Letter from Washington

At the Crossroads of Sustainability: Choices

n this 30th year since Beyond Pesticides' founding, our nation and world are at a sustainability crossroads. This issue of *Pesticides and You* captures the choices that we are making every day that have dramatic generational consequences for the protection of health and the environment.

Choices

Do we choose approaches that fundamentally manipulate nature and life through genetically engineered plants, or do we advance practices that are in sync with our ecology and natural systems? Do we choose approaches that ignore the health of honeybees and pollinators or choose a path that is protective of sensitive species that are integral to the web of life? Do we embrace risk assessment approaches to managing toxic chemicals that ignore the most vulnerable among us or establish precautionary approaches and policies that seek to protect those most threatened? Do we advance methods that ignore the social and economic impact on people and communities or choose practices and approaches that are socially just?

Ignoring the Bees

Events that have taken place over the last several months bring into focus the stark choices in front of us. First, there is the leaked internal memo from the Environmental Fate and Effects Division of EPA, which tells us that the study EPA says is essential to determining whether the pesticide clothianidin, known to highly toxic to bees and destabilizing to beehives, is flawed. We might be able to call it fraudulent if we could prove the intent of the chemical manufacturer that produced it; regardless, it is worthless for answering questions critical to honeybee health. This essential study, one EPA said was necessary because of the "possibility of toxic chronic exposure to nontarget pollinators through the translocation of clothianidin residues in nectar and pollen," was required in 2003 at the time that the agency granted the chemical a so-called conditional registration with serious unanswered questions. EPA accepted the study in 2007 and then in 2010 found it unacceptable for registration purposes.

Why is EPA registering toxic chemicals when it doesn't have all the answers, and then when the required study is deemed inadequate seven years later telling the public, as it did in February, that it cannot remove the chemical from the market because it doesn't have all the answers? Who should have the burden of proof? And, why don't we err on the side of precaution? Meanwhile, as bees disappear in extraordinary numbers and bee colonies collapse, EPA says it doesn't know why. The complexity of interactions unleashed by allowing the widespread introduction of toxic chemicals into the environment certainly makes things complicated and difficult when searching out a cause and effect; however, we know enough to know that a systemic pesticide that moves through the plant and expresses itself in pollen and nectar should be fully evaluated before use. Our current path is not sustainable.

Imposing Genetic Engineering

Then, in the month leading up to USDA's decision in January to deregulate genetically engineered (GE) alfalfa, the country's fourth largest crop, the department advanced the notion that conventional and organic agriculture can "coexist" with GE plant material. Ignoring the science on gene flow and genetic drift far from GE planted fields and a long list of uncertainties associated with the environmental and health impacts of GE alfalfa, USDA moved forward in allowing the technology to further invade our lives and limit our choices. Is this the end of non-GE seed and organic? Is it possible to coexist with a genetically altered plant material that trespasses and invades areas off the planted site? Why, again, would we unleash this technology with a half-hearted environmental impact statement filled with finding after finding of uncertainty instead of having all the answers? Despite claims of pesticide reduction, improved productivity, and reasonable cost with GE, we have seen increased pesticide use, weed resistance, a failure to increase crops yields, and the demise of economical seed saving. Meanwhile, we are seeing worldwide growth of GE crops. This is not the sustainable path.

The Choice is Clear

It is hard to escape Monsanto's claiming in its advertising that it is supporting sustainable choices. The ads are a reminder that we need to define the words that we use to ensure clarity of thought and actions in these times when our choices are crucial to our survival. Do we really have a choice but to protect honeybees and pollinators, or the genetics of plant species? We must. The only reason these are questions is because we have allowed our rights to clean water, air, food, and healthy soil to be trampled by interests committed to chemical-intensive practices that have a track record of destruction.

The framework in which EPA seems incapable of protecting health and the environment is one wedded to chemical-intensive practices where solutions that seek the elimination of toxic chemicals are outside the realm of possibility. Organic practices are marginalized in that framework and dismissed as niche or unaffordable. Economic costs are calculated as inputs, not toxic outputs with the secondary expenses of cradle to grave pollution. Meanwhile, the organic choice is clear from a health, environment, and economic perspective, where sustainability is defined by allowable practices and inputs that are protective of biodiversity, vulnerable groups, our future, and

permitted uncertainty of harm is replaced by precaution.



What makes this decade exciting is that the choice is clear and the solutions are within our grasp. We just need to make the right sustainable choices happen.

Jay Feldman is executive director of Beyond Pesticides.