From: CDPR Alternatives
To: CDPR dpr22005
Subject: FW: Protect Farmworkers From Highly Toxic Fumigants
Date: Friday, May 26, 2023 11:38:22 AM

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From: jeannaples7@everyactioncustom.com <jeannaples7@everyactioncustom.com>
Sent: Monday, May 22, 2023 2:12 AM
To: CDPR Alternatives <alternatives@cdpr.ca.gov>
Subject: Protect Farmworkers From Highly Toxic Fumigants

EXTERNAL:

Dear Director Julie Henderson,

I am writing as a physician and public health advocate, because I am very concerned by the fact that the California Department of Pesticide Regulation (DPR) proposal to remove existing limits on the use of 1,3-dichloropropene (1,3-D), has allowed Californians to breathe much more 1,3-D than other state toxicologists say is safe, and highlights the dangers to which farmworkers are routinely exposed. It is outrageous that the U.S. Environmental Protection Agency 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. Please understand that the minor changes to amend the state's earlier proposal are completely inadequate to ensure full protection for their public health.

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 the development of pulmonary edema, possibly resulting in death.

At this time, I thank you for your consideration of my letter and my recommendations. It is vital to understand that 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. Because of the fact that these fumigants pose unreasonable adverse effects on the public health of humans and the environment, I strongly urge you to please urgently cancel their registrations.

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

Sincerely,
Dr. Jean Naples
26 Montebello Commons Dr Suffern, NY 10901-4250 jeannaples7@gmail.com