

**Written Statement of Dr. Nathan Donley, Environmental Health Science Director
at the Center for Biological Diversity**

**U.S. House of Representatives Committee on Oversight and Reform
Subcommittee on Economic and Consumer Policy**

**Hearing on Seresto Flea and Tick Collars: Examining Why a Product Linked to
More than 2,500 Pet Deaths Remains on the Market**

June 15, 2022

Good morning, Chairman Krishnamoorthi, Ranking Member Cloud, and distinguished subcommittee members.

My name is Dr. Nathan Donley and I am the Science Director for the Environmental Health Program at the Center for Biological Diversity. I have a Ph.D in Cell and Developmental Biology from Oregon Health and Sciences University. The last 7 years of my professional life have been spent researching how pesticides impact people and the environment, and the regulatory failures that can actually facilitate harm rather than prevent it.

I have published 3 peer-reviewed scientific articles and 5 technical reports on this subject. I have authored over 100 technical scientific comments to the EPA on pesticide documents, including for flumethrin and imidacloprid, the two active pesticide ingredients in Seresto collars.

I have read through thousands of pages of FOIA documents I requested on matters related to the approval and continued use of Seresto.

It's important for this committee to understand that Seresto is the symptom of a much larger problem at EPA. It's simply one of the most egregious examples of what happens when the agency that is supposed to be making sure products that we encounter in our daily lives are safe is not up to the task.

Other than from the laboratory studies conducted by the pesticide companies themselves, the EPA actually knows very little about how pesticides will behave in the real world before they are approved. This is why incident-reporting by the public is essential to track pesticide impacts. And this is where EPA fails.

While other agencies, like the FDA, have robust systems to surveil harms from products under their purview, EPA only requires minimal information be submitted four times a year. And they delegate this responsibility to the pesticide industry itself. The limited information that is collected includes only the pesticide product name, where the incident occurred and the severity of the incident. That's it. Oftentimes the agency doesn't even know if the incident involves a dog or a cat.

Even though the EPA determines what incident information it collects, it then turns around and laments that the incident data are insufficient to take regulatory action to protect public health, the environment and our pets. It's a system designed to achieve nothing other than maintaining the status quo.

Worse yet, reported incidents significantly underestimate the true scope of harm. The EPA recently estimated that only 1 in 25 pesticide incidents involving another pesticide called dicamba was actually reported to the authorities. That's only a 4% reporting rate. Given that 100,000 people have reported their concerns about Seresto, this is very alarming, because the true number of harmful incidents to pets could potentially be far higher.

The EPA's counterpart in Canada was so concerned about Seresto incidents and harm to pets and humans that it denied Seresto approval in 2016. Canada analyzed US incident data and determined that Seresto collars had an incident rate 50 times greater than the average flea collar and 36 times greater than Canada's trigger for review.

The EPA has no trigger for review of any pesticide product no matter how much harm is being reported. Because the agency has no mandated trigger for

reviewing pesticides like Seresto, rather than choosing to use incident reporting data to inform a robust regulatory process and take dangerous products off the market, the EPA routinely chooses to do nothing at all.

That's especially troubling when you consider that Seresto is just one of 18,000 pesticide products currently approved by EPA.

People who are telling the authorities about the terrible things that happened to their pet or child deserve more than to have their reports ignored. Until this system changes it's impossible to have any confidence that the EPA is actually protecting us, our children, or our pets from harmful pesticides.

Thank you for the opportunity to be here today and to speak on behalf of this important issue.