

## Comments of the Natural Resources Defense Council

May 17, 2010

### **By Electronic Mail and Submission to [www.regulations.gov](http://www.regulations.gov)**

U.S. Environmental Protection Agency  
OPP Regulatory Public Docket (7502P)  
From the Pet Spot-On Analysis and Mitigation Plan Docket  
Docket ID No. EPA-HQ-OPP-2010-0229  
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### **Re: Comments on March 2010 Pet Spot-On Analysis and Mitigation Plan (EPA-HQ-OPP-2010-0229)**

On behalf of the NRDC (Natural Resources Defense Council), which has 1.3 million members and activists, we are writing to commend EPA for conducting a review of incidents associated with the use of Pet Spot-On products and to urge EPA to adopt strong measures to protect pets and their owners. The proposed mitigation plan is a good first step but must be expanded in order to adequately prevent adverse health impacts from pet pesticides.

EPA's analysis of pet poisonings, published in a March 12, 2010 memo titled "Review of Enhanced Reporting of 2008 Pet Spot-on Incidents" documents significant hazards associated with the use of these products. The incidents documented in this report include health effects ranging from skin irritation to death associated with the use of more than 25 products.<sup>1</sup> Based on these findings, EPA must improve the regulation of pet pesticides to prevent future incidents and protect the health of pets and families.

#### **I. EPA Should Adopt the Proposed Pet Spot-On Mitigation Plan**

The large number and severity of the poisoning incidents documented in the EPA analysis indicates an urgent need to improve the regulation of Spot-On and other pet products. The following proposed actions, included in the mitigation plan, will go a long way toward ensuring the safety of products on the market and should be implemented right away.

##### **a. Improved Assessments of Product Safety**

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<sup>1</sup> Review of Enhanced Reporting of 2008 Pet Spot-on Incidents. Memo from Kit Farwell, OPP, USEPA dated March 12 2010.

- Increased information on pesticide formulations, including inert ingredients, and associated toxicity will better ensure the safety of products on the market
- Increased toxicity and safety testing prior to registration, so that it aligns with FDA requirements, will better identify hazardous products
- Standardized reporting of pet poisonings will enhance surveillance activities and facilitate the review of products linked to adverse impacts

**b. Improved Labeling of Products**

- Improved labels to better inform consumers of restrictions and hazards can help protect cats and small dogs which were found to be disproportionately impacted by some of the Spot-On products.

**II. EPA Should Conduct Further Safety Assessments of Pet Products**

The proposed mitigation plan doesn't go far enough to protect pets and pet owners. Pet products contain many pesticides with documented health risks to pets and humans. Further assessments of these products is needed to ensure the safety of pets and their owners; particularly children who spend a significant amount of time with their pet. EPA should:

**a. Assess the Toxicity of Product Ingredients**

EPA's analysis of poisonings associated with Spot-On products omitted an evaluation of the hazards of the active ingredients to both pets and humans. Two of the active ingredients of the products assessed, permethrin and amitraz, are known to pose significant health risks to humans; including cancer and reproductive toxicity. Furthermore, other neurotoxic pesticides, such as tetrachlorvinphos and propoxur continue to be used in pet products such as flea collars. EPA should further analyze the safety for both pets and humans of the pesticides in pet products.

**b. Improve Assessment of Risks to Children**

Children are known to be more vulnerable to the toxic effects of the pesticides used in pet products and, due to age-specific behavior, can have increased levels of exposure. EPA's assessments of pesticides in pet products have routinely used faulty assumptions to calculate exposure levels. This has included, but is not limited to, underestimating pesticide residue levels on fur, unsubstantiated assumptions for duration of exposure, and failing to include indirect exposure via oral exposure to contaminated food or objects.<sup>2</sup>

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<sup>2</sup> Supplement to Natural Resources Defense Council Petition to Cancel Pet Collar Uses for the Pesticide Propoxur. Filed April 23, 2009. Docket ID No. EPA-HQ-OPP-2007-0935

Ensuring the safety of Spot-On products and other pet pesticides requires a better evaluation of health risks for children.

**c. Develop Improved Animal Safety Toxicity Screening**

The EPA analysis of Spot-On products concluded that the companion animal safety study didn't adequately predict impacts documented in the review of poisoning incidents. To ensure the safety of pets, EPA must revise the companion animal safety assessments to better approximate the risks and impacts documented in the EPA study.

**III. EPA Should Protect Pets and Consumers by Restricting the Use of the Most Dangerous Products**

Lastly, when products and ingredients pose unacceptable health risks to pets and humans, EPA must act to restrict or prevent their use. We commend EPA for including this in the proposed mitigation plan with regard to inert ingredients and strongly encourage EPA to similarly prohibit the use of active ingredients that endanger pets and families. The mitigation plan for Spot-On products should be amended to include an explicit commitment to evaluate and restrict these pesticides for use in pet products.

The health and safety of pets and their owners depend on the safety of pet products. To ensure this, EPA must adopt a strong mitigation plan for Spot-On products and act decisively to cancel pet uses of other hazardous pesticides, such as propoxur and tetrachlorvinphos in flea collars.<sup>3 4</sup>

Respectfully Submitted,

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<sup>3</sup> Natural Resources Defense Council Petition to Cancel all Pet Uses for the Pesticide Tetrachlorvinphos. Filed April 23, 2009

<sup>4</sup> Supplement to Natural Resources Defense Council Petition to Cancel all Pet Uses for the Pesticide Propoxur Filed April 23, 2009. Docket ID No. EPA-HQ-OPP-2007-0935