

Comments of Lori Ann Burd, Environmental Health Director,
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We're here to discuss pesticide regulatory burdens on industry. But I want to start by talking about other burdens — those borne by real people, not corporations. Those who are *exposed* to these pesticides — for starters, people of color. More than *90 percent* of the children living in areas of heavy pesticide use in California are children of color. What about their burdens?

Let's talk about the burdens borne by those exposed to chlorpyrifos, and why Scott Pruitt refused to ban it, despite abundant science linking it to lower IQs, attention deficit disorders, brain damage and developmental delays. Over 5 million pounds of it are still used each year in the U.S. How can we ignore the burden of people who suffer acute poisoning by dangerous organophosphates like chlorpyrifos? They suffer nausea, confusion, convulsions, and — sometimes — death by suffocation.

And, what about subacute effects? I'd love to know: When will we spend a morning listening to the stories of parents like Magda and Amilcar Galindo, who are raising a child developmentally disabled likely as a result of exposure to chlorpyrifos? When Mrs. Galindo was pregnant, she was living in Salida, California, down the street from fields where chlorpyrifos was sprayed during her second trimester. Women who live within a mile of fields where chlorpyrifos is sprayed during their second trimester *triple* their chances of having an autistic child. Her beautiful, tall, lanky 12-year-old Eva is autistic and has ADHD. Because of Eva's differences, her classmates are sometimes unkind to her, and her parents worry about bullying. She has a hard time with reading and requires help in social situations. How can we sit here and talk about ways to make life easier for industry and ignore the burdens of the Galindos and countless other families in California's Central Valley who suffer the effects of exposure to pesticides?

When will we bring in the parents, children and spouses of those who have lost their battle to non-Hodgkin's lymphoma, a cancer that the World Health Organization has linked to glyphosate use? When will these people be asked to share their ideas for regulations to reduce *their* burden? Perhaps they would identify regulations to ensure that never again

will the chair of a cancer assessment review from this office promise to — and apparently achieve success in — killing another agency's review of a pesticide's safety. That's exactly what Jess Rowland told Monsanto he would do when the Department of Health and Human Services indicated interest in reviewing glyphosate.

And then there's the burden of those who can't speak. Litigation has finally forced this agency to stop ignoring its legal responsibility to protect our nation's most imperiled plants and animals and complete its first-ever biological evaluations of a few pesticides, including chlorpyrifos. This analysis, on just three of the thousands of pesticides registered by this office, has revealed that they're likely to adversely affect almost all endangered species in this country. Now this office is considering requests from Dow and Croplife asking it to simply pull this analysis because they don't like it — and refusing to come up with a schedule for completing consultations for any pesticides that it doesn't have court-enforced deadlines for. When will we spend a day together in this room talking about the species these actions may well drive to extinction? Who here is ready to declare that they're OK with letting the whooping crane or Karner's blue butterfly or any other species be wiped off the Earth?

So, yes, please, let's talk about burdens and regulatory reforms. Let's talk about changes that must be made. I can tell you — I lose zero sleep over the burdens on the pesticide industry. But I lose lots of sleep over wildlife disappearing forever because of pesticides that also cause families like the Galindos to suffer in unimaginable ways. These are real burdens, matters of life and death. When will we take the time to discuss how regulatory reform could help ease *these* burdens?

Comment of Brett Hartl, Government Affairs Director, Center for Biological Diversity

I'll do my best to keep this to three minutes, but since I don't have a million dollars like Dow Chemical to give to President Trump, I hope you'll understand if I go slightly over.

The premise of this ridiculous sham hearing — that the pesticide industry is somehow overburdened by very reasonable regulations designed to protect the health of people, wildlife and the environment we share -- is fatally flawed. Donald Trump and Scott Pruitt's

transparent attempt to enrich themselves and their special interest masters quite literally puts lives at risk. It puts our environment at grave risk. And it moves dozens of endangered species closer to extinction. To suggest that common-sense measures to protect us all from toxic chemicals are not needed is unconscionable and will not be tolerated by the American public.

And the notion that the pesticide industry, which includes some of the richest corporations in the world, with billions in profit last year, can't handle the so-called burdens of regulation is laughably absurd.

The pesticide industry has effectively written most of the regulations that govern the pesticide-approval process. As a result, thousands of miles of streams and rivers are impaired by pesticide pollution. The last time the EPA had the courage to stop the use of a pesticide due to the imminent hazard provision of FIFRA was more than 30 years ago, back in 1986. The so-called ecological risk assessment process now in place is nothing more than a rubber stamp of approval, and always concludes that new pesticide poisons are safe to use, even when they are not. And yet the pesticide industry cries that the sky is falling when scientists at the U.S. Fish and Wildlife Service and National Marine Fisheries Service conclude that an insecticide, like chlorpyrifos, that's designed to kill insects, might kill endangered insects like butterflies.

Here are actual science-based facts, not the alternative facts that guide Scott Pruitt's agenda. There are 270 different recovery plans for endangered species that identify pesticides as key threats to those species. In the last few years, scientists using the best available science have concluded that species like the Dakota skipper and Rusty-patched bumblebee need protection under the Endangered Species Act because of status-quo pesticide use.

The facts are irrefutable: the EPA desperately needs to improve and strengthen its existing regulations, so that its ecological risk assessment process no longer just rubber-stamps every new pesticide, regardless of its danger to people and the environment. Instead of protecting industry, the EPA should follow the law, and protect our environment, so that future generations do not have to bear the increasingly heavy cost of unchecked pollution

from the more than 1 billion pounds of pesticides that are now dumped across the U.S. landscape every year.

And I will close by saying that if any discretionary action taken by this agency to repeal or weaken a regulation crosses the clearly established thresholds of the Endangered Species Act, we will fight you every step of the way.