

PESTICIDES - SCIENCE POLICY AND BIOTECHNOLOGY ADVISORY PANEL

Why the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) Scientific Advisory Panel (SAP) Is Important

External peer review by qualified scientific experts is a cornerstone of the scientific process; it provides assurances that the technical and scientific components of the EPA's decision-making process are credible, and can be sustained under intense public and legal scrutiny. The scope of the FIFRA SAP's work is solely related to technical and scientific issues concerning pesticides. It plays no role in EPA toxics program.

How the Panel Works

The SAP, created in 1975 under FIFRA, is a statutory advisory committee comprised of seven members who have been nominated through a process managed by the National Science Foundation and the National Institute of Environmental Health Sciences. The standing committee is supplemented by members of a Science Review Board, established under the Food Quality Protection Act (FQPA) of 1996, and consists of 60 scientists who are available on an *ad hoc* basis to assist in reviews conducted by the panel.

The SAP provides comments, evaluations, and recommendations on pesticide-related matters. Some of its responsibilities are legislatively mandated, such as scientific and technical aspects of impacts on health and the environment of matters arising under the cancellation, suspension, and rulemaking provisions of the law, or the evaluation of methods to ensure that pesticides do not cause "unreasonable adverse effects on the environment."

At present, SAP activities are managed by a very small staff in a component of the Office of Chemical Safety and Pollution Prevention that is separate from the Office of Pesticide Programs (OPP). It is important to keep the advisers separate from those seeking advice to avoid giving them the ability to exert undue control over the selection of the SAP advisers and/or to influence a particular outcome of the panel's deliberations. Nonetheless, OPP retains the authority to determine the number of panel meetings per year and, except for legislatively mandated activities, the topics to be presented for deliberation. Therefore, there is flexibility in establishing the budget requirements from year to year.

Consequences if the Panel Is Eliminated or Inadequately Funded

The SAP cannot be eliminated by an administration's budgetary fiat. Elimination is possible only by an amendment to FIFRA by Congress. Consequences of elimination or inadequate funding would be the loss of informed feedback on critical technical and scientific issues related to pesticide assessment and regulation. This would diminish the quality of EPA's decision-making about pesticides and could result in the agency's inability to complete its mandated regulatory actions. One could expect a spirited reaction (and, likely, lawsuits) from EPA's stakeholders, including the regulated community.

Demonstrated Successes

Over the 40+ years of its existence, the FIFRA SAP has provided invaluable observations and recommendations on scientific issues associated with its legislatively mandated responsibilities related to provisions of FIFRA, which led to proposals for cancellation of uses of the organochlorine insecticides,

chlorpyrifos and Alar, modification of use patterns for the EBDC fungicides, the organophosphate and carbamate insecticides, and the triazine herbicides, as well as provisions of the worker protection standards, among other actions.

The SAP has contributed valuable scientific input to the policy guidance documents developed in response to FQPA's risk assessment provisions such as application of the 10X Children's Safety Factor, how to assess groups of chemicals sharing a common mechanism of action, and conducting aggregate risk assessments.

The SAP has provided advice on every aspect of implementation of the Endocrine Disruptor Screening Program, including the scientific credibility of the proposed tiered screening and testing schemes, the validity of the screens and tests comprising the tiers, the selection of the chemicals to be subjected to testing and evaluation, the weight-of-evidence evaluation of the screening results and, most recently, the agency's efforts to develop alternative non-animal, high-throughput assays to determine endocrine disruption.

Lastly, the SAP has deliberated on issues related to studies designed to evaluate exposure of human subjects to pesticides; testing protocols for the evaluation of potential toxicity and exposure to humans and environmental species; models designed to estimate exposure of consumers and workers to pesticides via food, drinking water, indirect ingestion, air and skin; as well as the roles of biotechnology for use in pest management.

Funding for the Science Policy and Biotechnology Advisory Panel

FY2016 Baseline Budget: \$1.174 million

FY2017 President's Budget Proposal: \$1.144 million

FY2017 Amount Appropriated: \$1.172 million

FY2018 President's Budget Proposal: \$0

FY2018 Amount Appropriated: \$1.479 million

FY2019 President's Budget Proposal: \$0

FY2019 Amount Appropriated: \$2.040 million

FY2020 President's Budget Proposal: \$0