From: terrykardos@everyactioncustom.com on behalf of Theresa Kardos
To: CDPR dpr22005
Subject: Help Stop the Use of Highly Toxic Fumigants in Food Production to Protect Farmworkers
Date: Wednesday, January 4, 2023 1:58:58 PM

EXTERNAL:

Dear Director Julie Henderson,

As an environmental educator and field biologist as well as a former public health worker with the New York City and New York State Health Departments, I urge you to 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.

As a parent and grandparent, I am also concerned about the health and safety of many of vegetables and fruits that my family and community eat.

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.

I just finished reading Finding the Mother Tree, by Suzanne Simard, which outlines and clarifies in detail the importance of mycorhizal networks with roots of trees in forests that support the soil ecology, which includes nematodes. The use of such powerful pesticides on crops, including ones such as 1,3-dichloropropene, a pre-plant fumigant, suggests that the soil ecology in these areas is severely disrupted or nonexistent, and the possibility of drift of these chemicals raises the spectre that that they adversely affect the ecology of unintended targets as well. With organic methods available to create healthy soils that can resist crop pests, it is unnecessary that human health, soil ecology, and possibly wildlife health is put at such risk.

Thank you for your attention to this urgent issue.

Sincerely,
Ms. Theresa Kardos
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