

MAA Research Task Force Disagrees Strongly with EPA's Proposed Determination that Organic Arsenical Herbicides Are Ineligible for Reregistration

Washington D.C. August 15, 2006 – The MAA Research Task Force (MAATF) disagrees strongly with conclusions in a proposed Re-registration Eligibility Decision (RED) document issued on August 9, 2006, by the United States Environmental Protection Agency (EPA) that the organic arsenicals (MSMA, DSMA, CAMA and cacodylic acid) uses in the United States do not meet the criteria for re-registration, a conclusion based on concerns with an entirely different compound - inorganic arsenic. In fact, EPA concluded in the RED that the organic arsenicals per se do not pose an unreasonable risk. EPA based its proposed decision against re-registration on the levels of naturally occurring inorganic arsenic in water and soil, and on the possibility that the use of organic arsenicals may contribute additional inorganic arsenic to the environment.

The MAATF believes the crop and turf uses of these products meet both the Food Quality Protection Act (FQPA) standard for dietary risk and the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) risk-benefit standard that clearly warrant continued registration of MSMA, DMSA, CAMA and cacodylic acid. “EPA has exaggerated the risks of organic arsenicals by including inorganic arsenic in the exposure assessment for water and food. The MAATF is being asked to meet a standard for inorganic arsenic in water that is 500 times lower than the EPA Office of Water’s MCL for drinking water.” said Dr. Michal Eldan, Chairperson of MAATF. “We disagree with the evaluations behind the Agency’s RED and will continue our efforts to explain the science that supports our position. The Task Force believes it is imperative to protect important agricultural and turf uses of these products, as EPA has underestimated their unique benefits to agriculture and turf management in arriving at this unjustified conclusion to eliminate continued use of the products. The RED is not a final decision and the MAATF will vigorously defend its member company products.”

“MSMA/DSMA/CAMA/cacodylic acid registrations on cotton and turf are of critical economic importance to U.S. farmers and turf managers,” said Dr. Eldan. “Since EPA’s intention was made public, we have been receiving calls from users of our products.

EPA is underestimating the value of the organic arsenicals by ignoring the comments from many cotton growers and golf-course superintendents nationwide.” Cotton growers, the Golf Course Superintendents Association of America, State Departments of Agriculture and golf course superintendents have written in support of the continued use of the organic arsenical products.

MSMA/DSMA/CAMA control certain weed problems in cotton and turf like no other herbicides. For example, there are no alternative selective postemergence herbicides available for control of mature crabgrass and tropical signalgrass weeds. Using organic arsenicals in weed-control spray programs helps prevent weeds from becoming resistant to other herbicides, and makes these products key tools for integrated pest management programs. In addition, cacodylic acid is a unique cotton defoliant that is important to cotton production, and is also used as a turf edger and for turf renovation.

Based on a large body of scientific data, the MAATF believes that the organic arsenicals do not pose an unreasonable risk to workers, farmers, the public or the environment when used according to label directions. The estimate of risk used by EPA in their risk assessments are not supported by actual measurement of environmental concentrations and exposures of organic arsenicals. Rather, the risks perceived by the Agency are based on unduly conservative risk modeling estimates of inorganic arsenic in water.

Because the RED is not a final decision, farmers, turf managers, and home owners, may continue to use organic arsenicals on all currently registered crops and uses.

Members of the MAATF are basic manufactures of the organic arsenical products including Drexel Chemical Co. (APC Holdings), KMG-Bernuth, Inc. and Luxembourg-Pamol, Inc. These companies are global providers of products to the turf care and agricultural industries. For more information, contact the MAA Research Task Force, P.O. Box 33856, Washington D.C. 20033-0856, by telephone: (800) 890-3301, by fax: (202) 557-3836, or by e-mail meldan@luxpam.com