

[Media coverage of the PFAS press conference.](#)
[Op-ed by Dr. Brian Moench.](#)

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To: Utah State Official

A few months ago, the CDC made an unprecedented recommendation that physicians consider testing their patients' blood for PFAS or "forever" chemicals. That they have never made any such recommendation for any other toxic chemicals speaks volumes about the unprecedented danger of these chemicals. In 2022, EPA made stunningly strict drinking water guidelines for forever chemicals,¹ and then in April this year made enforceable, nationwide drinking water standards for these chemicals that are so strict it means EPA essentially believes there is no safe level of PFAS exposure.² They made the standard equal to the detection capability of current technology, i.e. 4 ppt (parts per trillion).²

Reflecting growing worldwide alarm in the scientific community, a pollution researcher at the UK's Liverpool John Moores University, Patrick Byrne, said PFAS are "probably the greatest chemical threat the human race is facing in the 21st century."³ Twenty-nine states have adopted at least some laws to protect their residents from PFAS in consumer products and more is being planned. But Utah is not one of them.¹²

Global contamination with PFAS now intersects with pesticide use because the evidence is overwhelming there is wholesale contamination of pesticides with PFAS chemicals, and many pesticides break down into still toxic, short chain PFAS type chemicals.¹⁴ As a former EPA scientist, Kyla Bennett said, "If the intent was to spread PFAS contamination across the globe there would be few more effective methods than lacing pesticides with PFAS."⁴

Pesticide use has been at best controversial since the 1962 publishing of Rachael Carson's book, *Silent Spring*. The idea that widely distributing biological poisons would leave beneficial plants, animals, and humans unharmed never made scientific sense, and in recent decades, a growing body of research confirms they do damage to far more of the biological world than just pests. But now the danger of the use of pesticides is likely exponentially greater.

A second dimension of concern emerged in the 1990s with research that showed many pesticides and industrial chemicals such as BPA, PCBs, and flame retardants, were also endocrine disruptors, i.e. they mimicked or antagonized critical human hormones at extremely low dose exposure, adding an entirely new level of scientific evidence of their harm to human health. Endocrine disruptors have been identified as causing a wide spectrum of harm,

especially at the earliest, most critical stages of human development; in utero, infancy, and childhood. Clinical consequences include developmental disorders, reproductive toxicity, multiple cancers, immunosuppression, and damage to the brain and nervous system. Because of this research, in 1996, Congress mandated EPA test all pesticides for endocrine disruption potential. Twenty-eight years later that still has not happened and EPA's regulatory process largely ignores the issue.⁵ Independent researchers meanwhile have strengthened the evidence of harm from endocrine disruptors.

A third dimension of public health harm from pesticides has emerged in the last few years that almost certainly dwarfs the previous two. Scientists from throughout the world are finding PFAS in many of the most commonly used pesticides. The presence of PFAS can be both intentional and inadvertent, i.e. intentionally incorporated into the active ingredient, as inactive ingredients used to enhance efficacy, or from leaching from storage containers.^{6,7,8,9}

There is already widespread PFAS pesticide contamination of every component of the global environment, including drinking water and the food supply.¹⁴ Nearly 100% of humans carry PFAS in their blood in very disturbing amounts, including newborns,^{13,16} and pesticides are a major reason. Women, fetuses, infants, and children are more susceptible to the health hazards of pesticides and PFAS.¹⁵ European scientists said, "The extent of this contamination is shocking. It is a result of political failure at many levels."¹⁰

Despite the EPA's recently adopted, extremely strict drinking water standards on forever chemicals, a complete disconnect with those standards has emerged within the EPA chemical division with their claim that their pesticide testing did not reveal any PFAS compounds. This contradicts independent research which has found nearly one third of active ingredients approved by EPA in the last ten years are PFAS.⁹ There is a complete disconnect within the agency itself, and it even raises the possibility of deliberate fraud¹¹ on the part of EPA chemical division, long criticized by agency whistleblowers for protecting pesticide manufacturers. This undermines claims by users that EPA approval scientifically exonerates the pesticides that they allow on the market. EPA granting "permission" to sell a pesticide is no more an exoneration of the health hazards from its use, than the FDA granting permission to sell cigarettes is an exoneration of smoking.

Pesticide use in Utah is largely unrestrained, and decisions about mass spraying are made by private contractors, companies, and government agency employees who have no expertise in the health consequences of the products they are exposing the public to. This lack of oversight is irrational, and it is now wholly unacceptable. There is strong evidence that the mass use of pesticides is now a serious, global public health threat on an unprecedented level because of endocrine disruption and now PFAS contamination.

So far, only two states, Maine and Minnesota, have taken action where it is needed most, to prohibit PFAS in pesticides. Utah has taken no state level action, including no laws to prohibit the use of PFAS pesticides. It is not a scientifically rational response to wait until the evidence of harm is even more overwhelming and irrefutable. As a public health imperative, we call on Utah to, at a minimum, follow Maine's and Minnesota's example and ban all PFAS pesticides.

Sincerely,

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