



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

JUL 11 2003

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Mr. Marcello Mollo
EarthJustice International Program
426 17th Street
Oakland, California 94612

Dear Mr. Mollo:

Thank you for your recent letter concerning the Environmental Protection Agency's (EPA) consultation with the U.S. Department of State (DoS) concerning illicit crop eradication efforts in Colombia. I appreciate your interest in this important matter.

As you know, the Foreign Operations Appropriations Act (P.L. 108-7) requires DoS to certify, after consulting with EPA, whether "the herbicide mixture is being used in accordance with EPA label requirements for comparable use in the United States," and that "the herbicide mixture, in the manner it is being used, does not pose unreasonable risks or adverse effects to humans or the environment."

DoS requested EPA's input on April 9, 2003, and the Agency completed its 2003 consultation review and submitted its findings on June 9, 2003. It is our understanding that DoS will combine EPA's document with material of its own and submit a complete package to Congress. DoS has also indicated that they intend to post EPA's consultation review on their web page.

I encourage you to review our 2003 consultation review, especially because many of the concerns you raise in your letter are addressed quite comprehensively. There are some issues that you raise which can be best addressed by DoS, including provisions of the Colombian Environmental Management Plan (EMJ) which fall outside of the scope of EPA's responsibilities. We have shared your letter with DoS, and believe that they are currently addressing many of the issues that you raise.

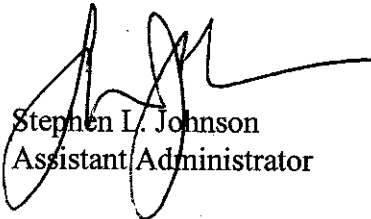
I would like to address the issues in your letter which are more pertinent to EPA. You asked whether EPA considered spraying of water sources, including ponds, rivers and streams; and direct spraying of farmers and their families and handling of plants just fumigated. The U.S. product label for glyphosate prohibits direct overspray of water bodies, and DoS has indicated that the eradication program is adhering to the U.S. product label, and has incorporated several

features designed to minimize the potential for off-target drift, provide quality assurance on a mission-by-mission basis, and evaluate the performance of the program to the extent given current conditions allow. Furthermore, DoS states that pilots are instructed not to spray fields where people and animals, including livestock, are present. With regard to consumption of sprayed crops, available data indicate that there are no dietary toxicological end points of concern. Moreover, since glyphosate is a contact herbicide that systematically kills plants after absorption through leaves, dietary exposure due to consumption of treated crops is expected to be limited. Since a coca field, and those food crops that might be interspersed with the coca, is sprayed no more than twice to eradicate the crop, no chronic food exposure is expected. With regard to the spray mixture, the DoS adopted our recommendation from the 2002 consultation review to transition to an herbicide product of less toxicity. Your concern about the potential impact of the spraying program on the integrity of coffee organic certification is an issue that we believe can be best addressed by the Government of Colombia, as this relates to their definition of organic, and how they regulate production and marketing of organic products.

Similar to our consultation last year, the Agency has assessed the potential risks to human health and the environment from the coca and poppy spray programs. Again this year, we have identified to DoS some areas for consideration to enhance the ability to determine potential risks to human health and the environment.

I hope this information is helpful. If you have any further questions, please let me know.

Sincerely,



Stephen L. Johnson
Assistant Administrator