



COMMUNITIES FOR A
BETTER
ENVIRONMENT

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October 17, 2014

Honorable Councilmembers
Los Angeles City Hall
200 North Spring Street
Los Angeles, California 90012

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Re: *Council File 13-1374; Prohibit the Growth of Genetically Modified (GM) Crops within City Limits*

Dear Honorable Councilmembers:

On behalf of Communities for a Better Environment (CBE), we write to express our strong support for the motion introduced by Councilmembers Paul Koretz and Mitch O'Farrell to create a "GMO-Free Zone" within the City of Los Angeles ("Motion").

CBE is a leading statewide environmental health and justice organization. Our mission is to build power within California's communities of color and low-income communities to achieve environmental justice by preventing and reducing pollution and building green, healthy and sustainable communities and environments.

CBE strongly agrees with the reasons outlined in the Motion explaining the necessity of a GMO-Free Los Angeles, such as destruction of biodiversity, colony collapse disorder, and GMO food consumption safety concerns. Genetically modified crops pose grave human and environmental health risks. One of the greatest dangers, often overlooked in the GMO discourse, is the increased use of synthetic herbicides and pesticides associated with GM crops, which expose farm workers and communities to debilitating and fatal diseases. Latinos disproportionately bear these severe health risks, since they comprise the great majority of farm workers in our state and nation. Children whose parents toil in the fields are particularly in peril, as they are likely the most pesticide-exposed subgroup in the country.¹ The Motion before the Council is a significant step toward safeguarding the health of the public and environment.

There is growing data showing that the rise of genetically engineered crops necessarily results in increased synthetic herbicide and pesticide use and health risks. A major consequence

¹ Adrianna Quintero-Somains and Mayra Quirindongo, *Hidden Danger: Environmental Health Threats in the Latino Community, A Report of the Natural Resource Defense Council*, at Ch. 4 (Oct. 2004). Available at: <http://www.nrdc.org/health/effects/latino/english/contents.asp>.

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of the widespread use of GM crops, and the herbicides and pesticides they were developed to withstand, is the evolution of weeds and insects now resistant to these chemicals. Crops genetically engineered to withstand herbicides emerged in 1996, making it possible for farmers to use a broad-spectrum herbicide, glyphosate (the active ingredient in Monsanto's Roundup).² As scientists warned early on, glyphosate-resistant weeds quickly developed, requiring greater quantities of herbicides be used on crops. A similar pattern emerged with insect pests.³ A recent study calculating the impact of resistant crop varieties over a 16-year period concluded that GE crops has brought about "substantial increases in the number and volume" of herbicides and pesticides applied since GE crops were introduced.⁴

The people most directly exposed to the risks of herbicides and pesticides are those who live near or work in farms. Because over 85% of farm workers in the U.S., and almost 100% of farm workers in California, are Latino, this problem is of particular concern to Latino communities.⁵ Studies have found that farm workers have elevated risks of certain kinds of cancer, Parkinson's disease, neurological effects, reproductive and developmental disorders, and increased respiratory disease due to pesticide exposure.⁶ There is also reported "evidence of associations between parental or infant exposures to pesticides and childhood brain tumors, leukemia, non-Hodgkin's lymphoma, sarcoma, and Wilm's tumor[,] as well as birth defects."⁷ A longitudinal birth cohort study examining the effect of pesticides on the health of farm workers' children in the City of Salinas found that children with mothers with high levels of pesticide exposure are at great risk for neurodevelopment problems, such as poor reflexes, pervasive developmental disorder, hyperactivity, and lower IQs.⁸ A leading researcher in children's environmental health, Dr. Philip Landrigan, equated the findings of the Salinas study with research findings on the effects of lead on children, which resulted in banning lead-based paint throughout the country decades ago.⁹

Despite the severe health risks posed by pesticides and herbicides to farm workers and their communities, the industry had responded to resistant weeds and insect pests by developing more potent, and dangerous, herbicides and pesticides. Indeed, the EPA very recently authorized a new toxic herbicide combination, "Enlist Duo," manufactured by Dow AgroSciences, a

² Charles M. Benbrook, *Impacts of genetically engineered crops on pesticide use in the U.S. -- the first sixteen years*, Environmental Sciences Europe (Sept. 28, 2012). Available at: <http://www.enveurope.com/content/24/1/24>.

