

From: [Angel Garcia](#)
To: [CDPR dpr22005](#)
Subject: Public comment re: 1,3-D
Date: Wednesday, May 31, 2023 4:27:34 PM

EXTERNAL:

My name is Angel Garcia, Co-Director with Californians for Pesticide Regulation – a statewide coalition of over 200 organizations based in California’s Central Valley. Agriculture depends on farmworkers and yet, farmworkers continue to be, in the words of Cesar Chavez, society’s canaries to this cancer-causing fumigant. The Department needs to propose tighter restrictions on telone by adopting the Proposition 65 ‘No significant risk level’ set by the office of environmental health hazard assessment. It’s time to listen to the cancer experts. DPR lost in the courts. More than once.

Also, we are disappointed with the Department’s use of public comments from the January 18 hearing. At the hearing, hundreds of public comments submitted overwhelmingly proposed an actual protection and not what DOW supported.

This new proposal appears to legitimize continued telone use, while perpetuating a high degree of environmental injustice given that 1,3-D is heavily used in Latino/a and indigenous farmworking communities.

This looks like a selective democratic process where only a few entities are heard, and the rest of farmworkers, Latino and indigenous Mexican farmworkers are not. Again, I urge the DPR to follow OEHHA’s NSRL.

--

Ángel García, Co-Director
Californians for Pesticide Reform
145 E Hermosa St, Lindsay, CA 93247
(559) 667-2966
pesticidereform.org