



BEYOND PESTICIDES

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October 24, 2006

Office of Pesticide Programs
Regulatory Public Docket (7502P)
Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460-0001

Re: Resmethrin Reregistration Eligibility Decision; EPA-HQ-OPP-2005-0284

Dear Madam/Sir:

Beyond Pesticides appreciates this opportunity to comment on the Reregistration Eligibility Decision (RED) for resmethrin. Beyond Pesticides seeks to educate the public on the potential hazards of pesticides, restrict pesticides uses in a manner that protects public health and the environment, and advance alternatives that eliminate dependency on toxic chemicals. While we recognize EPA's efforts to reevaluate the use of resmethrin, Beyond Pesticides asks the agency to strengthen the following areas of the decision.

1) Risk analysis needs to reflect real life situations. Resmethrin exposure in the real world does not occur in isolated incidents. EPA does look at scenarios of multiple sources of exposure for resmethrin. However, EPA admits the science is incomplete to evaluate cumulative risks of synthetic pyrethroids as a class and further, does not look at synergistic effects with other chemicals. Research shows that combinations with pesticides and other chemicals, including pharmaceuticals, multiply the toxic effects of individual pesticides and create new adverse impacts.

2) Use of resmethrin for mosquito abatement is not effective. Adulticiding is not an effective method of mosquito control. A new study, *Efficacy of Resmethrin Aerosols Applied from the Road for Suppressing Culex Vectors of West Nile Virus*, funded in part by the Centers for Disease Control and the National Institutes of Health and led by the Harvard School of Public Health, provides data specifically illustrating this point. The study concludes that "ULV applications of resmethrin had little or no impact on the *Culex* vectors of WNV, even at maximum permitted rates of application." In combination with the health and environmental risks posed, which again are likely greater in reality than what is reflected in current lab tests, resmethrin should not be approved for mosquito abatement.

3) Resmethrin is harmful to ecologically and economically vital species, especially pollinators, many of which are declining in population. EPA identifies acute risk to some aquatic species and non-target insects, including agriculturally crucial pollinators

such as honeybees. Further protections are needed to protect these species, as well as ecological health.

4) *Changing label language is an unrealistic method of risk mitigation.* The agency assumes full compliance with product labels when setting standards – as ideal as this scenario would be, it is not congruent with reality. Violations and accidents are widespread and a fact of life. EPA must use other risk mitigation measures (i.e. restrict use) to be effective.

6) *EPA must incorporate expected increases in market share into exposures for all scenarios.* The entire market for non-agricultural insecticide use is changing as a result of the phase out of most urban uses of diazinon and chlorpyrifos (Dursban), as well as possible restrictions to other organophosphate and carbamate insecticides. The possibility of a market increase must be accounted for in the exposure assessments. The extent of post-harvest approved uses for resmethrin in food handling establishments (food processing/handling plants, restaurants, commercial food item transportation, food storage facilities) is especially concerning as this creates the potential for almost all food to be exposed to the chemical, substantially increasing dietary risk. Failure to account for market increases due to the phase out of other pesticides skews the results of the RED. EPA must include this predicted increase in market share in the RED.

In conclusion, the resmethrin Reregistration Eligibility Decision does not provide an adequate risk assessment or realistic mitigation measures for the risks that are identified. At the very least, resmethrin should not be used for mosquito abatement purposes as this use is largely ineffective and has widespread residential and environmental impacts. Until EPA has a comprehensive understanding of the risks of resmethrin, the precautionary principle should be employed, curtailing use expeditiously to avoid potentially harmful phase-out periods.

Sincerely,

Laura Hepting
Special Projects Coordinator