



BEYOND PESTICIDES

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December 7, 2006

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

RE: Organic Arsenical Herbicides RED; EPA-HQ-OPP-2006-0201

Dear Madam/Sir:

Beyond Pesticides appreciates this opportunity to support EPA's decision to deny reregistration for all organic arsenical herbicides. Our interest in this issue lies in our mission to protect public health and the environment, and advance alternatives that eliminate dependency on toxic chemicals.

EPA's decision is one that will protect public health and the environment. Arsenic has long been known for its toxic properties and the ability of organic arsenic to transform into the more toxic form of inorganic arsenic in the environment is of great concern. The agency is far from being alone in its conclusions over arsenic levels in drinking water. For example, Robert Goyer, chair of the National Academy of Sciences committee that wrote the 2001 report, *Arsenic in Drinking Water: 2001 Update*, has said, "Even very low concentrations of arsenic in drinking water appear to be associated with a higher incidence of cancer."

This decision is especially beneficial for states like Florida, a state that not only tends to practice intensive turf management but also depends on a permeable aquifer system for drinking water. As EPA knows, Florida's Department of Environmental Protection is also concerned over the use of these herbicide products and the resulting impact on the state's soils and water supply.

Further, we appreciate the agency's consideration of safer alternatives in this decision. Especially in the case of aesthetic uses, like golf courses and other turf management, there is no justifiable need to use toxic products, especially when safer alternatives exist. Even in the case of cotton production, which has traditionally used organic arsenicals, many producers have already voluntarily moved toward less-toxic products.

For the above-mentioned reasons, we applaud EPA's decision to deny reregistration of all organic arsenical herbicides. We respectfully ask the agency to take regulatory actions quickly, avoiding a potentially harmful phase-out period, as there is no justifiable need, economic or otherwise, to keep these products on the market.

Sincerely,

Laura Hepting
Special Projects Coordinator
Beyond Pesticides