

Chlorpyrifos Status Update for
PPDC Meeting Nov. 3, 2016 – Session 7f
Prepared: October 19, 2016

Background

The EPA must respond to a National Resources Defense Council (NRDC) and Pesticide Action Network of North America (PANNA) petition seeking the revocation of all chlorpyrifos tolerances and cancelation of all registrations for chlorpyrifos, citing human health concerns. In October 2015, the EPA issued a proposed tolerance revocation for chlorpyrifos based on the science as it stood. There are several unresolved scientific issues the EPA has been working through before issuing a final decision.

EPA has considered several approaches in determining the critical effect, and related uncertainties, for use in the chlorpyrifos human health risk assessment. The 2014 revised human health risk assessment used dose-response data on acetylcholinesterase inhibition (AChI) in laboratory animals to derive a point of departure. However, the EPA believes that evidence from epidemiology studies indicates effects may occur at lower exposures than indicated by the toxicology database. The EPA consulted with the FIFRA Scientific Advisory Panel (SAP) on using a specific epidemiology study to establish a new toxicological endpoint and associated point of departure for the chlorpyrifos risk assessment. The SAP advised against that approach. The SAP also emphasized concern that the point of departure based on AChI is not sufficiently health protective for use in risk assessment. The 2016 SAP cited that epidemiology and toxicology studies suggest there is evidence for adverse health outcomes associated with chlorpyrifos exposures below these levels, which is consistent with recommendations from the 2012 SAP meeting on chlorpyrifos.

The EPA has thoroughly considered the SAP's recommendations, and is currently finalizing its 2016 revised risk assessment. The EPA anticipates making the revised risk assessment, along with an updated drinking water assessment, available for public comment in the very near future. The EPA anticipates issuing a final tolerance rule for chlorpyrifos by the court-ordered deadline, March 31, 2017.

Milestones

- The EPA anticipates issuing a Notice of Data Availability (NODA) for the proposed rule in the very near future. The NODA will include a revised human health risk assessment, updated drinking water assessment, and other supporting information. The EPA will also notify the World Trade Organization of EPA's impending tolerance decision at this time.
- The Notice of Data Availability will be published for a 60-day public comment period.
- The EPA will respond to public comments and finalize its decision on the chlorpyrifos tolerance rule by March 31, 2017.