

BioSpotVictims.org

February 22, 2010

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

RE: Public Availability of Identities of Inert Ingredients in Pesticides
(Document ID EPA-HQ-OPP-2009-0635-0001)

Dear Sir or Madam:

Thank you for the opportunity to comment on the EPA's proposal to disclose the identity of inert ingredients on pesticide product labels. BioSpotVictims, a non-profit organization which seeks to educate the public on the potential hazards of pet pesticide products, would like to commend the EPA for embarking on this rulemaking proposal. It truly represents a sea change from the former Administration's reckless disregard for public health.

BioSpotVictims supports the disclosure of inert ingredients on pesticide product labels, regardless of hazard. As a quick interim step, EPA should mandate disclosure of inert ingredients that it has already classified as hazardous (which were specified in the 2006 petitions), and work towards more complete disclosure.

Inert ingredients are often added to pesticide formulations to increase their effectiveness. Some of these ingredients are not classified as hazardous, but are in fact hazardous if they increase dermal absorption, slow metabolism, or otherwise increase the toxicity of the active ingredient.

Last October, the FIFRA Scientific Advisory Panel met to consider a substantial revision to EPA's Standard Operating Procedures for Residential Pesticide Exposure Assessment. The panel expressed concern that the proposed SOPs did not adequately protect pregnant women, fetuses, and toddlers.

EPA's residential exposure assessments only consider the risks posed by active ingredients – not the entire pesticide formulation. That greatly underestimates the risk to toddlers from scenarios such as incidental oral ingestion of residues on pets via hand-to-mouth activity after pet treatment, or from dermal contact with treated pets.

BioSpotVictims urges EPA to require disclosure of all inert ingredients with percent composition on pesticide product labels. Residential post-application exposure assessment of pesticides should require a full assessment of product formulations, and not be limited to individual active ingredients.

Sincerely,

James TerBush
Website Administrator