

NAACP
Eugene ~ Springfield Branch
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To: Chair Paul Holvey and members of the House Rules Committee

Date: 5/8/2019

Subject: Support for HB 2619 A-Engrossed

Our three organizations work at the nexus of environmental pollution and illness, labor injustice, and immigrant rights. Beyond Toxics, NAACP Eugene-Springfield and Unete Farm Worker Advocacy Center urge your vote to pass HB 2619 A Engrossed to ban chlorpyrifos. The passage of this bill is important to the vulnerable communities we serve, the people in frontline communities, particularly farm workers and their families who work hard to harvest the foods and agricultural goods that make Oregon's economy strong.

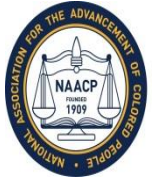
Chlorpyrifos is an organophosphate pesticide developed during WWII and is in the same family of chemicals as Sarin gas. Today, this former chemical weapon has been repurposed as a common insecticide to kill a number of pests including insects and soil organisms.

Chlorpyrifos is a nerve agent, which attacks chemical pathways and causes a breakdown in the ability of nerves to communicate. This insecticide has been determined "toxic" to birds and "extremely toxic" to fish according to the National Institutes of Health (NIH). The NIH has also determined it is "extremely toxic" to non-target insects, like bees and butterflies. (Chlorpyrifos , National Center for Biotechnology Information. PubChem Compound Database , U.S. National Library of Medicine, July, 2009)

Chlorpyrifos is exceptionally harmful to humans. A growing body of evidence shows that prenatal exposure to very low levels of chlorpyrifos—levels far lower than what EPA was previously using to establish safety standards — harms babies permanently. Research shows that prenatal exposures are associated with reduced IQ, loss of working memory, attention deficit disorders and delayed motor development. It is also linked to adverse birth and developmental outcomes, including pre-term birth, low birth weight, congenital abnormalities, autism spectrum disorders, pediatric cancers, neurobehavioral and cognitive deficits and asthma.

In a 2017 letter to the U.S. EPA, the American Association of Pediatrics supported a ban, and wrote the "EPA has no basis to allow continued use of chlorpyrifos, and its insistence in doing so puts all children at risk."

The US EPA has studied chlorpyrifos extensively. The agency found a single application of chlorpyrifos poses significant risks, especially to endangered species; and it determined that there is no safe level of chlorpyrifos exposure in food or drinking water. In 2016 under the Obama Administration, the EPA was set to recommend a nationwide ban on chlorpyrifos. Changing leadership within the EPA instead reversed this ban despite serious scientific concerns and substantive process gaps in the amended action.



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In 2000, Chlorpyrifos was determined to be harmful enough for the U.S.EPA to ban it for most residential uses. It is shockingly unacceptable that the farmers and farm workers who grow our food are not protected from chlorpyrifos. Farmworkers are exposed to it from mixing, handling, and applying the pesticide; as well as from entering fields where chlorpyrifos was recently sprayed. Workers absorb chlorpyrifos through the skin and inhalation as they pick and tend the crops. Farm workers in the Christmas tree industry absorb chlorpyrifos while cutting, bundling , wrapping and packing trees for shipping. Children of pregnant farmworkers who are exposed in utero have significantly higher risk for neurological harm and developmental disorders.

Researchers have consistently demonstrated negative impacts on developing human brains that are linked with decreased IQ. Adverse outcomes and the brain abnormalities appeared to occur following low-level exposures to chlorpyrifos that are below EPA safety standards. (Rauh, et. al., Brain anomalies in children exposed prenatally to a common organophosphate pesticide . Proc National Academy of Sciences U S A . 2012)

Two years after the proposed EPA ban was reversed, a major study undertaken by the National Institute of Health to evaluate the safety of chlorpyrifos concluded:

In our review of raw data on a prominent pesticide, chlorpyrifos, and a related compound, discrepancies were discovered between the actual observations and the conclusions drawn by the test laboratory in the report submitted for authorization of the pesticide. These observations are highly relevant in view of the present legal challenges to continued chlorpyrifos use in the USA and the ongoing re-evaluation of the current approval in the EU. Although our findings may not be generalized, they suggest the existence of bias in the reporting of industry-sponsored toxicity studies. The prevalence of such (funding) bias deserves further examination.

This suggests that the current EPA safety standards do not protect vulnerable populations such as the developing infant and small child from the adverse impacts of this neurotoxicant. Well designed, peer-reviewed research studies consistently demonstrate that chlorpyrifos exposure is; 1) damaging to the developing brain, 2) adversely impacts motor, cognitive and behavioral development, and 3) effects may be persistent and lead to long lasting impacts on the lives of those individual and the families exposed. The most imminent threat of ignoring scientist's warnings about pesticides is the harm to future generations of children who may experience brain damage and reduced cognitive function.

This pesticide can drift at unsafe levels 300 feet from a farm's edge which may result in potentially harmful exposures for nearby rural neighbors and, of course, farm employees and farm families. In fact over the past 5 years, there have been 57 complaints involving chlorpyrifos made to the Oregon Department of Agriculture. (Documents provided to Beyond Toxics from the Oregon Department of Agriculture, 3/21/2019) Of these complaints, 21 cases, over 36%, resulted in departmental action, and 17 out of 21 cases were enforcement cases. Fourteen cases were complaints of human health and four were complaints about the loss and impacts to bees.



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Furthermore, chlorpyrifos has been shown to lead to the loss of species diversity and keystone species, resulting in a range of cascading effects that alters ecosystem dynamics. Ultimately, the cost of chlorpyrifos and neonicotinoids to human and environmental health is far greater than the cost of switching to alternatives to reduce pest problems.

Based on science regarding children's health, farm worker health and unacceptable economic risks from the loss of beneficial insects, we urge Oregon to join with Hawaii and New York to take action to ban chlorpyrifos, and seven other states who are considering eliminating the sale and use of this dangerous insecticide. It is our turn to pass a ban on chlorpyrifos in Oregon because we cannot wait any longer for the federal government or the courts to protect our nation's children.

Please pass HB 2619 A-Engrossed.

Sincerely,

Kathy Keese Morales and Dagoberto Morales, Directors
Unete Farm Worker Advocacy Center
27 N Ivy St.
Medford, OR 97501

Lisa Arkin, Executive Director
Beyond Toxics
120 Shelton McMurfhey Blvd., Suite 280
Eugene, OR 97401

Eric Richardson, President
NAACP Eugene-Springfield
330 High St.
Eugene, OR 97401