

MARCH 18, 2022

---

**TO:** TRIBAL PESTICIDE PROGRAM COUNCIL

**FROM:** TPPC RISK ASSESSMENT WORKGROUP, OCSPP OPS/MISSION SUPPORT DIVISION, AND OPP/HEALTH EFFECTS DIVISION

**SUBJECT:** PILOT PROJECT: TRIBAL DIETARY EXPOSURE TO PESTICIDES

---

In response to the Tribal Pesticide Program Council's (TPPC) recommendations in the *Status of Pesticides in Indian Country Report*, Section 2. Risk Assessment for Pesticides, the EPA and the TPPC Risk Assessment Workgroup are re-initiating a pilot project with the TPPC. The purpose of this pilot project is to identify specific, unique tribal dietary exposure scenarios to incorporate tribal pesticide exposure scenario pathways into EPA risk assessments. The EPA recommends that the TPPC initially work with one tribe for this pilot project, which is expected to last approximately 3 months. Information provided will be voluntary and EPA will work with the tribe and the TPPC Risk Assessment Workgroup. If this pilot project is successful, the EPA and the TPPC Risk Assessment Workgroup hope to facilitate further pilot projects with tribes in other regions.

Discussion topics will include, but are not limited to:

1. What foods are eaten that are not captured in EPA's Dietary Exposure Evaluation Model (DEEM) (e.g., game animals, freshwater fish, etc.), which EPA uses to make informed decisions in risk assessments that support new pesticides, new uses of registered pesticides, and periodic reviews of existing pesticides?
2. What is the range of consumption of these foods among the tribe?
3. What specific behaviors does the tribe engage in that are not currently considered in EPA pesticide risk assessments (e.g., food gathering near areas where pesticides may be applied, use of pesticide-treated materials, such as for basket weaving, etc.)?
4. What are the tribe's sources of drinking water?

EPA is particularly interested in gathering information about tribal consumption patterns on the following:

1. Fish consumption
2. Gathering
3. Game consumption
4. Drinking water sources
5. Tribal-specific traditional exposures

To be successful, we anticipate requesting the tribal partner to:

1. Provide consumption pattern information on each of the five topics above.
  - The TPPC member would not be expected to know the answers; however, they would be able to tap into the knowledge of other members of their tribe to join the series of virtual discussions with the TPPC Risk Assessment Workgroup, OCSPP Tribal Team, and HED.
2. Dedicate time and resources to activities that would contribute to the pilot project, such as:
  - Attend and participate in a series of virtual discussions. For the pilot project, it is envisioned that the meetings will be held every two weeks for approximately 3 months.
  - Contact and secure participation of other tribal members to respond to pilot project questions.
  - Provide follow-up correspondence in a timely manner.

Note: The Freedom of Information Act (FOIA) provides the public the right to request access to records from any federal agency. Federal agencies are required to disclose information requested under the FOIA unless it falls under one of nine exemptions which protect interests such as personal privacy, national security, and law enforcement. Thus, EPA may be obligated to share certain information collected through the pilot project if it is ever subject to a FOIA request.