

Links:

- [LGA Press Release](#)
- [LGA “Your Questions Answered by the LGA”](#)
- [Persistence of florpyrauxifen-benzyl in sediments following application to a large oligotrophic lake to control Eurasian watermilfoil](#)

Collected comments and documents

> Lake George Association comments:

Press Release:

“The LGA emphasizes that there is no evidence of drinking water, recreation or human health risks based on its current data.”

“Your Questions Answered by the LGA:”

Is drinking water safe? Nothing in our data indicates human health or drinking water risks. Our concern is ecological, not drinking water or recreation.

Should people who eat Lake George fish be concerned? Nothing in our data suggests human health risk from eating Lake George fish at this time.

Do your scientific findings impact swimming or fishing? Recreational use of Lake George remains safe.

> Executive Director Dave Wick from the LGPC (as quoted in the Glens Falls Chronicle):

The Chronicle asked, Do you accept the LGA finding that ProcellaCOR and its breakdown products persisted more than a year in lakebed sediments?

The Park Commission replied, “The LGA findings largely align with the EPA product registration which notes that ProcellaCOR can persist at trace levels in anoxic condition in sediment for many months. While this finding is longer than noted in the EPA documents, the minute quantity (parts per billion) identified has absolutely no public health impacts nor identified ecological impacts.”

The Chronicle asked, Does the LGA report alter the state’s view that ProcellaCOR is safe to use in Lake George (and in other New York lakes)?

The Commission replied, “The Lake George Association press release clearly notes that their organization does not dispute that ProcellaCOR has no negative impacts on the public health, safety or welfare of the users of Lake George.

“The current LGA study finding of trace amounts of ProcellaCOR in the treatment areas does not identify any direct impact to the ecology of Lake George.

“ProcellaCOR was studied extensively over years of time by the EPA, the NYS DEC, and dozens of other countries, all of which align in their assessments that this product has no identified ecological impacts.

“The two ProcellaCOR treatments in Lake George, and indeed every Adirondack Park lake treatment, were found to be exceedingly effective at eliminating invasive Eurasian watermilfoil with no resulting negative impacts.”

> Olin Reed, Aquatic Biologist & Permit Specialist, Department of Environmental Conservation (communication with FOVLAP President Pat Suozzi, shared with permission):

Thanks for sending this over. I had read through some of this yesterday but hadn't had a chance to dive into it. I'll simply reiterate the LGPC statement that finding trace amounts of ProcellaCOR in the treatment areas does not identify direct impacts to lake ecology. As they mention, extensive studies on the pesticide have been conducted around the world. Additionally, the State of Vermont has independently reviewed the parent compound and degradation products in ProcellaCOR. I know you're aware of the VDH and DEC Ecotoxicity reviews which go into more detail, but I will link them below. Additionally, I've CC'ed toxicologists from VDH, VAAF, and DEC for their awareness.

> Jon Gosselin, Technical Development Biologist - North, SePRO (communication with LSCA, shared with permission):

Thanks for reaching out. I'll first highlight LGA's last statement in the press release, *'The LGA emphasizes that there is no evidence of drinking water, recreation or human health risks based on its current data.'* Their findings are in line with EPA Env Fate and Transport studies and expectations, except for they note a couple of sites (single point within a 1-inch section of a ~20 inch core) where flurpyrauxifen-benzyl concentration exceeded the NOAEC level for chironomids (midges). However, there is nuance to how the chironomid NOAEC was established (see below), and based on their findings I think it's reasonable to conclude that risk to midges in Lake George sediment is extremely minimal.

Please see comments to help contextualize the LGA findings.

