



## Cape Alliance for Pesticide Education

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A local resource for information about toxic chemical pesticides and alternatives to their use

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August 8, 2009

Dear Senator O'Leary and Representative Peake:

Thank you for requesting a moratorium on the herbicide spraying by NSTAR in Eastham. GreenCAPE is deeply concerned about NSTAR's plans to return to the use of hazardous herbicides to control weeds on their easements throughout the Cape –and now in Eastham- after years of controlling plant growth by simple cutting of vegetation. Why risk exposure to toxic chemicals and contamination of our water supply and air when a safe alternative already exists? Herbicides are not regulated to be "safe" and are intentionally toxic by design. The registration process (not an "approval" process) for pesticides offers no assurance of safety, nor was it ever intended to do so. Before you attend the informational session in Eastham on Wed. evening, it is important for you to know that the pesticide registration process is not a straightforward health and environmental impact assessment, but rather an attempt to balance the adverse impacts of pesticide use against its perceived benefits. Pesticides (an umbrella term for herbicides, insecticides, fungicides, rodenticides, etc.) are regulated by EPA under FIFRA (the Federal Insecticide, Fungicide and Rodenticide Act) which sets the standard for pesticide registration. EPA's efforts of late have been seriously deficient, relying on inadequate data provided by the manufacturer. Under FIFRA EPA must register a pesticide if the Administrator determines that the pesticide will perform its intended function *without any unreasonable adverse effect on the environment*. Under the law, "unreasonable adverse effect on the environment" is defined as "any unreasonable risk to man or the environment *taking into account the economic, social, and environmental costs and benefits of its use.*" This term defines the registration process as a balancing act and clearly the registration of any pesticide is not dependent on a finding of safety. To emphasize that, federal regulations prohibit any claim that a pesticide is safe, nontoxic, or harmless, even if that claim is limited to use of the pesticide in accordance with label directions. Older pesticides have not been reviewed according to more modern standards and those reregistrations are not expected to be complete until midcentury ---though the pesticides will still be on the market. Awareness of the flaws inherent in the current process may allow you to more accurately weigh the assurances of safety that will be presented Wed. evening by NSTAR and the MDAR.

One of my numerous concerns about the chemicals NSTAR plans to spray regards the ease with which pesticides can migrate in to the water table and wetlands. The fast draining sand of Eastham will not serve as a very adequate filter to restrict the passage of the herbicides in to the aquifer. Also, pesticide drift via air currents is all too common regardless of any attempts to limit chemical applications to minimal wind conditions. Herbicide residues will quickly find their way in to lakes, ponds, bays, wetlands, and estuaries via storm drains and road runoff during any rains following application. Studies of the health effects of most of the herbicides NSTAR is considering-including their mutagenic or carcinogenic potential, as well as their reproductive and neurological impacts-are notably absent or inconclusive. Herbicides are not screened for their impacts on the endocrine system yet but many herbicides disrupt that critical body system. This may be pertinent to the proposed NSTAR herbiciding in Eastham. Because

of adverse effects on sperm production in rabbits from glyphosate (the active ingredient in Accord), glyphosate is now included on the EPA's list of pesticides to be tested for hormonal effects as part of the new "Endocrine Disruptor Screening Program". Unfortunately, if the NSTAR program proceeds, we won't have the benefit of those test results in time to avoid previously unreported health impacts.

I think you will agree there is still much we don't know about human health problems that can result from pesticide exposure. Additionally, the EPA does not routinely review data on pesticide risks to native bees, earthworms, amphibians, reptiles, beneficial insects or companion animals. Most pesticides have never been tested for safety on humans (nor would we want them to be) and U.S. EPA's testing guidelines do not require observation of several key endpoints such as developmental neurotoxicity or immunotoxicity. Exposures to multiple pesticides (which would be the case in Eastham) are not evaluated by EPA, even though exposure to multiple pesticides occurs frequently. The non-pesticidal ingredients in pesticides (the so-called "inert" ingredients/ "other" ingredients) which make up the bulk of the product can also be harmful --in some cases more harmful than the pesticide-(remember Agent Orange?) and they are usually not even identified on the label.

It is reckless to permit this unhealthy polluting practice atop our vulnerable aquifer when the safer alternative of selective cutting exists. Right-of-way spraying for highways and railroad beds near wetlands are no longer conducted on the Cape because of the sensitivity of the environment. Utility easement spraying must be terminated as well. If the NSTAR request to spray herbicides in Eastham is not denied outright, at the very least, NSTAR should be mandated to pay for drilling test wells and lab analysis conducted by the U.S. Geological Survey. Studies in Denmark have determined that glyphosate (active ingredient of Accord) is polluting that country's underground water far more than previously thought. Drift catchers should be made available to the town to test for chemical trespass via air currents and citizens encouraged to report health impacts affecting them, their pets, and wildlife.

Sincerely,

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