MCTF Pesticide Selection Subcommittee: Final Meeting

This file presents the six recommendations prepared and voted on by the MCTF Pesticide Selection Subcommittee and the voting results:

Directive 1:

The MCTF shall make recommendations regarding "identifying known ingredients in pesticide products used for mosquito control, analyzing the ability, or lack of ability, to identify such ingredients, and making recommendations for determining such ingredients."

Recommendation PS-1: Active Ingredients

Background

Pesticide formulations generally consist of two types of ingredients: active ingredients and "inert" ingredients. Active ingredients are those chemicals in a formulation that have pesticidal action against a target pest. Pesticidal action may include killing the pest, repelling it, deterring feeding, or otherwise mitigating the pest. Synergists, a subcategory of active ingredients, enhance the pesticidal action of another active ingredient in the formulation. The synergist piperonyl butoxide (PBO) is a common ingredient in mosquito adulticide formulations containing pyrethroid or pyrethrum/pyrethrin ingredients.

Active ingredients, including synergists, are required by federal law to be listed on pesticide labels. The MCTF Pesticide Selection Subcommittee found no evidence of active ingredients not being identified on labels of registered pesticides.

Recommendation and Rationale

The MCTF Pesticide Selection Subcommittee makes no recommendation relative to additional active ingredient disclosure beyond what is currently required. Subcommittee members unanimously agreed that the identity of active ingredients, including synergists, is adequately addressed through the current federal and state regulatory programs and processes.

Voting Results

- All seven subcommittee members supported this recommendation.

Directive 1:

The MCTF shall make recommendations regarding "identifying known ingredients in pesticide products used for mosquito control, analyzing the ability, or lack of ability, to identify such ingredients, and making recommendations for determining such ingredients."

Recommendation PS-2: Inert Ingredients (Option 1)

Background

Pesticide formulations generally consist of two types of ingredients: active ingredients and "inert" ingredients. Inert ingredients are those chemicals in a pesticide formulation without intended pesticidal action. They are sometimes referred to as "other" ingredients on pesticide labels. These inert ingredients may include adjuvants, drift retardants, solvents, fragrances, etc. Inert ingredients are not necessarily toxicologically inert, and may pose risks to human or ecological health. EPA categorizes inert ingredients based on their use and toxicological profile (https://www.epa.gov/pesticide-registration/categorized-lists-inert-ingredients-old-lists).

Inert ingredients are considered to be Confidential Business Information (CBI) and are often not listed on the label. In some situations, the disclosure of inert ingredients can be used by competitors to recreate a formulation. This creates an issue with regulatory/government review of pesticides as some agencies do not have the ability to protect submitted information from public records/freedom of information laws. While EPA has the ability to review inert ingredients as part of registration without disclosing CBI, this has not typically been the case in Massachusetts. The Pesticide Board Subcommittee does not have the ability to protect CBI from public disclosure, but other Massachusetts agencies reportedly do have this ability.

Recommendation and Rationale

The MCTF Pesticide Selection Subcommittee critically evaluated the current EPA process for reviewing inert ingredients; and the majority of the Subcommittee felt that EPA's review is adequate and recommended that no further action is necessary.

These Subcommittee members acknowledged that Massachusetts is a relatively small market for mosquito pesticides. If faced with public disclosure of CBI, many companies would simply choose not to register products in the state. CBI is typically a larger issue with newer products, many of which offer health, efficacy, and environmental safety advantages over older products. As such, it will often be in the best interest of the Commonwealth to be able to protect CBI.

Voting Results

- Five subcommittee members supported this recommendation.
- Two subcommittee members did not support this recommendation. The reasons for the dissenting opinions were:

- One felt that additional checks and balances on EPA review were necessary. This is because the state of Massachusetts often regulates chemicals more stringently (and in a more precautious manner) than the federal government does. Refer to recommendation PS-3 for further information. (Note: The MCTF Pesticide Selection Subcommittee members unanimously agreed that concerns about CBI claims relative to inert ingredients is often justified. If the Task Force is to move forward with recommendation PS-3, which calls for a state agency to review inert ingredients, then this should be accompanied by a recommendation that legislation be enacted to protect inert ingredients from disclosure under Massachusetts Public Records law.)
- Another felt that this had been a long-standing issue and concern, particularly from the environmental community. It remains to be seen if a review of mosquito control pesticides will be done at the state level (outside of the Pesticide Board Subcommittee). If it is, it would seem prudent to provide whoever is doing this review with the ability to review inert ingredients as well, so long as CBI can be protected under the Massachusetts Public Records Law.

