

Staff Paper # 32
9/14/98

**REGULATORY MECHANISMS FOR
ACHIEVING PESTICIDE RISK MITIGATION**

Background:

The attached paper was developed to provide information for TRAC and other stakeholders about the regulatory mechanisms that would be available to the EPA in its tolerance reassessment process, in the event that EPA makes a finding that the risks posed by a pesticide (or group of pesticides sharing a common mechanism of toxicity) exceed the “reasonable certainty of no harm” safety standard under FQPA.

TRAC Discussion:

Discussion by the TRAC centered primarily around the timing of the different regulatory mechanisms, whether the Agency had a preferred regulatory option and under which circumstances one regulatory approach might be used over another. The Agency acknowledged that the timeframes noted in the staff paper were the statutory minimums only and did not reflect any additional steps to increase stakeholder opportunity for participation in the process.

The TRAC also noted that the minimum process requirements effectively eliminated meaningful participation from all but the pesticide registrants. The TRAC then discussed what steps might be added to the process to ensure adequate participation by other interested stakeholder groups.

Next Steps:

This document will provide the basis for stakeholder awareness for the regulatory tools which the Agency will consider for the OP reregistration and tolerance reassessment.