



BEYOND PESTICIDES

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Bill Oldland
SEIS Team Leader
US Forest Service
180 Canfield Street
Morgantown, WV 26505

**Re: Comments on the Gypsy Moth Management in the United States: A Cooperative Approach
Draft Supplemental Environmental Impact Statement**

Dear Mr. Oldland,

Please accept and fully consider these comments on behalf of Beyond Pesticides. We appreciate the opportunity to submit these comments to the United States Department of Agriculture Forest Service and Animal and Plant Health Inspection Service (APHIS) on the Draft Supplemental Environmental Impact Statement (DSEIS) for Gypsy Moth Management in the United States. As mandated under the National Environmental Policy Act (NEPA), the DSEIS outlines the alternatives proposed by the USDA Forest Service and APHIS for the management of the gypsy moth.

These comments are submitted on behalf of Beyond Pesticides and its membership that resides in areas that would be affected by the proposed gypsy moth control program. It is because of our concern about health and environmental impacts associated with the gypsy moth management programs that we submit these comments.

Because of the addition of the insecticide tebufenozide, Beyond Pesticides does not support the agencies' preferred alternative (Alternative 3). Instead, we support the no new chemical treatment option and urge the use of least and non-toxic options, including natural predators (parasitic wasps), as a method to suppress gypsy moth populations. In support of this position, we would like the agencies to consider the following:

I. Use Least-Toxic Alternatives to Protect Human Health and the Environment

Beyond Pesticides opposes the addition of yet another hazardous chemical to the program instituted for the management of the gypsy moth and encourages the agencies to support and utilize the least toxic alternatives included in the 1996 Record of Decision (ROD) described in the 1995 Environmental Impact Statement (EIS). Tebufenozide mimics the action of the natural insect hormone to induce premature molting and metamorphosis in insects. The agencies, in their risk assessment documents, discuss the many environmental risks associated with the use

of tebufenozide. As mentioned in these documents, tebufenozide can damage hemoglobin in mammals, leading to adverse health effects especially in sensitive groups, such as those with suppressed immune systems and children. Tebufenozide can also cause skin and eye irritation. In the environment it is highly active against most lepidopterous larvae and as a result, can seriously impact non-target insects, such as several species of butterfly and other species of moths. There is also noted concern for birds and fish¹. Tebufenozide also has the ability to contaminate surface waters and leach through soil to contaminate groundwater,² depending on soil conditions. The label for Mimic[®] states that “this chemical may also have a high potential for runoff into surface water.....[T]his pesticide demonstrates the properties and characteristics associated with chemicals detected in ground water.”³

Even though these impacts to human health and the environment are recognized by the agencies, it is unclear why tebufenozide and other hazardous chemicals are to be considered for the gypsy moth management program, given that the agencies have already approved the use of several least-toxic alternatives known to reduce gypsy moth populations. These programs have been successful without the use of chemicals known to have toxic impacts. For instance, the state of New Jersey reports satisfactory foliage protection with more than 70 percent reduction of moth populations⁴ using *Bacillus thuringiensis var. kurstaki (Btk)*. Other states, such as Minnesota routinely use *Btk* and other least-toxic options, such as mating disruption⁵ to successfully control gypsy moths in their states. However, there is a growing body of science documenting potential adverse human health impacts associated with exposures to various formulations of *Bt*. We believe it is critical to prevent human exposure to any products associated with adverse human health impacts and therefore urge the agencies to more fully incorporate in their program the use of natural predators as a method to suppress gypsy moth populations. By doing so, human health impacts would be greatly reduced. Parasitic wasps such as the *Ooencyrtus kuvanae* and *Cotesia melanoscela* are natural predators of the gypsy moth and have been used to successfully suppress moth populations in the state of Wisconsin.⁶

Since least-toxic options have been proven successful, and given that the impacts of tebufenozide would cause adverse effects to human health, wildlife and water resources, we urge the agencies to reconsider tebufenozide and other hazardous chemicals as the preferred alternative for gypsy moth management.

II. Notify the Public and Provide Full Public Disclosure of All Chemical Ingredients

Public Notification

The agencies indicate that prior to chemical application the public would be notified so that residents can avoid exposures. However, little is said about how this is to be implemented. Beyond Pesticides receives many calls from its members and other individuals voicing their concerns over not being notified prior to public sprayings, or of being given very little advance notice. We suggest that the agencies reconsider their current public notification practices to include all media outlets: newspapers, radio and television. Since it is plausible that some residents may not have access to these media, we also suggest notification via postal service. Notices should include application

dates, all chemical ingredients and their associated health impacts. The public should also be notified of precautionary measures to be taken to avoid exposures, how to seek medical treatment if exposed and be provided with a toll-free information hotline where further information about the health risks can be communicated.

