**Center for Biological Diversity \* Center for Food Safety \* Defenders of Wildlife Earthjustice \* Natural Resources Defense Council**

[[[ 12/15 draft – NGO sign-on letter to go to all Members of Congress]]

December \_\_\_\_, 2017

Re: Oppose Efforts to Gut Safeguards Protecting Imperiled Species from Pesticides

Dear Represenative/Senator:

The undersigned \_\_[#] \_\_ conservation, consumer, agricultural, and other public interest groups urge you to oppose all efforts to weaken or gut Endangered Species Act requirements to address the effects of toxic pesticides on threatened and endangered species. The Endangered Species Act is our nation’s most effective law for protecting wildlife in danger of extinction and has prevented the extinction of more than 99 percent of the species under its care. This vital law is supported by more than 90 percent of American voters.

Some members of the pesticide manufacturing industry are proposing legislation that would exempt their products from key Endangered Species Act safeguards. Their proposal would also exempt this industry from responsibility for the harms caused by pesticides to West Coast salmon, California condors, Florida panthers and a host of other imperiled species. These proposed changes would severely undermine the Endangered Species Act and have devastating consequences for our nation’s threatened and endangered species.

Under current law, the Environmental Protection Agency (EPA) must consult with two expert agencies—the U.S. Fish and Wildlife Service and National Marine Fisheries Service (“the wildlife agencies”)—to identify and minimize impacts to endangered species caused by pesticide products that EPA registers for commercial use. When necessary, these science-based interagency consultations result in commonsense protections, such as limits on spraying pesticides in key areas where endangered species live.

The industry-proposed legislation would gut these longstanding requirements and instead put large corporate interests in control. In addition, this dangerous legislation would exempt all approved pesticide use from enforcement under the Endangered Species Act, even where it directly kills or injures endangered wildlife.

Our organizations are supportive of administrative innovations to improve interagency consultations on the impacts of pesticides on endangered species. The National Academy of Sciences made recommendations to do just that in a 2013 report. This process is already underway with a set of pilot consultations on three neurotoxic pesticides—chlorpyrifos, malathion and diazinon—and we support its continued implementation and refinement.

Unfortunately, in April of this year Dow AgroSciences [asked](http://www.biologicaldiversity.org/campaigns/pesticides_reduction/pdfs/Letters_to_Pruitt_Zinke_Ross_from_Dow_Chemical.pdf) EPA Administrator Scott Pruitt to stop all of his agency’s work to assess the effects of these three pesticides on endangered species. This request came shortly after Mr. Pruitt defied his own agency’s previous finding that chlorpyrifos is unsafe, especially to young children, by allowing it to remain on the market. We urge you to ensure that this interagency consultation process continues in earnest and that EPA and the wildlife agencies involved receive adequate funding.

Endangered species are often the early warning system to alert us to the unintended harms of pesticides. It was the catastrophic decline of the bald eagle, peregrine falcon and other endangered species that caused the U.S. Fish and Wildlife Service and other agencies to sound the alarm on DDT. Thankfully, the bald eagle, our national symbol, was saved from extinction by the protections afforded by the Endangered Species Act. The Act remains the “gold standard” for species protection and recovery today, both here and around the world. We ask you to protect this vital law, not only to save our most treasured rare plants and animals, but also to protect our waters, our lands, and our health. Please oppose all efforts to weaken the Act’s ability to protect our environment from toxic pesticides.

Sincerely,

Center for Biological Diversity

Center for Food Safety

Defenders of Wildlife

Earthjustice

Natural Resources Defense Council