



MEMORANDUM

Via E-Mail

DATE: July 20, 2006

TO: Firm Clients and Friends

FROM: Bergeson & Campbell, P.C.

RE: FY 2005 Pesticide Reregistration Performance Measures and Goals

On June 23, 2006, the U.S. Environmental Protection Agency (EPA) announced its progress in meeting its performance measures and goals for pesticide reregistration during fiscal year (FY) 2005. The *Federal Register* notice provides the status of various regulatory activities associated with reregistration and tolerance reassessment, gives total numbers of chemicals and products reregistered, tolerances reassessed, Data Call-Ins issued, and products registered under the “fast-track” provisions of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA). The notice also contains the schedule for completion of activities for specific chemicals during FYs **2006** through **2008**. The complete notice is available on the Internet at <http://www.epa.gov/fedrgstr/EPA-PEST/2006/June/Day-23/p9956.pdf>.

GOALS FOR FY 2006 AND BEYOND

According to the notice, EPA’s major pesticide reregistration and tolerance reassessment goals for FY 2006 and future years are to:

- **Complete individual pesticide risk management decisions.** EPA’s goal in conducting the reregistration and tolerance reassessment program is to complete about 45 reregistration eligibility decisions (REDs) and interim REDs (IREDs) during FY **2006**, for pesticides with associated tolerances, and to complete a total of about 45 REDs for pesticides with no food uses or tolerances in FYs **2007** and **2008**. EPA’s schedule for completing these decisions appears below and also is available on the Internet at http://www.epa.gov/pesticides/reregistration/decision_schedule.htm.
- **Complete tolerance reassessment decisions.** EPA states that it is continuing to reassess tolerances within the time frames set forth in the



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Federal Food, Drug, and Cosmetic Act (FFDCA), as amended by the Food Quality Protection Act (FQPA), “giving priority to those food use pesticides that appear to pose the greatest risk.” EPA notes that it “successfully reached its first two tolerance reassessment milestones by completing over 33% of all tolerance reassessment decisions by August 3, 1999, and over 66% by August 3, 2002.” According to the notice, EPA plans to meet the final FQPA tolerance reassessment goal of 100% by **August 3, 2006**.

- **Evaluate cumulative risks.** Once EPA completes individual risk assessments for the organophosphates (OP), carbamates, and others, EPA intends to make cumulative risk findings for each of these common mechanism groups of pesticides. More information is available on EPA’s cumulative risk website at <http://www.epa.gov/pesticides/cumulative/>.

FUTURE SCHEDULE FOR REREGISTRATIONS

EPA intends to complete REDs for pesticides that have no food uses or tolerances by **October 3, 2008**. Its schedule for completing these decisions is below. EPA notices that, although it is “committed to meeting the reregistration and tolerance reassessment deadlines,” the list may change “due to the dynamic nature of the review process.”

FY 2006 RED, IRED, and TRED Schedule

REDs

ADBAC	Glutaraldehyde
Aliphatic alkyl quarternaries	Imazapyr
Aliphatic solvents	Inorganic chlorates
Alkylbenzene sulfonates	Inorganic sulfites
Cacodylic acid	Iodine
Chlorine dioxide	MCPB
Copper compounds II	Metaldehyde
Copper salts	Methanearsonic acid, salts (DSMA, MSMA, CAMA)
Copper sulfate	MGK-264
Cypermethrin	Mineral acids, weak (sodium carbonate)
Dicamba	PCNB
Dichloran (DCNA)	
Ethylene oxide	



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Permethrin
2-Phenylphenol and salts
Phytophthora palmivora
Piperonyl butoxide
Propiconazole
Propylene oxide

Pyrethrins
Resmethrin
Rotenone
Salicylic acid
TCMB
Triadimefon

IREDs

Aldicarb
Carbofuran
Dichlorvos (DDVP)
Dimethoate

Formetanate HCl
Malathion
Simazine

TREDS

Acetochlor
Amitraz
Azadirachtin
Benzaldehyde
Bitertanol
Boric acid group
CP enolpyruvylshikimate-3-phosphate
Ethephon
Fomesafen

Imazaquin
Methyl bromide
Neomycinphosphotransferase II
Oxytetracycline
Propazine
Sodium cyanide
Streptomycin
Triadimenol
Tridemorph

FY 2007 RED Schedule

2,4-DP
Acrolein
Aliphatic alcohols
Aliphatic esters
Alkyl trimethylenediamine
Allethrin stereoisomers
Amical 48
Antimycin A
Benzoic acid
Bioban-p-1487
Bromonitrostyrene

Chlorflurenol
Chloropicrin
Chromated arsenicals (CCA)
Coal tar/creosote
Copper and oxides
Dazomet
Dikegulac sodium
Formaldehyde
Grotan
Irgasan
MCP



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Methyl bromide
Methyldithiocarbamate salts (metam
sodium/metam potassium)

MITC
Ochthilnone
Pentachlorophenol

FY 2008 RED Schedule

4-Aminopyradine
Busan 77
Flumetralin
Mefluidide
Naphthalene
Naphthalene salts
Nicotine
Organic esters of phosphoric acid (new case)
p-Dichlorobenzene
Polypropylene glycol
Prometon

Siduron
Sodium fluoride
Sodium/potassium
dimethyldithiocarbamate salts (case
2180 already counted with ziram)
Sulfometuron methyl
Sumithrin
TBT-containing compounds
Tetramethrin
Triforine
Trimethoxysilyl quats

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