Inert Ingredients

In the DSEIS, the agencies provided risk assessments for the chemicals used in the current management programs, as well as tebufenozide, the chemical chosen to be part of the preferred alternative. While the agencies gave an extensive overview of the hazards and exposure risks for these chemicals, no separate assessment was provided for the inert ingredients. So-called inert ingredients include chemicals that EPA has officially determined, under other statutory programs, to be hazardous or toxic. Among these are ingredients known or suspected to cause cancer, central nervous system disorders, liver and kidney damage, and birth defects, as well as a variety of short term health and ecological impacts. Even lower toxicity options, such as *Btk*, *gypchek* and *disparlure*, can contain inert ingredients that may be skin and eye irritants, or even respiratory irritants. Under current labeling requirements and “trade secret” proprietary agreements, these dangerous chemicals are not identified. However, the public has a right to know what is in these products to which they will be exposed. The agencies must not be intimidated by industry’s demand for secrecy, but put the health of the public first!

Precedent was set in 2007 when public concern was raised over chemical spraying for the light brown apple moth in the state of California. In response, the California Department of Food and Agriculture publically identified the chemical components of the pesticide product in question. This revealed several chemicals with known and unknown toxicity. In turn, the agencies, in their task to “prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare of man” Sec. 2 [42 USC § 4321] must fully assess and disclose all chemical ingredients of products used for any gypsy moth eradication project.

III. Do More to Prevent Pesticide Drift

The agencies stated that they would “establish buffer zones where necessary to minimize or eliminate insecticide drift to areas of special concern, such as wilderness areas or sensitive species habitats...” First, we would like to point out that all areas outside of the treated area are “areas of special concern,” be they wilderness areas, suburban or urban residential communities, organic farms, schools or hospitals, and should be treated as such. Secondly, there is little to no information on how the agencies would go about establishing buffer zones and minimize spray drift. It is mentioned that tebufenozide “would not be sprayed over water or areas where surface water is present.” This however, does not go far enough. We request that spraying within watershed areas, especially those with a history of contamination, for example the Chesapeake Bay watershed, should not be conducted.

Pesticide drift, which is the off-target movement of the pesticide through air at the time of application or soon thereafter, arises due to weather conditions, topography, and application methods and decisions. Beyond Pesticides receives many calls from the public concerning exposures to toxic chemicals as a result of the application of pesticides on windy days or on days

forecasted for rain. Buffer zones become irrelevant especially when pesticides are applied irresponsibly and in disregard of environmental conditions that exacerbate drift. Since we are aware that most pesticide drift incidents are due to applicator negligence, we urge the agencies to become more proactive in reducing pesticide drift, enforce the rules associated with minimizing drift and pursue violations in a manner that would restore public confidence in the agencies. Only in minimizing pesticide drift would the exposures to human health and environment be limited.

Conclusion

Under NEPA, the agencies have satisfied their administrative obligations with the publication of their DSEIS. However, to protect human health and the environment, the agencies must not continue to view hazardous chemicals as a solution to the gypsy moth problem. Least-toxic options have not only been proven successful, but pose less impacts to human and environmental health. Beyond Pesticides therefore calls for the rejection of alternative 3- tebufenozide and other toxic pesticides, as a viable addition to the gypsy moth management program.

While we urge the agencies to incorporate biological controls in the gypsy moth control program, it is absolutely essential that the public is provided with sufficient notice and with all information in order to better protect themselves and sensitive subgroups from chemical exposure. Full product ingredient disclosure is the only way to satisfactorily communicate with the public about the health risks imposed upon them. The agencies must also do more to reduce human exposures and environmental contamination due to pesticide drift.

Beyond Pesticides supports the agencies' attempts to manage gypsy moth populations, but feels that it is imperative that the above mentioned issues be taken into consideration for the protection of human and environmental health.

Sincerely,

Nichelle Harriott
Research Associate

¹ [Hamoutene D](#), et al. 2008. Effects of tebufenozide on some aspects of lake trout (*Salvelinus namaycush*) immune response. *Ecotoxicol Environ Safety*. 69(2):173-9

² NY State Dept of Environmental Conservation. 2002. Tebufenzide (Confirm) - NYS DEC Letter: New Active Ingredient Registration. http://pmep.cce.cornell.edu/profiles/insect-mite/propetamphos-zetacyperm/tebufenozide/tebufen_reg_0402.html

³ DowAgroSciences. 2008. Mimic 2LV Specimen Label. Label revised 07/30/08

⁴ NJDA. 2006. Gypsy Moth Suppression. New Jersey Department of Agriculture. <http://www.nj.gov/agriculture/divisions/pi/prog/gmquestions.html>

⁵ MDA.Gypsy Moth Unit. Minnesota Department of Agriculture <http://www.mda.state.mn.us/plants/pestmanagement/gypsymoth.htm>

⁶ Diss, A., 1998. Containing Gypsy Moth. Wisconsin Natural Resources. WI Department of Natural Resources. <http://www.wnrmag.com/stories/1998/aug98/gypsy.htm>