From: jeannaples7@everyactioncustom.com on behalf of Jean Naples
To: CDPR dpr22005
Subject: Help Stop the Use of Highly Toxic Fumigants in Food Production to Protect Farmworkers
Date: Wednesday, January 4, 2023 6:39:44 AM

EXTERNAL:

Dear Director Julie Henderson,

I am writing as a physician and public health advocate, that strongly disapproves of the California Department of Pesticide Regulation (DPR) proposal to remove existing limits on the use of 1,3-dichloropropene (1,3-D), Please realize that this proposed plan will allow Californians to inhale much more 1,3-D than other state toxicologists say is safe. This highlights the dangers to which farmworkers are routinely exposed. It is outrageous that the Environmental Protection Agency (EPA) would allow farmworkers, whose labor was judged "essential" during the pandemic, to be routinely exposed to highly toxic pesticides, which could be easily replaced by organic practices.

1,3-D is a pre-plant soil, carcinogenic, fumigant registered for use on soils to control nematodes. It is sprayed on all crops and is often used with chloropicrin, another highly toxic fumigant, to increase its herbicidal and fungicidal properties. 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".

Please realize that 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. Any exposure to chloropicrin is extremely irritating to lungs, eyes, and skin and inhalation may lead to pulmonary edema, possibly resulting in death.

At this time, I thank you for your consideration of my letter and my recommendations. I am very concerned because these and other soil fumigants pose severe public health threats to farmworkers and bystanders and their use also damages the soil and water ecosystems. In contrast, use of organic production builds healthy soils that resist plant pathogens, making use of fumigants unnecessary. Due to the fact that use of these fumigants pose unreasonable adverse public health and environmentally damaging effects on humans and the environment, I strongly urge you to please immediately cancel the registrations of these fumigants.

Sincerely,
Jean Marie Naples, MD-Ph.D.

Sincerely,
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