

## Readers Respond

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*I feel kind of funny asking a Cornell researcher to show us the science first, before we make public policy decisions that will have cataclysmic impact on our lives and our environment.*

—Larry Wilson



# Regarding The Precautionary Principle

*To the Editor,*

In the Winter 2004 issue of *CUTT* appeared an article written by Suzanne M. Snedeker, Ph.D. entitled "Do No Harm: The Precautionary Principle". The article cites precedent for applying the precautionary principle and points out that the recent legislation in Canada was based on precautionary policy. It is pretty much unanimous among those working in commercial horticulture in New York State that the recent Canadian laws go too far, some of them banning all chemicals used outdoors on lawns and ornamentals. Ms. Snedeker sort of glosses over the impact that similar laws would have on our industry in New York and attempts to put a happy face on the impact by telling us that our industry could find new products. We are doing that at present, although getting new products registered in New York is like moving a mountain.

Ms. Snedeker proceeds to criticize the criticisms that she raises to the precautionary principle. The criticism that The Precautionary Principle is not science based is all too apparent. The chemicals that lawn care relies upon are probably some of the most scrutinized chemicals ever conceived. Most of them have been around for decades, and have withstood countless studies, many by Cornell University researchers. It's nice that she acknowledges that "evaluations by independent agencies and researchers are *also important*."

When Ms. Snedeker mentions "policy makers", bells start to ring. Too many policy makers that I have spoken with have admitted that on many key pieces of pesticide legislation passed in New York in recent memory, that decisions were made on a *political basis*. When neighbor notification passed in the New York State Assembly, it passed *unanimously*. Does anybody think that all 150 Assembly members can be unanimous about anything on ideological merit? As we informally polled the Assembly later, we found that a startling number of legislators voted for it due to political concerns, many knew little about it. Ms. Snedeker is correct when she writes that "action should not be taken on a perceived risk."

We wish! Unfortunately, that is precisely what is happening, and the precautionary principle will only add fuel to the fire.

Another criticism of the precautionary principle, that Ms. Snedeker discounts as well, is that the risk assessment procedure takes too long. Without even examining *why* that is true, we get to the heart of the matter. After undergoing the five or ten year testing period as cited by Ms. Snedeker, as the chemicals that we use *have*; after undergoing study by independent researchers all over the world, should they be removed from the manufacturing stream as a precaution? She makes a case for doing just that. I disagree with that premise and when you begin to use the precautionary principle for making policy decisions on chemical use, as has been seen in Canada, I think that everyone engaged in commercial horticulture in New York State should sit up and take notice, we are talking about the demise of our industry.

We applaud you and your department for presenting sound scientific information to our industry on the products that we use. I have always respected your wish to remain distant from the realm of public policy when making judgments about the impacts upon Integrated Pest Management made by various public policy issues. While we commend her scrutiny of methyl-bromide in previous articles, Ms. Snedeker's apparent endorsement of the use of the precautionary principle in public policy decisions seems like a departure of sorts from what we have seen from Cornell. The public policy arena is a very complicated place where science sometimes gets hijacked for political purposes. I feel kind of funny asking a Cornell researcher to show us the science first, before we make public policy decisions that will have cataclysmic impact on our lives and our environment. So be it.

Thank you again!

Larry Wilson, Chairman

New York Alliance For Environmental Concerns

*Dr. Snedeker responds:*

*Dear Mr. Wilson,*

Dr. Frank Rossi, editor of *CUTT* was kind enough to forward a copy of your letter written in response to the article I wrote on the Precautionary Principle which appeared in the Winter 2004 issue. The article that ran in *CUTT*, was a shorter version of a more in-depth article I had written entitled "What is the Precautionary Principle? How is it taking shape nationally and globally?" which appeared in vol. 8 no. 3, 2003 edition of *The Ribbon* newsletter (see <http://envirocancer.cornell.edu/Newsletter/General/v8i3/precautionary.cfm>).

I encourage you to read the entire text of the original article. The major themes covered in the original article included the history of the precautionary principle (which also appeared in the *CUTT* version), and how policy based on the precautionary principle was in the process of being enacted in Europe. Unfortunately, this portion did not appear in the *CUTT* version. This is important, since I was trying to show how the science-based policy that requires a scientific risk assessment was an important element of regulatory action based on the precautionary principle in Europe. I attended a talk by the Danish Minister of the Environment in December 2002 outlining the European approach, and was impressed with the requirement to conduct full-risk assessments as part of the proposed European Union policy on the regulation of new and old chemicals.

