

**From:** [brightlightbeing@everyactioncustom.com](mailto:brightlightbeing@everyactioncustom.com) on behalf of [JUDITH IAM](#)  
**To:** [CDPR dpr22005](#)  
**Subject:** STOP Highly Toxic Fumigants in Food Production to Protect Farmworkers  
**Date:** Tuesday, January 3, 2023 11:52:33 AM

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EXTERNAL:

Dear Director Julie Henderson,

1,3-D is a pre-plant soil fumigant registered for use on soils to control nematodes. It is allowed on all crops and is often used with chloropicrin, another highly toxic fumigant, to increase its herbicidal and fungicidal properties. 1,3-D causes cancer. In addition, the National Institutes of Health's PubChem states, "Occupational exposure is likely to be through inhalation and via the skin. Irritation of the eyes and the upper respiratory mucosa appears promptly after exposure. Dermal exposure caused severe skin irritations. Inhalation may result in serious signs and symptoms of poisoning with lower exposures resulting in depression of the central nervous system and irritation of the respiratory system. Some poisoning incidents have occurred in which persons were hospitalized with signs and symptoms of irritation of the mucous membrane, chest discomfort, headache, nausea, vomiting, dizziness and, occasionally, loss of consciousness and decreased libido." Chloropicrin is extremely irritating to lungs, eyes, and skin. Inhalation may lead to pulmonary edema, possibly resulting in death.

These and other soil fumigants not only pose severe health threats to farmworkers and bystanders, but also threaten soil and water ecosystems. In contrast, organic production seeks to build healthy soils that resist plant pathogens, making fumigation unnecessary. Thus, these fumigants pose unreasonable adverse effects on humans and the environment. Their registrations should be cancelled.

Thank you for your attention to this urgent issue.

Sincerely,  
Ms. JUDITH IAM  
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