

Texas is the state where the most 2,4,5-T has been used. Therefore, it is an excellent area to consider when studying the safety question of 2,4,5-T. Also, 82% of all the rangeland and pasture acreage treated with 2,4,5-T is in Texas and it is the largest producer of beef cattle in the United States. Comments of Texas Agricultural Authorities³⁴ on the safety of 2,4,5-T to humans and animals are extremely pertinent. Their comments on this subject are quoted in their entirety:

"The chemical has been used in Texas since 1949-1978 (29 years). In this span of years, approximately 50,000,000 acres have been treated, with many areas of land receiving 3 to 5 applications. To date there has not been a single lawsuit because of attributed health damage to man or animal. There have been lawsuits on damage to vegetation outside of target areas. Percentage of calf, lamb and kid crop is up in Texas. There are less deformities in newborn animals than in the history of the livestock industry. The cause of practically all deformities has been traced to plants that historically cause deformities to fetuses."

The Texas and California summations of their experiences is convincing evidence that in the real world 2,4,5-T with its trace contaminant TCDD is safe for humans and the environment.

INDEPENDENT RISK ASSESSMENT OF 2,4,5-T

Another independent group of scientists have recently reviewed the scientific data pertaining to the safety of 2,4,5-T. The Scientific Advisory Panel (SAP) consisting of seven members was authorized by Congress under FIFRA to advise EPA on scientific questions related to suspension or cancellation actions or any new proposed regulations of EPA. The SAP is particularly concerned with the effect of EPA's proposed actions on human health and the environment.

The SAP on September 26, 1979 issued their review of EPA's proposed notice of intent to hold a hearing on the presently non-suspended uses of 2,4,5-T and silvex. The Panel's initial recommendation stated:

"The Scientific Advisory Panel recommends that the Agency not hold such a meeting at this time. After extensive review of the data we find no evidence of an immediate or substantial hazard to human health or to the environment associated with the use of 2,4,5-T or silvex on rice, rangeland, orchards, sugarcane, and non-crop uses specified in the decision documents."²²

This reference pertains to the present non-suspended uses of 2,4,5-T and silvex. But recognize that the Scientific Advisory Panel's safety evaluation of 2,4,5-T with its trace contaminant TCDD would also apply to the presently suspended uses of 2,4,5-T.

29. Murray, F. J. et al. Three-Generation Reproduction Study of Rats Given 2,3,7,8-Tetrachlorodibenzo-p-dioxin (TCDD) in the Diet. Toxicology and Applied Pharmacology 50:241-252, 1979.
30. Kilian, D. J. et al. Cytogenetic Studies of Personnel who Manufacture 2,4,5-T. Presented at New York Academy of Sciences Workshop on Occupational Monitoring and Genetic Hazards, March 28-29, 1975.
31. Young, A. L. et al. The Toxicology, Environmental Fate, and Human Risk of Herbicide Orange and Its Associated Dioxin. Report OEHL TR-78-92.
32. National Academy of Sciences, Washington, D.C. 1974. The Effects of Herbicides in South Vietnam Part A — Summary and Conclusions.
33. California Department of Food and Agriculture — News Release #78-48. CDFA Releases Report of Phenoxy Investigation. April 6, 1978.
34. According to the USDA SCS Survey of 1978. U.S.D.A. Soil Conservation Service, State Office, Temple, Texas.
35. Kociba, R. J. et al. Results of a two-year Chronic Toxicity and Oncogenicity Study of 2,3,7,8-Tetrachlorodibenzo-p-Dioxin in Rats. Toxicology and Applied Pharmacology 46:279-303, 1978.