³ *Id.*

⁴ *See id.*

⁵ Quintero-Somaini & Quirindongo, *supra*, at 38.

⁶ Susan Kegley, PhD, *The Health Costs of Our Food Production System: Pesticide Exposure and Effects on Farmers, Farm Workers, and Rural Residents*, Physicians for Social Responsibility. Available at: <http://www.psr.org/environment-and-health/environmental-health-policy-institute/responses/the-health-costs-of-our-food-production-system.html>; *see also*, Quintero-Somaini & Quirindongo, *supra*, at 39-43; *id.* at 43 ("One such study, by the Cancer Registry of Central California, found that Hispanics employed as farmworkers had a 59 to 69 percent greater risk of stomach, cervical, and uterine cancer, and of some leukemias, than other Hispanics in California") (citing P.K. Mills and S. Kwong, *Cancer Incidence in the United Farmworkers of America (UFW), 1987-1997*, Cancer Registry of Central California (2001)).

⁷ *See* Quintero-Somaini & Quirindongo, *supra*, at 39.

⁸ Freinkel, Susan. *Warning Signs: How Pesticides Harm the Young Brain*, The Nation, March 11, 2014. Available at: <http://www.thenation.com/article/178804/warning-signs-how-pesticides-harm-young-brain#>.

⁹ *Id.*

subsidiary of Dow Chemical Company, to be used on GM crops resistant to glyphosate.¹⁰ The new combination contains the herbicide 2,4-D,¹¹ which is notorious for causing non-Hodgkin's lymphoma, gastric, and other forms of cancer in farm workers chronically exposed to 2,4-D.¹² In approving this new herbicide combination, the EPA acknowledged that 2,4-D use will dramatically increase, which "could [then] result in the spread of weeds resistant to 2,4-D."¹³ Thus, it is only a matter of time before GM crops require more powerful and increased quantities of chemicals, putting farm workers and their children at further risk of suffering potential lifelong and irreversible health consequences. It is an unconscionable practice and vicious cycle in which Latinos bear a deadly burden.

The City of Los Angeles has made recent strides in developing and supporting innovative sustainability policies. A City ordinance pursuant to the Motion will further ensure a healthy and sustainable Los Angeles by, among other things, protecting Angelenos from exposure to pesticide residues on food. The Motion is also a necessary policy step to halt the use of dangerous crop chemicals in our state and throughout the country. By passing the Motion, the City can help lead the nation toward policies that develop ecologically-based farming systems with minimal pesticide use, that are both economically sound and serve the public's health and welfare.

Accordingly, CBE strongly supports a GMO-Free Zone in the City of Los Angeles.

Sincerely,

Gladys Limón
Staff Attorney

Bahram Fazeli
Policy Director

¹⁰ Environmental Working Group, Press Release, *EPA Ignores Public Outcry, Approves Dangerous Weed Killer*, Oct. 15, 2014. Available at: <http://www.ewg.org/release/epa-ignores-public-outcry-approves-dangerous-weed-killer>

¹¹ United States Environmental Protection Agency, Registration of Enlist Duo. Available at: <http://www2.epa.gov/ingredients-used-pesticide-products/registration-enlist-duo#decision>.

¹² See Paul K. Mills and Richard C. Yang, *Agricultural exposures and gastric cancer risk in Hispanic farm workers in California*. Environ. Res. 104 (2007); Environmental Working Group, Press Release, "Citing Health Risks, Doctors and Scientists Urge Congress to Reject Potent Herbicide Mix for Genetically Engineered Crops, July 23, 2014. Available at: <http://www.centerforfoodsafety.org/press-releases/3321/citing-health-risks-doctors-and-scientists-urge-congress-to-reject-potent-herbicide-mix-for-genetically-engineered-crops#>.

¹³ United States Environmental Protection Agency, Registration of Enlist Duo. Available at: <http://www2.epa.gov/ingredients-used-pesticide-products/registration-enlist-duo#decision>.