Directive:

The MCTF shall make recommendations regarding "identifying known ingredients in pesticide products used for mosquito control, analyzing the ability, or lack of ability, to identify such ingredients, and making recommendations for determining such ingredients."

Recommendation PS-3: Inert Ingredients (Option 2)

Background:

There are currently 4,555 chemicals or substances approved as inert ingredients by the EPA for "Food and Nonfood Use" or "Nonfood Use Only" (EPA InertFinder; https://ordspub.epa.gov/ords/pesticides/f?p=INERTFINDER:1:0::NO:1::). These lists contain substances reviewed by the EPA Integrated Risk Information System (IRIS) and found to be carcinogenic, compounds that are regulated by the Safe Drinking Water Act (SDWA) and the Clean Water Act (CWA), and compounds subject to the Massachusetts Toxic Use Reduction Act. It also contains fluorinated compounds such as para-chlorobenzotrifluoride (a compound designated by the state of California, but not the EPA, to cause cancer).

EPA sets minimum standards the states must adopt, although states have the ability to set stricter standards. Massachusetts regulates several chemicals under the CWA and the SDWA at more stringent levels than EPA guidelines. These include two chemicals with lower (more stringent) drinking water maximum contaminant Levels (MCLs) compared with EPA guidelines (Perchlorate and PFAS6) and at least 24 chemicals that have lower (more stringent) water quality standards for surface water contamination compared to EPA guidelines. These examples provide evidence that the Commonwealth of Massachusetts takes additional considerations into account when setting chemical regulations compared with the EPA.[1] With this in mind, the Commonwealth of Massachusetts should not defer to EPA's approval when it comes to the over 4,500 inert ingredients currently registered for use in the US.

Currently the Massachusetts Pesticide Board, Pesticide Board Subcommittee, established by the Massachusetts Pesticide Control Act of 1978, reviews pesticide products for registration in Massachusetts. This Pesticide Board Subcommittee consists of the following members: MDAR (Massachusetts Department of Agricultural Resources), MDCR (Massachusetts Department of Conservation and Recreation), MDPH (Massachusetts Department of Public Health, the Director of Division of Food and Drug (within MDPH) and a commercial applicator appointed by the Governor. This board is a public body and subject to Open Meeting Law (although the Pesticide Board can hold an executive session which appears to be a closed meeting). Therefore, there is

[1] A couple MCTF Pesticide Selection Subcommittee members have expressed concern that Massachusetts does not have as robust a regulatory process for evaluating and setting standards for contaminants as EPA's process and EPA's process should be followed. One member stated that different states setting different standards creates challenges for the regulated community.

concern that if pesticide registrants include inert ingredient lists and percentages in their application, it would be made public. However, applications are sent to MDAR which initially reviews the application for administrative and technical aspects. It does not appear that MDAR's technical review is subject to Open Meeting Law, only the information that is presented to the Pesticide Board Subcommittee. It could be possible for MDAR or another body to review the inert ingredients for toxicological considerations and keep CBI confidential. They would only be able to present general information to the Pesticide Board Subcommittee such as a general decision on whether the inert ingredients were safe or not safe for application according to the label.

Recommendation and Rationale:

This recommendation is to update/amend the appropriate state law and provide appropriations and resources so the following changes can be made:

- The makeup of the Pesticide Board Subcommittee will be amended to include the Massachusetts Department of Environmental Protection (MassDEP) as MassDEP is the agency responsible for setting regulatory standards for surface and drinking waters and is responsible for regulating toxic substances. MassDEP is often consulted on matters related to the Pesticide Board Subcommittee and this would formalize their involvement. If the creation of a board with an even number of members is seen as problematic, an additional public member may be added to the Pesticide Board Subcommittee.

- Require that pesticide registrants, starting with the mosquito control products, to include information about inert ingredients and their percentages in their product registration applications. This information will be reviewed in a confidential manner by the MDAR and as needed, by MassDEP. These agencies will present only general information about the overall hazard assessments of the inert ingredients during an open meeting of the Pesticide Board Subcommittee so that they do not disclose confidential business information.

