

April 19, 2000

The Honorable Dan Glickman  
Secretary  
United States Department of Agriculture  
14<sup>th</sup> Street and Independence Avenue, SW  
Washington, DC 20250

The Honorable Carol M. Browner  
Administrator  
Environmental Protection Agency  
401 M Street, SW  
Washington, DC 20460

Dear Secretary Glickman and Administrator Browner:

We are writing to express our concerns about a recent study by the Harvard Center for Risk Analysis (HCRA) concerning purported economic effects of pesticide regulation. The study, *Risk/Risk Tradeoffs in Pesticide Regulation: Evaluating the Public Health Effects of a Ban on Organophosphate and Carbamate Pesticides*, is biased and fundamentally flawed, and reaches conclusions that are not remotely credible. Nevertheless, this study, and the prestigious name of Harvard, are being used to frighten the public about potential consequences of implementing the Food Quality Protection Act (FQPA), and to generate support in Congress for rolling back the FQPA's key public-health provisions.

The HCRA study was paid for by the American Farm Bureau Federation (AFBF), which has waged a vociferous campaign to undercut the FQPA. The study rests upon admittedly unrealistic assumptions and a remarkably shallow analysis, yet reaches blatantly inflammatory conclusions. For example, the study asserts that FQPA implementation could result in up to 1,000 premature deaths per year due to decreased food consumption, an incredible claim. Nevertheless, assertions that the FQPA will kill the very children it aims to protect have been cited as "The Truth from Harvard" in partisan editorials in the agricultural and pesticide industry trade press. The HCRA study is also cited in a letter from several members of Congress to Administrator Browner that warns of unintended adverse public-health effects of FQPA implementation.

We urge you, Administrator Browner, to firmly resist political pressure based on this severely flawed study. We also understand that USDA has been asked to meet with the authors of the study, to hear a presentation of its findings. Secretary Glickman, we hope you will take great care to ensure that USDA does nothing to enhance the credibility of this partisan and unsound research. We urge that any meeting between the authors of the Harvard study and USDA staff be structured so that USDA experts on pesticide risk analysis have "equal time" to point out the mistakes and flawed assumptions of the study.

The Honorable Dan Glickman  
The Honorable Carol M. Browner  
April 19, 2000  
Page Two

The most prominent flaws of the Harvard study are: (1) the authors assume that implementation of the FQPA would result in a catastrophic loss of insecticides available to farmers for control of crop pests, and (2) they ignore the availability of alternative chemical and non-chemical pest control options, which would replace FQPA-curtailed uses of high-risk chemicals and largely offset economic impacts of restrictions on the highest-risk insecticides.

#### (1) Unrealistic Assumptions About Loss of Insecticides

The authors assume that EPA will ban all uses of all organophosphate (OP) and carbamate insecticides. This scenario, a complete ban of more than 50 chemicals, has never been even a remote possibility; it is far outside the scope of any action EPA has ever considered necessary to attain the FQPA's goals. The study's authors acknowledge this fact, then base their analysis on what they concede is a false assumption. They justify their decision on account of its "analytic virtue" (i.e., simplicity).

Of the 35 economically important OP and carbamate insecticides used in food production, only about 15 leave detectable residues in foods, based on several years of data from the USDA Pesticide Data Program. Well over half of the 600+ current uses of OPs and carbamates pose minimal risks of dietary exposure and are likely to survive EPA's review. Consumers Union's analyses of residue and toxicity data have repeatedly shown that only about 100 of those 600+ uses account for more than 99 percent of dietary risk. (See for example, *Do You Know What You're Eating? An Analysis of U.S. Government Data on Pesticide Residues in Foods*, by Consumers Union, January 1999. This and other analyses of the PDP data are on CU's FQPA project web site, at <http://www.ecologic-ipm.com>.) Our analyses have shown that EPA could eliminate most of the risk associated with dietary OP and carbamate residues by targeting its regulatory actions against selected uses of just eight to ten pesticides.

#### (2) Failure to Consider Available Alternatives

Consumers Union has also shown in published analyses that multiple and cost-effective alternative pest-management options are available for nearly all high-risk OP and carbamate uses. (See *Worst First: High-Risk Insecticides, Children's Foods and Safer Alternatives*, Consumers Union, September 1998, also available at the web address above.)

The Harvard analysis—like an earlier AFBF-sponsored study by Texas A&M University, on which the HCRA analysts relied—dismisses alternatives to OP and carbamate insecticides as more costly, and makes no effort to assess chemical or non-chemical control options that would replace specific banned uses. The study assumes massive losses of effective pest control, with severe associated economic losses and food cost increases. These assumptions are unfounded, and the projected economic impacts are completely unrealistic.

The Honorable Dan Glickman  
The Honorable Carol M. Browner  
April 19, 2000  
Page Three

There are many existing, proven alternatives to high-risk insecticides. Some of these are lower-risk OP and carbamate uses that will survive FQPA reassessments, which the Harvard study assumed out of existence. In addition, spurred in part by pressure the FQPA has created to phase out older, high-risk chemicals, the pest-control industry has been introducing new products at a record pace. EPA's just released biennial report lists over 50 new active ingredients registered, more than half of which meet the agency's "reduced risk" criteria. The HCRA analysis ignores these effects of market-driven innovation and progress made by growers in adopting biointensive Integrated Pest Management (IPM). (See *Pest Management at the Crossroads*, Consumers Union, October 1996; also see, <http://www.pmac.net>.)

The HCRA assertion that alternatives are "too costly" is based on no analysis of actual costs and is simply not credible. The facts are that pesticide prices and expenditures in the U.S. are falling across the board. The dozens of new products registered in most crop markets have unleashed something of a price war, with some new products discounted to gain market share. In other crop markets, new products are more costly per acre but they are worth more because they work better and are less disruptive to beneficial organisms on the farm.

In summary, we hope both USDA and EPA will look very critically at the flaws in this alarmist Harvard study and widely publish your criticisms. The FQPA was passed unanimously by both houses of Congress, a testament to the hard work its sponsors devoted to reaching a consensus that all sides could live with. The reforms embodied in the FQPA were urgently needed to replace a regulatory system that all agreed was outdated and ineffective in protecting the health of children. It is the AFBF's overt attempts to undermine that compromise, and the willingness of academic researchers to lend their prestige and biased analysis to that campaign, that pose a danger to public health, not the FQPA itself.

We urge USDA and EPA to redouble your efforts to fully and fairly implement the Food Quality Protection Act. The nation's children need you to carry this fight forward on their behalf.

Thank you very much.

Sincerely,

Adam J. Goldberg  
Pesticide Policy Analyst

Edward Groth III, Ph.D.  
Senior Scientist

Charles M. Benbrook, Ph.D.  
FQPA Consultant