

January 11, 2021

OPP Docket # EPA-HQ-OPP-2011-0855
Environmental Protection Agency Docket Center (EPA/DC)
(28221T)
1200 Pennsylvania Ave. NW
Washington, DC 20460-0001

Subject: Letter Opposing the Re-registration of Paraquat

The undersigned 56 farmworker, public health, environmental justice, environmental, human rights, faith-based and farmer advocates urge the EPA to ban paraquat because of its substantial and demonstrated risks to environmental and human health. The EPA must cancel registration of this pesticide in order to adequately protect the people and places most likely to be harmed by this dangerous herbicide.

Paraquat is the most acutely lethal herbicide still in use in the United States today and has resulted in the death of at least 30 people country-wide in the last 30 years. In addition, chronic paraquat exposure has been associated with an increased risk of developing Parkinson's disease and it is a suspected endocrine disrupting chemical.

Much of the world has banned or is in the process of phasing out paraquat due to its high toxicity, including three of the largest agricultural producing economies in the world – the European Union, China and Brazil.

Yet paraquat use in the United States is higher now than it's been in the past 25 years, with use rising considerably in recent years. This increase shows no signs of slowing.

Despite its extreme toxicity, the EPA has only proposed weak restrictions on future use of paraquat. For instance, the agency has proposed prohibiting aerial applications of paraquat, but includes an exemption for the most common aerial use: cotton desiccation. Considering that only 3% of paraquat applications are made aerially and the most common aerial use is exempted, this will do little, if anything, to reduce the harm from this pesticide.

While the long overdue prohibition on use of paraquat by backpack sprayer and handgun application will eliminate some high level exposures, overall EPA has exacerbated the problem by reducing the Food Quality Protection Act (FQPA) Safety Factor by 3-fold, essentially erasing protections for the most vulnerable young children in our population. The agency has also ignored strong associations with Parkinson's disease.

The agency found serious risks to farmworkers who are exposed to high levels of paraquat on the job, which also poses a significant risk to their families via residues that are transported from the job site to the home. The agency proposes to address this problem by requiring additional Personal Protective Equipment (PPE) for workers, some of whom labor in 100-degree summer heat. This is not reasonably achievable, nor is it reasonable to assume that these requirements that look good on paper will be faithfully adopted in the real world.

The EPA has also identified considerable environmental harms, including to mammals, birds and pollinators that forage near treated fields, that are not mitigated whatsoever in the proposed decision.

We urge the EPA to immediately ban paraquat. Farmworkers, farmers, children, and natural places in the US should no longer be harmed by this chemical that has already been banned in so many countries around the world. The proposed re-registration of paraquat represents a blatant failure to protect public health and the environment.

Signed,

Alaska Community Action on Toxics
Alianza Nacional de Campesinas
American Parkinson Disease Association
Beyond Pesticides
Brian Grant Foundation
California Rural Legal Assistance Foundation
Californians for Pesticide Reform
Center for Biological Diversity
Center For Food Safety
Central Maryland Beekeepers Association
Central Valley Air Quality Coalition
Coalition on the Environment and Jewish Life
Conservation Council For Hawaii
Earthjustice
Endangered Habitats League
Endangered Species Coalition
Environmental Protection Information Center (EPIC)
Environmental Working Group
Episcopal Farmworker Ministry
Farmworker Association of Florida
Friends of the Earth
GMO Free Kaua'i
Green America
Hawai'i SEED
Hawaii Alliance for Progressive Action (HAPA)
Hawai'i Parkinson Association
Heartwood
Howling For Wolves
International Marine Mammal Project of Earth Island Institute
Klamath Forest Alliance
Maine Organic Farmers and Gardeners Association
Maryland Pesticide Education Network
Missouri Coalition for the Environment
Natural Resources Defense Council
New Hampshire Audubon
Northwest Center for Alternatives to Pesticides (NCAP)
NY4WHALES
Occidental Arts and Ecology Center
Oceanic Preservation Society (OPS)
Ohio Valley Environmental Coalition (OVEC)
Organic Consumers Association
Parkinson & Movement Disorder Alliance

Parkinson Association of the Rockies
People Organized In Defense of Earth and Her Resources (PODER)
Pesticide Action Network
PolicyLink
Pollinate Minnesota
Save Our Soil
Sierra Club
Student Action with Farmworkers
The Alliance of Nurses for Healthy Environments
The Michael J. Fox Foundation for Parkinson's Research
The Ocean Research & Conservation Association
Toxic Free North Carolina
Western Nebraska Resources Council
Worker Justice Center of New York