UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

SEP 14 2017

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Mr. Kenneth Cook
Environmental Working Group
1436 U Street NW Suite 100
Washington, DC 20009

Dear Mr. Cook:

Thank you for the letter of June 27, 2017, to the U.S. Environmental Protection Agency, regarding chlorpyrifos.

As your letter mentions, the EPA denied a petition asking the agency to revoke all pesticide tolerances (maximum residue levels in food) for the pesticide chlorpyrifos under the Federal Food, Drug, and Cosmetic Act (FFDCA) and cancel all chlorpyrifos registrations under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA). Prior to this determination, the EPA took the issues raised in the petition to the FIFRA Scientific Advisory Panel (SAP) and presented approaches and proposals for evaluating recent epidemiologic data exploring the possible connection between *in utero* and early childhood exposure to chlorpyrifos and adverse neurodevelopmental effects. The SAP has reviewed experimental toxicology and epidemiology data, and their incorporation into risk assessments (2008, 2010, 2012, 2016), risk assessment approaches for semi-volatile pesticides (2009), and the evaluation of a chlorpyrifos-specific pharmacokinetic-pharmacodynamic (PBPK-PD) model (2011). The SAP's reports have offered numerous recommendations for additional study and sometimes conflicting advice for how the EPA should consider (or not consider) the epidemiology data in conducting the EPA's registration review human health risk assessment for chlorpyrifos.

Following a review of public comments on both the November 2015, proposal to revoke tolerances and the November 2016, notice of data availability, the EPA concluded that, despite several years of study, the science addressing neurodevelopment effects remained unresolved. Further evaluation of the science during the remaining time for completion of registration review is warranted to achieve greater certainty as to whether the potential exists for adverse neurodevelopmental effects to occur from current human exposures to chlorpyrifos.

The EPA is committed to resolving these questions through the registration review process, a Congressionally mandated program that re-evaluates all pesticides on a 15-year cycle. The EPA does not believe the FFDCA petition process should serve to truncate that review. Currently, chlorpyrifos remains registered as the registration review continues. The EPA will not complete the human health portion of the registration review or any associated tolerance

revocation of chlorpyrifos without first attempting to come to a clearer scientific resolution on those issues. Congress has provided that the EPA must complete registration review by October 1, 2022. All documents related to the registration review can be located in the chlorpyrifos registration review docket EPA-HQ-OPP-2008-0850 located at www.regulations.gov.

Sincerely,

Nancy B. Beck, Ph.D., DABT
Deputy Assistant Administrator