

March 8, 2016

Doug Bannerman
Scientific Integrity Officer
U.S. Department of Agriculture
Jamie Whitten Building
1400 Independence Avenue SW
Washington, DC 20250

Dear Mr. Bannerman,

Dr. Jonathan Lundgren, a senior scientist at the U.S. Department of Agriculture's Agricultural Research Service (ARS), recently filed a whistleblower complaint charging your agency of suppressing research findings that challenge the safety and efficacy of a widely used class of pesticides—neonicotinoids. On behalf of our millions of members and supporters, the undersigned organizations would like to follow-up on our May 2015 letter by expressing our deep concerns regarding the allegations raised in this complaint and allegations from numerous other U.S. Department of Agriculture scientists, that they are being harassed and that their work is being censored or suppressed.¹ In particular, scientists whose work has touched on issues related to neonicotinoid insecticides and glyphosate are reporting a pattern and practice of harassment, censorship, and suppression. Just last month, we were pleased to see that USDA Inspector General Phyllis Fong said the USDA will open a broad investigation into this issue², but we were surprised to also see that your agency rejected a complaint by one of its top entomologists regarding scientific suppression.³ We urge you to make a commitment to launch a thorough investigation into this matter, make the investigation publicly available once it is complete, and take the necessary steps to ensure that the USDA maintains scientific integrity. We also request that an independent, third party conduct an investigation into this issue.

In particular, we are asking for binding reforms to USDA's scientific integrity policy. The agency must prohibit suppression and alteration of scientific findings, employ clear and enforceable procedures for conducting loss of scientific integrity investigations, assure transparency and consistency in the administration of policies, adopt strong protections for scientists who file misconduct complaints, and participate in misconduct investigations when scientists and their work face interference. These actions are needed to ensure that USDA scientists can properly do their jobs.

In March 2015, the Public Employees for Environmental Responsibility (PEER) filed a citizen [petition](#)⁴ requesting that the U.S. Department of Agriculture adopt new policies that would further protect the ability of government scientists to evaluate and communicate freely about the safety of agricultural chemicals without political interference or fear of retaliation. According to the petition, "The stated purpose of USDA's scientific integrity policy is to ensure 'the highest level of integrity in all aspects of the executive branch's involvement with scientific and technological processes and analyses.' However, the Policy fails to clearly prohibit political suppression and interference. While the Policy defines political suppression and interference, it does not include these acts in its definition of misconduct. The USDA, by its own admission, has yet to develop procedures for handling scientific integrity complaints."

PEER has reported that more than ten USDA scientists have faced consequences or investigations when their work called into question the health and safety of agricultural chemicals.⁵ These scientists documented clear actions that violated their scientific integrity, including USDA officials retracting studies, watering down findings, removing scientists' names from the authorship of papers, and delaying approvals for publication of research papers. According to an [article in Reuters](#)⁶, one senior scientist with USDA said he experienced harassment and censorship and told Reuters, "Your words are changed, your papers are censored or edited and you are not allowed to submit them at all."

In September 2014, Dr. Jonathan Lundgren filed an official complaint⁷ with USDA scientific integrity authorities after alleging harassment, hindrance, and retaliation from his superiors for his research that raised questions about the agrichemical industry's current and future products. The agency deemed his work to be "sensitive"⁸, but USDA has yet to define and publicize its policy regarding what makes a topic "sensitive."⁹ Furthermore, as the PEER petition notes, "unlike many of its sister federal agencies, the USDA scientific integrity policy lacks any process or mechanism for preventing politically motivated suppression or for challenging it once it occurs."¹⁰

Despite clear documentation of actions taken by the USDA to censor and suppress Dr. Jonathan Lundgren's research, your agency rejected his complaint. It appears the USDA has been consistently unwilling to consider these allegations valid as the USDA originally rejected launching an investigation into this issue in September 2014.¹¹

These reports by PEER and Reuters are extremely troubling. The USDA has a responsibility to protect the health and safety of the American public and to ensure the long-term viability and sustainability of the environment and our natural resources. It is imperative that the American people can trust that their government and its employees are serving their constituents and not the profits of private companies. All of the research that the USDA conducts must maintain scientific integrity and transparency to ensure it is guiding sound policy decisions.

Bees, butterflies, birds, and other critical pollinators are in great peril and populations are dwindling worldwide. A growing body of scientific evidence has implicated neonicotinoids as a leading driver of bee declines and glyphosate as a leading driver of the destruction of milkweed, the sole food source for monarch butterflies.

