- Include information about protective equipment and sheltering from pesticide applications.

Other comments:

### **Organizations responsible for pesticide policy**

8. Who should be responsible for the following as relates to pesticides (policy and appropriation of funding)? (Please select all that apply)

a. List of potential responsible parties:

- Federal government
- State government
- Local governments
- Registrant (manufacturer)
- User (business or organization)
- Community (e.g. exposed individuals, environmental organizations, academia)
- Other (please specify)

Comments:

b. List of areas:

- Research into harms to humans of a new pesticide
- Research into harms to humans of an already registered pesticide
- Research into harms to animals or the environment of a new pesticide
- Research into harms to animals or the environment of an already registered pesticide

- Research into alternatives of pesticides
- Research into pesticides with less off-target impacts
- Food security
- Protection of farmworkers
- Protection of neighboring communities
- Protection of consumers
- Monitoring for and maintaining databases of pesticide exposures and potentially related human and environmental health impacts
- Monitoring for and maintaining databases of of pesticide residue in the environment and potentially related pesticide uses & spills
- Monitoring of pesticide residue on consumer products (e.g. food, clothing)
- Enforcement of pesticide regulations
- Research for alternative agricultural and forestry practices that minimize pesticide use (e.g. restorative agriculture, organic farming, crop rotation, etc.)
- Training and promotion of alternative agricultural and forestry practices that minimize pesticide use (e.g. Integrated Pest Management(IPM))
- Prevention of invasive species spread

Other comments:

9. When multiple government agencies (e.g. DEQ, OHA, and DOA all have some overlapping responsibilities) and multiple levels of government (e.g. federal and state) have overlapping responsibilities, how should this be handled?
- All agencies/levels of government should handle independently
  - All agencies/levels of government should handle together
  - One of the agencies/levels of government should handle independently and report back to the others

Other comments:

10. When multiple government agencies have policies or manage regulations that relate to the same issue, how should this be handled? (e.g. Oregon OSHA and the DoF both discuss buffer zones)
- Regulations should be harmonized as much as possible (e.g. a school next to any area where pesticides are applied will trigger the same rules)
  - Each agency should deal with its own policies/regulations and physical areas (e.g. DoF handles forestry, and DOA handles agricultural; if buffer zones are different, a school next to a forest may trigger different rules than a school next to a farm)

Other comments: