

An Open Letter to Public Officials on Mosquito-Borne Disease Control from Beyond Pesticides/National Coalition Against the Misuse of Pesticides

Dear Local and State Public Officials:

While we believe that something must be done to control adult mosquitoes that are known to carry dangerous diseases that pose a public health threat, we believe it is essential that local and state governments adopt procedures to: (i) identify the diseases that it considers a threat (including its life threatening and long-term effects); (ii) establish a disease surveillance system; (iii) release information on the numbers of mosquitoes found to carry the disease and their location; (iv) take steps to eliminate and control breeding areas and those areas that have been found to be inhabited by the disease carrying mosquitoes; and, (v) disclose any chemical use before application with information on potential adverse effects. Before taking action to control adult mosquito populations, you should explain to the public why breeding site reduction, biological larviciding and protective repellants have not achieved adequate control.

We share the concern about the potential for mosquito-borne disease in our community. However, we are also concerned about the potential exposure of large portions of our population to toxic pesticides that can also have serious adverse health effects.

The active ingredients in pesticide products are, as a rule, toxic materials that are intended to kill living things. While their human toxicity and ecological effects vary, depending on the specific materials, they can cause harm. A product's "inert" ingredient(s), which more often than not composes the majority of the pesticide formulation, can be more toxic than the active ingredient, even though it is not disclosed on the product label, nor made known to decision makers.

The locality and state should expand its larviciding efforts with biological controls at the front end, rather than focus on the less efficient and effective practice of adulticiding at the back end with toxic materials. With a more aggressive education campaign on the hazards of pesticides used in adulticiding programs, the public would better appreciate the need to help in the effort to eliminate breeding sites, such as containers and other objects/areas that can collect water, on their property.

Given findings of pesticide adverse effects, incomplete safety data, and clear legal restrictions on pesticide safety claims, public officials should never refer to pesticides as "safe" or "harmless." The *Federal Insecticide, Fungicide, Rodenticide Act* (FIFRA), 7 U.S.C §§ 136 et seq., requires that pesticides are registered and prohibits those who sell or distribute pesticides from making claims that substantially differ from claims made during the registration process. 7 U.S.C. § 136j(a)(1). The Environmental Protection Agency (EPA) has limited what can be said regarding the safety of pesticides. Pursuant to 40 CFR 162.10(a)(1), EPA has defined "false or misleading statements" to include the following: "(ix) Claims as to the safety of the pesticide or its ingredients, including statements such as "safe," "nonpoisonous," "harmless" or "non-toxic to humans and pets . . ."

As you may know, EPA is beginning to more fully evaluate the family of organophosphate pesticides, which includes malathion and naled (Dibrom™), because of the additive and cumulative effects associated with human exposure. The agency has already found that public exposure to most of the organophosphates exceeds acceptable risk standards from dietary exposure alone. This raises serious questions when considering non-dietary or non-agricultural exposure that certainly occurs as a result of mosquito adulticiding.

I have attached *Approaches to Dealing with Mosquito-Borne Diseases*, which outlines what we believe are the necessary steps in a program to protect the public from infected mosquitoes and pesticides. We hope that you can agree to this approach.

We look forward to working with you and other government agencies in taking proactive measures to protect public health.

Sincerely,

Jay Feldman
Executive Director