Message

From: Miller, David [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=FA0582F5BA6540C687844F9289A4F74F-DAVID J. MILLER]
Sent: 3/23/2020 5:19:23 PM
To: DavidJ Miller [Miller.DavidJ@epa.gov]
Subject: FW: Safe Fruits and Veggies: Food Network Article by Toby Amidor

---

From: Miller, David
Sent: Tuesday, August 06, 2019 4:20 PM
To: Villanueva, Philip <Villanueva.Philip@epa.gov>; Crowley, Matthew <Crowley.Matthew@epa.gov>; Schneider, Bernard A. <Schneider.Bernard@epa.gov>; OPP HED CEB <OPP_HED_CEB@epa.gov>; OPP HED TEB <OPP_HED_TEB@epa.gov>; Kramer, George <Kramer.George@epa.gov>
Subject: RE: Safe Fruits and Veggies: Food Network Article by Toby Amidor

Yes. As I said: if you don't like the answer to question, get them to ask a different question.

It seems that was done here by FFA.

David.

From: Villanueva, Philip <Villanueva.Philip@epa.gov>
Sent: Tuesday, August 06, 2019 4:16 PM
To: Miller, David <Miller.DavidJ@epa.gov>; Crowley, Matthew <Crowley.Matthew@epa.gov>; Schneider, Bernard A. <Schneider.Bernard@epa.gov>; OPP HED CEB <OPP_HED_CEB@epa.gov>; OPP HED TEB <OPP_HED_TEB@epa.gov>; Kramer, George <Kramer.George@epa.gov>
Subject: RE: Safe Fruits and Veggies: Food Network Article by Toby Amidor

Ex. 5 Deliberative Process (DP)

From: Miller, David <Miller.DavidJ@epa.gov>
Sent: Tuesday, August 06, 2019 4:10 PM
To: Villanueva, Philip <Villanueva.Philip@epa.gov>; Crowley, Matthew <Crowley.Matthew@epa.gov>; Schneider, Bernard A. <Schneider.Bernard@epa.gov>; OPP HED CEB <OPP_HED_CEB@epa.gov>; OPP HED TEB <OPP_HED_TEB@epa.gov>; Kramer, George <Kramer.George@epa.gov>
Subject: RE: Safe Fruits and Veggies: Food Network Article by Toby Amidor

Ex. 5 Deliberative Process (DP)

So in thinking about it a bit more, I realized that the FFA folks weren't considering the toxicity. They were just looking at whatever sample (here, for potatoes) had the highest concentration. And then calculating- on that basis – how many potatoes you could eat to reach the cPAD, aPAD, RfD, or whatever the relevant tox endpoint was. I think for

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

David.

From: Villanueva, Philip <Villanueva.Philip@epa.gov>
Sent: Tuesday, August 06, 2019 3:46 PM
To: Crowley, Matthew <Crowley.Matthew@epa.gov>; Miller, David <Miller.DavidJ@epa.gov>; Schneider, Bernard A. <Schneider.Bernard@epa.gov>; OPP HED CEB <OPP_HED_CEB@epa.gov>; OPP HED TEB <OPP_HED_TEB@epa.gov>; Kramer, George <Kramer.George@epa.gov>
Subject: RE: Safe Fruits and Veggies: Food Network Article by Toby Amidor

The FAQ for the calculator (https://www.safefruitsandveggies.com/calculator-faq/) indicates the tox values are from EPA.

> ***What exactly is the calculation used on your website to determine risk from pesticides?***
>
> *In this analysis, the toxicologists use a calculation involving: the "No Observed Adverse Effect Level" as established by the U.S. Environmental Protection Agency for the pesticide in question; the average body weight for each consumer group; the amount of pesticide measured by the USDA Pesticide Data program; and the serving size of the produce item adjusted for the age and size of the consumer.*

The "full report" (https://www.safefruitsandveggies.com/wp-content/uploads/2019/01/pesticides-in-perspective.pdf) doesn't give much more detail about where the NOAEL come from, but does provide summary tables (see below). Funny thing is the NOAEL associated with highest residue are generally lower (i.e., more toxic) for the "clean fifteen" compared to the "dirty dozen."

EFSA has a publicly-available tox database. I don't know how good it is, but it called OpenFoodTox: https://www.efsa.europa.eu/en/data/chemical-hazards-data. Apparently they collect the info from their risk assessments. The direct link is https://www.efsa.europa.eu/en/microstrategy/openfoodtox.

