

**1. Citizen Petition**

Date: October 4, 2019

The undersigned submits this petition under the Federal Food, Drug, and Cosmetic Act or the Public Health Service Act or any other statutory provision for which authority has been delegated to the Commissioner of Food and Drugs to request the Commissioner of Food and Drugs establish a DDT action level of 3 ppm for ginseng.

**2. A. Action Requested**

That the FDA set a 3ppm DDT action level for ginseng.

**3. B. Statement of Grounds**

The Health Effects Division of the EPA was asked to assist the FDA in interpreting or applying a DDT action level for ginseng. The undersigned attaches to this petition the HED's recommendation in full, dated February 26, 2018.

HED's recommendation was to use the FDA action level for DDT in/on carrots (3 ppm) as a surrogate FDA action level for ginseng for three reasons:

- i) Ginseng and carrot are both members of the EPA Crop Subgroups 1A and 1B (40 CFR 180.41)
- ii) When establishing EPA tolerances for those subgroups, carrot is one of the representative commodities for required field sampling (EPA/OPP/HED SOP 2000.1).
- iii) Radish is also a member and representative commodity of crop group 1A and 1B although carrot is more similar to the growth and structure of ginseng therefore EPA recommends using carrot to represent ginseng.

Applying the FDA action level for DDT in/on carrots to ginseng would set the DDT action level in/on ginseng at 3 ppm.

The undersigned respectfully submits that the HED is best-suited to make a determination on this matter. The fact that the HED was asked to assist FDA in interpreting or applying a DDT action level for ginseng proves this. As such, the HED's recommendation to translate the carrot action level to ginseng is sound.

In view of the HED's recommendation, the undersigned formally requests that the FDA now adopt the HED's recommendations and implement a 3 ppm DDT action level for ginseng.

4. **C. Environmental Impact**

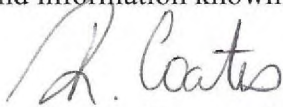
The undersigned makes a claim for categorical exclusion under §25.32 (foods, food additives, and color additives).

5. **D. Economic Impact**

Economic impact information will be submitted upon request of the Commissioner.

6. **E. Certification**

The undersigned certifies, that, to the best knowledge and belief of the undersigned, this petition includes all information and views on which the petition relies, and that it includes representative data and information known to the petitioner which are unfavorable to the petition.



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