All information that is protected as confidential business information under FIFRA, section 10, will also be protected during the Massachusetts product registration process.

Voting Results

- Two subcommittee members supported this recommendation.
- Five subcommittee members did not support this recommendation.

Directive:

The MCTF shall make recommendations regarding "promoting the use of the safest or minimum risk pesticides feasible."

Recommendation PS-4: Selecting Pesticides and Ensuring a Transparent Selection Process

Introduction

The MCTF Pesticide Selection Subcommittee has been charged with providing guidance on "promoting the use of the safest or minimum risk pesticides feasible."

From a technical/scientific perspective, the MCTF Pesticide Selection Subcommittee does not feel this language of the charge is appropriate for several reasons:

1. Risk communicators and regulators have long eschewed the use of the word "safe" as it is an imprecise/subjective term often interpreted by the public to mean that no precautions are necessary.

2. "Minimum Risk" is a preferable term, but still simplifies the dynamic of choosing the most appropriate pesticide. For instance, it does not acknowledge that pesticides may pose a relatively low risk in one area (for instance human health) and a greater risk in another (for instance pollinators).

3. The charge ignores the fact that efficacy must be a consideration in choosing a pesticide. Pesticides are registered based on benefit and risk. If a pesticide is not efficacious, then the risk is unacceptable. As worded, garlic-based products would score highly on a list of preferable products, despite a consensus among mosquito management professionals that garlic (and most 25B products) have very limited efficacy.

4. Use patterns and application methods (ultra-low volume, barrier applications, etc.), site of application (water, playgrounds, etc.), and even the level of licensure of the applicator have significant implications on the benefits and risks that might result by the use of a pesticide. The charge ignores this fact.

The MCTF Pesticide Selection Subcommittee has redefined its charge to meet what we collectively believe to be the intent and spirit of the original language. We have been operating under the following:

When a pesticide is considered justified from those products already registered by EPA and the Pesticide Board Subcommittee, applicators shall select formulations and manner of their application that will be deemed efficacious, practical, and pose more benefit than risk to human health while minimizing non-target effects.

Background

Stakeholders (including the public, elected officials, and environmental groups) may be unfamiliar with the pesticide registration and selection process, which leads them to believe there is no scientific basis for pesticide selection. The risk from a pesticide depends on exposure and toxicity. Human and environmental health must be considered when selecting a pesticide for use. The biology and lifecycle of mosquitoes, as well as their habitat, spatial and temporal abundance, and their capacity to transmit pathogens must also be considered.

The existing active ingredients for mosquito control are quite limited. In relation to agriculture, mosquito control is a small market and new active ingredients are not often formulated or sold. This leaves mosquito control districts with limited options for product selection.

While there is a formalized process for registering pesticides by EPA and the Commonwealth of Massachusetts, many are not aware of these processes because the information is not centralized in one location, like a website. Stakeholders would need to search multiple sites to find the information necessary to understand the process. Following a product's federal registration, the current process for registration in Massachusetts requires the Pesticide Board Subcommittee approval, as outlined in M.G.L.c 132B and CMR 333. The five-member Pesticide Board Subcommittee is Chaired by the Director of the Food Protection Program within the Department of Public Health, with the other four members consisting of representatives of the Department of Agricultural Resources, Department of Conservation and Recreation, Department of Public Health, and a Commercial Pesticide Applicator appointed by the Governor. The Pesticide Board Subcommittee is responsible for registering all pesticides for use in the Commonwealth. The Massachusetts Pesticide Board Subcommittee is also responsible for reviewing new active ingredients and issuing all experimental use permits.

Describing the manner by which pesticides are registered and selected may better satisfy the desires of persons and organizations who seek such information. It may also promote and encourage consistency on selection of mosquito control products, whether such products are used on behalf of the Commonwealth or by commercial applicators. Currently the SRB relies on several state agencies to review and provide their opinion on products used for aerial adulticiding applications in the event of a declared public health emergency. These agencies include DPH, DFW-NHESP Division, DEP, MDAR and DMF (Division of Marine Fisheries). DFW-NHESP Division currently reviews and provides guidance on all pesticides used by MCDs in the Commonwealth within sensitive areas.

