

BioSpotVictims.org

November 20, 2009

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

RE: Carbaryl; Notice of Receipt of a Request To Voluntarily Cancel Pesticide Registrations To Terminate Use of Certain Products; Request for comments; Federal Register Vol. 74, No. 202, P. 54045-54047, October 21, 2009; Docket No. EPA-HQ-OPP-2008-0347

Dear Sir or Madam:

Thank you for the opportunity to comment on the request by Wellmark International to voluntarily cancel their product registrations for pet collar products containing the pesticide carbaryl. These comments are submitted on behalf of BioSpotVictims, a non-profit organization which seeks to educate the public on the potential hazards of pet pesticide products, and provide alternatives that are less toxic for pets and children who are exposed to treated pets.

BioSpotVictims welcomes the decision by Wellmark International to cancel their carbaryl pet collar products – the last carbaryl pet products registered for use in the United States. However, we are against EPA's proposal to allow persons other than the registrant to continue to sell existing stocks of canceled products until such stocks are exhausted. Such a proposal would allow children to be exposed to carbaryl pet collars well beyond the cancellation date of December 30, 2010.

Health risks to children from exposure to carbaryl have been a concern for years. In March 2005, EPA issued a cancellation order for the liquid broadcast use of carbaryl on residential turf to address post-application risk to toddlers. EPA also issued generic and product-specific Data Call-Ins (DCIs) for carbaryl, which required additional toxicology studies for products containing carbaryl.

In response to the DCIs, many carbaryl registrants chose to voluntarily cancel their carbaryl products, rather than revise their labels or conduct studies to support these products. Wellmark International chose to submit three pet collar studies – all were deemed unacceptable by the EPA.

According to the Natural Resources Defense Council, EPA greatly underestimated children's exposure to carbaryl from pet collars in its assessment. Furthermore, EPA failed to obtain all the relevant data on exposures before making its determination that tolerances were safe.

BioSpotVictims urges EPA to consider prohibiting all persons from selling existing stocks of carbaryl pet collar products after the cancellation date of December 30, 2010.

Sincerely,

James TerBush
Website Administrator

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