

# Pesticide regulatory apparatus 'not working'

**EDITOR'S NOTE:** The following are excerpts from a short talk on pesticide regulations given by Dr. Jack Early this month in a session with the American Association of Agricultural Editors, meeting in Chicago. Early is president of the National Agricultural Chemicals Association.

CHICAGO, Ill. - The farm community is united in its conviction that it must have modern technology to produce quality food and fiber crops in abundance. Consumers are vocal in their search for good food at low prices. Yet there is real trouble brewing both for farmers and for consumers, because our regulatory apparatus for measuring and introducing new pesticide technology is simply not working.

Some of you may be aware of the current regulatory log-jam in the Environmental Protection Agency. Three months have passed since the Agency imposed a moratorium on all registrations of pesticides. This moratorium stemmed in part from congressional pressure for the EPA to validate all data which supports present registrations. Currently the EPA has developed a plan to do this job and has a target date in the Spring to catalog about 1.5 million file documents. But while this process is underway, there are hold-ups in registration of new and amended products, in reregistration of old products, in classification of pesticides, and even experimental use permits.

Petitions for tolerances and food additive regulations will be affected and even registrations of pesticides containing

because our regulatory apparatus is faltering. It is not working. It is not geared to the delivery of needed technology to the farm. New ideas are being bottled up by increasingly torturous studies, mandated under a maze of complex federal regulations that have sprung into existence, following passage of the 1972 amendments to the Federal Insecticide, Fungicide, and Rodenticide Act. This legislation, commonly known as FIFRA, is the basis of these regulations.

Little more than a decade ago, a basic manufacturer of pesticide chemicals expected to invest \$4 million and perhaps four years to bring a new compound from the laboratory bench to the field. Today, the cost is up to \$12 or \$15 million and often the time can be eight years or more. The added cost and the added time are one measure of our current regulatory difficulties. But down the road, it seems obvious that there will be a significant impact on new chemical technology needed in the U.S. (and indeed around the world) to boost farm productivity. Farmers cannot meet a food goal of 50 per cent more by the year 2000, if they are to be locked in to the technology of the mid-1970's. New technology is not likely to emerge, if research and development costs and time periods continue to escalate as they have. These escalations not only discourage people and companies doing agricultural research, but they also focus research effort only on the "big" opportunities. These "big" opportunities are certainly limited in number. The numbers of firms with needed resources are also limited.

The next Congress will be faced with the challenge of considering new farm legislation. It also must take up the vital question of amending or modifying FIFRA and funding the operations. This is an important act, not just to our 125 NACA members or only to the 3.4 million American farmers, but it is also a very important act to 210 million American consumers.

An average American family consumes about 2½ tons of food a year. This now represents about 17 per cent of the family's disposable income, as compared with about 23 per cent back in 1951. To keep this cost down and to avoid boosting it back to the level of 25 years ago, the consumer and the farmer need a new look into pesticide regulatory administration. The housewife and the farmer must have farm and food regulators who are production minded and cost-and-price oriented, as well as regulators who are concerned with the environment.

That is why I feel that we must go to Congress next year and urge a new approach in regulating pesticides. Briefly stated, we must develop a plan that will truly balance the benefits and risks of new technology. We must find a mechanism for environmental safeguards for pesticides without shackling the farmer's ability to boost productivity and improve quality.

We had thought we had such a plan in FIFRA. Now we can see that priority attention has gone only to the environment. Food production benefits of crop chemicals have received scant attention.

Valuable production tools in the form of pesticides which the American farmer has come to rely on are being knocked off one by one. Little is being done to take up the slack and fill the void. We need to emphasize that a change is needed in the way benefits and risks are evaluated.

Under the law, Congress must extend EPA's authorization before new funding can be approved for pesticide regulation. The cost of that regulation, incidentally, is about \$40 million a year. It is not clear now whether expected oversight hearings will occur, nor indeed which committees of the House or Senate may be holding them if they are held. But regardless of the time, the hearings will provide an unusual opportunity

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new active ingredients will be delayed because manpower has been diverted to other work.

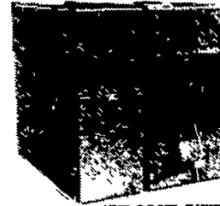
The confusion is not limited to registration of products. Other delays and difficulties have developed in the classification of pesticides, in the certification of applicators, and in the dual position occupied by the EPA in attempting to measure environmental risk of a crop chemical against a farmer's crop protection need or consumer benefit.

Too often, we find the EPA in the role of a prosecutor as well as the role of a judge as it attempts to determine whether a pesticide should or should not be introduced or kept on the market to help farmers maintain high yields and top quality. Too often we find frustrating and needless delays the accepted pattern in the EPA, as administrators wrestle with intricate, time-consuming details established by mountains of new regulations.

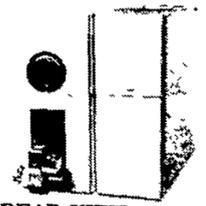
I must tell you than the people who research, make and market agricultural chemicals are very much concerned,

for farmers, for independent experts, for editors and for manufacturers to help evaluate EPA's administration of FIFRA and to make recommendations for its improvement

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