Other countries, along with states, cities, businesses, and universities across the United States, have passed measures to restrict the use of neonicotinoids to protect pollinators, our agricultural system, the U.S. economy, and the environment. Yet, the Obama administration has not taken measures to restrict the use of these pesticides, despite mounting evidence and growing public concern around their widespread use, including the EPA's recent preliminary risk assessment for the neonicotinoid imidacloprid.¹²

In June 2014, President Obama issued a Presidential Memorandum, which directed federal agencies to create a Pollinator Health Task Force, co-chaired by the USDA and EPA, and develop a federal strategy to protect pollinators. We question the USDA's ability to co-chair this task force and develop a meaningful federal strategy that will truly protect bees, birds, monarchs, and other critical pollinators, if the USDA is censoring and suppressing its own scientists who are raising concerns about these dangerous pesticides.

Please contact Larissa Walker, Pollinator Program Director, Center for Food Safety (lwalker@centerforfoodsafety.org or 202-547-9359) by March 31, 2016 so we can discuss how USDA will address the points outlined in this letter. We would also be happy to schedule a meeting with your office to discuss these points.

Sincerely,

Beyond Pesticides
Beyond Toxics
Center for Environmental Health
Center for Biological Diversity
Center for Food Safety
Ecology Center
Environment America
Environment Arizona
Environment California
Environment Colorado
Environment Connecticut
Environment Florida
Environment Georgia
Environment Illinois
Environment Iowa
Environment Maine
Environment Maryland
Environment Massachusetts
Environment Michigan
Environment Minnesota
Environment Missouri
Environment Montana
Environment Nevada
Environment New Hampshire
Environment New Jersey
Environment New Mexico
Environment New York
Environment North Carolina
Environment Ohio
Environment Oregon
Environment Rhode Island
Environment Texas
Environment Virginia
Environment Washington
Farmworker Association of Florida
Food and Water Watch
Friends of the Earth
Global Bees
Green America
Maryland Pesticide Education Network
Natural Resources Defense Council

Olympia Beekeepers Association
Organic Consumers Association
Penn Environment
People and Pollinators Action Network
Pesticide Action Network
Sierra Club
Sum of Us
The Institute for Agriculture and Trade Policy
Toxic Free North Carolina
U.S. Right to Know
Wisconsin Environment

cc:

Tom Vilsack, Secretary of Agriculture
Catherine Woteki, Under Secretary for Research, Education & Economics
Gina McCarthy, EPA Administrator
Rick Keigwin, EPA Director of Pesticide Re-Evaluation Division

¹ http://www.peer.org/assets/docs/usda/10_26_15_Lundgren_Whistleblower_%20Complaint.pdf

² Gunderson, Dan. USDA inspector general to investigate censorship of scientists. 12 February, 2016.

<http://www.mprnews.org/story/2016/02/12/usda-inspector-investigate-censorship-allegations>

³ Ganga, Maria. Government rejects scientist's claim it tried to cover up his pesticide research. 29, February 2016.

<http://www.theguardian.com/environment/2016/feb/29/scientist-usda-negative-pesticide-research-neonicotinoids-environment>

⁴ Ruch, Jeff. Petition for Rulemaking United States Department of Agriculture. 26 March 2015.

http://www.peer.org/assets/docs/usda/3_26_15_USDA_%20Rule-Making_Petition.pdf

⁵ Gillam, Carey. Environmental group seeks greater protection for USDA scientists. Reuters. 27 March 2015.

<http://www.reuters.com/article/2015/03/27/usda-petition-idUSL2N0WT1TQ20150327>

⁶ *Ibid.*

⁷ Complaint of Violations of USDA Scientific Integrity Policy. 12 September 2014.

http://www.peer.org/assets/docs/usda/10_26_15_Sci_Integrity_Complaint.pdf

⁸ USDA/ARS/PA. Letter to Dr. Lundgren. 3 August 2015. http://www.peer.org/assets/docs/usda/10_26_15_Suspension_decision.pdf

⁹ Philpot, Tom. This Scientist Uncovered Problems With Pesticides. Then the Government Started to Make His Life Miserable. Mother Jones. 4 December 2015.

<http://www.motherjones.com/tom-philpott/2015/11/usda-researcher-claims-harrassment-and-retaliation-pesticide-research>

¹⁰ *Ibid.* at 1

¹¹ Public Employees for Environmental Responsibility News Release. USDA Justifies Scientific Suppression As Its Policy.

<http://www.peer.org/news/news-releases/usda-justifies-scientific-suppression-as-its-policy.html>

¹² EPA News Release. EPA Releases the First of Four Preliminary Risk Assessments for Insecticides Potentially Harmful to Bees. 6 January 2016. <http://yosemite.epa.gov/opa/admpress.nsf/0/63E7FB0E47B1AA3685257F320050A7E3>