

Written Statement of Karen McCormack, Retired EPA Employee
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**

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

My name is Karen McCormack. At the present time, I am a retired government employee after working for over 40 years at the Environmental Protection Agency. During my career at EPA, I first worked in an EPA laboratory as a research coordinator and in that capacity, I conducted research on pesticides. Later I transferred to EPA's Headquarters in Washington, D.C. where I worked in various positions in the pesticide program as a scientist, policy analyst, and communications officer. I also worked in a number of offices at EPA, including the Office of the Assistant Administrator for pesticides and toxics. Although I am retired from EPA, I'm still closely following a number of environmental topics. One of these topics of interest to me has been the impact of flea and tick pet products on cats and dogs.

The U.S. Environmental Protection Agency is charged with regulating products that contain pesticides and in ensuring that all pesticide products are safe to use. Before 1996, EPA did not consistently require manufacturers to conduct animal safety studies for pet products containing pesticides. Because pet products containing pesticides were readily available in many commercial stores, consumers thought they must be safe. This is not necessarily the case. Flea and tick products are designed to kill insects and often contain poisonous chemicals. When combined with pesticides used outside the home and in the water and food that people drink and eat, the aggregate risks from all these sources of pesticides can be high, especially for children who are more vulnerable to toxic chemicals than adults. It wasn't until the passage of the 1996 Food Quality Protection Act (FQPA) that EPA began to examine the risks from sources other than food, including risks from pet products containing pesticides. After the passage of FQPA, pesticide manufacturers were required to submit to EPA animal safety studies and incident reports showing harm to animals and humans exposed to pesticides in pet products.

Between 2012 and the present time, the EPA received an increasing number of incident reports related to the use of flea and tick pet collars for dogs and cats. Toxic effects that were described in the many incident reports from the use of certain pet collars ranged from mild effects, such as skin irritation to more severe effects such as intense tremors, seizures, paralysis, organ failure, and death.

The largest number of incident reports that EPA received during this period were for the use of a pet collar called Seresto. Between January 2012 and January 2022, EPA received over 86,000 incident reports of adverse effects associated with the use of Seresto, including 2300 reports of pet deaths. This number is most likely a low estimate of the actual number of incidents that are occurring since many pet owners do not know that they can report incidents to EPA, and they may not correlate the adverse effects in their pets with a particular pet product.

Determining the safety of pet products such as Seresto is difficult. There are no independent organizations that rank the safety of pet products, and the sales data which is needed to rank the safety of pet products is considered confidential business information by the manufacturers. EPA's risk assessments also do not tell the full story of what pet products are safe as they rely heavily on industry-generated studies that were conducted on mice and rats rather than on dogs and cats. EPA's risk assessments also are based mainly on studies that were conducted with only one pesticide in Seresto rather than on the combined pesticides in this pet product. Although the original manufacturer of Seresto (Bayer) did conduct a number of efficacy and safety studies on dogs and cats treated with Seresto, the company did not conduct two critical studies that are important in determining the safety of a pet product. These tests include a pet transferrable residue study (i.e., petting study) to determine the exposure of humans to Seresto and a study that measures the amount of pesticides in the blood of treated dogs and cats.

Both Bayer and Elanco have claimed that Seresto is safe for pets, and Bayer has claimed that the pesticides in Seresto remain on the outer surface of the animal's skin and hair coat. An independent study conducted at Murray State University, though, found that one of the pesticides in Seresto, imidacloprid, can cross the skin barrier and enter the blood of treated pets. Unfortunately, EPA does not require the pesticide manufacturers to submit a petting study or a study that measures the amount of pesticides in the blood of treated animals. As a result, EPA and consumers are in the dark concerning the safety of the flea and tick products they purchase at their pet stores. This situation needs to change, and EPA needs to require adequate testing of pet products before they are approved for use in the United States.