

BioSpotVictims.org

March 5, 2010

Office of Pesticides Program (OPP) Regulatory Public Docket (7502P)
Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460-0001

RE: Notice of Receipt of Requests to Voluntarily Cancel Certain Pesticide Registrations
(Document ID EPA-HQ-OPP-2009-1017-0001)

Dear Sir or Madam:

Thank you for the opportunity to comment on the receipt of requests to voluntarily cancel certain pesticide registrations. BioSpotVictims, a non-profit organization which seeks to educate the public on the potential hazards of pet pesticide products, would like to commend the registrants for taking this action, which will eventually remove several pet pesticide products from the market.

Most of the products affected by this voluntary cancellation contain pyrethrins and pyrethroids as their active ingredients. Until recently, these pesticides were alleged to pose little harm to people, pets, and the environment.

However, the widespread use of these pesticides over the past decade has raised concerns recently over their potential impact on the environment and human health:

<http://www.environmentalhealthnews.org/ehs/news/pyrethroids-raise-concerns>

The products affected by this voluntary cancellation also include synergists which increase the toxicity of the formulation. EPA risk assessments fail to consider the toxicity of formulations.

Despite longstanding concerns that exposure to pyrethroids may aggravate asthma or lead to asthma-like symptoms in individuals with a history of ragweed allergy, the EPA has not required a warning statement specific to asthmatic or allergic individuals on household products that contain pyrethrins or pyrethroids.

Last year, the EPA acknowledged that pyrethroids share a common mechanism of toxicity, and therefore, need a cumulative risk assessment.

The EPA has also recently determined that developmental toxicity studies (DNTs) previously required for pyrethroids do not adequately characterize the potential susceptibility of infants and children. There is concern for developmental neurotoxicity based on evidence of neurotoxicity at high doses in a subchronic neurotoxicity study.

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Due to these ecological and human health concerns, BioSpotVictims urges EPA to reassess the risks of all pyrethroid-based spot-on products for pets – including products which contain high concentrations of permethrin, phenothrin, cyphenothrin, and etofenprox.

The EPA has registered pyrethroid-based spot-on products since 1990, but due to an **oversight**, these products were omitted from all EPA residential risk assessments until 2006 – TEN YEARS after the Food Quality Protection Act required EPA to reassess all existing pesticide tolerances.

When pyrethroid-based spot-on products were finally included in residential risk assessments, the corrected assessments indicated **risks of concern** to toddlers from incidental ingestion of residues on pets via hand-to-mouth exposure after pet treatment.

When the EPA became aware of these risks of concern, it should have put forth a risk mitigation proposal, requiring registrants to include a warning on their labels, or canceled the registration of these products. Instead, EPA “refined” their risk assessments using incorrect dosages and assumptions, and dubious data from unpublished studies that were provided by registrants. The revised risk assessments indicated no risks of concern to toddlers.

Last April, EPA issued an advisory due to a sharp increase in the number of incidents (including pet deaths) reported from the use of spot-on products. In 2008, over 44,000 adverse incidents were reported to the EPA – the majority of which involved pyrethroid-based products.

For all of the reasons stated above, it is clear that pyrethroid-based spot-on products pose unreasonable and unacceptable risks to children, pets, and the environment.

BioSpotVictims urges EPA to adhere to its mandate to protect the public from unreasonable risk by canceling the registration of pyrethroid-based spot-on products, effective immediately.

Sincerely,

James TerBush
Website Administrator