5/7/2019

House Committee on Rules
900 Court St. NE
Salem, Oregon 97301
(503)-986-1731

Dear Oregon Legislators,

As academics and scientists in the fields of public health, biology, chemistry, ecology, ecotoxicology, entomology, sustainability and human sciences, we would like to call your attention to the irreparable harm chlorpyrifos has on the environment and human health of Oregon. The 47 signers of this letter urge you to take immediate action to protect your constituents and the environment by passing HB 2619-1, which would ban this dangerous chemical.

Chlorpyrifos is Not Safe for Human Health

Chlorpyrifos is a toxic pesticide derived from a nerve gas developed by Nazi Germany for use in WWII.[1] Although the EPA banned almost all residential use of Chlorpyrifos in 2000, it is still widely used in the agricultural industry.[2] Oregonians regularly come into contact with chlorpyrifos through residue on food and contaminated drinking water and air. In 2015, a Food and Drug Administration study found that chlorpyrifos is the fourth most common pesticide found as a residue on human foods.[3]

Scientific studies have linked chlorpyrifos to brain damage in children, autism, cancer, Parkinson's disease and a whole host of other negative human health impacts such as reduced IQ, loss of working memory, attention deficit disorders and delayed motor development.[4,5,6,7] Farmers, farmworkers, and rural communities have an increased risk of exposure to chlorpyrifos because of their proximity to agriculture, which is associated with immediate and long-term adverse health impacts.[8,9,10]

A large body of science, including the U.S. Environmental Protection Agency's scientific review demonstrates that chlorpyrifos residues in water and food are unsafe for pregnant women and children.[11] In fact, studies indicate there are no safe levels for pregnant women since chlorpyrifos exposure can result in negative health outcomes for both the mother and fetus, such as increasing the chance of having a preterm birth.[12]

Chlorpyrifos is Not Safe for Wildlife

Chlorpyrifos is also extremely damaging to wildlife, namely birds, fish and pollinators. Federal scientists concluded this pesticide poses a risk to about 1,800 critically threatened or endangered species.[13] Chlorpyrifos contributes to the staggering decline of pollinators because of its sub-lethal effect on bees. Studies have found that chlorpyrifos can have negative physiological, mutagenic, and sub-lethal effects on aquatic life.[14,15,16]

Alternatives to Chlorpyrifos

Chlorpyrifos is often sprayed on Christmas trees just before they are harvested for sale. This poses a risk of exposure to Christmas tree workers and U-Cut customers and their families. There are safer alternatives that are just as effective as chlorpyrifos. These alternative pesticides and/or pest management practices can address challenging pests on farms, orchards, golf courses and general land care. According to the Pesticide Research Institute—an environmental consulting firm that provides research, analyzes,

technical services and expert consulting on pesticide toxicology and chemistry— there are 67 safer insecticides available to treat Christmas tree or conifer pests, 178 safer insecticides for apple tree pests, and 98 safer insecticides for turf/lawn or grass seed pests.[17] With a significant amount of alternatives available to manage Oregon crop pests, workers and families should not be exposed to this neurotoxin.

Chlorpyrifos in the US Courts

Due to the surmounting evidence of chlorpyrifos' toxicity to humans and the environment, the U.S. Environmental Protection Agency (EPA) experts determined there was no safe way to use the chemical and recommended a complete ban.[18,19] However, former EPA Administrator Scott Pruitt denied the petition to ban chlorpyrifos as one of his first formal acts in office.[20,21]

As a result, numerous state attorneys general have filed suit against the EPA challenging its ruling.[22] The state of Hawaii responded by banning chlorpyrifos.[23] In August 2018, the U.S. Court of Appeals for the Ninth Circuit ordered EPA to ban chlorpyrifos within 60 days.[24] Days before the deadline, EPA and the Department of Justice appealed the decision and requested a re-hearing. [25] It is anticipated that federal action on chlorpyrifos, necessary to protect people, drinking water and wildlife, will be mired in the courts for the unforeseeable future.

As scientists and academics, we agree that the body of evidence on chlorpyrifos' detrimental effects to human health and the environment is conclusive. We urge the state legislature to take action where the federal government has failed. We strongly ask that Oregon legislators champion human health and environmental stewardship by passing HB 2619-1, without any weakening amendments, in order to fully ban the state use of chlorpyrifos this legislative session.

Sincerely,

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(The above signatures indicate individual support and does not reflect their affiliation's view unless stated)

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