Recommendation and Rationale

All pesticides used by the Commonwealth's organized mosquito control districts and the "SRB" are reviewed by EPA and are federally registered; and approved for use by the Commonwealth's Pesticide Board Subcommittee as outlined in M.G.L.c 132B and 333 CMR. In keeping with best practices and acknowledging concerns by some stakeholders that these

reviews are not sufficient, the "SRB" or a new subcommittee established by the "SRB" will further review pesticide products used in the management of mosquito populations. This new subcommittee should include DPH, DFW-NHESP Division, DEP, MDAR, DMF (Division of Marine Fisheries), and a representative from an MCD. Each representative will review the products from their Agency's purview. The MCD representative will provide information on how, where, and when the pesticides may be used based on the labels to help in the review. Review shall include but not be limited to: ensuring adequate protections of surface and groundwaters of the Commonwealth, public water supplies, aquatic organisms, and endangered species; and consideration of toxicity of active ingredients, the potential for synergists to amplify the toxicity of pesticides already in the environment, risk assessment, and benefit to public health. This formalized review of products will be conducted when deemed necessary. When a pesticide is reviewed, formulations and manner of application will be considered and recommendations will be made if the pesticide is deemed efficacious, practical, and pose more benefit to human health than risk to human health and the environment.

Once pesticide products are reviewed, they are included in the statewide Mosquito Management plan, which specifies factors that are considered in the process of selecting pesticides used to control mosquitoes. An opportunity for public comment should be provided before this Mosquito Management plan is finalized. Agencies will read and consider comments, but will not be bound to incorporate all suggestions. The statewide Mosquito Management plan will be freely available and discoverable on a centralized statewide mosquito control website. The centralized website will also contain a summary of the pesticide registration and approval processes of the EPA and Massachusetts Pesticide Board Subcommittee.

<u>Voting Results</u>

- Four subcommittee members supported this recommendation.
- Two subcommittee members did not support this recommendation.
- One subcommittee member abstained.

Directive:

The MCTF shall make recommendations regarding "promoting the use of the safest or minimum risk pesticides feasible."

Recommendation PS-6: Consideration of Novel Risk/Exposure Scenarios

Background:

Pesticides are registered by the EPA and Pesticide Board Subcommittee. They are typically evaluated against a registration standard – a standard battery of various studies focused on toxicology and environmental fate that are meant to provide data on the potential risks to human health and the environment posed by the use of a chemical. The requirements may vary between products and are determined by pesticide category and intended use. For instance, if a pesticide is to be used on food, this triggers different studies in the registration standard. While a baseline, the registration standard cannot be expected to capture every potential scenario or risk.

Limitations to the registration standard include:

- 3rd party studies are seldom available with the initial registration of a pesticide as the chemical has typically not been previously in use. While re-registration decision-making does take into account third party studies, studies are often not of a quality or design so as to be useful.
- The registration standard cannot take into account every possible species or ecosystem. In some cases, the combination of a particular species and ecosystem might result in a risk that was unanticipated in the normal course of registration/consideration.
- No standard can take into account every possible scenario by which a pesticide might cause harm. There are occasionally pathways or exposure scenarios which were not anticipated and are perhaps deserving of review in making decisions on use. In some cases, these scenarios may be particular to a given geography or ecosystem, often "novel" rather than widespread.

As an example, this MCTF Pesticide Selection Subcommittee has discussed concern associated with an exposure scenario related to the piperonyl butoxide (PBO). Previous studies have indicated that insecticide formulations that include the PBO synergist can cause increased toxicity of pyrethroid insecticides already present in the receiving waters and their sediments. This was the major finding of a 2006 study that sampled water and sediments in Sacramento, California, following aerial application of pyrethrins + PBO. PBO persisted for at least three days post spraying (sampling did not occur beyond three days) and the levels of PBO present synergized other pyrethroids, including bifenthrin, that were already present in the sediments.

This example is interesting as it points out an exposure scenario that is not typically considered in the registration process as it involves multiple application methods, multiple active ingredients (pyrethroids and PBO), and a medium not typically monitored in studies required for registration. Many other researchers have put forward such scenarios where they believe particular risks have been unaccounted for in the registration process or relating to the choice of a pesticide – synergies, particularly susceptible species, groundwater hydrology, indoor air impacts, etc.

Given that mosquito pesticides are applied by the government, over wide areas of land and very often on private property, a higher standard of consideration is warranted.

