



BEYOND PESTICIDES

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July 21, 2004

Environmental Protection Agency
Public Information and Records Integrity Branch (7502C)
Office of Pesticide Programs
1200 Pennsylvania Ave., NW
Washington, DC 20460-0001

RE: Docket ID No. OPP-2004-0018

We appreciate the opportunity to comment on the EPA's "Labeling Statements on Products Used for Mosquito Control." These comments are submitted on behalf of Beyond Pesticides and its national membership and the groups signed below. We write to respectfully request the EPA to reconsider the recommendations set forth in the above-referenced document. The comments put forth in this letter illustrate what we consider to be compelling reasons why this proposal should be dropped.

Introduction

We believe that most of the recommendations set forth in the agency's proposal will result in adverse effects on public health and the environment. The proposed recommendations will also create the unintended consequence of an overall increase in ULV spraying without a proper assessment of the effects of that increase in spraying.

The agency identifies seven aspects of labeling that it claims are aimed at providing consistency rather than differences among labels. However, making labels consistent for the purpose of convenience for the users and at the cost of known and unknown hazards to wildlife is unacceptable. The precautions on each label are there for a distinct purpose and due to distinct data. As the chemicals have different known and unknown effects on human health and wildlife, we believe that it is only appropriate for the agency to change the label after a complete toxicity assessment is performed as the active ingredient comes up for reregistration review. Neither the public nor the environment is well served or better protected by the agency removing use restrictions or wildlife protections on adulticides prior to an assessment of the new usage patterns.

Introducing these kinds of changes to the label will push mosquito control in the wrong direction and unintentionally inspire a new wave of reliance on adulticiding. This comes at a crucial time when many mosquito managers are moving toward more responsible management with better surveillance, prevention and larval control. The agency must be made aware that there is currently a crisis of misuse and controversial adulticidal

