



Joint Letter to US EPA Regarding Pesticides and Developmental Neurotoxicity Testing

May 12, 1999

The Honorable Carol Browner
Administrator
U.S. Environmental Protection Agency
401 M Street, S.W.
Washington, D.C. 20460

Dear Administrator Browner,

Our organizations are writing to urge you to move forward with requiring developmental neurotoxicity testing (DNT) for all pesticides.

As you know, Executive Order 13045 directed each Federal agency to "make it a high priority to identify and assess environmental health risks and safety risks that may disproportionately affect children" and to "ensure that its policies, programs, activities, and standards address disproportionate risks to children that result from environmental health risks or safety risks."

Even before this order, your October 1995 policy directive requires the Environmental Protection Agency (EPA) to consistently and explicitly evaluate environmental risks of infants and children in all risk assessments, risk characterizations, and in setting environmental and public health standards.

We commend and support these policies and believe they clearly call for requiring registrants to submit information about the toxicity of pesticides on the developing nervous system. Your Agency has had a validated DNT test guideline in place since 1991.

As you move forward on implementing the Food Quality Protection Act (FQPA), the EPA has gathered advice from numerous expert sources. At least two Scientific Advisory Panels organized by the Agency have raised concerns about the absence of DNT testing from the Agency's "core" testing battery used in the registration of pesticides.

Draft policy papers circulating in the Agency, such as "Toxicology Data Requirements for Assessing Risks of Pesticide Exposure to Children's Health" (dated November 1998), have recommended that DNT testing be added to this "core" testing battery.

In *Pesticides in the Diets of Infants and Children* (1993), the National Academy of Sciences' recommendations on toxicity testing included: "Testing must be performed during the developmental period in appropriate animal models, and the adverse effects that may become evident must be monitored over a lifetime. **Of particular importance are tests for neurotoxicity** (emphasis added) and toxicity to the developing immune and reproductive systems."

Given the extreme vulnerability [to FQPA briefing] of the developing nervous system of the fetus, infant and child and the fact that many pesticides are designed to be toxic to the nervous system, it is only rational that the Agency require adequate data about a pesticide's effects on the developing nervous system.

The agency's developmental neurotoxicity testing policies and protocols should meet several requirements:

- If DNT is not required for every pesticide, it should at least be required of all pesticides known to be neurotoxic in adults.
- Similarly, DNT should be required at least for every pesticide class with the same or similar mechanism of toxic action.
- The tests should include a functional assessment to evaluate the function of the nervous system.
- The tests should include life-long follow-up of the exposed animals to determine if early exposure to the neurotoxicant causes diseases late in life.

To remove the presumptive safety factor created in FQPA without the benefit of this information would run counter to the FQPA statute, as well as Executive Order 13045 and other EPA policy directives and commitments.

As you move forward in making a decision, we support the counsel you have received that calls for making this test mandatory. Our organizations believe that ample information exists for a decision to be made. We strongly support adding DNT testing to the core testing battery without delay and urge you to take this vital step.

We look forward to your reply and would be pleased to answer any questions that you may have.

Sincerely,

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- [Media Release](#) on Developmental Neurotoxicity Testing of Pesticides
 - Letter from NRDC, Consumers Union, LDA and SEHN on [NRDC web site](#)
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