

August 12, 2008

To:

Stephen L. Johnson,
Administrator U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

We, the undersigned health and children's rights organizations, call on the U.S. Environmental Protection Agency to cancel the remaining uses of the insecticide endosulfan. Our position supports the February 2008 petition signed by 13,300 people across the country,¹ a legal petition filed by the National Resources Defense Council that same month,² and three letters sent to the Agency on May 19, 2008 signed by 111 non-profit environmental groups, 55 scientists, and 5 coalitions of Indigenous groups and tribes, respectively³

We are particularly concerned about the effects of endosulfan on prenatal and child development. Peer-reviewed science demonstrates that endosulfan is both an endocrine disruptor and a neurotoxicant.⁴ Numerous studies have consistently demonstrated that endosulfan behaves physiologically as an anti-androgen⁵, which inhibit or prevent the biological effects of male sex hormones. The effects of endosulfan are most pronounced in immature animals whose reproductive systems and brains are still developing.⁶

In humans, maternal residence in areas of high use of endosulfan and dicofol has been associated with increased incidence of autism spectrum disorders in a recent ecological epidemiological study.⁷ Animals exposed to endosulfan *in utero* or as juveniles have altered brain chemistry later in life,⁸ and impairment of learning and memory has been observed in studies of immature rats exposed to low doses of endosulfan.⁹

Increased incidences of birth defects of male reproductive system have been observed in human populations exposed to endosulfan. One study has documented delayed puberty in exposed boys.¹⁰ In rats, endosulfan exposure can cause fetal malformations.¹¹ Endosulfan has been detected in human blood, fetal placenta, breast milk, and mammary adipose tissue,¹² and is a common food contaminant.¹³ Endosulfan also travels thousands of miles on wind and water currents to colder Northern latitudes¹⁴ and there is concern that like other persistent organic pollutants, it disproportionately contaminates the bodies of pregnant women, fetuses and infants in the circumpolar Arctic.

In 2002 the EPA determined that acute dietary risks due to exposure to endosulfan through food exceeded the Agency's level-of-concern for infants.¹⁵ An updated exposure estimate in 2007, which included exposure via drinking water in addition to food, determined that children and infants were even more exposed to endosulfan than previously thought. The Agency, however, simultaneously revised its level-of-concern upward by factor of 10, and therefore concluded that such risks are acceptable.¹⁶ This revision was unjustified and contravened the 1996 Food Quality Protection Act, since

ample evidence exists for the increased susceptibility of infants and children to endosulfan.¹⁷

Endosulfan poses a threat to the health of children in the U.S. This antiquated organochlorine has already been phased out of agriculture in the European Union¹⁸ and at least 50 other countries. It is high time for the U.S. to take the health of our future generations seriously and ban all uses of endosulfan.

Sincerely,

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Senator Bill Nelson
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¹ Tupper K *et al.*, February 19, 2008. Docket ID No. EPA-HQ-OPP-2002-0262-0067-0086.1
<http://www.panna.org/files/petitionSubmissionEndosulfan20080219.pdf>

² “PETITION TO BAN ENDOSULFAN AND REVOKE ALL TOLERANCES AND COMMENTS ON THE ENDOSULFAN UPDATED RISK ASSESSMENT (OPP-2002-0262-0067) BY THE NATURAL RESOURCES DEFENSE COUNCIL,” National Resources Defense Council, February 19, 2008. Docket ID No. EPA-HQ-OPP-2002-0262-0067-0084.1 http://docs.nrdc.org/health/hea_08021901A.pdf

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