

Congress of the United States
Washington, DC 20515

February 11, 2016

Administrator Gina McCarthy
Environmental Protection Agency
1200 Pennsylvania Ave NW
Washington, DC 20004

Dear Administrator McCarthy:

We write to express our concerns regarding the findings in a recent *Chicago Tribune* report¹ on the Environmental Protection Agency's (EPA) review process for the herbicide Enlist Duo, and to request more information about EPA's plan to reevaluate Enlist Duo's health and environmental risks.

Enlist Duo is a new herbicide currently approved for use on herbicide-resistant corn and soybean crops. Dow AgroSciences created Enlist Duo, a mixture of the weed killers glyphosate and 2,4-D, to combat so-called "superweeds" that have grown resistant to glyphosate alone. As reported in the *Chicago Tribune* article, EPA registered Enlist Duo in October 2014 after reversing its previous analysis of certain health harms associated with exposure to 2,4-D. We were concerned to learn that, during this process, EPA dismissed a key study linking 2,4-D to kidney abnormalities based on one scientist's analysis, and in doing so, effectively gave the green light for 41 times more of the chemical to enter the American diet than was previously allowed.

Given the widely-known adverse impacts of 2,4-D on human health and the environment, and with little understood about the implications of combining 2,4-D and glyphosate, EPA should use the utmost caution in assessing the safety of Enlist Duo before approving it for continued use. We were pleased to learn of EPA's decision in November 2015 to ask a court to vacate the agency's approval of Enlist Duo, after Dow provided the agency with information regarding the synergistic effects of glyphosate and 2,4-D in Enlist Duo on threatened and endangered plants. The court denied that request, but did remand the registration decision to EPA for reevaluation. We are troubled by reports that the EPA plans to conduct an extremely limited reanalysis of Enlist Duo's harms, questioning only whether a larger no-spray zone is needed to protect endangered plants that grow close to farm fields. Moreover, these actions do not address questions about serious potential health risks brought to light by the *Chicago Tribune*.

At a minimum, while it considers the question of synergistic effects on remand, the EPA should evaluate at least two other major factors about Enlist Duo's environmental and health impacts. First, the World Health Organization's International Agency for Research on Cancer recently published a groundbreaking finding that glyphosate is "probably carcinogenic to humans."² EPA registered Enlist Duo without considering this cancer finding, and without looking at *any* studies on glyphosate's cancer risk that have been published in the last twenty years.

¹ <http://www.chicagotribune.com/news/watchdog/ct-gmo-crops-pesticide-resistance-met-20151203-story.html>

² <http://www.iarc.fr/en/media-centre/iarcnews/pdf/MonographVolume112.pdf>

Second, studies indicate that Enlist Duo threatens the monarch butterfly, an iconic species famed for its annual migration across the continent. The monarch migration has declined sharply in recent years, driven by increasing applications of herbicides to herbicide-resistant crops, which has decimated milkweed, the sole food source for monarch caterpillars^{IIIIV}. Scientists have warned that the monarch migration is now at risk of vanishing entirely. Enlist Duo is specifically intended to kill milkweed, but so far EPA has refused to consider harm to monarch butterflies when determining whether Enlist Duo causes unreasonable environmental impacts. Enlist Duo's effects on the monarch butterfly must be part of EPA's reanalysis.

The public deserves to know how EPA intends to address all of these concerns about the risks posed by Enlist Duo. We ask that EPA respond promptly to the following questions:

- What factors caused EPA to reverse its previous analysis of the health impacts of Enlist Duo and dismiss evidence linking 2,4-D to kidney abnormalities?
- How, if at all, did EPA assess the synergistic effects of glyphosate and 2,4-D, as opposed to merely each chemical individually?
- Does EPA have a standard practice or policy guidance for assessing the synergistic effects of chemical mixtures? If so, what is that practice, does it occur during the registration process, and did EPA follow it here?
- Considering the World Health Organization's finding that glyphosate is a probable carcinogen, will EPA also assess the synergistic effects of the chemicals in Enlist Duo on human health – especially children's health – in addition to their effects on endangered and other plants
- Will EPA prohibit sales of Enlist Duo while it reviews all information submitted by Dow regarding synergistic effects?
- What is EPA's plan to evaluate Enlist Duo's harm to monarch butterflies before re-approval? Will EPA agree not to approve continued use of Enlist Duo until the agency considers and addresses the herbicide's adverse effects on monarchs?
- What is EPA's plan to evaluate Enlist Duo's human cancer risk before re-approval? Will EPA agree not to approve continued use of Enlist Duo until the agency considers and addresses up-to-date science on glyphosate's cancer risk?
- Will EPA agree not to re-approve Enlist Duo until the agency has completed its registration review process for glyphosate?
- What is EPA's timeline for the review process of Enlist Duo?

Thank you for your prompt attention to these questions. We look forward to receiving your response as soon as possible.



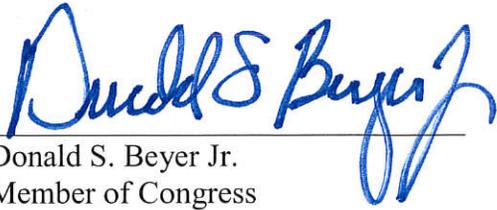
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Member of Congress

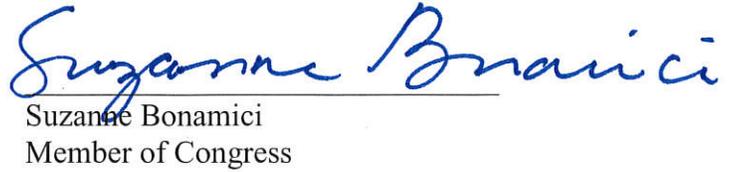


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Member of Congress

^{III} <http://onlinelibrary.wiley.com/doi/10.1111/1365-2656.12253/abstract>

^{IV} http://www.mlmp.org/results/findings/pleasants_and_oberhauser_2012_milkweed_loss_in_ag_fields.pdf


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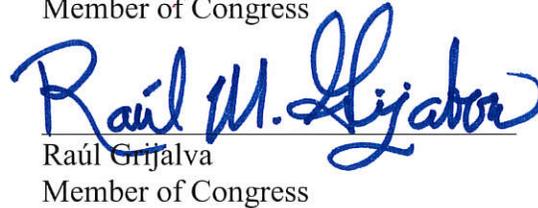

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