Message

From: Enck, Judith [Enck.Judith@epa.gov]
Sent: 7/29/2014 9:49:38 PM
To: Jones, Jim [Jones.Jim@epa.gov]
Subject: FW: New Herbicide - Dow Agroscience Enlist Duo

Hi Jim: dr. phil Landrigan is a well respected pediatrician in NYC. Can you please have someone in your office call him or respond to this email or advise me on how I should respond. Many thanks. Judith

From: Landrigan, Philip [mailto:phil.landrigan@mssm.edu]
Sent: Tuesday, July 29, 2014 9:10 AM
To: Enck, Judith
Subject: New Herbicide - Dow Agroscience Enlist Duo

Dear Judith,

I am writing to express my concern about the potential risks to health of a new combination pesticide product that is currently making its way very rapidly through the review process in the Pesticide Office at EPA Headquarters. I recognize that this is not especially a Region II issue, but I am in hopes that by directing my concerns to you they will be forwarded to the proper channels within EPA.

The product in question is Dow Agroscience's "Enlist Duo™" -- a mixture of two potent herbicides - glyphosate and 2, 4-D. The Pesticide Office is moving forward to approve this new combination in tandem with the United States Department of Agriculture's process to approve corn and soybean seeds that are genetically engineered to withstand Enlist Duo. The two herbicides are being combined by Dow into this new product because 61 million acres in 36 states are now home to weeds that have become resistant to glyphosate. This is the consequence of widespread application of glyphosate (Roundup) over the past two decades to treat Round-Up-Ready corn and soybeans.

My concern here is that EPA appears to be proceeding in great haste and with little visible attention to the impacts that this new combination may have on children's health. To me this seems like a violation of the Food Quality Protection Act's mandate that EPA explicitly consider the potential impacts of any pesticide on children's health and when appropriate apply a child-protective safety factor.

This lapse is especially egregious given that 2, 4-D has been linked to increased risks of Parkinson's disease and non-Hodgkin lymphoma, a cancer that is increasing in incidence in the United States. Studies of exposed farmworkers show also that 2, 4-D is linked to disruption of thyroid function and lower sperm count.

The potential for exposure to high levels of 2, 4-D is all too real if this new product is approved. USDA has estimated that approval of Enlist Duo will lead to a three-to-seven-fold increase in use of 2, 4-D by the end of the decade. With that sharp increase, consumers will be exposed to increased levels of 2, 4-D in their food. Children in the womb will be exposed to 2, 4-D consumed in foods by their mothers. Children will be exposed in their homes, communities and schools to airborne pesticide drift from sprayed fields. According to Dow, Enlist Duo can drift up to 200 feet from where it is sprayed – and that is under optimal conditions when applicators follow all of the rules.

There are 5,600 schools in the United States within 200 feet of a corn or soybean field that could be sprayed with Enlist Duo. Nearly 500 of these are elementary schools.

EPA and USDA are moving quickly to approve Enlist Duo and the seeds resistant to its toxic effects. In its rush EPA appears not thinking very carefully about health. The Agency needs to slow down, take a step back and follow the process mandated by Congress nearly two decades ago.

Sincerely,

Phil Landrigan

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