

To:

Environmental Protection Agency  
Office of Pesticide Programs Mail Code 7501P  
1200 Pennsylvania Ave, N. (Sipe, Sipe, Lardinois, & Mason, 2014)W  
Washington, DC 20460

July 20, 2022

From:

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Re: I am petitioning the EPA for removal of citronella and perhaps evoke the APA (Administrative Procedures Act). This includes a Policy change to disallow citronella and remove it from the 25(B) approved list due to its carcinogenic component – Methyl Eugenol.

Citronella, which contains Methyl Eugenol has been part of the approved 25(B) approved list for decades but according to EPA – the agency does not require carcinogenicity studies for biochemicals, so that may not be recognized until a 15 year review is conducted. The documents below show that the US is the only entity that still allows the unregistered use of citronella and that it is a carcinogen and should be removed from the 25(B) minimum risk list. As with other biopesticides it should only be allowed to be registered after scientific data can show its safety.

According to my recent (6/2/2022) email with Health Canada:

...Products that qualify as pest control products under the *Pest Control Products Act*, requiring registration, must be formulated with a *source* of technical grade of active ingredient (TGAI) that is registered in Canada for that *use*. Thus, registration of TGAI(s) are source specific and depend on the use pattern of the related product.

As per our [label engine](#), you can see that there are only two IMEP registrations for citronella oil. This is a different type of registration submission in Canada and you may review our [Regulatory Directive: Importation for Manufacturing and Export Program \(IMEP\)](#) for general info regarding IMEPs. They are only to be used in the manufacture (formulating, repackaging, etc.) of a pest control product solely for export from Canada. As stated in the Directive, "every control product (including technical active ingredients, manufacturing concentrates, and end-use products) used in the manufacture (e.g., formulating, repackaging, etc.) of control products as well as those that are imported into, or used in Canada, must be registered under the PCP Act. Currently, there is no source of citronella oil TGAI registered to be used in an end-use product used, sold or marketed in Canada.

According to communications with Health Canada, no one has performed any safety tests to justify the registration of citronella and its requirement to contain less than 2 PPM to safely be considered.

Pubchem:

PubChem [Internet]. Bethesda (MD): National Library of Medicine (US), National Center for Biotechnology Information; 2004-. PubChem Compound Summary for CID 7127, Methyleugenol; [cited 2022 July 20]. Available from: <https://pubchem.ncbi.nlm.nih.gov/compound/Methyleugenol>

PubChem [Internet]. Bethesda (MD): National Library of Medicine (US), National Center for Biotechnology Information; 2004-. PubChem Annotation Record for METHYLEUGENOL, Source: Hazardous Substances Data Bank (HSDB); [cited 2022 July 20]. Available from: <https://pubchem.ncbi.nlm.nih.gov/source/hsdb/4504>

According to Common Ground:

...The reason these safe citronella products are being ordered off the market – even as Deet has caused so many side effects and is still widely available – involves establishment manipulation of science. You see, citronella contains a substance called methyleugenol. When methyleugenol on its own was administered internally to mice – via a stomach tube – tumours arose at multiple sites. <http://ntp.niehs.nih.gov/ntp/roc/twelfth/profiles/Methyleugenol>.

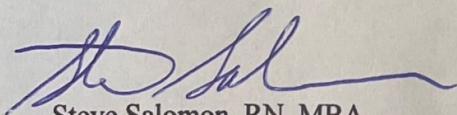
[Health Canada bans citronella - Common Ground](#)

According to McGill 2017:

...Anyone wishing to still use citronella extracts will have purchase them in the U.S. where FDA or EPA see no problems. Don't look for citronella in Europe though, their regulations are even stricter than Canada's.

[Canada Bans Citronella Based Bug Repellants | Office for Science and Society - McGill University](#)

Thank you in advance for your consideration and review,



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