

ENVIRONMENTAL CARE ASSOCIATION COMMENTS AND RESPONSE TO:

NRDC (Natural Resources Defense Council) proposed request to the EPA to ban all uses of the herbicide 2, 4-D. EPA Docket Number: EPA-HQ-OPP-2008-0877

Environmental Care Association of Idaho (ECA) is submitting the following comment on this proposed ban of all 2, 4-D herbicide.

ECA of Idaho is strongly opposed to this proposed ban of all 2,4-D based formulations.

ECA of Idaho is the professional association of all pesticide applicators of the State of Idaho. ECA is made up of companies, firms, private applicators and local government agencies involved in the applications of pesticides in grounds maintenance, urban ornamentals, commercial and urban pest management operations and many other government agencies that apply pesticides.

ECA History: The Environmental Care Association was formed in 1980 to promote professionalism and offer training to all pest control/pest management operations, lawn care and tree care professionals and landscape maintenance professionals, private applicators as well as various local government agencies. It has a Board of Directors made up of all these various industry segments and is active in the National Pest Management Association. ECA Board Members are also active in various other national associations such as Professional Landcare Network (PLANET) and the American Mosquito Control Association (AMCA) as well as various regional associations. ECA members provide services for a very large population of homeowners, commercial food processing operations, commercial interests, cities, parks and recreational interests and other land/property owners.

ECA of Idaho is strongly opposed to this proposed ban of all 2,4-D herbicide products for the following reasons:

The Chlorophenoxy herbicide 2,4-D has been used since 1946. This selective broadleaf herbicide has an excellent safety record and has a minimal risk to human, fish and wildlife and other mammals.

In a quote from 1996 USDA study, it concluded that if 2,4-D became unavailable the cost to growers and other users in terms of weed control expense and to consumers in the form of higher food and fiber costs would total \$1.6 billion annually in the United States. These are 1996 dollar figures and as a nation of consumers could not afford to absorb in today's economic situation.

Another conclusion from a USDA study: Extensive epidemiological studies have concluded that 2,4-D is of very low toxicity to humans and animals. There are no scientific documented health risks, either acute or chronic that exists from the approved uses of 2,4-D phenoxy herbicide.

A recent study from Canada findings state: "Weed control cost to barley and wheat producers would increase by a factor of 2.9 times if 2,4-D was not available to Canada farmers.

There have not been any world wide studies on the benefits of 2,4-D, although these benefits have known to be an enormous tool in combating world hunger by adding to lowering the price of food production. (From "Assessment of Economic and Related Benefits to Canada of Phenoxy Herbicides")

According to a recent expert review (Dost, 2003) "2, 4-D is possibly the most extensively researched of all



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pesticides. The data has been examined by an unusual number of advisory committees and work groups". In Idaho, the use of 2,4-D is a vital tool in the battle against noxious weeds that threaten pastures, range grasses, landscape areas, parks and waterways. A good example is the use of low dosages of 2,4-D on Idaho water ways to battle Eurasian Milfoil. The use of 2,4-D is the most cost effective approach to weed control operations. The use of 2,4-D on landscape turf areas has been documented for decades. Various independent studies conclude that there are no known toxicological ill affects from the **proper** use of 2,4-D.

Under EPA Classification of Carcinogenicity, 2,4-D is classified as a class D compound non carcinogenic. This Carcinogenicity Peer Review Committee has made this conclusion **four** different times. (Herbicide and Health, David Page) The latest of this being in August 2007. The conclusions of this Carcinogenicity Peer Review, August, 2007 state:

If used according to label directions:

After 60 years of wide spread use and research, an unprecedented amount of scientific data on 2,4-D has been amassed around the world.

After rigorous analysis of the relevant scientific data, experts **all agree**, 2,4-D:

- Is not a human carcinogen.
- Does not cause birth defects.
- Does not cause cancer in other animals.
- Does not cause genetic damage.

2,4-D as a tool in landscape to increase property value:

In these days of falling property values, the proper use of 2,4-D herbicide can help promote a health turf. A healthy well maintained lawn and landscape can increase the property value of a home by up to 15%. (From Staygreen web site, Family Handyman Magazine, February, 2009)

Conclusions:

The position of ECA of Idaho is the proper use of 2,4-D products according to manufacturers label directions is a valuable tool in ornamental turf, agriculture, industrial, and noxious weed control.

The position of ECA of Idaho is that the proper use of 2,4-D according to label directions is a valuable Integrated Pest Management (I.P.M.) tool. The proper use of 2,4-D can lead to the better health and vigor of crops, turf, landscape.

To summarize:

- A healthy crop simply means fewer pesticides will be needed to maintain the health of a crop.
- Healthy crops mean economically more food to feed a hungry world.
- Healthy landscape means increased property value in a troubled economy.

ECA of Idaho, a voice of industry fertilizer and chemical users recommends to the EPA that the proposed request made by NRDC be rejected on the grounds of 60 years of sound scientific data and Integrated Pest Management principles.

Respectfully submitted,
Ed Burnett, President, ECA of Idaho

Submitted with approval from the Board of Directors, ECA of Idaho

*The premier voice for Idaho's tree, lawn care and pest management industries
to protect the health and property of our client.*