Servings of Fruits and Vegetables Equivalent to a NOAEL Dose at the Highest Reported Residues, USDA: Pesticide Data Program "DIRTY DOZEN"*

Commodity	Highest PDP Residue	Residue (ppm)	NOAEL Dose (mg/kg-bw/day)	Consumer	Body Weight (Kg)	Servings Equivalent to the NOAEL
Apple	Diphenylamine (DPA)+	4.2	10	Child (2-6y)	20	340
				Teen(12-19)	45	480
				Woman	60	860
				Man	70	1180
Blueberries	Iprodione	2.7	100	Child (2-5y)	20	5291
				Teen(12-19)	45	10582
				Woman	60	13228
				Man	70	18519
Canola	Linuron	0.65	20	Child (2-5y)	20	7240
				Teen(12-19)	45	14480
				Woman	60	18100
				Man	70	25339
Celery	Diclofen	1.5	50	Child (2-6y)	20	7843
				Teen(12-19)	45	14686
				Woman	60	19608
				Man	70	27451
Cherry	Tebuconazole	3	10	Child (2-6y)	20	478
				Teen(12-19)	45	852
				Woman	60	1195
				Man	70	1667
Cherry Tomatoes	Fludioxonil	2.3	3.7	Child (2-6y)	20	679
				Teen(12-19)	45	767
				Woman	60	946
				Man	70	1324
Cucumbers	Oxamyl oxime	1.7	0.1	Child (2-6y)	20	13
				Teen(12-19)	45	24
				Woman	60	30
				Man	70	42
Hot Peppers	Acephate	3.1	0.5	Child (2-6y)	20	108
				Teen(12-19)	45	216
				Woman	60	269
				Man	70	376
Kale/ Collard Greens	Permethrin	0.79	25	Child (2-6y)	20	7446
				Teen(12-19)	45	14892
				Woman	60	18616
				Man	70	26061
Lettuce (Conventional)	Propamocarb HCL	18	150	Child (2-5y)	20	1667
				Teen(12-19)	45	3333
				Woman	60	4167
				Man	70	5833
Lettuce (Organic)	Spinosad	0.4	2.68	Child (2-6y)	20	1340
				Teen(12-19)	45	2680
				Woman	60	3350
				Man	70	4690
Nectarine	Iprodione	8.2	100	Child (2-6y)	20	2304
				Teen(12-19)	45	4608
				Woman	60	5760
				Man	70	8064
Peaches	Iprodione	7.2	100	Child (2-6y)	20	1890
				Teen(12-19)	45	3779
				Woman	60	4724
				Man	70	6614
Pears	Diphenylamine (DPA)	5.6	2.5	Child (2-5y)	20	54
				Teen(12-19)	45	108
				Woman	60	135
				Man	70	223
Potato	Chlorpropham	23	250	Child (2-6y)	20	1468
				Teen(12-19)	45	2936
				Woman	60	3672
				Man	70	5141
Snap Peas	Acephate	2.6	0.5	Child (2-6y)	20	46
				Teen(12-19)	45	93
				Woman	60	116
				Man	70	162
Spinach	Permethrin	19	25	Child (2-6y)	20	310
				Teen(12-19)	45	619
				Woman	60	774
				Man	70	1084
Strawberry	Captan	7.5	10	Child (2-6y)	20	181
				Teen(12-19)	45	363
				Woman	60	454
				Man	70	636
Sweet Bell Pepper	Acephate	1.5	0.5	Child (2-6y)	20	78
				Teen(12-19)	45	157
				Woman	60	196
				Man	70	274

* EWG has included these commodities on current or past "dirty dozen" lists.

Servings of Fruits and Vegetables Equivalent to a NOAEL Dose at the Highest Reported Residues, USDA: Pesticide Data Program "CLEAN 15"*

Commodity	Highest PDP Residue	Residue (ppm)	NOAEL Dose (mg/kg-bw/day)	Consumer	Body Weight (Kg)	Servings Eqivalent to the NOAEL
Asparagus	Carbofuran	0.075	0.22	Child Teen Woman Man	20 40 60 70	690 1380 1725 2416
Avocado	Imiprothrin (+)	0.2	5	Child Teen Woman Man	20 40 60 70	3571 7143 8929 12500
Cabbage	Imidacloprid	0.13	14	Child Teen Woman Man	20 40 60 70	25339 50679 63348 88688
Cantaloupe	Oxamyl oxime	0.24	0.1	Child Teen Woman Man	20 40 60 70	60 119 149 208
Cauliflower	Deltamethrin	0.041	1	Child Teen Woman Man	20 40 60 70	6739 11478 14347 20086
Eggplant	Acephate	0.7	0.5	Child Teen Woman Man	20 40 60 70	168 336 420 588
Grapefruit	Imazalil	0.067	1.25	Child Teen Woman Man	20 40 60 70	2665 5330 6663 9328
Mangoes	Thiabendazole	1.5	10	Child Teen Woman Man	20 40 60 70	952 1905 2381 3333
Onion	Boscalid	0.034	4.4	Child Teen Woman Man	20 40 60 70	30450 60900 76126 106574
Papaya	Boscalid	0.075	4.4	Child Teen Woman Man	20 40 60 70	8381 16762 20952 29333
Pineapples	Carbaryl	0.11	9.6	Child Teen Woman Man	20 40 60 70	12466 24935 31169 43636
Sweet corn	Acephate	0.004	0.5	Child Teen Woman Man	20 40 60 70	29412 58824 73529 102941
Sweet potatoes	Dicloran	3.7	50	Child Teen Woman Man	20 40 60 70	2467 4914 6143 8600
Sweet peas (frozen)	Dimethoate	0.005	0.05	Child Teen Woman Man	20 40 50 70	2353 4706 5882 8235

