



December 12, 2005

Public Information and Records Integrity Branch  
Office of Pesticide Programs  
US Environmental Protection Agency  
1200 Pennsylvania Ave, NW  
Washington, DC 20460-0001

**RE: Docket ID Number OPP-2003-0132**

To Whom it May Concern,

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 opposes all human pesticide testing and is asking the EPA to withdraw their guidance document. CCE is encouraging the EPA to *refuse acceptance of ALL third party studies* that test pesticides on humans. Any guidance document outlining "ethical treatment of humans" regarding the testing of harmful chemicals only endorses human testing and should be scraped.

CCE believes the guidance document is laden with loopholes and encourages unethical treatment of human subjects, including prisoners, pregnant woman, children, and infants. In particular, CCE is extremely concerned that the new guidance document allows for repeat CHEERS-like studies.

CHEERS, funded by the American Chemistry Council, was designed to observe and evaluate the effects of harmful pesticides in the home on development of infants and toddlers. The study enticed low-income families to participate with free camcorders and money. **CCE vehemently opposed the study.** The announcement of the study was followed by an enormous public outcry which resulted in the EPA rightfully withdrawing the study. However, the new guidance document allows for this type of study to occur, since it is considered "unintentional dosing" or "observational study".

CCE also strongly disagrees with the EPA's inclusion of an over-arching waiver; allowing the EPA to disregard the guidance document and accept studies that are "crucial to a regulatory decision." **This type of wavier voids the entire document and should be removed.**

Allowing data from human research only puts participants at risk. These studies will inevitably target vulnerable populations and lower economic status populations. In today's society it is unconscionable for our government to accept and assist in administering a program that allows for the exploitation of the less fortunate in economic status. As a society we need to protect all segments of society and flatly reject plans that will result in harm for certain segments of our diverse populations. The EPA's continued objective and goal needs to be to phase out toxic pesticide use especially for the most sensitive populations of infants, children and pregnant women.

CCE is calling for an overarching policy that protects public health equally along every economic status and societal boundary. This needs to include the ban of all human pesticide research to prevent discriminatory practices and programs that will inevitably be established as a result of this proposed guidance.

Thank you for this opportunity to comment.

Sincerely,

Adrienne Esposito  
Executive Director