

May 19, 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 111 organizations, are calling on the Environmental Protection Agency (EPA) to cancel all remaining uses of the organochlorine pesticide endosulfan. Our position supports the February 2008 petition signed by 13,300 people across the country and the February 2008 NRDC petition (Docket ID EPA-HQ-OPP-2002-0262-0084.1) to ban endosulfan and revoke all tolerances of this toxic chemical. The European Union and 20 other countries have already banned endosulfan, and it is time for the U.S. to do the same.

EPA's own analysis shows that use of endosulfan in agriculture poses unacceptable risks to the health and safety of pesticide applicators who handle this pesticide and farmworkers who work in endosulfan-treated fields.

Endosulfan is acutely toxic, especially to the nervous system. Symptoms of poisoning include headaches, nausea and vomiting, seizures, and in extreme cases unconsciousness and even death. Endosulfan is also a suspected endocrine disruptor, and low dose exposure while in the womb has been linked to autism, male reproductive harm, and birth defects

Endosulfan is toxic, persistent in the environment, accumulates in humans and animals and travels long distances away from the place of application. Endosulfan is among the organochlorine pesticides that threaten communities living thousands of miles away from its point of application. A growing body of evidence shows that the Arctic region has become a sink for this pesticide, even though it is neither used nor produced there. Endosulfan has been found in Arctic air, lake water, seawater, fish, snow and plants. Unlike most other organochlorine pesticides, concentrations of endosulfan in Arctic air have not declined in recent years. Endosulfan poses a serious health hazard to northern Indigenous peoples who rely on traditional foods such as fish and marine mammals.

In addition to jeopardizing human health, endosulfan and its breakdown products are potent environmental toxins and persistent organic pollutants. EPA's calculations show that its use on tomatoes in Florida (one of the few remaining crops in the U.S. with significant endosulfan use) presents a grave threat to aquatic organisms.

Surely the relatively minor economic benefits that endosulfan use provides to a small number of growers do not outweigh the substantial risks it poses to the health of farmworkers, pesticide applicators, consumers, Indigenous peoples, and the environment. Viable alternatives to endosulfan—including non-chemical pest control methods—are readily available.

The U.S. and the world can do without endosulfan. Communities around the world are actively campaigning for it to be banned. The U.S. must act now to protect the health of people and the environment at home and worldwide by banning endosulfan.

Sincerely,

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