

October 2, 2017

The Honorable John Barrasso  
Chairman  
Committee on Environment and Public Works  
410 Dirksen Senate Office Building  
Washington, DC 20510

The Honorable Thomas R. Carper  
Ranking Member  
Committee on Environment and Public Works  
456 Dirksen Senate Office Building  
Washington, DC 20510

Dear Senators:

We, the undersigned organizations, serve and represent farmworkers, rural, immigrant, indigenous and Latino communities at the local, state and national level. We write to you on behalf of over two million farmworkers in the United States and the Commonwealth of Puerto Rico. Agriculture is one of the most dangerous industries in the nation, with higher worker death rates than in the transportation, mining and construction industry sectors.<sup>1</sup> Daily exposure to a range of harmful agricultural chemicals is among one of the many hazards that farmworkers encounter on the job. Farmworkers urgently need and deserve the strongest safeguards to prevent illness, injuries, and fatalities, and to protect the healthy development of their children and families from toxic chemicals. **As organizations that represent some of the workers and communities most exposed to toxic pesticides, we urge you to oppose the confirmation of Dr. Michael Dourson to head the Office of Chemical Safety and Pollution Prevention at the EPA.**

The impacts of occupational exposures to pesticides on men, women and children are a reality of everyday life that we see on a regular basis in the course of our work in and among the people in these communities. Farmworkers tell us about their experiences in the field – their health concerns for themselves and their children or symptoms they may be experiencing, such as headache, nausea, vomiting and dizziness. Most farmworkers do not have health insurance, so many of their symptoms go untreated. Sometimes these symptoms go away without treatment. Other times, the symptoms may lead to further health complications that impact the entire family, especially if a family member loses work and income due to an untreated illness. Long-term exposure can lead to debilitating chronic illnesses for an already disadvantaged community.

Alarming, what we know about Dr. Dourson and his company, Toxicology Excellence for Risk Assessment (TERA), is that they have served as toxicologists-for-hire, paid by chemical companies and their trade associations to cast doubt on the science and to undermine health-protective standards for dozens of toxic chemicals, including the neurotoxic chemical chlorpyrifos.<sup>2</sup>

Chlorpyrifos is a widely used agricultural pesticide that poses serious risks to children, farmworkers, rural communities and all consumers. Prenatal exposures to chlorpyrifos have been linked to neurodevelopmental impairment in children and in many states, this chemical is most often identified as the culprit in acute pesticide poisoning incidents of workers and bystanders.<sup>3</sup> The health, safety and wellbeing of our members and our communities are directly threatened by the continued use of this nerve agent pesticide, a chemical that EPA Administrator Scott Pruitt has refused to ban in our food.

**The nomination of Dr. Dourson to be in charge of chemical safety at the EPA is a threat to our nation's children, farmworkers and communities at the frontlines of exposure to chlorpyrifos:**

- In 2006, Dr. Dourson and his colleagues at TERA published a paper, funded by Dow AgroSciences, making recommendations that would be far less protective than what EPA found was necessary to protect children its 2001 human health risk assessment.<sup>4</sup> The 2006 paper relied heavily on the findings of another paper<sup>5</sup> the authors published a year prior, also funded by Dow AgroSciences.

- Since Dr. Dourson's publications, several peer-reviewed studies have found harm to children's brains from much lower doses of chlorpyrifos than previously accounted for in EPA's risk assessments.
- Following these findings, in 2016, Dr. Dourson was among a group hired by the pesticide trade association Croplife America to present at a meeting of EPA's FIFRA Scientific Advisory Panel.<sup>6</sup> Dr. Dourson's group attempted to undercut one of the Columbia University studies that showed impaired mental development for children who were exposed to chlorpyrifos in the womb, and his group recommended that EPA do nothing to incorporate the findings of neurodevelopmental harm to children in future risk assessments.