Recommendation and Rationale:

While it is beyond the scope, charge, and expertise of the MCTF Pesticide Selection Subcommittee to recommend that this particular exposure scenario be considered in choosing and/or limiting pesticides used for mosquito applications, we do recommend that whatever group is charged with choosing mosquito pesticides to be used in the Commonwealth consciously create a process where novel or otherwise unaccounted for risks can be put forward for consideration in the process. The technical experts in this group should be charged first with evaluating the validity and strength of the proposed concern. If it is deemed significant, the risk or concern should become part of the decision-making process.

Many of the novel exposures and risks that will be considered in the "process" will be emerging concerns among scientists and the public and may have only preliminary data available and not enough evidence to warrant changes in pesticide selection. Therefore, the MCTF Pesticide Selection Subcommittee also recommends that the Legislature create a line item in the budget specific to funding pilot studies to further investigate concerns about potential novel exposures and risks. The pesticide selection board could consider regular (annual or biannual) calls for proposals where scientists could propose studies to investigate an emerging concern or requests for proposals on specific topics as they arise.

Voting Results

- Five subcommittee members supported this recommendation.
- Two subcommittee members did not support this recommendation.

Directive:

Make recommendations regarding "employing methods, including product disclosures or implementation of testing protocols and procedures, to avoid the use of pesticides containing per- and polyfluoroalkyl substances (PFAS)."

Recommendation PS-7: Avoiding Use of Pesticides Containing PFAS and Other Contaminants

Background:

Concern about the impact that PFAS compounds have on human health and the environment has increased in the last decade. Massachusetts has been proactive in regulating PFAS in drinking water and groundwater by setting a Massachusetts Maximum Contaminant Level of 20 parts per trillion (ppt) for the sum of six PFAS compounds (PFAS6), as well as classifying PFAS as a hazardous material under MGL 21E and the Massachusetts Contingency Plan. PFAS are ubiquitous, they are persistent, and sampling conducted throughout the Commonwealth shows their presence in rivers, groundwater, soils, drinking water sources (both public and private), wastewater discharges, and biosolids.[2]

In September 2020, Public Employees for Environmental Responsibility (PEER) notified the Commonwealth and the United States Environmental Protection Agency's (EPA) Region 1 office that sampling they conducted indicated the presence of PFAS in Anvil 10+10. Follow up sampling conducted by MassDEP and EPA confirmed the presence of PFAS in the pesticide. "In response to public interest in PFAS chemicals, the EPA Office of Pesticide Programs previously determined that there were no pesticide active or inert ingredients with structures similar to prominent PFAS such as PFOS, PFOA, and GenX."[3] After further investigation it was determined that the PFAS was not part of the product formulation, but rather PFAS was leaching from the containers that the pesticide was distributed in.[4] EPA confirmed that it "detected eight different PFAS from the fluorinated HDPE containers, with levels ranging from 20-50 parts per billion,"[5] which is quite a bit higher than the Massachusetts Maximum Contaminant Level of 20 ppt. Given that we are still trying to understand PFAS fate and transport in the environment, seeing levels as high as they were causes concern about the potential impact previous applications of those pesticides could have had on groundwater and surface waters of the Commonwealth. EPA and the manufacturer responded swiftly to the detection of PFAS in Anvil 10+10; EPA encouraged states not to use the impacted product and to return it to the manufacturer. Recognizing the importance of addressing concerns related to PFAS across many regulatory programs, EPA released a strategic roadmap for actions they will be taking relative to PFAS;

[2] https://www.mass.gov/info-details/per-and-polyfluoroalkyl-substances-pfas
[3] https://www.epa.gov/pesticides/updates-epa-efforts-address-pfas-pesticide-packaging#:~:text=To%20date%2C%20the%20only%20PFAS,(Anvil%2010%2D10).
[4] https://www.epa.gov/pesticides/pfas-packaging
[5] https://www.epa.gov/pesticides/pfas-packaging#info

Massachusetts should monitor the process closely and respond accordingly as new information emerges.

Scientific research on PFAS is rapidly evolving, as is the ability to detect these compounds in various media. EPA released a draft method for sample analysis of PFAS in oily matrix. In addition, EPA is currently evaluating chemical structures and applying the working definition from EPA's Office of Pollution Prevention and Toxics (OPPT). EPA states: "Under FIFRA Section 6(a)(2), pesticide registrants should report to EPA additional factual information on unreasonable adverse effects, including metabolites, degradates, and impurities (such as PFAS). EPA considers any level of PFAS to be potentially toxicologically significant and may trigger 159.179(b) in the Code of Federal Regulations (CFR)."[6] MDAR reports that the Pesticide Board Subcommittee is reviewing PFAS concerns and may make recommendations related to adopting EPA's working definition.

