From: mgiltis@everyactioncustom.com on behalf of Michael Iltis
To: CDPR dpr22005
Subject: Help Stop the Use of Highly Toxic Fumigants in Food Production to Protect Farmworkers
Date: Tuesday, January 3, 2023 10:19:30 AM

EXTERNAL:

Dear Director Julie Henderson,

Please stop tinkering with a toxic pesticide that should be banned for use. The California Department of Pesticide Regulation (DPR) proposal to remove existing limits on the use of 1,3-dichloropropene (1,3-D), allowing Californians to breathe much more 1,3-D than other state toxicologists say is safe, highlights the dangers to which farmworkers are routinely exposed. It is outrageous that the state would allow farmworkers—whose labor was judged "essential" during the pandemic—to be routinely exposed to highly toxic pesticides, which could be replaced by organic practices.

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,
Dr. Michael Iltis
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