

**Resolution No. 009-01-COE**

**August 20, 2001**

[Labeling of Inerts in Pesticide Products]

URGING THE MAYOR AND THE BOARD OF SUPERVISORS OF THE CITY AND COUNTY OF SAN FRANCISCO TO URGE THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY (US EPA) TO REQUIRE THAT MANUFACTURERS AND REGISTRANTS OF PESTICIDE PRODUCTS FULLY DISCLOSE ALL INERT INGREDIENTS ON PESTICIDE PRODUCT LABELS.

**WHEREAS**, in 1996, the City and County of San Francisco adopted an Integrated Pest Management (IPM) Ordinance mandating that San Francisco minimize its pesticide use and reduce the negative impact of pesticides on people and the environment<sup>1</sup>; and,

**WHEREAS**, San Francisco's IPM Ordinance requires that the Commission on the Environment maintain a list of reduced-risk pesticides which are exempt from the IPM Ordinance<sup>2</sup>; and

**WHEREAS**, the ingredients of a pesticide product must be carefully examined in order to determine whether the product is a reduced-risk pesticide; and

**WHEREAS**, the United States Environmental Protection Agency requires manufacturers of pesticide products to label active ingredients in the products and does not require the labeling of inert ingredients<sup>3</sup>; and

**WHEREAS**, the US EPA states that an inert ingredient is "any ingredient in the product that is not intended to affect a target pest"<sup>4</sup>; and

**WHEREAS**, pesticide products can contain up to 99.9% inert ingredients; and

**WHEREAS**, most of the chemicals used as inert ingredients are labeled by EPA as having "unknown toxicity" because they have not yet been evaluated by EPA for toxicity to humans or the environment<sup>5</sup>; and

**WHEREAS**, the inert ingredients in pesticide products may have the potential to affect human health and the environment; and

**WHEREAS**, there may be detrimental synergistic effects between active and inert ingredients; and

**WHEREAS**, the public has a right to know the full list of product ingredients in order to make informed purchasing decisions about acceptable risks to human health and the environment; and

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<sup>1</sup> San Francisco Administrative Code, Chapter 39 San Francisco Integrated Pest Management Program

<sup>2</sup> San Francisco Administrative Code, Chapter 39.8 San Francisco Integrated Pest Management Program

<sup>3</sup> [www.epa.gov/opprd001/inerts/](http://www.epa.gov/opprd001/inerts/)

<sup>4</sup> [www.epa.gov/opprd001/inerts/](http://www.epa.gov/opprd001/inerts/)

<sup>5</sup> [www.epa.gov/opprd001/inerts/lists.html](http://www.epa.gov/opprd001/inerts/lists.html)

**WHEREAS**, the herbicide Scythe contains an inert ingredient, ethylene oxide<sup>6</sup>, that is a known carcinogen, while its active ingredient, pelargonic acid, is fairly benign; and

**WHEREAS**, the surfactant POEA, one of the inert ingredients used in the herbicide, RoundUp, is more acutely toxic than the active ingredient, glyphosate<sup>7</sup>; and

**WHEREAS**, coal tar is classified as a known human carcinogen by the International Agency for Research on Cancer<sup>8</sup> and is registered by the EPA as an active ingredient in restricted use pesticides<sup>9</sup>, yet when coal tar is included in a product as an inert ingredient there is no requirement to include it on the product label; and

**WHEREAS**, the inert ingredients xylene<sup>10</sup> and toluene<sup>11</sup> are considered toxic to the fetus and nervous system respectively by the U.S. Department of Health and Human Services; and

**WHEREAS**, the lack of labeling of inert ingredients on pesticide products could result in delayed or improper treatment of patients suffering from pesticide exposure<sup>12</sup>; and

**WHEREAS**, requiring manufacturers to list hazardous ingredients on product labels has resulted in the reformulation of products, eliminating the use of these toxic ingredients<sup>13</sup>; now, therefore be it

**RESOLVED**, as a policy matter, the Commission on the Environment finds that industry's claims or concerns that their competitive edge will be lost if they are required to list inert ingredients on pesticide product labels must be subjugated to the basic and legitimate right to know about risks to human and environmental health from such products; and, be it

**FURTHER RESOLVED**, that the Commission on the Environment urges the Mayor and the Board of Supervisors of the City and County of San Francisco to write a letter to the Administrator of the US EPA, and send copies to the U.S. Surgeon General, to California's U.S. Senators, and to U.S. Representatives elected from San Francisco, urging the US EPA to require manufacturers and registrants of pesticide products to fully disclose all inert ingredients on pesticide product labels.

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<sup>6</sup> Letter from Dow AgroSciences, May 26, 2000.

<sup>7</sup> Sawada, Y., Y. Nagai, M. Ueyama, and I. Yamamoto. Lancet, 1(8580):299. 1988

<sup>8</sup> International Agency for Research on Cancer. 1997. IARC Monographs, vols 1-69. Lyon, France.

<sup>9</sup> [www.epa.gov/RestProd/rupjul01.htm](http://www.epa.gov/RestProd/rupjul01.htm)

<sup>10</sup> U.S. Dept. of Health and Human Services. Public Health Service. Agency for Toxic Substances and Disease Registry. 1995. Toxicological profile for xylene (Update). Atlanta, Georgia.

<sup>11</sup> U.S. Dept. of Health and Human Services. Public Health Service. Agency for Toxic Substances and Disease Registry. 1994. Toxicological profile for toluene (Update). Atlanta, Georgia.

<sup>12</sup> Affidavit of Dr. Grace Ziem, January 20, 1998.

<sup>13</sup> 52 FR 13305; April 22, 1987 and US EPA Status Report to the Pesticide Program Dialogue Committee, 1999.

*I hereby certify that this resolution was adopted by the Commission on the Environment at its regular meeting on August 20, 2001.*

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*Sraddha Mehta*  
*Commission Secretary*

***VOTE:***

*Ayes: Commissioners Hayes, Evans, Bingham, Shah, Werbe, Rodriguez, and Bradford-Bell.*

*Noes: None.*

*Absent: None.*