

INDUSTRY TASK FORCE II ON 2,4-D RESEARCH DATA

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The Honorable Lane Evans
U.S. House of Representatives
328 Cannon Building
Washington, D. C. 20515

Dear Mr. Evans:

Several communications from your office on the use of the herbicide 2,4-D for roadside weed control have recently been called to my attention. Since you have chosen to take a position on this matter, what follows is an effort to correct some rather serious misimpressions you may have about this product.

First, contrary to your letter to Governor James Thompson, dioxin was not a herbicide used in the Vietnam War, nor was 2,4-D a dioxin component. Rather, dioxin was a trace contaminant of the herbicide 2,4,5-T used in the defoliant Agent Orange. (Agent Orange consisted of an equal mix of the butyl esters of the herbicides 2,4,5-T and 2,4-D.)

Given the depth of your feelings on the defoliation program in Vietnam, I want to point out that 2,4-D was never a part of the Agent Orange litigation. Rather, by the plaintiffs' choice, that litigation focused entirely on 2,4,5-T. It is not my intention to take a position on whether or not 2,4,5-T as used in Vietnam was the cause of human health effects, though I call your attention to the enclosed book by Michael Gough and note for the record Judge Jack Weinstein's comments in ratifying the Agent Orange settlement that the evidence then before the court suggested that the plaintiffs' case was "without merit" (September 1984). Regardless of the validity of Judge Weinstein's opinion, the point remains that 2,4-D was never a part of that legal issue.

Since you reference the National Cancer Institute's 1986 survey of Kansas farm workers in your letter, I also want to call the following to your attention:

- * Notwithstanding the NCI Kansas study, the weight of the evidence does not indicate 2,4-D as a likely cause of health effects in people. These are not simply my own conclusions but also those of independent organizations which have reviewed the science on this compound and have determined that 2,4-D can continue to be used without significant risk. These organizations include the Canadian Expert Panel on Carcinogenicity of 2,4-D, the Environmental Protection Agency and the Council on Agricultural Science and Technology. (Copies of their reviews are included with this letter.)

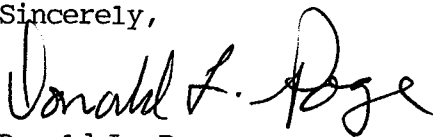
- * The NCI study is an important piece of data, but one which needs to be evaluated in light of the total body of scientific research on 2,4-D. For example, six studies in six different countries have examined this issue and have not found a link between 2,4-D exposure and non-Hodgkin's lymphoma (the type cancer suggested by the NCI study). This includes studies of exposed manufacturing and forestry workers in Canada, the United Kingdom, Sweden and Finland, and case control studies of people in New Zealand and the state of Washington. (Copies of those studies are included with this letter as well.)
- * A number of independent reviewers have questioned the accuracy of the NCI's study findings in light of a variety of problems in its methodology. Among the reviewers was Dr. Brian MacManon, chairman of the Department of Epidemiology of the Harvard University School of Public Health. (His review is also included with this letter.) Similar concerns about the NCI study's methodology are also noted in the previously referenced reviews by the Canadian Expert Panel on Carcinogenicity of 2,4-D, the EPA and the Council on Agricultural Technology.

Further, the comparison of roadside spraying operations in the U.S. with defoliation by Agent Orange in Vietnam is both misleading and inflammatory. Herbicides used for defoliation in Vietnam were used at maximum strength, applied by military aircraft flying under combat conditions. The products sprayed for roadside brush control in the U.S. are highly diluted and are applied with ground equipment which permits accurate placement of the herbicide, resulting in very significantly less exposure.

Finally, you express concern that 2,4-D kills sprayed trees. It is the function of 2,4-D, as a weed and brush control material, to do exactly that. Roadside spraying is done because the control of vegetation along roadsides provides important economic and safety benefits, including better visibility resulting in fewer accidents for motorists and wildlife.

Surely the weight of the scientific evidence on 2,4-D and the 40 years of practical experience with the compound in the field provide considerable reassurance that the compound can and has been used safely and effectively. But we are dealing here with relatively complex technical issues where misimpressions by the general public come easily. I hope that sufficient information has been sent with this letter to allow you to draw your own conclusions. I have access here to much data and many studies done by independent laboratories and organizations, and I would be more than happy to make the resources of this office available to you should this issue continue or other issues involving 2,4-D arise in the future.

Sincerely,



Donald L. Page
Chairman