Finding PFAS in pesticides that do not have these chemicals in their formulations raises the question of how the Commonwealth can ensure that other "contaminants" are not inadvertently introduced to the environment through the application of pesticides. The MCTF Pesticide Selection Subcommittee recognizes that while PFAS is the current focus, the Commonwealth should be prepared for other emerging contaminants, especially those that are persistent and bioaccumulative, and proactively have a plan to address any concerns. Source control is an important measure to ensure that inadvertent contamination of our drinking water sources and the environment does not occur.

<u>Recommendation:</u>

To avoid use of pesticides containing PFAS and other contaminants, the MCTF Pesticide Selection Subcommittee makes several recommendations. The text below directs these recommendations to whatever body reviews mosquito pesticides for use in Massachusetts. The recommendations are:

- As analytical capabilities evolve, the Pesticide Board Subcommittee should have methods available to ensure pesticide products registered in Massachusetts are not contaminated with PFAS or emerging contaminants of concern as identified by EPA or the United States Geological Survey. The MCTF Pesticide Selection Subcommittee understands there are complexities and costs associated with testing products for use in the Commonwealth. Some considerations to be discussed are the extent and frequency of testing (e.g., is it every lot, is it each method of delivery, is it annually or just newly registered pesticides, who is responsible for undertaking the testing, who is responsible for paying for the testing). We also recognize that the charge of this Task Force is specific to mosquito control, but some members of the MCTF Pesticide Selection Subcommittee have concern that all pesticide products registered in Massachusetts

[6] https://www.epa.gov/pesticides/pfas-packaging#info

should be under evaluation. The Commonwealth could institute producer certification requirements, or require the manufacturers to submit sampling results, or the Commonwealth could undertake the sampling and analysis on its own, but additional financial and personnel resources would need to be provided to any Massachusetts agency tasked with that effort, not only to collect samples but also to interpret results.

- The MCTF Pesticide Selection Subcommittee is concerned about the old adage: "You don't know what you don't know." We have a desire for the Commonwealth to be proactive, rather than reactive in identifying pesticides that might have unintended properties. While we are currently focused on PFAS, there may be other characteristics, such as pesticides that might have endocrine disrupting properties, which the Pesticide Board Subcommittee may want to look at. Pesticides registered for use in Massachusetts could be required to have bioassay screening which can pick up on emerging contaminants or undesirable compounds, without requiring manufacturers to disclose inert ingredients which could compromise Confidential Business Information. Bioassay screening could utilize high-throughput in vitro assays such as those developed and promoted by the federal Tox21 program (tox21.gov) and offered as services by toxicology testing contractor companies. Additional financial and personnel resources would need to be provided to the Pesticide Board Subcommittee to accomplish such an evaluation.

- The Pesticide Board Subcommittee, a subcommittee of the SRB, or the appropriate entity should prevent the use, through a "stop sale" or "stop use" order, of any pesticides where PFAS or emerging contaminants of concern have been detected as an active or inert ingredient or a contaminant in the product. This issue should be raised with the Legislature's Interagency PFAS Task Force which may have recommendations related to PFAS source control in the Commonwealth. An outright ban on the sale or use of pesticides that contain PFAS might need to be implemented through legislative action. There is pending legislation to ban the use of PFAS in consumer products and food packaging; pesticides could be added to that pending legislation.

- The Pesticide Board Subcommittee should define or categorize "persistence," as it relates to pesticides. Understanding that persistence may be a desirable trait in some pesticide products; the Pesticide Board Subcommittee should have a process to evaluate where persistence might be a concern and they should take appropriate action to restrict use of such products in Massachusetts.

- EPA continues to evaluate what universe of chemicals are considered to be PFAS as it relates to pesticides. If EPA determines that any pesticides have active ingredients that fall into a current or revised PFAS definition, Massachusetts must make appropriate registration decisions, including evaluating whether substances should be added to the Groundwater Protection List.

Voting Results

- Four subcommittee members supported this recommendation.
- Three subcommittee members did not support this recommendation.