



BEYOND PESTICIDES

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December 16, 2015

Jack Housenger
Director, Office of Pesticide Programs
Environmental Protection Agency
1200 Pennsylvania Ave, NW
Washington DC 20460-0001

Re: Glyphosate testing on U.S. commodities.

Dear Mr. Housenger,

We are writing to express concern over the lack of routine residue testing for glyphosate in U.S. food commodities. Glyphosate is the most widely used herbicide in the U.S., used on millions of acres of crops grown across the country.¹ The U.S. Environmental Protection Agency (EPA) under the *Federal Insecticide Fungicide and Rodenticide Act* (FIFRA) as well as the *Food Quality Protection Act* (FQPA) has an obligation to safeguard human health from potential risks from glyphosate exposure, especially dietary exposures. Currently, there is no formal testing for residues of glyphosate on food commodities, and we are now asking EPA to ensure that there is routine U.S. testing for glyphosate on U.S. food.

The U.S. Department of Agriculture (USDA), Food and Drug Administration (FDA) and EPA all share some oversight on pesticide residues in food. From a regulatory standpoint, EPA sets pesticide limits in food through its risk assessment process under FIFRA. Currently, USDA's Pesticide Data Program (PDP) tests food commodities for pesticide residues. FQPA directs USDA to collect pesticide residue information on food highly consumed, particularly by infants and children.² The data gathered from this program helps EPA conduct and validate the accuracy of its dietary assessments for pesticides under FQPA. As a result, EPA can submit requests for data.

As mentioned, EPA utilizes residue data to estimate the exposure of the general population to pesticides in food. Residue data from PDP is therefore very useful in helping the agency set tolerance limits on food. Section 408(b)(2)(A)(i) of the *Federal Food Drug and Cosmetics Act*

¹ USEPA. 2006 and 2007 Market Estimates. Pesticides Industry Sales and Usage.

http://www2.epa.gov/sites/production/files/2015-10/documents/market_estimates2007.pdf

² USDA. 2013. Pesticide Data Program. Annual Summary, Calendar Year 2011. Agricultural Marketing Service. Washington DC.

states that EPA can establish a tolerance for a pesticide chemical residue in or on food only if EPA determines that the tolerance is safe. "Safe" is then defined as a "reasonable certainty that no harm will result from aggregate exposure to the pesticide chemical residue, including all anticipated dietary exposures and all other exposures." Part of the tolerance setting process is the consideration of the amount of residue likely to remain on the food commodity. These limits must be based on human health data and should be informed by reliable real-world data. Without this, proper assessment of human health exposures can be left grossly underestimated, putting public health at risk. Currently the tolerances set for glyphosate range from 0.1ppm to 400ppm. On widely treated food commodities, glyphosate is set at 20ppm for soybean seed, 5ppm for corn, and 20ppm for canola seed.³

Currently, PDP is not testing for glyphosate residues on crops. In its last report, released in 2013, there was preliminary data for glyphosate on a small sample of soybeans.⁴ 300 soybean samples were tested where 90 percent contained residues from 0.26ppm to 18.5ppm, barely under the tolerance limit of 20ppm. No residue testing has been done for corn.

Corn and soybean are the two most widely grown crops in the U.S., and the most treated with pesticides like glyphosate, due to the use of genetically engineered (GE) herbicide-tolerant strains. Further, corn and soybean make up the foundation of the American diet. Recently, EPA increased the glyphosate tolerances for other minor crops, like carrots and sweet potato, and many expect to see increases in glyphosate applications. Gathering residue information on glyphosate's presence on the foods Americans eat is critical to EPA's assessment of human health risks posed by this chemical. With the recent classification of glyphosate as a 'probable human carcinogen' by the World Health Organization's International Agency for Research on Cancer (IARC), and the impending release of glyphosate's registration review, many consumers are growing increasingly concerned about glyphosate exposures, making it more imperative that this information is made available.

We urge the agency to work with USDA to ensure that glyphosate becomes a routine part of the PDP's residue testing and that these tests are done more frequently. We would love the opportunity to talk further on this matter if needed. We look forward to your response.

Sincerely,



Nichelle Harriott
Science and Regulatory Director

³ 40 CFR 180.364

⁴ AMS. 2013. Pesticide Data Program. Annual Summary, Calendar Year 2011.