

**From:** [Brian Oakey](#)  
**To:** [Janis Perry](#)  
**Subject:** Fwd: {External}Protect Idahoans from Pesticides  
**Date:** Wednesday, October 7, 2020 8:29:18 AM

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Sent from my iPhone

Begin forwarded message:

**From:** Max Graham <maxemersongraham@gmail.com>  
**Date:** October 7, 2020 at 8:27:24 AM MDT  
**To:** Brian Oakey <Brian.Oakey@ISDA.IDAHO.GOV>  
**Subject:** {External}Protect Idahoans from Pesticides

Greetings,

Thank you for this opportunity to submit comments on the proposed rule 02.03.03 – RULES GOVERNING PESTICIDE AND CHEMIGATION USE AND APPLICATION

I support ISDA in taking steps to expand the definition of hazard areas to protect Idahoans from highly hazardous pesticides. **However, the rule must expressly protect** hazard areas from highly toxic pesticides, which is not currently the case. I strongly believe language should be added to include protections for schools, hospitals, towns and cities from pesticides linked to neurological and developmental diseases, cancer and early death. Specifically, hazard areas should be protected from the class of organophosphate pesticides and paraquat. I believe this because:

- Currently the only express protections for hazard areas mentioned is for phenoxy herbicides, but these pesticides (Dicamba and 2,4-D) are only classified as probable carcinogens, while organophosphates and paraquat have known links to cancer, developmental issues in children, and death.
- Paraquat:
  - Paraquat is the most acutely lethal herbicide still in use today and has resulted in the death of at least 30 people in the U.S. in the last 30 years. In addition, chronic paraquat exposure has been associated with an increased risk of developing Parkinson's disease.
  - Baseline data of pesticide contamination in Idaho indicate high levels of paraquat, and even at low levels it poses a threat.

- Much of the world has banned or is in the process of phasing out paraquat due to its high toxicity, including three of the largest agricultural producing nations in the world – the European Union, China and Brazil. Paraquat use in the U.S. is higher than it's been in the past 25 years.
- Organophosphates:
  - This class of pesticides targets the neurosystems of unwanted insect pests, and are known endocrine disruptors in humans.
  - One of these pesticides is chlorpyrifos, which is acutely toxic and associated with neurodevelopmental harms in children. Prenatal exposures to chlorpyrifos are associated with lower birth weight, reduced IQ, loss of working memory, attention disorders and delayed motor development.
  - Acute poisoning suppresses the enzyme that regulates nerve impulses in the body and can cause convulsions, respiratory paralysis, and, in extreme cases, death. Chlorpyrifos is one of the pesticides most often linked to pesticide poisonings.
  - There is NO safe level of chlorpyrifos in drinking water.
  - Pesticide drift reaches unsafe levels at 300 feet from the field's edge.
  - Chlorpyrifos is found at unsafe levels in the air at schools, homes and communities in agricultural areas.

In addition to the language changes in the rule, I support:

- **Involving farm workers and labor advocates** in decision making processes. Farm workers are unlikely to report symptoms of pesticide poisoning due to fear of losing their jobs, fear of retaliation on the job, uncertainty or lack of knowledge about pesticide poisoning symptoms, lack of access to health care and the inability to have access to information on what products they are using on the job.
- **Please create opportunities for farm workers and labor advocates to have a seat at the table** and be consulted during department decision making that impacts them and to reduce their exposure to pesticides in the workplace.
- **Increased education and compliance assistance for employers** about their responsibility and requirement to provide annual pesticide training to their employees.
- Continuing to **investigate all reported pesticide incidents**, including those involving aerial applications.
- Ensuring pesticide **incident reporting is language accessible** in at least English and Spanish by phone and online form via ISDA.

Max Graham

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