



December 21, 2012

Ms. Andrea Mojica  
Pesticide Re-evaluation Division (7508P)  
Office of Pesticide Programs, Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460- 0001

*Submitted electronically. Docket Identification Number: EPA-HQ-OPP-2005-0252*

Dear Ms. Mojica,

We are writing to express our strong support for most of the Memorandum of Agreement that formally terminates all agricultural use of iodomethane in the United States. We urge U.S. EPA and Arysta LifeScience North America to move forward as planned by the end of 2012. We are extremely concerned with one clause in the voluntary agreement, however, that allows continued formulation of products intended for export. The U.S. EPA has characterized the agreement in this way:

*As of January 1, 2013, Arysta's technical/manufacturing use iodomethane product may no longer be used in the US except to formulate products for export.*

As the PAN International publication [\*Communities in Peril: Global Report on Health Impacts of Pesticide Use in Agriculture\*](#) (attached) describes in detail: the conditions of pesticide use in many countries around the world result in acute pesticide poisonings of workers, families and children, with little recourse; as well as long-term illness and ecosystem harm from such exposure.

Allowing the formulation for export of an extremely highly hazardous and volatile chemical like iodomethane for agriculture in countries around the world is a recipe for health and ecosystem disaster. There is overwhelming evidence of potential harm from exposure to this pesticide – a chemical so toxic that scientists take precautions to use methyl iodide in a ventilation hood in very small quantities. In contrast, if used as a soil fumigant in agricultural production, iodomethane would be applied in fields at rates up to 175 pounds per acre. Since it spreads as a gas, it drifts from the application site, with significant potential to poison neighboring residents and farmworkers in nearby fields.

During U.S. EPA's deliberation and registration process on this chemical, serious concerns were expressed by U.S. farmworkers, small farmers, rural residents, and group of over 50 eminent scientists, including two Nobel Laureates. These scientists sent a letter to USEPA stating,

*"As chemists and physicians familiar with the effects of this chemical, we are concerned that pregnant women and the fetus, children, the elderly, farm workers and other people living near application sites would be at serious risk if methyl iodide is permitted for use in agriculture."* The letter goes on to explain, *"Because of methyl iodide's high volatility and water solubility, broad use of this chemical in agriculture will guarantee substantial releases to air, surface waters and groundwater, and will result in exposures for many people. In addition to the potential for increased cancer incidence, USEPA's own evaluation of the chemical also indicates that methyl iodide causes thyroid toxicity, permanent neurological damage, and fetal losses in experimental animals."*

We ask that you disallow continued formulation for export of this dangerous chemical as part of the Memorandum of Agreement on iodomethane that ends use in U.S. production agriculture.

Thank you for your serious consideration of this suggestion. We look forward to your response.

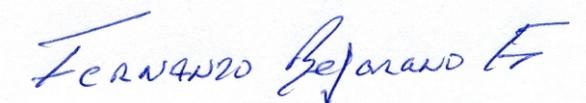
Most sincerely,



Sarojeni Rengam  
Chair, Pesticide Action Network International



Judy Hatcher  
Executive Director  
Pesticide Action Network North America



Fernando Bejarano  
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Javier Souza  
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- Michael Greene, Director, Legislative Affairs, California State Grange
- Caroline Cox, Research Director, Center for Environmental Health
- Jeannie Economos, Pesticide Safety and Environmental Health Project Coordinator, Farmworker Association of Florida
- Mike Somers, State Director, Pesticide Watch
- Deby DeWeese, Karen Moyes, and Karin Cushaway, Founders, Sisquoc Citizens Against Pesticide Use