* EWG has included these commodities on current or past "clean 15" lists.

From: Crowley, Matthew <Crowley.Matthew@epa.gov>
Sent: Tuesday, August 06, 2019 12:32 PM
To: Miller, David <Miller.DavidJ@epa.gov>; Schneider, Bernard A. <Schneider.Bernard@epa.gov>; OPP HED CEB <OPP_HED_CEB@epa.gov>; OPP HED TEB <OPP_HED_TEB@epa.gov>; Kramer, George <Kramer.George@epa.gov>
Subject: RE: Safe Fruits and Veggies: Food Network Article by Toby Amidor

Yea, would be interesting to see it flipped to the perspective of highest toxicity rather than from the perspective of highest residue.

And I'd love to know what toxicity database is underlying the calcs. Theres no good publicly-available pesticide one.

From: Miller, David <Miller.DavidJ@epa.gov>
Sent: Tuesday, August 06, 2019 12:22 PM
To: Schneider, Bernard A. <Schneider.Bernard@epa.gov>; OPP HED CEB <OPP_HED_CEB@epa.gov>; OPP HED TEB <OPP_HED_TEB@epa.gov>; Kramer, George <Kramer.George@epa.gov>
Subject: RE: Safe Fruits and Veggies: Food Network Article by Toby Amidor

Thanks, Bernie.

I remember this coming out a number of years back and being very disappointed in how misleading the calculator was in only telling you (literally) half the story.

David.

From: Schneider, Bernard A. <Schneider.Bernard@epa.gov>
Sent: Tuesday, August 06, 2019 11:32 AM
To: OPP HED CEB <OPP_HED_CEB@epa.gov>; OPP HED TEB <OPP_HED_TEB@epa.gov>; Kramer, George <Kramer.George@epa.gov>
Cc: Schneider, Bernard A. <Schneider.Bernard@epa.gov>
Subject: Fw: Safe Fruits and Veggies: Food Network Article by Toby Amidor

Bernard A. Schneider, Ph.D, Environmental Scientist
US EPA/OPP/HED
schneider.bernard@epa.gov

From: Alliance for Food and Farming <rgong@foodandfarming.info>
Sent: Tuesday, August 6, 2019 11:00 AM
To: Schneider, Bernard A. <Schneider.Bernard@epa.gov>
Subject: Safe Fruits and Veggies: Food Network Article by Toby Amidor

Email not displaying correctly?
View it in your browser.

SafeFruitsandVeggies.com

A resource for science-based information about the safety of organic and conventional produce

News and Updates

Amidor's Food Network Article Helps Guide Healthy Choices

Toby Amidor, MS, RD, CDN, and a participant in the Alliance for Food and Farming's first-ever Produce Safety Media Tour in 2017, wrote an article for Food Network to help consumers make the right shopping choices for themselves and their families in the produce aisle. Toby's article provides information on organic certification, nutrition of organic and conventionally grown fruits and veggies as well as produce safety. Toby also included this information:

"If you want to see how much pesticide residue the food you're choosing to eat has, you can try this pesticide residue calculator from the Alliance for Food and Farming. For example, if you select spinach, you'll find that you need to eat 773 servings in one day without any effect — even if the spinach has the highest pesticide residue recorded for spinach by the USDA. For strawberries, it's 453 servings in one day. Given that most Americans don't even meet their daily recommended amounts of fruits and vegetables, it's highly unlikely that you'll even come close to consuming this amount!"

Thanks Toby for including the safefruitsandveggies.com calculator in your article and providing helpful information to consumers to reassure them about the safety of organic and conventionally grown produce.

This update was distributed by the Alliance for Food and Farming.

For more information, please contact:

Teresa Thorne: tthorne@foodandfarming.info

Forward to Friend

Copyright © 2019 Alliance for Food and Farming. All rights reserved.

On our media list.

Our mailing address is:

Alliance for Food and Farming

P.O. Box 2747

Watsonville, CA 95077

Add us to your address book

unsubscribe from this list | update subscription preferences