



POLICY & ACTION FROM CONSUMER REPORTS

March 26, 2015

The Honorable Margaret A. Hamburg, M.D.
Commissioner of Food and Drugs
U.S. Food and Drug Administration
10903 New Hampshire Avenue
Silver Spring, MD 20993

Dear Commissioner Hamburg:

Consumers Union, the public policy and advocacy division of Consumer Reports, is writing to raise concerns about the impact of pesticides on health and the environment. As you may know, last week our organization released “Pesticides in Produce,” a prominent story for the May 2015 issue of *Consumer Reports* magazine. Based on the results of more than two and a half years of research into pesticide residues by our Food Safety and Sustainability Center,¹ this article examines the level of risk posed by pesticides, the evidence of their harm to human, worker, and environmental health, and the particular risk to children.

We make clear that a diet rich in fruits and vegetables has numerous health benefits, and that eating enough produce should be consumers’ primary goal. However, the article also gives consumers new guidelines on how to make the healthiest and most environmentally sound choices – including in what circumstances we recommend always buying organic produce, and when, alternatively, there is a low-risk conventional option.

We also specifically address the widespread use of the herbicide glyphosate on U.S. farms. Glyphosate, which is often known by its original trade name Roundup and is the most commonly used agricultural pesticide in the United States, has been detected in the air and water near fields where it is applied, as well as in food. Yet, as we point out in the article, its residues are not consistently monitored by the federal government. On Friday, the World Health Organization-affiliated International Agency for Research on Cancer (IARC) announced that it had classified glyphosate as “probably carcinogenic to humans,” following an evaluation by 17 oncology experts from 11 different countries. Even before this news, consumers nationwide

¹ Since 2012, the Food Safety and Sustainability Center has fought to advance public health by addressing how food is produced. The Center’s work focuses on issues including foodborne illness and antibiotic resistance, pesticide use, heavy metals, truth and transparency in labeling, and promoting sustainable agricultural practices. The scientific report “From Crop to Table: Pesticides in Produce” was authored by Urvashi Rangan, Ph.D.; Michael Crupain, M.D., M.P.H.; Doris Sullivan, Ph.D.; Michael K. Hansen, Ph.D.; and Keith Newsom-Stewart, Ph.D.

were concerned about the effects of pesticides on their health and the environment; now, there is an even starker need to better understand pesticides' impact.

Consumer Reports supports the important work of the Food and Drug Administration (FDA) to enforce federal limits (also known as tolerances) on how much residue can remain on fruits and vegetables. In part by analyzing U.S. Department of Agriculture and Environmental Protection Agency data, our scientists evaluated the amount and frequency of residues on food, the typical serving size, the weight of the eater, and the toxicity of the pesticide to allow for a comparison of the relative risks of pesticide exposures from different food sources. Our conclusions on individual foods and food origins can be found in the enclosed report.

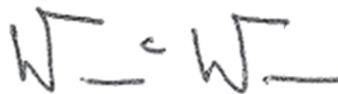
Given these findings and consumers' deep-rooted concerns about the impact of pesticides, we urge FDA to expand and improve pesticide residue testing and enforcement. According to a 2014 report by the U.S. Government Accountability Office (GAO), FDA does not regularly test for some of the most common pesticides, such as glyphosate, 2,4-D, and methyl bromide. In addition, FDA tests only a very small percentage of both imported and domestic fruits and vegetables. The FDA should begin regularly testing for those chemicals identified by GAO, and should increase its sampling of both domestic and imported produce. The agency should undertake these enhancements to the extent possible within its current budget, but also determine whether it needs additional funding to be most effective.

Thank you for your consideration of this recommendation, which is even more important to implement in light of the recent IARC conclusion that glyphosate is probably carcinogenic in humans. As an organization, Consumer Reports stands ready to work with you to provide consumers with the information they need to make choices consistent with a healthy and environmentally sustainable lifestyle. Together, we can move the marketplace and reduce the health and environmental impacts of pesticides in produce.

Sincerely,



Ellen Bloom
Senior Director, Federal Policy and
Washington Office



William C. Wallace
Policy Analyst