

March 5, 2021

OPP Docket # EPA-OPP-2008-0850-0750
Environmental Protection Agency Docket Center (EPA/DC)
1200 Pennsylvania Ave. NW
Washington, DC 20460

Subject: Letter Urging Expedient Action to Ban Chlorpyrifos

The undersigned 101 farmworker, public health, environmental, labor, and faith organizations urge the EPA to immediately revoke all food tolerances for chlorpyrifos and initiate the cancellation process to end all uses of this neurotoxic pesticide.

Chlorpyrifos, which belongs to a nerve agent class of pesticides called organophosphates (OPs), is used on an extensive variety of crops and is acutely toxic and associated with neurodevelopmental harms in — harms babies permanently. Studies show exposure to

OP pesticides during pregnancy is associated with lower birth weight, attention spectrum disorders, reduced IQ, and loss of working memory.

¹ It is also unsafe

for workers even with the most protective equipment.

In 2014, EPA released a risk assessment finding unsafe drinking water contamination from chlorpyrifos and it proposed to ban chlorpyrifos from food in 2015. In 2016, EPA released a revised human health risk assessment which confirmed that exposures to chlorpyrifos are unsafe whether in food, pesticide drift, or drinking water; toddlers we Td [k3Tw 0.478 vlth

Ending use of chlorpyrifos on food will protect the farmworkers who grow that food. However, chlorpyrifos is also used in other ways that expose workers to extremely dangerous amounts of the pesticide. For example, chlorpyrifos is used in greenhouses on ornamental plants. The greenhouse workers face unconscionable risks. And the EPA's 2020 risk assessment and proposed decision, agency finds that the workers who mix and apply chlorpyrifos will face unsafe exposures from more than 100 tasks workers who reenter fields sprayed with chlorpyrifos will be at risk well.

The EPA is proposing to allow these risks to continue because of the economic benefits of using chlorpyrifos compared to other currently available chemical pesticide alternatives. In making this proposal, EPA is ignoring nonchemical methods of pest control as well as the economic costs and hardships caused by pesticide poisoning learning disabilities, reduced IQ in children, and environmental harm from chlorpyrifos use. This pesticide also contaminates surface water and harms threatened and endangered species including birds, Pacific salmon, Southern Resident Killer Whales and other mammals

For the workers, the EPA is considering requiring more protective clothing and gear, but those measures can cause heat stress in many regions where workers toil in hot temperatures. And the agency proposing to afford farmworkers less protection than industrial workers where personal protective equipment is the last resort, employed only if the exposures cannot be prevented

When the Trump EPA derailed the proposed tolerance revocation, states like Hawaii, California, Oregon, and New York stepped in. In California, 99% of chlorpyrifos uses are now banned. While states can end use of chlorpyrifos, they cannot prevent uses of chlorpyrifos on their food. Only the EPA can do that. All Americans need the EPA to do its job and ensure our food is safe for children.

We, therefore, urge the EPA to immediately

1. Revoke the 2009 final order² that denied the 2007 petition to ban food uses of chlorpyrifos;³
2. Grant the 2007 petition;
3. Finalize the 2015 proposed order⁴ revoking all chlorpyrifos food tolerances⁴ and
4. Initiate the cancellation process for all uses of chlorpyrifos

The proposed interim decision on chlorpyrifos fails to protect the health of workers and children from a pesticide that is widely recognized as unsafe. Only bans unife 0.0.7 (a)7.6 (n) (s)-4.3 (u)-0y0O532 (c)598 0 T4

Center for an Ecology-Based Economy
Center for Biological Diversity
Center for Energy & Environmental Education
Center for Food Safety
Child Labor Coalition
Citizens Campaign for the Environment
Clean Water Action/Clean Water Fund
CommunityActionWorks
Conservation Law Foundation
CREA: Center for Reflection, Education and Action
CRLA Foundation
Defend Our Health
Earth Action, Inc.
Earth Ethics, Inc.
Earthjustice
East Yard Communities for Environmental Justice
Endangered Species Coalition
Environment Maine
Environmental Advocates NY
Experimental Farm Network

