



January 6, 2021

**Environmental Working Group Comments to the Environmental Protection Agency
Docket ID: EPA-HQ-OPP-2020-0600-0001; Pesticide Product Registration:
Applications for New Uses (November 2020)**

The Environmental Working Group, or EWG, a nonprofit research and policy organization with offices in Washington, D.C., Minneapolis, Minn., San Francisco and Sacramento, Calif., urges the Environmental Protection Agency to reject the proposed new uses of aldicarb on oranges and grapefruit in Florida and Texas.

Aldicarb is a neurotoxic insecticide that can cause acetylcholinesterase inhibition, a toxicity target shared by other neurotoxic pesticides, including organophosphates. In 2010, as part of the human health risk assessment, aldicarb use on citrus and potatoes was identified as a concern for children's health. Subsequently, the EPA signed a Memorandum of Agreement with the aldicarb manufacturer at the time, Bayer CropScience, to phase out its use, with the uses that can cause the greatest public health risk, application on potatoes and citrus, ended immediately after this EPA-Bayer voluntary agreement.¹

In a striking reversal of the public health protections, new registrations by another pesticide manufacturer, Ag Logic, for use of this pesticide on peanuts, cotton, sugar beets, sweet potatoes and dry beans were approved in 2011,² and aldicarb use continued, as did the resulting aldicarb contamination of drinking water. This development was made possible by the fact that the EPA did not ban aldicarb outright, an action that was and is warranted, given the pesticide's neurotoxicity, its ability to contaminate ground water sources and its risks to children's health.

In the 2016 human health risk assessment, the EPA estimated that aldicarb levels in food and drinking water exceeded by nearly 3,000 percent the safe levels of exposure to aldicarb for infants less than one year old.³ According to the U.S. Geological Survey, approximately 0.1 to 0.2 million pounds of aldicarb were used in 2017, mostly on cotton, primarily in southeastern states and Texas.⁴ Additionally, drinking water testing by community water systems documented that more than 900,000 people who rely on public water supplies had detectable levels of aldicarb sulfoxide in their drinking water between 2015 and 2017. Some of these detections were above 0.87 parts per billion, the value the

¹ https://archive.epa.gov/pesticides/reregistration/web/html/aldicarb_fs.html#background

² <https://beta.regulations.gov/document/EPA-HQ-OPP-2010-1021-0120>

³ EPA. Aldicarb: Draft Human Health Risk Assessment in Support of Registration Review. March 25, 2016 <https://beta.regulations.gov/document/EPA-HQ-OPP-2012-0161-0022>

⁴ https://water.usgs.gov/nawqa/pnsp/usage/maps/show_map.php?year=2017&map=ALDICARB&hilo=L&disp=Aldicarb



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EPA identified as potentially causing risk when combined with dietary exposures.⁵ Importantly, this value is likely too high, since the EPA reduced the Food Quality Protection Act tenfold safety factor, despite acknowledgement of increased susceptibility to the neurotoxic effects of aldicarb during early development, noted in the 2016 human health risk assessment.

Given the risks to children's health from aldicarb, it is unacceptable to consider new proposed uses of this insecticide that have already been phased out, namely those on citrus. To protect human health and the environment, the EPA should deny the proposed new uses and cancel all uses of aldicarb.

Thank you for the opportunity to comment.

Submitted on behalf of the Environmental Working Group,

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⁵ <https://www.ewg.org/tapwater/contaminant.php?contamcode=2043>