



MEMORANDUM

Via E-Mail

DATE: January 9, 2004

TO: Firm Clients and Friends

FROM: Bergeson & Campbell, P.C.

RE: EPA Releases Proposed Schedule for Inert Tolerance Reassessment

Yesterday, the U.S. Environmental Protection Agency (EPA) released its proposed schedule for inert tolerance reassessment ([available online](#)). EPA states:

The pesticide tolerances and tolerance exemptions that were in place as of August 1996, when the Food Quality Protection Act was signed, are subject to reassessment. This reassessment process is scheduled for completion in 2006. Approximately 500 tolerance exemptions for chemical substances used as inert ingredients in pesticide products must be reassessed.

In reassessing the tolerances to determine if they meet Food Quality Protection Act (FQPA) standards, EPA intends to consider the following:

- The aggregate non-occupational exposure from the pesticide (dietary exposure and exposure from using pesticides in and around the home, and exposure from drinking water);
- The cumulative effects from pesticides with a common mechanism of toxicity;
- Whether there is an increased susceptibility to infants and children, or other sensitive subpopulations, from exposure to the pesticide; and
- Whether the pesticide produces an effect in humans similar to an effect produced by a naturally-occurring estrogen or other endocrine effects.



BERGESON & CAMPBELL, P.C.

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It is not clear who within the Registration Division in EPA's Office of Pesticide Programs, newly under Lois Rossi's leadership, will be tasked with working on this project, or on what schedule EPA may be operating. We understand CropLife America, American Chemistry Council, Chemical Producers and Distributors Association, and others are working informally to develop ideas to help EPA move this challenging program forward.

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We hope this information is helpful. As always, please call if you have any questions.

[Attachment](#)