

Office of Pesticide Programs (OPP) Regulatory Public Docket (7502P)
United States Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460-0001

Re: Docket EPA-HQ-OPP-2009-0635, Public Availability of Identities of Inert Ingredients in Pesticides

To whom it may concern:

The City Council of Albany California is pleased that the U.S. EPA is proposing to require disclosure of so-called inert ingredients in pesticides. We urge the EPA to require **full disclosure of all inert ingredients in all pesticide formulas, without exception.**

Because inert ingredients typically make up the majority of a pesticide formula and are not truly “inert,” their disclosure is an important matter of public safety.

Disclosure of the identities of inert ingredients would allow public agencies such as our city to make informed decisions regarding what products we wish to use in maintaining public property where our residents and their visitors would be exposed to the chemicals that might be applied. Disclosure of inerts is also critical for allowing members of the public to make informed decisions regarding chemicals to which they and their families could be exposed.

Many inert ingredients are associated with serious health effects; inert ingredients in one pesticide formula can be active ingredients that are lethal to the target pest in another pesticide formula. One of the most recent revelations of the risk of inerts was in a research study published by a team of French scientists last year, which revealed that POEA, one of the inert ingredients in the commonly used herbicide Roundup, was more deadly to human embryonic, placental, and umbilical cord cells than the herbicide itself. This finding emphasizes that children are more vulnerable to the adverse effects of chemical exposure. Because many pesticide products (particularly herbicides) are used on lawns and other outdoor areas where children play on the ground, disclosing the full list of ingredients in pesticide formulas will help protect children’s health in particular.

Thank you very much for initiating this rulemaking to improve health and safety protections for American consumers.

Sincerely,

Joanne Wile, Mayor