

Environmental Protection Agency
Region 9 Offices
75 Hawthorne Street
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To Whom It May Concern:

My name is Jeff Shields and I live in San Francisco, California. I am writing this letter for the safety of farm workers in California and all across the United States. I must ask that you please reconsider the legality of a particular organophosphate pesticide, which is poisoning many men and women on U.S. farms today. This pesticide I am referring to is malathion.

Malathion is classified as an organophosphate insecticide, which means that it is an organic compound, containing phosphorous. It is used on farms as well as home gardens to kill unwanted insects (This means that anyone who can afford it can go to their local nursery or possibly hardware store and pick up some malathion). Malathion is also used to treat head lice [Agency for Toxic Substances and Disease Registry (ATSDR), 2003]. A final use for malathion has been to kill substantial populations of fruit flies and Boll Weevils in U.S. communities (EPA, 2005). Use of malathion in this way has caused environmental concerns as well.

I know this pesticide to be not only a very dangerous chemical, but also a very prevalent one. In my home state alone, California Pesticide Regulation (2003) shows that it is used in 47 of the 58 counties (SF not one of them). Each county sprays hundreds and thousands of pounds of malathion a year while the effects of this pesticide are ill explained and not well clarified by official

government sources. Most of malathion use is on farmland where, needless to say, there are many farm workers on site.

In California alone, there are over a million farm workers in a given year, 66% of them are Mexican or from other Latin countries (U.S. Dept. of Labor, 2005). These workers depend on strict and fair laws to help protect them from unhealthy work conditions on the farm. Many farm workers are either not aware of the potential dangers of pesticides or they are afraid to raise conflict with their employer. California farms in particular are monitored more so than most other states. However, this does not say much, considering the pervasiveness of malathion on California farms (note: I spoke with Assistant Director of California Pesticide Regulation, Veda Federighi, and I was surprised by her unwillingness to discuss organophosphate pesticides).

The effect that pesticides have on farm workers is real. Cox (1994) notes that “Farmworkers suffered at above-average frequency from liver cancer, lung cancer, cancer of the pharynx, multiply myeloma, cancer of the stomach, cervical cancer, prostate cancer, and testicular cancer (Journal of Pesticide Reform). The ATSDR (2003) also notes, “Farm workers, chemical sprayers, and people who work in factories that make malathion are most likely to be exposed.” They also go on to explain that “Exposure to high amounts of malathion can cause difficulty breathing, chest tightness, vomiting, cramps, diarrhea, blurred vision, sweating, headaches, dizziness, loss of consciousness, and possibly death.”

The EPA does address the issue of malathion in its Risk Assessment Fact Sheet,

which is important. However, the language does not seem to clarify malathion's general dangers, nor does it include the impact that it has on farm workers. Under the EPA's Revised Risk Assessment Fact Sheet (2005), it states, "The Agency's characterization of the carcinogenic potential of malathion remains unchanged as suggestive evidence of carcinogenicity but not sufficient to assess human carcinogenic potential." It seems to me that if there is "suggestive evidence of carcinogenicity" for malathion use, than it should not be used. Also, under "Occupational Risks," the EPA mentions very little about the "handlers," who are mostly farm workers. Requirements for farms with regard to malathion only deals with proper clothing for the "handlers" and a standard 12-hour reentry interval (REI). This is not enough protection for these individuals. People are generally safer when they are far away from malathion. Farm workers do not have the luxury of moving away. They are being forced to work in conditions that many researchers find to be dangerous.

There are some that tend to tone down the dangers of malathion. However, these claims come from short-term studies, and sometimes from groups that just want to protect private business practices. For instance, Freya Camel (1998) wrote an article about the possible neurological affects of organophosphates on farm workers and found there to be very little (Environmental Medicine). However, I found it interesting that this article accepted the fact that farm workers experienced some degree of exposure to these types of pesticides. Also, since the study lasted only a single season of work, it would be difficult to conclude on the affects of a

low level of exposure because, logically, less exposure would necessitate more of a long-term study.

Maybe one of the biggest challenges in protecting farm workers from malathion are the employers. Since their businesses are set up in a way that necessitates these types of pesticides, it is difficult to persuade them to take action their selves. There are even coalitions of employers, like Pest Control Operators of California (2006), that unite together in order to protect their freedom to use these chemicals. They proudly proclaim statements like, “We successfully fought efforts to require costly pesticide notification before every application,” or “We blocked efforts to require inspection of all work performed.” These practices are also complemented by big agriculture chemical businesses that profit greatly from pesticide sales to farms.

The bottom line is that farm workers need more protection. Within the Department of Labor, there is protection for them, which comes from the Occupational Safety and Health Administration (OSHA) as a result of the Occupational Safety and Health Act. Also, Toth (1996) points out, “In 1992, the EPA revised the Worker Protection Standard for Agricultural Pesticides (regulations initially issued by the agency in 1974 to protect agriculture workers from exposure to pesticides in the fields).” (North Carolina Cooperative Extension Service). This was important in posting information on the pesticides for farm workers and giving them notification about when the pesticides would be used. It also set standards for safety training of farm workers.

However, since the EPA approves of malathion as a safe pesticide to use on these farms, it would make it difficult to shield these workers from exposure. It is the job of

the EPA to express a complete understanding of these chemicals and their long-term affects on humans. I feel that malathion has slipped through the cracks. It is not enough to require permits for “general” or “restricted” use of this chemical (EPA, 2005). There must be a complete ban. Any use of it hurts these farm workers.

There are a number of alternatives to using malathion. Anne Sorenson (2000) states, “a real movement is afoot to switch to more ecologically based methods of pest control, thanks in part to the 1996 Food Quality Protection Act” (Environmental Science & Technology). It is true that the FQPA does help, but it looks more closely at toxic residue before it gets to the consumer, and not at farm workers. Farms like Walnut Acres, Knoll Farms, CAPAY Organic, and Seabreeze Farms all use alternatives to malathion. It is important for the EPA to use these types of ecologically friendly farms as standards to achieve healthier working conditions. These farms think about the balance of life and how everything is interconnected. The fact that these organic farms exist means that it is possible.

Please consider my plea for the end of malathion in the United States. Many believe that this insecticide is dangerous for good reason. It seems to me that if there is a lot of credible information out there, stating that this chemical has potential to do harm and there is very little information about its positive attributes, then it should not be allowed to exist so prolifically in our country. Please think about the people who work in and around this chemical on a daily basis; think about their families, and think about whether you would want to work in these kinds of conditions.

References

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Advocacy Paper
Malathion Use And Its Affect on Farm Workers

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