

December 16, 2019

OPP Docket # EPA-HQ-OPP-2011-0855  
Environmental Protection Agency Docket Center (EPA/DC)  
(28221T)  
1200 Pennsylvania Ave. NW  
Washington, DC 20460-0001

**Subject: Letter Opposing the Re-registration of Paraquat**

**The undersigned 52 farmworker, public health, environmental justice, environmental, and farmer advocates urge the EPA to ban paraquat because of its substantial and demonstrated risks.** The continued use of paraquat cannot be justified and the EPA must cancel its registration in order to adequately protect the people and places most likely to be harmed by this dangerous herbicide.

Paraquat is the most acutely lethal herbicide still in use today and has resulted in the death of at least 30 people in the U.S. in the last 30 years. In addition, chronic paraquat exposure has been associated with an increased risk of developing Parkinson's disease.

Much of the world has banned or is in the process of phasing out paraquat due to its high toxicity, including three of the largest agricultural producing nations in the world – the European Union, China and Brazil.

Yet paraquat use in the United States is higher than it's been in the past 25 years, with use rising considerably in recent years. This increase shows no signs of slowing.

Paraquat is one of the most highly toxic herbicides still used in the United States. Yet in the draft risk assessment, EPA has erased protections for the most vulnerable young children in our population and ignored associations with Parkinson's disease.

The agency found serious risks to farmworkers who are exposed to high levels of paraquat on the job, which also poses a significant risk to their families. The EPA has also identified considerable environmental harms.

We urge the EPA to ban this chemical. Farmworkers, farmers, children, and our natural places should not be left behind when crucial public health and environmental protections have been granted almost everywhere else in the world.

Signed,

350 Colorado  
Alianza Nacional de Campesinas  
Beyond Pesticides  
Center for Biological Diversity  
Center for Environmental Health  
Center for Food Safety  
Coalition of Florida Farmworker Organizations, Inc.  
Coming Clean  
Community Alliance for Global Justice  
Endangered Species Coalition

Environmental Working Group  
Fair World Project  
Family Farm Defenders  
Farmworker Association of Florida  
Friends of Milwaukee's Downtown Forest  
Friends of the Earth  
IPEN (International Pollutants Elimination Network)  
Justice/Justicia For Migrant Workers  
MADE SAFE & Nontoxic Certified  
Md Pesticide Education Network  
National Family Farm Coalition  
National Farm Worker Ministry  
National Toxic Encephalopathy Foundation  
Natural Resources Defense Council (NRDC)  
Nature Coast Conservation, Inc.  
New Hampshire Audubon  
Northeast Organic Farming Association of Massachusetts  
Northeast Organic Farming Association of New York  
NY4WHALES  
Oceanic Preservation Society  
Ohio Valley Environmental Coalition (OVEC)  
People Concerned About Chemical Safety  
Pesticide Action Network  
Physicians for Social Responsibility Maine Chapter  
Pollinate Minnesota  
Prairie Rivers Network  
Predator Defense  
Protect All Children's Environment  
Real Food Media  
Sierra Club  
Sierra Club Toxics Team  
South Asian Fund for Education, Scholarship and Training (SAFEST)  
The Animal Welfare Institute  
The Michael J. Fox Foundation for Parkinson's Research  
The Northwest Center for Alternatives to Pesticides  
Toxic Free NC  
Unexpected Wildlife Refuge  
Virginia Association for Biological Farming  
Western Watersheds Project  
WhyHunger  
Wildearth Guardians  
Worker Justice Center of New York