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REGISTRATION OF PESTICIDES BY EPA

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On behalf of Mr. Douglas Campt, Acting Director of the Registration Division, and Mr. Charles Smith of the Special Registrations Branch, I want to thank Dr. Byers for inviting us to meet with you at this symposium to consider current pesticide registration requirements, especially as they pertain to the use of rodenticides in orchards.

Perhaps I do not have to remind this group that man has, throughout history, competed with animal and insect pests in the cultivation and harvesting of his crops. On a worldwide basis, it is estimated that more than 1/5 of the foodstuffs planted by mankind every year never reaches the table because of pests and disease and that 33 million tons of cereal grains in storage are lost to rodents each year. In the 1920 Yearbook of Agriculture we read, "in a single county of Virginia, losses of orchard trees from depredations of pine mice were estimated at not less than \$200,000". Also in that same reference, "over 132,000 men working on foot and horseback distributed 1610 tons of poisoned grain on more than 32 million acres of farm and range land.----The resulting prairie dogs and ground squirrels effected a savings of \$11,000,000." The caption under a photograph in this same yearbook reads, "a campaign recently waged against rats in a small town in Virginia resulted in 30,000 tails being turned in as evidence of its success." Historically commensal and field rodents have plagued Virginia residents. It is my understanding that pine mouse control is the number one problem facing orchardists today. Through their incessant gnawing at underground lateral root systems of apple trees, the extent of damage is not readily determined and is therefore difficult to assess in terms of dollars lost. The need for effective field rodent control measures is recognized.

In recent years the farmers and orchardists have been able to use a variety of products to protect crops or reduce the amount of damage caused by insect and animal pests. Because of health and environmental concerns the Federal government has become involved in regulating pesticides. Congress passed the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) in 1947 to regulate the marketing of pesticides termed economic poisons. Federal registration of pesticides shipped across state lines was required. It became unlawful to sell unregistered pesticides that had been misbranded or adulterated in interstate commerce. EPA was established by Congress in 1970 and was charged with specific environmental tasks, including the regulation of pesticides. In 1972 FIFRA was amended to extend federal control to all pesticide products in the United States, both interstate and intrastate. This amendment provided for stronger enforcement measures, classification of pesticides and applicators, establishment registration and inspection, unlawful acts indemnification, stop sale orders, use or removal and penalties.