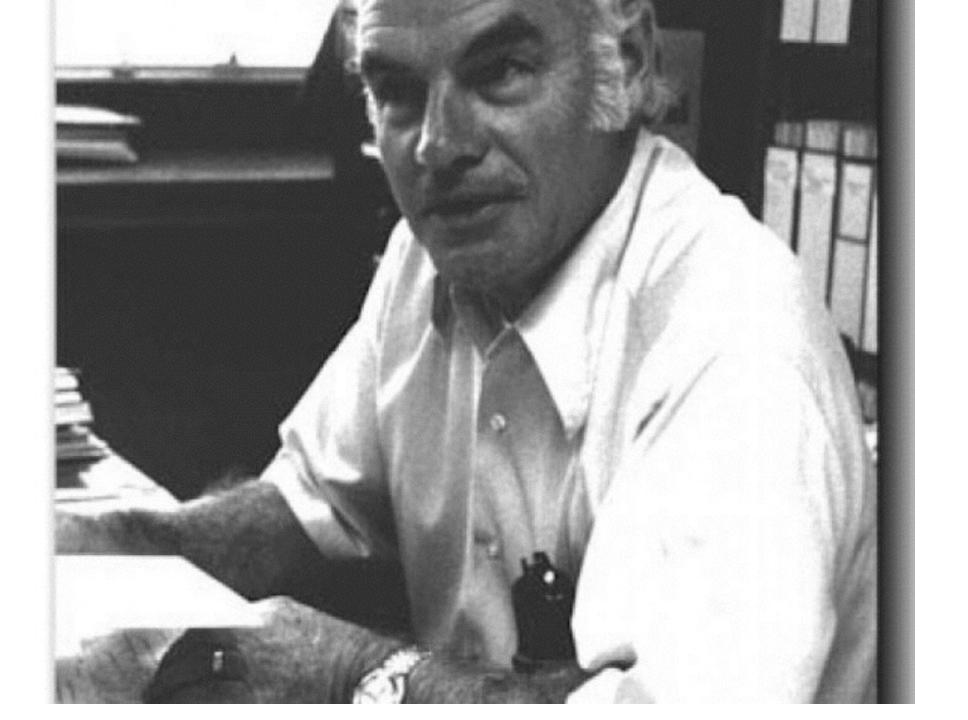
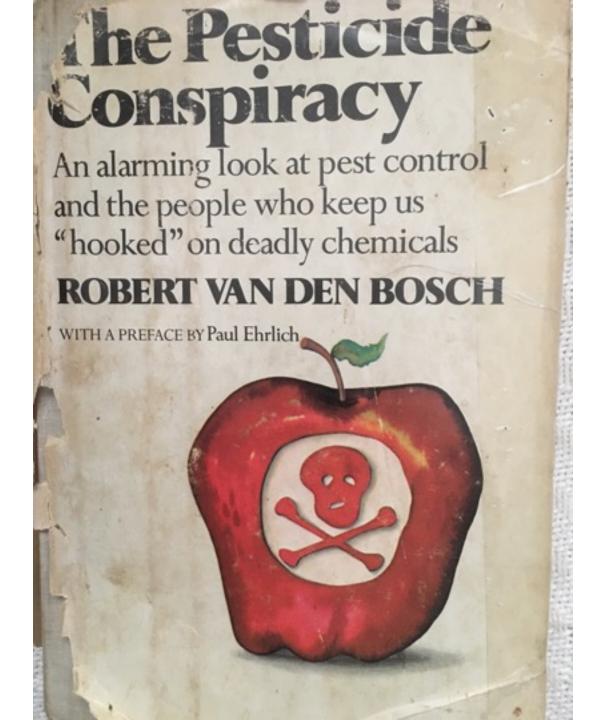
Pesticide Residue Testing is a COMPLETE Fraud!

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Over 99% of tested produce 'well below' pesticide safety limits, USDA study shows Tom Karst | Packer | December 19, 2018

More than 99% of [fruits and vegetable] samples tested in the U.S. Department of Agriculture's Pesticide Data Program had residue levels well below levels established by the Environmental Protection Agency.

- California agriculture applied 207 million pounds "active ingredients" to crops in 2016. In addition, 10 - 20% pesticide applications went unreported.
- Additionally, numerous government agencies are not required to report pesticide use, including CalTrans, which annually applies more than 2 million gallons of glyphosate plus other herbicides and pesticides.
- These alarmingly high statistics do not reflect the greatly increased concentration of virtually all pesticides used in agriculture compared to 20 years ago.
- So pesticide use is greatly increasing.

