

Lisa P. Jackson, Administrator  
U.S. Environmental Protection Agency  
Ariel Rios Building  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

Jan 5, 2010

Dear Administrator Jackson:

We are writing you as organizations representing family farmers, farmworkers and people concerned about scientific integrity in the regulatory process. We have strong concerns about the safety of the herbicide atrazine and how Syngenta, its primary manufacturer in the United States, has continued to promote its use to farmers as completely safe. We are also concerned about Syngenta's manipulation of the regulatory process.

Many farmers who are members of the undersigned organizations use herbicides and pesticides as part of their farming operations. Many farmworkers work on farms where these chemicals are applied. They rely on the U.S. EPA in registering pesticides to use a transparent process that is guided by science and places protection of human health and the environment above corporate profits. Farmers, farmworkers and their families can be among the first harmed when unsafe pesticides are approved by your agency.

We do not believe that the Syngenta corporation can legitimately claim to represent the interests of farmers. As the world's largest manufacturer of pesticides and herbicides and one of the largest seed suppliers, Syngenta has pursued a strategy of achieving profits that often relies on raising prices to farmers and vertical integration. Its track record is one of looking out harder for its own bottom line, rather than the wellbeing of family farmers.

Atrazine is one of the most commonly detected pesticides in U.S. ground and surface water. A monitoring program coordinated by the U.S. EPA in 10 states between 2003 and 2005 found that 94 of 136 public water systems tested had atrazine concentrations above the federal drinking water standard of three parts per billion in their untreated water for at least one 90-day period.<sup>1</sup> Herbicides need to be designed to stay on the field. Such widespread contamination indicates a problem with the chemical, not how it is applied. Further, it is worrisome that a large and growing body of science is showing atrazine is linked to birth defects, breast cancer, prostate cancer and other human health concerns.<sup>2</sup>

The past record of Syngenta on the issue of atrazine is concerning. Some of the events that we find most egregious include:

- In 2003, while atrazine was being reviewed by U.S. EPA, Syngenta participated in approximately 50 closed-door meetings with U.S. EPA regulators. These meetings were not publicly announced, and documents about the meetings were only made public by the agency after a lawsuit was brought by the Natural Resources Defense Council.<sup>3</sup>
- Syngenta attempted to prevent publication of science conducted by Dr. Tyrone Hayes that showed atrazine at very low levels feminized frogs and acted as an endocrine disruptor.<sup>4</sup>

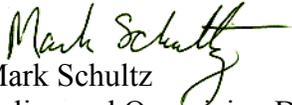
- Syngenta-funded studies submitted in 2003 to the EPA’s Scientific Advisory Panel on the effect of atrazine on amphibians were found to be inaccurate and flawed.<sup>5</sup> Publicly-funded science should be given primary consideration.
- Male workers at a Syngenta factory in Louisiana where atrazine was manufactured experienced significantly increased rates of prostate cancer.<sup>6</sup>

We are extremely encouraged that U.S. EPA, under your direction, is reexamining atrazine and has officially opened a new review. To ensure the integrity of the process and rebuild farmer confidence in the agency’s efforts, we make the following requests.

- The process should be 100% transparent. There should be no closed-door meetings of any kind, especially with industry representatives, and summaries of all interactions between U.S. EPA and stakeholders on this topic should be included in the official record (i.e. the docket) and made publicly available.
- Studies funded by Syngenta should be discounted in the review process. Studies the corporation has submitted in the past have been deeply flawed and have hampered good decision-making. Publicly-funded and peer reviewed science should be given primary consideration.
- All scientific studies supporting the continued registration of atrazine should be made available for public scrutiny or removed from consideration. Syngenta and other atrazine registrants should not be permitted to hide critical data from independent scientific examination by claiming “confidential business information.” For the sake of transparency and to ensure farmer and farmworker confidence in its decisions, U.S. EPA should only rely on studies that are publicly available.
- If after review the science indicates atrazine is a threat to human health or the environment, U.S. EPA should take swift and clear action to protect farmers and the general public.

