

November 8, 2004

Michael Leavitt
EPA Administrator
Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Re: Immediate halt to the Environmental Protection Agency's Children's Environmental Exposure Research Study (CHEERS) in Duval County Florida.

Dear Administrator Leavitt,

Citizens Campaign for the Environment (CCE) is an 80,000 member, not-for-profit, non-partisan advocacy organization working for the protection of public health and the natural environment on behalf of its members in New York and Connecticut. CCE has been working to reduce pesticide use and exposure pathways of pesticides across New York State and throughout the Nation since its inception in 1985.

CCE believes that the EPA CHEER Study is flawed in its design and promotes the use of pesticides for low socioeconomic status families thus raising concerns of environmental justice and racism. In addition the source of the funding raises concerns.

The EPA's fact sheet for this study states "there is no risk" associated to the children or the family, if they participate. This statement is false and is in direct contradiction with EPA educational information, which informs the public that all pesticides have risks.

Informing participates that "there is no risk" is false information and safety guards should have been put into place before the study started.

CCE vehemently opposes the EPA's Children's Environmental Exposure Research Study (CHEERS), which uses infants and toddlers as human test subjects. We are requesting the immediate discontinuation of the study.

CCE offers the following specific comments on CHEERS:

- 1. CCE believes that there are Environmental Justice and Racism Issues in the CHEER study.**
 - The EPA cites 6 health clinics and 3 hospitals in which recruitment for the participants of the study took place. The study claims the mix health care facilities will provide "some diversity with respect to socioeconomic status".

Yet the study states that the 6 clinics “*primarily serve individuals with lower incomes*”. In 2000, 75% of the users of the clinics for pregnancy issues were at or below poverty level. Only 1.8% of the clinic users were middle class residents. The 3 hospitals chosen by the study show that 51% of all the total births were to non-white mothers, with a 62% of all mothers having only received an elementary or secondary education. The study also states “the percentage of births to individuals classified as black by the U.S Census is higher at these three hospitals than for the County as a whole”. ***CCE believes that the study participants do not show diversity with regards to socioeconomic status, but rather targets lower socioeconomic status (SES) families.***

- The EPA states that the participants will receive a monetary compensation, as well as a free camcorder, bibs, t-shirts, calendars, and a VCR for participating in the study. The participants can only keep the camcorder, upon completion of the study, in which they are then also given a VCR. The participants are given a monetary compensation for each stage of the study that the participant completes. Yet, there is no plan in the study if the *participate chooses to stop using pesticides*. It is implied by that the participate will be eliminated from the study, *thus not eligible to keep the camcorder or the full monetary reward*. ***CCE believes that this design promotes and targets the use of pesticides in lower SES families.***
- The EPA states in the study that the participants should not intend to send their children to daycare. ***CCE believes that this again solicits lower SES families to participate, since they are most likely unable to afford child day care services.***

2. CCE believes that there are serious design flaws in the EPA CHEER Study.

- The EPA claims that the study was not designed to increase the participants use of pesticides, yet the sliding pay structure for monetary compensation and the non-monetary gifts, which are only given if the participant completes the study, are set up to influence the participates use of pesticides. ***CCE believes that the targeted participants might be easily persuaded to maintain or increase their use of pesticides to receive the non-monetary and monetary compensations.***
- This study was designed with no provisions for intervening if a child begins to show signs of developmental problems or register high exposure levels of chemicals in their urine samples.
- There is a severe lack of education in the design of the study. Unlike any other EPA program in this area, this study does not provide basic pesticide education materials to the participants, nor does it provide participants with information about the recommended ways to apply and store pesticides around the home. ***CCE believes that this lack of education will only harm, and possible increase the exposure levels of the children and the families in the study.***

- The study was designed to have 60 participants, with less than 10% of them representing a control group. This control group is insufficient to determine any statistical significance in the study. The EPA states “it will not be possible to draw inferences to a larger population from the results of the study”. EPA labels the control group as “low-pesticide” use, rather than designing the control group as a “no-pesticide” use group. The EPA does not even define what low-pesticide use is. ***CCE believes that a control group in this type of study should represent more than 10% of the participants and should at least be designed so the data can be used to a larger population.***
3. CCE believes that the EPA should give back the \$2 million in funding that it received from the American Chemistry Council for this study. This council represents 135 companies, including pesticide manufactures. ***CCE believes that the Industry, representing many of the chemicals being studied, should not fund the study.***

CCE urges the EPA to stop CHEERS immediately. This study has environmental justice concerns, environmental racism concerns, serious design flaws, and funding questions which render the study unethical and hazardous. CCE feels that this study only promotes the use of pesticides in lower SES families and will dramatically increase the health risks to the participant’s children.

Thank you for the thoughtful consideration of our comments.

Respectfully submitted,

Adrienne Esposito
Executive Director

Cc: US Senator Hillary Clinton
US Senator Charles Schumer
NYS Attorney General Elliot Spitzer