- In their Environmental Fate and Ecological Risk Assessment, EPA unfortunately is not clear in describing that the NOAEC for the OECD 219 study referenced by Wiltse et al. is actually the average measured concentration of the active ingredient in sediment (25 ug ai/kg...or 25 ng/g per LGA paper units) for the maximum exposure rate at the beginning and end of the 28-day study reference (the end sediment concentration at 28-days was 46 ug ai/kg). The starting maximum test concentration in the spiked overlying water in the study was measured at 78.5 ppb ai (circa 10X LG application rate and 60% over max label rate). While this supplementary study's results were not fully explained by EPA, the study showed no effects on survival, emergence, or development rate of the midge at that maximum rate evaluated. Going above that concentration in that particular study design (spiked water) isn't feasible because of solubility artifacts noted for the active ingredient. Since the LGA paper emphasizes this study and its 'endpoint' as evidence of risk, it is important to make this clarification. It should also be noted that lifecycle studies for the particular midge evaluated are typically 28-days based on their biology in such trials in case there are questions about potentially longer study periods.
- EPA has an understanding that concentrations of the active and some of its degradants persist in sediments for an extended period. Our pond dissipation studies showed trace concentrations in some sediment samples at 4 months. With photolysis and hydrolysis as key drivers of active ingredient breakdown, some longer-term detection of the active in sediments is not surprising. The profile of the degradants is also understood such that detections here are also not surprising. The question comes down to 'hazard' vs 'risk'. EPA has fully assessed aquatic risk based on the full profile of the product after reviewing all of the studies on the product's fate and toxicological profile, and will continue to do that formally over the lifetime of the product's registration. The effort here to sample sediments following treatment does give more data about the product's environmental fate, however, the paper doesn't fully assess risk based on all information provided to EPA in the registration process.
- It should be noted that any management options, including the option of no EWM control, have hazards and potential risks. For example, Lake George's productive DASH program has hazards and risks to divers, non-target organisms, water quality etc. A full risk assessment to support a comprehensive AIS management plan that weighs all available tools' (quote from the draft LGA press release) should describe and compare hazards and risks of all strategies.
- EPA concluded it does not have any hazard concern for metabolites and/or degradates of florpyrauxifen-benzyl that may be found in drinking water, plants, and livestock.
- EPA Env Fate and Ecological Risks Assessment provides a robust, data-driven foundation showing low persistence and minimal ecological risk for florpyrauxifen-benzyl, countering the paper's portrayal of uncertainty and prolonged threats.

Notes:

NOAEC = No Observed Adverse Effect Concentration

> Lake Iroquois Association - Herbicide Renewal Permit, November 2025, [Link](#):

ProcellaCOR Herbicide Information

First registered with the EPA in 2018, and approved for use in Vermont for the 2019 management season, ProcellaCOR was then applied at four Vermont waterbodies that year. Since then, it has been applied extensively throughout New England, New York and elsewhere in Vermont. Based on available data, ProcellaCOR has been more selective for EWM control in Vermont than when previously using Sonar (fluridone) or Renovate (triclopyr) herbicides.

ProcellaCOR has a reduced-risk profile from the EPA, a minimal photolytic half-life (1.68 hours), and thus is only present within the water for a short time. Based on ProcellaCOR's high selectivity for milfoils and few other species, there is minimal impact anticipated to the native plant species present within Vermont. For anticipated non-target treatment impacts that are specific to Lake Iroquois, please refer to that section below.

In a recent study led by the Lake George Association, a historically anti-aquatic herbicide organization, it was found that ProcellaCOR and/or its degradates could be identified in sediment core samples within a treatment area approximately a year after application (Wiltse et al., 2025). Although the study was well orchestrated, it is a limited example of this type of data and has not been certified by peer review, which is a crucial step of ensuring credible scientific research.

Additionally, the lead author on the study is a member of the Lake George Association, which could be viewed as a potential conflict of interest. Core samples were only collected at one site per treatment area, but multiple core samples were collected outside of the treatment area and were primarily found to have non-detect results. Further, memos from both Vermont DEC's Monitoring and Assessment Program and the Department of Health's state toxicologist state that findings of their reviews support that proposed use of ProcellaCOR at rates of 3-5 PDU/ac-ft "pose an acceptable risk to the non-target aquatic biota and environment" (Levy, 2022) and "is expected to result in negligible risk to public health from both the active and inert compounds in ProcellaCOR," (Vose, 2022) respectively. Both memos are included within this application for reference.

Given recent attention that PFAS, or perfluoroalkyl or polyfluoroalkyl substances, have received, it is important to note that the State of Vermont has defined PFAS as a class of fluorinated organic chemicals containing at least one fully fluorinated carbon atom, in [Bill H.238 \(Act 54\)](#). It

is important to note that florpyrauxifen-benzyl, the active ingredient in ProcellaCOR EC herbicide, does not contain any fully fluorinated carbon atoms (National Center for Biotechnology Information, 2025). Based on that information and the State of Vermont's definition of PFAS, ProcellaCOR would not be defined as a PFAS product. Additionally, it is important to note that Bill H.238 only defines PFAS and does not regulate the sale or use of pesticides that meet this definition.