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March 10, 2021

Robin H. Richardson
Deputy Associate Administrator, Office of Congressional and Intergovernmental Relations
Environmental Protection Agency (EPA)
1200 Pennsylvania Avenue, NW, Room 3426 WJC North
Washington, DC 20460

Dear Deputy Associate Administrator Richardson:

Please see the attached constituent message I received regarding pet deaths that may be related to the Seresto flea and tick collar. I would appreciate a response from the EPA on this issue that I can share with my constituent. Thank you for attending to this matter.

Sincerely,

BERNARD SANDERS
UNITED STATES SENATOR

Dear Senator Bernie Sanders,

In the face of 1,700 pet deaths linked to Seresto's flea and tick collar—as reported March 2, 2021 by USA Today, based on EPA records—EPA has taken no action. This unconscionable inaction is defended by an EPA spokesperson who told the media that, despite these incidents, the agency has deemed Seresto collars "'eligible for continued registration' based on best available science, including incident data. . . . No pesticide is completely without harm, but EPA ensures that there are measures on the product label that reduce risk." Seresto is developed by Bayer and sold by Elanco.

I am calling on EPA to recognize, finally, that the label on flea collars is not adequately protective, as evidenced by the number of deaths and 75,000 incidents. EPA has the authority to act now, and it should use its powers to protect the health and lives of pets by stopping the sale of Seresto flea collars. EPA should act on the deaths immediately, not wait for further study—just as it did with the herbicide Imprelis (2011) by issuing an order to E.I. DuPont de Nemours (DuPont) directing the company to immediately cease the distribution, sale, use or removal. In that case, EPA said, "The directions for use and/or warning or caution statements on DuPont's Imprelis labeling are inadequate [to prevent the death of trees]".

USA Today reports, "A 2012 Bayer study found [flumethrin and imidacloprid] have a 'synergistic effect,' meaning they are more toxic together on fleas. . . " However, a 2016 EPA bulletin concluded, "The risk of the combination of the two active ingredients, flumethrin and imidacloprid, was not assessed because the two chemicals act in completely different ways." This failure to evaluate synergistic effects of pesticides is standard practice of EPA. The agency does an inadequate job of evaluating the risks and harms of exposures to multiple pesticide compounds, as well as those of so-called "inert" or "other" pesticide ingredients.

The Seresto flea collar is meant to kill fleas and ticks, while on dogs or cats for months at a time. Apart from deaths, pets suffer rashes, seizures, motor dysfunction, fatigue, diarrhea, vomiting, and excessive drooling. Although the product label on the collar specifically states that it is for external use only, it fails to account for grooming behavior of dogs and cats through which the pet can ingest the pesticides that the collar releases and disperses onto fur and skin steadily over the course of months.

The same concern is true for children's exposure to the chemical residues on their pets and their direct contact with the flea collar. The collar's label warns: "DO NOT LET CHILDREN PLAY WITH THIS COLLAR OR REFLECTORS; KEEP OUT OF REACH OF CHILDREN." Although EPA acknowledges synergistic effects on fleas and ticks, the agency finds separate risks of flumethrin and imidacloprid to be below levels of concern and did not assess their combined risk.

EPA has logged "Seresto" incidents in its database for years, but has not seen fit to warn the public. Karen McCormack, a retired EPA scientist and communications officer, notes that these collars have garnered the greatest number of incident reports of any pesticide product in her long experience. She says, "EPA appears to be turning a blind eye to this problem, and after seven years of an increasing number of incidents, they are telling the public that they are continuing to monitor the situation. But I think this is a significant problem that needs to be addressed sooner rather than later."

Thank you for your urgent consideration.