Dr. Dourson's work on chlorpyrifos shows either a fundamental lack of understanding or a callous disregard for EPA's duty and mandate to protect children from pesticides. It is critically important to understand that this amounts to a national public health issue that affects us all. While we represent and defend farmworkers, the health of our nation's children is jeopardized by continued use of chlorpyrifos, due in part to EPA's own findings of unsafe levels on food and in drinking water. In addition, our country cannot afford the health consequences of the weakening of any protections of the public against exposure to toxic agricultural chemicals. By protecting farmworkers, we protect our food supply and, ultimately, we protect ourselves and the health of our children.

We urge the Senate to wholeheartedly object to this unconscionable nomination.

Respectfully,

Alianza Nacional de Campesinas (National Alliance of Farmworker Women)  
 CRLA Foundation  
 Earthjustice  
 El Comité de Apoyo a los Trabajadores Agrícolas (The Farmworker Support Committee)  
 Fair World Project  
 Farmworker Association of Florida  
 Farmworker Justice  
 Farmworker Self-Help  
 Food Chain Workers Alliance  
 Labor Council for Latin American Advancement (LCLAA)  
 League of United Latin American Citizens (LULAC)  
 Mi Familia Vota  
 Migrant Legal Aid  
 Mixteco Indigena Community Organizing Project  
 National Hispanic Medical Association (NHMA)  
 New Mexico Center on Law and Poverty (NMCLP)  
 New York Environmental Law and Justice Project (NYELJP)  
 Northwest Forest Worker Center  
 Organización en California de Líderes Campesinas, Inc.  
 PCUN-Pineros y Campesinos Unidos del Noroeste (Northwest Treeplanters and Farm Workers United)  
 United Automobile, Aerospace and Agricultural Implement Workers of America (UAW), International Union  
 United Farm Workers (UFW)  
 Warehouse Worker Resource Center  
 Worker Justice Center of New York, Inc. (WJCNY)

---

<sup>1</sup> American Federation of Labor and Congress of Industrial Organizations (AFL-CIO). (2017). *Death on the Job: The Toll of Neglect, 2017*. (26<sup>th</sup> edition). Retrieved from AFL-CIO website: [https://aflcio.org/sites/default/files/2017-04/2017Death-on-the-Job\\_0.pdf](https://aflcio.org/sites/default/files/2017-04/2017Death-on-the-Job_0.pdf)

<sup>2</sup> See: Lerner, S., The Intercept, July 21, 2017 “Trump’s EPA Chemical Safety Nominee Was In The ‘Business Of Blessing’ Pollution” and Adams, R. and Song, L., Inside Climate News, December 19, 2014 “One-Stop Science Shop Has Become a Favorite of Industry—and Texas”

<sup>3</sup> Farmworker and Conservation Comments on Chlorpyrifos Revised Human Health Risk Assessment (Apr. 30, 2015), in EPA-HQ-OPP-2008-0850, available at

<http://earthjustice.org/sites/default/files/files/FarmworkerandConservationCommentsonChlorpyrifosRHHRA.pdf>

<sup>4</sup> Zhao, Q., Dourson, M., and Gadagbul, B., “A review of the reference dose for chlorpyrifos,” *Regulatory Toxicology and Pharmacology Volume 44, Issue 2, March 2006*; EPA Chlorpyrifos Human Health Risk Assessment (2000); and EPA Chlorpyrifos Revised Human Health Risk Assessment (2016)

<sup>5</sup> Zhao, Q., Gadagbul, B., and Dourson, M., “Lower birth weight as a critical effect of chlorpyrifos: A comparison of human and animal data,” *Regulatory Toxicology and Pharmacology Volume 42, Issue 1, June 2005*

<sup>6</sup> See pp. 384-5 of the transcript of the FIFRA SAP Panel meeting, available at

[https://www.epa.gov/sites/production/files/2016-](https://www.epa.gov/sites/production/files/2016-05/documents/fifra_sap_04_19_16_to_04_21_16_final_transcript.pdf)

[05/documents/fifra\\_sap\\_04\\_19\\_16\\_to\\_04\\_21\\_16\\_final\\_transcript.pdf](https://www.epa.gov/sites/production/files/2016-05/documents/fifra_sap_04_19_16_to_04_21_16_final_transcript.pdf)