



The Farmworker Association of Florida

La Asociación Campesina

Asosiyasyon Travayè Latè

1264 Apopka Boulevard • Apopka, FL 32703
(407)886-5151 phone • (407)884-6644 fax
www.floridafarmworkers.org

August 16, 2018

Acting Administrator Andrew Wheeler &
Office of the Science Advisor
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460

Re: EPA-HQ-OA-2018-0259

Dear Acting Administrator Wheeler and Office of the Science Advisor:

The Farmworker Association of Florida (FWAF) is submitting these comments on what has been called the Strengthening Transparency in Regulatory Science proposed rule on behalf of our over 10,000 farmworker and rural community members in Florida and the estimated 150,000-200,000 farmworkers in our state. Farmworkers harvest the food that feeds this nation. They risk exposure to toxic pesticides every day that they are in the fields where these pesticides are applied and where residues remain on the plants they touch and can contaminate the ground, drinking water and can be carried into living spaces on clothes and shoes. The men, women and children who perform this necessary and life-sustaining work deserve the strongest protections possible against threats to their health and well-being, yet, they are often victims of policies and practices of environmental injustice. That is why the role of the EPA in protecting farmworkers is absolutely critical to their lives and the lives of their children.

Rather than strengthening transparency, the proposed rule would limit or eliminate the very significant scientific studies that are crucial in reasoned EPA decision-making for protecting environmental and human health. Epidemiological studies produce vital and valid scientific information that is necessary to determine impacts on humans of various types of occupational and environmental exposures. Without these studies, real world impacts on individuals and communities would not be captured, and important data that could affect hundreds and thousands of people would be lost.

The Farmworker Association has engaged, for close to two decades, in various studies with academic institutions to conduct scientific research on health and safety risks to farmworkers from the conditions of their employment, including from pesticide exposure. We conduct these community-based studies by pairing the collaboration of researchers at the universities with community health workers and staff in our organization. The studies work, because the community has confidence and trust in our organization, and they see the benefit to themselves and their communities by participating in these studies. They also agree to participate, because they are guaranteed that their information will remain

anonymous, so that they do not risk retaliation for participating. Without that guarantee of anonymity, we would not have their cooperation to engage in this work.

Not only are the studies of significant importance to the overall body of scientific knowledge, but the information learned is shared with and given back to the communities in the form of community meetings and presentations and in popular education trainings that can be both protective and preventative in the information they convey. Basically, the studies provide information that the community can use to be safer in the workplace and to protect their family's health.

As an organization with a 35-year history of working in, with and for the farmworkers in Florida, we value, respect, and honor the trust that the community has in us. We are committed to maintaining that level of trust, as we understand the everyday realities that farmworkers face. Protecting people's identities is an important aspect of that trust, without which nothing can be accomplished. The "transparency" that is the basis for this rule would virtually undermine any studies that look at real world environmental health impacts to the people we work with every day. If that is the intent of this rule, then, the EPA is not living up to its mission of protecting environmental and human health.

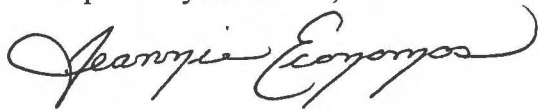
In proposing this rule, EPA is essentially discounting the scientific expertise, knowledge, experience, and integrity of tens of thousands of researchers around the country that engage in epidemiological research. The rule is also an attempt to invalidate the decades of research that has led to health protective regulation. Labeling the rule as enhancing transparency is a misnomer, and the public needs more transparency from EPA as to the underlying reasons the Agency is making this proposal.

The Farmworker Association of Florida is a statewide, grassroots, community-based, non-profit organization that works on issues of social and environmental justice for farmworkers in Florida and around the country.

We are in opposition to this proposed rule for the reasons stated above.

This is a public health issue. This is a justice issue.

Respectfully submitted,

A handwritten signature in black ink, reading "Jeannie Economos". The signature is fluid and cursive, with the first name "Jeannie" written in a larger, more prominent script than the last name "Economos".

Jeannie Economos
Pesticide Safety and
Environmental Health Project Coordinator