Our health – and more importantly the health of our children and their children – will bear the consequences of your decision. Thank you for your consideration of our views.

Sincerely,

  
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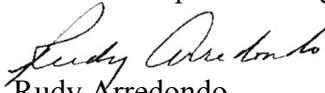
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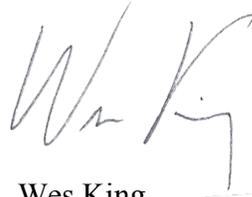
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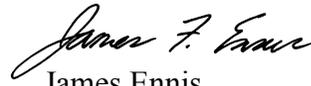
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1. Mae Wu et al., *Poisoning the Well: How the EPA is ignoring atrazine contamination in surface and drinking water in Central United States*, (San Francisco, CA: Natural Resources Defense Council, 2009), <http://www.nrdc.org/health/atrazine/default.asp> (accessed December 4, 2009).

2. a) Jennifer Sass and Paul Brandt-Rauf, "Cancer Incidence Among Triazine Herbicide Manufacturing Workers," *Journal of Occupational and Environmental Medicine*. Vol. 45, No. 4 (April 2003), 343-344 b) M.A. Kettles, et al., "Triazine exposure and breast cancer incidence: An ecologic study of Kentucky counties," *Environmental Health Perspectives*, Vol. 105, No. 11 (1997), 1222-1227 c) R. Munger, et al., "Intrauterine growth retardation in Iowa communities with herbicide-contaminated drinking water supplies," *Environmental Health Perspectives*. Vol. 105, No. 3 (March 1997), 308-314 d) T.E. Arbuckle, et al., "An exploratory analysis of the effect of pesticide exposure on the risk of spontaneous abortion in an Ontario farm population," *Environmental Health Perspectives*, Vol. 109, No. 8 (2001), 851-857 e) S. Swan, et al., "Semen quality in relation to biomarkers of pesticide exposure," *Environmental Health Perspectives*, Vol. 111, No. 12 (September 2003): 1478-84 f) Also see: Land Stewardship Project and Pesticide Action Network North America, *The Syngenta Corporation & Atrazine: The Cost to the Land, People & Democracy*, (January 5, 2010), 17.

3. Jennifer B Sass and Aaron Colangelo, "European Union Bans Atrazine, While the United States Negotiates Continued Use," *International Journal of Occupational and Environmental Health*, Vol. 12, No. 3 (July/September 2006): 260.

4. a) Tyrone Hayes, *Presentation at Land Stewardship Project event*, (Minneapolis, MN: LSP, October 10, 2007) b) Goldie Blumenstyk, "The Story of Syngenta & Tyrone Hayes at UC Berkeley: The Price of Research," *The Chronicle of Higher Education*, October 31, 2003, [www.mindfully.org/Pesticide/2003/Syngenta-Tyrone-Hayes-31oct03.htm](http://www.mindfully.org/Pesticide/2003/Syngenta-Tyrone-Hayes-31oct03.htm) (accessed November 29, 2009) c) Gitanjali Deb, "Atrazine: A Case Study in the Difference Between Regulation of Endocrine Disrupting Chemicals in the EU and the US," *Temple Journal Of Science, Technology and Environmental Law* Vol. 25 No. 2 (Fall 2006).

5. Rick Weiss, "'Data Quality' Law is Nemesis of Regulation," *Washington Post*, August 16, 2004, <http://www.washingtonpost.com/wp-dyn/articles/A3733-2004Aug15.html> (accessed December 2, 2009).

6. Jennifer Sass and Paul Brandt-Rauf, "Cancer Incidence Among Triazine Herbicide Manufacturing Workers," *Journal of Occupational and Environmental Medicine*. Vol. 45. No. 4 (April 2003). 343-344.