Child Labor on Farms –
Issue Summary and Talking Points

The Issue
There are unsubstantiated reports of children less than 12 years of age are being potentially exposed to pesticides because they are working in agricultural fields. Pesticide exposures of children brought to the farm should be addressed through workplace practices that prevent the opportunities to occur, and address social needs such as child care for all working parents. The sources for these reports do not include verifiable data. However, CBS’ 60 minutes news show is going to run an episode on child labor in agriculture.

Against this media coverage, EPA has signaled its intent to “apply risk assessment techniques developed in implementing the Food Quality Protection Act of 1996 to any pesticide risk assessment, whether it falls under FQPA or not” by the application of an additional 10-fold safety/uncertainty factor to protect children. This additional safety factor is unnecessary as EPA’s current assessment approaches is protective.

Talking Points
• CropLife America and its member companies support improved worker protection standards, promote product stewardship and advocate for rigorous scientific studies of pesticide exposures to ensure the safety of their employees, farm workers and families and pesticide applicators.

• CLA encourages the U.S. federal and state governments to enforce existing agricultural workplace labor laws and strengthen them if necessary.
  • This is not a pesticide regulatory issue but, rather, a labor enforcement issue.
  • Sightings of children in the fields, which are held up as examples, are illegal and improper under current law and should be fully prosecuted.
  • Congress must adequately fund enforcement activities by the Department of Labor in order to prevent or stop child employment abuses in all industries.

• CLA opposes the arbitrary application of additional uncertainty factors in risk assessments that are not based on sound science and do not take into account either the benefits of FIFRA-regulated products or the unintended economic and social consequences of such actions.

• CLA recognizes that farms can be dangerous places for young children and fully supports EPA effort to highlight this danger.
  • CLA encourages EPA and other organizations such as USDA, NIOSH, CDC, 4-H, the National FFA Organization, farm worker advocacy groups, and farm trade advocacy groups to collaborate in preventing young children from working in agriculture or being present in inappropriate agricultural work environments.
  • EPA should recognize that pesticides rank very low among causes of mortality and morbidity for all children in the US. Data indicate that even for children on family farms, pesticides are not a recognized source of significant illness.