• In spite of a huge increase in organic farming, greatly increased use of Integrated Pest Management, consumer and farmer awareness of health and environmental risks associated with pesticide use, the use of pesticides greatly increased in the United States in the last 10 years

•ALL Pesticide human and animal safety, efficacy, environmental fate and other data is generated to the FDA and EPA by the registrant of the pesticide. The company selects the "independent laboratories" to generate the required data. The company selects the data that it submits to the government. Generally the government does no further testing and accepts the data from the registrant as accurate. The company is not required to divulge data that doesn't the support the positive, safe use of the pesticide.

- The FDA specifies the protocol and methodology for all pesticide residue testing and allowable residues on edible crops.
- All laboratories and all pesticide data generated in the United States is required to use this methodology and analytical testing.
- All data generated by the government is based on testing done using this protocol by EPA, FDA and CDFA.
- In California further data is generated using this analytical base by California Dept of Pesticide Regulation.

- Virtually all pesticides used in agriculture are water soluable.
- •FDA regulations REQUIRE all produce be washed with water and then drained prior to residue extraction. Thus, all water soluable compounds are washed off the produce before the testing.
- •FDA standards DO NOT require the testing of the wash water, thus virtually all water soluable compounds are washed down the drain prior to testing.

 The standard pesticide residue analytical procedure for all produce sampled in California and the US, both for CDFA analytical purposes and on contract to EPA, FDA and USDA, is to use a multi-residue screen method utilizing high performance liquid chromatography-tandem mass spectrometry (HPLC-MS/MS). This methodology is mandated by FDA regulations. That is, all labs in the US, public or private, must use this same methodology in order to be valid within the Federal guidelines. CDFA is the contract lab for all the data generated by CDPR, and for much data generated for the FDA and EPA.

 Currently in California there are 1058 active ingredients (AI) registered as pesticides for use in agriculture. This does not take into account various formulations, combinations of Al's, or "inert" ingredients. It is documented that inert ingredients in many pesticides are as toxic as the pesticides themselves, or increase the toxicity of the AI when combined with the inner ingredients to much greater toxicity levels. No inert ingredients are tested for on a routine basis by CDFA or EPA, only active ingredients.

 The HPLC methodology can only test for 343 Al's. Of the 343 that are routinely tested for (I have the list if you are interested), 16 of the compounds are breakdown metabolites, not the active ingredients. Additionally, 146 of the Al's in this group testing methodology are **not** registered for use in agriculture, and the majority that were at some point registered for use have not been utilized in over 10 years, some for more than 30 years. Doing the math the actual quantity of pesticide Al's tested is 181. This represents less than 17% of the active ingredients registered for use as pesticides in agriculture!

- The California Department of Pesticide Regulation issues public documents that identify the most commonly used pesticides in California. The most recent data is for 2016. DPR lists the top 100 active ingredients used in CA agriculture, by weight.
- The residue screen analysis used by CDFA analyzes ZERO of the top 10 Al's in use. The lab analyzes three of the top 20 Al's in use. The screen analyzes nine of the top 50 Al in use. This fake technology tests only 23 of the top 100 Al's used in agriculture in California. Only 4 Category 1 pesticides are routinely tested.

- The only time they perform residue analysis of compounds not included in the multi-residue screening process is if the inspector that collected the produce suspected the use of a compound not found in the screen technique. Most inspectors sample produce only at the retail or wholesal level, so there is no way for them to suspect what residues might be present. When I queried how frequently a test of a non screen group pesticide occurred the CDFA official said it was less than .25% of tests in a given year.
- If the pesticide used is not contained within the group capable of being analyzed with the multiscreen technique, it's **not** tested for.

 The compound used as the solvent in this technology is acetonitrile. All AI compounds in the HPLC screen analysis are extracted from the produce using this solvent. The efficacy of this solvent to extract the pesticides in question ranges from a high of approximately 90% of the active ingredient to a low of less than 10%. Only the actual residue is reported, even if the efficacy of extraction is extremely low, so the numbers are often artificially very low.

How the pesticide mafia continues to control the food supply

- Creates the regulations that it is governed by.
- Puts its hench people in government positions to regulate its industry.
- Creates ALL the data that proves what it sells is safe.
- Creates the fake methodology and lab technology to "prove" the food supply is safe.
- Manipulates the media and government to trumpet their propaganda.
- Kills people who get in their way.

What are we going to do about it?

- Educate ourselves and the public as to the ongoing poisoning problem.
- Increase consumption of Organically grown foods.
- Increase the growing of Organically grown foods.
- Encourage the development of biological and non-toxic pest management.
- Push back with all your might.
- Remember it is us creating the change that is essential.