

**Alaska Inter-Tribal Council**  
**Indigenous Environmental Network**  
**International Indian Treaty Council**  
**Native Movement**  
**Resisting Environmental Destruction on Indigenous Lands**  
**(REDOIL)**

May 19, 2008

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

Dear Mr. Johnson:

We, the undersigned Indigenous organizations call on the Environmental Protection Agency (EPA) to cancel all remaining uses of the organochlorine pesticide endosulfan.

**The Alaska Inter-Tribal Council** is a statewide, tribally-governed non-profit organization that advocates in support of Tribal governments throughout the state. The Council promotes Indigenous self-determination by providing technical assistance to tribal governments, facilitating inter-governmental and inter-agency communication and collaboration, offering public education regarding Alaska Native cultures and tribal governments, and advocating on behalf of tribal initiatives and self governance.

**The International Indian Treaty Council (IITC)**, founded in 1974, is an organization of Indigenous Peoples from North, Central and South America and the Pacific working to provide an international voice and advocacy for Indigenous Peoples to effectively address their concerns and defend their rights, ecosystems and survival from the local to the international levels. In 1977, IITC was the first Indigenous organization to receive Consultative Status with the UN Economic and Social Council. IITC provides access for grass-roots Indigenous Peoples to present local concerns at the UN and other international bodies addressing human rights and environmental protection.

Established in 1990 within the United States, **Indigenous Environmental Network (IEN)** was formed by grassroots Indigenous peoples and individuals to address environmental and economic justice issues (EJ). IEN's activities include building the capacity of Indigenous communities and tribal governments to develop mechanisms to protect our sacred sites, land, water, air, natural resources, health of both our people and all living things, and to build economically sustainable communities. IEN convenes local, regional and national meetings on environmental and economic justice issues, and provides support, resources and referral to Indigenous communities and youth throughout primarily North America—and in recent years—globally.

**Native Movement Alaska** is an organization led by Indigenous youth focusing on peace, sustainability, youth leadership development, healing, community and movement building. Native Movement's work is grounded in the traditional values of our peoples, understanding the importance of our spirituality in relation to our activism and leadership. Native Movement has begun to organize, develop skills, and generate dialogue and action to move toward a healthier vision for humanity.

**Resisting Environmental Destruction on Indigenous Lands (REDOIL)** is a network of grassroots Alaska Natives of the Inupiat, Yupik, Aleut, Tlingit, Gwich'in, Eyak and Denaiana Athabascan tribes who have formed a network to address the human and ecological health impacts of the unsustainable development practices of the fossil fuel industry in Alaska. The REDOIL Network strongly supports self-determination rights of tribes in Alaska as well as a just transition from fossil fuel development and promotes the implementation of sustainable development on or near Indigenous lands.

Endosulfan is toxic, persistent in the environment, accumulates in humans and animals and travels long distances far from the place of application. Endosulfan is among the organochlorine pesticides that may be harming communities living thousands of miles away from its point of application. A growing body of evidence shows that the Arctic region has become a hemispheric sink for this pesticide, even though it is neither used nor produced within the northern region/Arctic. We are concerned that there are serious health effects associated with exposure to endosulfan, including neurological harm, endocrine disruption, reproductive and developmental toxicity at low dose exposures. We request that you take precautionary action by canceling all remaining uses of endosulfan which pose a threat to our health and cultures. Our physical, spiritual, and cultural sustenance depends on the health and safety of our traditional foods.

Endosulfan is prevalent in Arctic air, lake water, seawater, fish, snow and plants. Levels of endosulfan in northern regions are increasing rather than diminishing. A study evaluating concentrations of endosulfan in Arctic seawater found the highest concentrations in the western Arctic, specifically in the Bering and Chukchi Sea.<sup>1</sup> Given the inherent persistent and bioaccumulative properties of endosulfan and its presence in Arctic air, water, and biota, continued use of endosulfan poses too great a hazard to the health of northern Indigenous peoples who are reliant on traditional diets of fish and marine mammals.

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<sup>1</sup> Weber, J. et.al. 2006. Endosulfan and gamma-HCH in the Arctic: an assessment of surface seawater concentrations and air-sea exchange. Environ. Sci. Technol. 40(24):7570-6.

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 Indigenous peoples farm workers, pesticide applicators, consumers, and the environment. Viable alternatives to endosulfan—including non-chemical pest control methods—are readily available. The European Union and 20 other countries have already banned endosulfan, and it's time for the U.S. to do the same.

The United States currently has a legal government-to-government trust responsibility with Tribes. The executive memorandum establishes government-to-government relations between the United States and Tribes requiring that the EPA:

- 1) Operate within a government-to-government relationship with federally recognized Tribes;
- 2) Consult, to the greatest extent practicable and permitted by law, with tribal governments before taking actions that affect federally recognized tribes;
- 3) Assess the impact of agency activities on tribal trust resources and assure that tribal interests are considered before the activities are undertaken.

EPA must consider these responsibilities in this important decision. The U.S. must act now to protect the health of Indigenous peoples and future generations at home and worldwide by banning endosulfan.

Sincerely,

Mike Williams, Chair  
Alaska Inter-Tribal Council  
Anchorage, Alaska

Tom Goldtooth, Executive Director  
Indigenous Environmental Network  
Bemidji, Minnesota

Andrea Carmen, Executive Director  
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