

Children's Health Advisory Committee (CHPAC) Consultations Update

May 2023 Pesticide Program Dialogue Committee Meeting

Over the past two years, EPA/OPP has consulted with the Children's Health Advisory Committee (CHPAC) on two topics: consideration of legally working children in pesticide exposure assessment and take-home pesticide exposure. Background and key points for each are provided below.

Consideration of Legally Working Children in Pesticide Exposure Assessment

Background

- The presentation was a summary of an analysis released in 2016 which addressed how children engaged in farm labor activities and how those activities were considered in pesticide risk assessment. The analysis was conducted to assess the protectiveness of the current risk assessment methodologies. The findings concluded that quantitative post-application assessment of adults is protective of legally working children. The basis of the findings was the extensive monitoring data that was available, which indicated that childrens' exposure to pesticides is lower when compared to adult exposure.
- May 2021: Initial consult with CHPAC
 - EPA/OPP presented CHPAC with four charge questions. The charge questions addressed the basis of the problem formulation and whether the analysis appropriately characterizes working children in agriculture as well as if additional studies or data were available to include in the analysis. The CHPAC was asked if the exposure factors used in the analysis were appropriated and what the general strengths and weakness were of the methods used to complete the analysis.
- December 2021: CHPAC provided a response to the charge question in the form of recommendations to EPA in a formal written response.
- May 2022: At the May 2022 CHPAC meeting, EPA/OPP provided an overview presentation of a workplan which was designed to address the recommendations. The workplan was developed to focus on both short-term that the workgroup could accomplish and long-term action items that would involve collaboration with internal and external partners, stakeholders, and require additional resources.
- Nov 2022: Following the May 2022 presentation and discussion of the workplan, EPA provided a formal response to the CHPAC recommendation letter.
- Dec 2022: At the December 2022 CHPAC meeting, EPA/OPP provided a progress update on the action items that were shared with the CHPAC.
- March 2023: A representative of EPA/OPP was invited to meet with the NEJAC Farmworker and Pesticide Workgroup to discuss the CHPAC engagement on this topic.

Key Points:

- EPA/OPP is continuing to work towards the short-term action items identified as a result of the CHPAC recommendations; for example, exploring additional statistical analyses better suited for the data, review of the citations provided by CHPAC, and developing the parameters of a strategic literature search for additional data to be incorporated in the problem formulation and quantitative determination of exposure.
- EPA/OPP is also focusing on long-term action items by engaging with NEJAC and other external partners as well as internal partners (i.e., ORD and OCHP) on this topic.

Take-Home Pesticide Exposure

Background

- EPA consulted the CHPAC regarding take-home pesticide exposure, a potential indirect exposure scenario where individuals, including children, can be inadvertently exposed to pesticides by way of family members “taking home” pesticide residues from work on their skin and clothing.
- November 2021: EPA/OPP presented the CHPAC with four charge questions focused on evaluation of take-home pesticide exposure in published literature, potential quantification of take-home exposure in human health risk assessments, requirements and recent revisions of the Worker Protection Standard, and education and outreach related to occupational pesticide exposure.
- July 2022: CHPAC provides EPA with a letter outlining a set of recommendations
- December 2022: EPA/OPP provides preliminary thoughts during CHPAC meeting, noting that some of the CHPAC’s recommendations regarding enforcement will require coordination with EPA/OECA.
- May 2023: EPA/OPP coordinates with EPA/OECA to provide response letter to CHPAC.

Key Points:

- EPA/OPP engaged EPA/OECA, including obtaining direct input on the response letter; OPP will continue to work with OECA regarding pesticide enforcement in other public stakeholder meetings (e.g., NEJAC).
- EPA/OPP agreed with many of the CHPAC recommendations; for example, aiming for upstream strategies that target workplace conditions and employer engagement in addition to downstream strategies like worker education and at-home interventions.