From: CDPR Alternatives
To: CDPR dpr22005
Subject: FW: Protect Farmworkers From Highly Toxic Fumigants
Date: Friday, May 26, 2023 10:53:41 AM

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From: mjklein3@everyactioncustom.com <mjklein3@everyactioncustom.com>
Sent: Saturday, May 20, 2023 7:57 AM
To: CDPR Alternatives <alternatives@cdpr.ca.gov>
Subject: Protect Farmworkers From Highly Toxic Fumigants

EXTERNAL:

Dear Director Julie Henderson,

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 DPR 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. The minor changes to amend the state's earlier proposal are woefully inadequate.

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.

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When are you going to recognize you are fighting an ever escalating war with nature of measures and countermeasures. and nature is always defeating your purpose, while the side effect damage is threatening the loss of higher species essential to actual pollinating!!!

This is "SILENT SPRING" ALL OVER AGAIN ON STEROIDS!!! FARM WORKERS ARE BEING POISONED AND DYING TOO!!!!

It is time to change tactics before it is too late! Even the US realised that DDT WAS KILLING MORE THAN INSECTS WE FEARED! Far sooner than you are now!!!

CHANGE DIRECTION!!!

Michael Klein
Akron, Ohio

Sincerely,
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