



PUBLIC EMPLOYEES FOR ENVIRONMENTAL RESPONSIBILITY

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September 26, 2022

Administrator Michael Regan
U.S Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Dear Administrator Regan:

I am writing to bring to your immediate attention new research that finds disturbingly high levels of per- and polyfluoroalkyl substances (PFAS) in widely used pesticides. Published this week in the *Journal of Hazardous Materials Letters* the study (“Targeted Analysis and Total Oxidizable Precursor Assay of Several Pesticides for PFAS”)

<https://www.sciencedirect.com/science/article/pii/S266691102200020X> found –

- PFOS in 6 out of 10 tested insecticides at incredibly high levels, ranging from 3,920,000 to 19,200,000 parts-per-trillion (ppt). As you know, this June the U.S. Environmental Protection Agency (EPA) updated its Health Advisory for PFOS to 0.02 ppt;
- These PFAS are being taken up into the roots and shoots of plants, which means that they are entering our food supply through contaminated soils; and
- A non-targeted PFAS analysis indicates that there are far more additional unknown PFAS in 7 out of 10 tested insecticides.

On September 1, EPA moved to remove 12 PFAS from its approved list of inert ingredients for pesticides. Its announcement stated that “these PFAS are no longer used in any registered pesticide products...” However, this study indicates that the PFAS in pesticides problem is far larger than just the inert ingredients; specifically, PFOS was not one of the 12 PFAS removed from the list of approved inert ingredients, and yet the levels of PFOS found in these six pesticides is alarming.

Moreover, this contamination does not spring from contaminated HDPE barrels but is in the ingredients of the pesticides themselves, possibly added as dispersants to aid in the even spreading of the agents on plant surfaces.

These findings strongly suggest that EPA’s approach to preventing PFAS contamination of registered pesticides has been wholly inadequate. In addition, EPA’s reliance on voluntary testing appears to be profoundly misplaced.

Further, the level of PFAS absorption by plants detected in this study suggests that this exposure pathway poses a major threat to the safety of our food supply. For this reason, it is quite possible that PFAS in our food is a bigger PFAS exposure pathway than water. This threat is not merely

to the safety of U.S. agriculture but of the world's food supply, as these pesticides are widely applied in other countries.

As you know, EPA considers any level of PFAS to be potentially toxicologically significant. Thus, the presence of PFAS in pesticides at levels that are *hundreds of thousands of times higher* than EPA's Health Advisories for water should be cause for your immediate concern.

On behalf of my organization, Public Employees for Environmental Responsibility (PEER), I am writing to ask you to examine this study and direct EPA to take these three actions on an urgent basis:

1. Require that every manufacturer test every registered product and certify that they do not contain PFAS. EPA should spot check these tests to assure their accuracy;
2. Ban the use of any pesticide containing any form of PFAS; and
3. Remove from EPA's website and publications any statement that says or implies PFAS are no longer used in any registered pesticide product until testing is done.

Regarding this second request, the study's detection of unknown PFAS suggests that many of the PFAS being found in the pesticides tested fall outside the narrow definition of PFAS that EPA is developing for regulatory purposes. Once again, PEER urges that EPA regulate all PFAS as a category, rather than continuing its present chemical-by-chemical approach for the hundreds of PFAS that are now in use and the unknown number of these chemicals being developed.

Should you want any additional information on any aspect of this matter, we will be more than happy to provide it.

Sincerely,

Tim Whitehouse
Executive Director