I fully agree with you that regulatory decisions can't be made based purely on politics. The entire point of my article, which I am sorry I did not convey as fully as I had hoped, is that the precautionary principle must be science-based, and using a precautionary approach does not eliminate the need for risk assessments. As I mentioned in the article, invoking "monsters under the bed" is criticism and a potential pitfall of the precautionary principle when a science-based approach is not used. Again, I emphasized "the precautionary approach does not eliminate the need for assessing harmful effects of chemicals. The definitions of the precautionary principle outlined earlier in this article do have the common element that precautionary action should be taken when there is credible, scientific evidence of harm. Action should not be taken because of a perceived risk." If the legislation being considered or enacted in Canada is based on a perceived risk, then I share your concern of such regulatory action. It must be

science based, and based on evidence of harm due to exposure to the chemical(s) in question. On this point, we are in agreement.

The entire point of my article was to pull away from "catchy phrases" and to put the precautionary principle in a science-based context, to show that when used in this way it can be effective, as I outlined in my examples of regulations and policy being proposed in Europe as well as in U.S. legislation. I would disagree with your letter that I advocated that chemicals whose risk is well characterized that do not show evidence of harm should be removed from the manufacturing stream. But, the absence of studies does not show an absence of risk. In all cases, risk assessments are needed.

Again, numerous times I emphasized in my article that there needs to be credible evidence of harm to invoke regulatory action based on the precautionary principle. You say, "show the science first;" I could not agree more. That is my point. That is the reason I wrote the article to educate those who have misconceptions about the precautionary principle, that it can be based on a perceived risk. It cannot by any of the definitions I outlined, and this certainly is not how it is being used in Europe. Perhaps we have much to learn from our neighbors across the Atlantic.

Another paragraph not in the *CUTT* article was a summary of the *Canadian Healthy Lawn Program* developed through collaboration between Health Canada's Pest Management Regulatory Agency and provincial and territorial governments in Canada. This IPM-based program is discussed online at [www.healthylawns.net](http://www.healthylawns.net). This program was presented at the North American Pesticide Applicator Certification and Safety Education Workshop last August as a model of a national policy to promote integrated pest management techniques.

In closing, risk assessment of pesticides and whether they may or may not affect human health or cause other environmental concerns is a constantly evolving process. I served as a special expert to the National Advisory Panel to the Agricultural Health Study this past February. This National Cancer Institute-sponsored study is evaluating whether the risk of cancer, neurological problems connected to Parkinson's disease or farm-related injuries, respiratory disease, and retinal degeneration are related to past exposure to pesticides or other agricultural chemicals and practices.

*The article that ran in CUTT, was a shorter version of a more in-depth article I had written entitled "What is the Precautionary Principle? How is it taking shape nationally and globally?" which appeared in vol. 8 no. 3, 2003 edition of The Ribbon newsletter.*

*The definitions of the precautionary principle outlined earlier in this article do have the common element that precautionary action should be taken when there is credible, scientific evidence of harm. Action should not be taken because of a perceived risk.*

*If the legislation being considered or enacted in Canada is based on a perceived risk, then I share your concern of such regulatory action.*  
—Suzanne Snedeker

## Regarding the Precautionary Principle

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*While the majority of pesticides may not pose a risk, it is important to continue to study and evaluate the few that may. When credible scientific evidence shows harm from exposure, a precautionary approach is a prudent action to protect public health and those with occupationally related exposures.*

—Suzanne Snedeker

*We enjoy receiving letters from readers reacting to the articles and information presented in CUTT. Send your comments to Cornell University Turfgrass Times, 134A Plant Science Building, Cornell University, Ithaca, NY 14853, or via email to [fsr3@cornell.edu](mailto:fsr3@cornell.edu).*

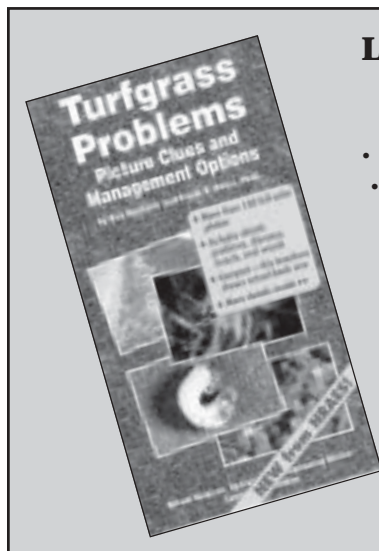
While the majority of pesticides may not pose a risk, it is important to continue to study and evaluate the few that may. When credible scientific evidence shows harm from exposure, a precautionary approach is a prudent action to protect public health and those with occupationally related exposures. As a member of the American Public Health Association (APHA), and the American Association for Pesticide Safety Educators (AAPSE), I support such a science-based, public health policy.

Sincerely,  
 Suzanne M. Snedeker, Ph.D.  
 Associate Director of Translational Research Program on Breast Cancer and Environmental Risk Factors (BCERF)  
 Division of Cancer and the Environment  
 Sprecher Inst. for Comparative Cancer Research  
 Cornell Univ. College of Veterinary Medicine  
  
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