



CropLife America (CLA) appreciates the opportunity to provide comments to the European Food Safety Authority (EFSA) on its scientific report entitled “Establishment of cumulative assessment groups of pesticides for their effects on the nervous system.” Owing to space limitations, we send this document as an addendum to CropLife America’s submission to the EFSA commenting site.

Following are some links that may be useful for EFSA consideration as it brings the process of establishing appropriate cumulation risk assessment approaches:

- The US EPA screening level cumulative risk assessment approach.

<https://www.epa.gov/pesticide-science-and-assessing-pesticide-risks/pesticide-cumulative-risk-assessment-framework>

- Problem formulation for determining if a cumulative risk assessment is appropriate.

<https://www.tandfonline.com/doi/full/10.1080/10408444.2016.1211617>

- Framework for how to perform a cumulative risk assessment and how to incorporate modulators of the risk.

<https://www.tandfonline.com/doi/full/10.1080/10408444.2016.1211618>

- Considerations on selecting a relevant endpoint for common assessment group around biological response.

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3307604/>

- Identification and Characterization of Adverse Effects in 21st Century Toxicology

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3307604/>

Additionally, the Agency for Toxic substances and Disease Registry (ATSDR), Department of Health and Human Services (HHS) recently made available its report on “Draft Interaction Profile for Mixtures of insecticides: Pyrethroids, Organophosphorus Compounds, and Carbamates.” Link found [here](#). The ATSDR report supports EPA’s position on grouping that is based on a common mode action and which concludes no evidence of greater than additive outcomes. We encourage EFSA to read and consider the conclusions in this report.

Respectfully,

A handwritten signature in cursive script that reads "Janet E Collins".

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