ASSOCIATION OF FLIGHT ATTENDANTS-CWA, AFL-CIO
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February 23, 2016

President Obama
The White House
1600 Pennsylvania Avenue, N.W.
Washington, DC 20500

Dear Mr. President:

On behalf of Flight Attendants around the world, we applaud your letter to Congress seeking emergency supplemental appropriations of approximately $1.9 billion to respond to the Zika virus both domestically and internationally. This funding is critical for supporting ongoing preparedness efforts and immediate response activities, as well as FY 2016 research, education, and prevention efforts.

We urge you to act quickly to prevent importation of insects that carry vector-borne disease on commercial airline flights through mechanical disinsection methods rather than misguided practices of spraying pesticides. This is an opportunity to shape global policy on methods to limit the transport of insects on aircraft while protecting the health of airline passengers and crew.

Approximately 50 countries require aircraft *disinsection.* As recommended by the World Health Organization (WHO), this involves spraying the cabin with pesticide. As front line responders, Flight Attendants are particularly vulnerable to the effects of this outdated and unacceptable practice. The US government has long expressed significant concern about pesticide use on airplanes (See Appendix for details).

The International Civil Aviation Organization (ICAO) recommends that states accept WHO-recommended methods of aircraft disinsection, but allows for testing of alternative non-chemical methods for WHO approval. The US has investigated non-chemical methods of disinsection, and WHO should accelerate its review and approval of these methods to protect the health of airline passengers and crew.

As soon as possible, the US Department of Agriculture (USDA) and the Department of Transportation (DOT) should implement necessary testing and validation processes so airlines can opt for safe, non-chemical means of disinsection. We strongly urge you to use your authority to take the following steps:

1) Urge the WHO to clearly define the necessary performance criteria for non-chemical disinsection;
2) As a priority, reinvigorate and fund the USDA initiative to test the efficacy of the combined air blowers and net curtains on a range of aircraft types and operations (e.g., boarding bridge/wide-body aircraft, boarding bridge/narrow-body aircraft, air stairs, and regional aircraft);
3) Draft clear protocols for airlines to implement non-chemical disinsection, as part of a vector-control plan at and around US airports, especially those with international service; and
4) Formally invite the WHO to review and approve the protocols as non-chemical alternatives.

If any country insists on chemical spraying on U.S. aircraft, we ask that you require measures to protect the health of crew/passengers (see Attachment for specific recommendations).

Thank you for your time and prompt attention to this urgent matter.

Most respectfully,

Sara Nelson
International President
Association of Flight Attendants-CWA

cc: Secretary Anthony Foxx

APPENDIX

History of US Government Policies and Actions on Aircraft Disinsection

- In 1979, the Centers for Disease Control and Prevention (CDC) banned routine spraying on incoming flights, citing "undue discomfort to passengers and crew passengers," and in some cases, placing "those exposed at risk of developing acute allergic (anaphylactic) reaction." It also described the efficacy of the process as "questionable"[1];

- In 1995, the Department of Transportation (DOT) proposed a rule requiring passenger notification of onboard pesticide spraying, prior to ticket purchase.[2] Some countries that received direct flights from the US dropped their spraying rules, and the DOT withdrew its proposal;

- In 1996, the Environmental Protection Agency issued PR Notice 96-3, which effectively banned the use of pesticide products on occupied aircraft (citing safety concerns), unless the registrant could demonstrate an acceptable level of safety;

- In 2002, the DOT created and led an inter-agency task group[3] to assess the efficacy of an alternative non-chemical means of disinsection; namely, forced air barriers at boarding doors and customized net curtains at service doors, together intended to prevent flying insects from either boarding or deplaning;

- In 2004-5, the US Department of Agriculture (USDA) demonstrated the efficacy of air barriers in a test environment simulating a boarding bridge and aircraft cabin. The team concluded that off-the-shelf air blowers were effective at containing more than 97% of released mosquitoes[4]. Units tailored for this application would increase that efficacy rate further. The team recommended air blowers at passenger boarding doors and customized, self-closing, net curtains over aircraft service doors, both of which have been designed and could be prepared for testing;

- In 2004, the US government asked the International Civil Aviation Organization (ICAO) to allow states to "allow non-pesticidal approaches to aircraft disinsection that have been shown to be at least as efficacious as those methods and treatments for chemical disinsection that have been approved by the World Health Organization (WHO).[5]"

- In 2005 the WHO expanded its official definition of "disinsection" from "killing insects" to "controlling or killing insects" so that non-chemical means could qualify;[6]

- In 2007, the US government proposed to ICAO that it further encourage the exploration of non-chemical means of disinsection[7]; and

- In 2012, the FAA Modernization and Reform Act[8] required airlines to notify passengers about pesticide spraying requirements on aircraft.

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[1] NPRM: FR 44: 18536-18537, March 28, 1979; Final rule: FR44: 58911-58912

[2] FR 60: 3596-3598, January 18, 1995

[3] Members of the task group were the Centers for Disease Control and Prevention, the Department of Defense, the Environmental Protection Agency, the Federal Aviation Administration, the United States Department of Agriculture

[4] Carlson, DA; Hogsette, JA; Kline, DL; et al. "Prevention of mosquitoes (Diptera: Culicidae) and houseflies (Muscidae: Diptera) from entering simulated aircraft with commercial air curtains," J. Econ. Entomol. 99: 182-193, 2006.

[5] ICAO, "Non-pesticidal disinsection of aircraft," Presented by the United States, FAL/12-WP/61, Cairo, Oct. 2004.

[6] WHO, "Revision to the International Health Regulations," Approved at the 58th World Health Assembly, World Health Organization, Geneva, 2005.

[7] ICAO, "Non-chemical approaches to aircraft disinsection," Presented by the United States, A36-WP/199, Montreal, Quebec, Sept. 14, 2007.

[8] PL 112-95, § 42303.

ATTACHMENT

Recommendations for Crew/Passenger Education and Exposure Prevention

If a country insists on chemical disinsection for incoming flights, suitable crew/passenger education, training, and exposure prevention measures should be implemented, including the following:

1) Train Flight Attendants in procedures to minimize human exposures when spraying disinsectants during flights, provide them with suitable masks and gloves, and ensure they wear long-sleeved clothing;
2) Ensure that residual spraying schedules provide sufficient drying time such that boarding will not be initiated until all interior spaces are dry and odor-free;
3) Prohibit spraying of crew bunks and implement a "no food" rule in crew bunk rooms; and
4) Inform passengers about any routine inflight spraying rules, as well as any potential residual treatment spraying, in advance of ticket purchase and indicate knowledge of such information as a condition of proceeding to final ticket purchase.

Other sustainable, environmentally-friendly measures to supplement mechanical disinsection methods could include the following:

1) Address any sources of standing water at/around airports that can serve as breeding grounds for mosquitoes;
2) Develop and implement insect trapping and sterile insect release programs;
3) Ban the importation of certain wood and plant products associated with certain pests; and
4) Review and update as necessary, cargo hold inspection procedures.