

From: [CDPR Alternatives](#)
To: [CDPR dpr22005](#)
Subject: FW: Protect Farmworkers From Highly Toxic Fumigants
Date: Friday, May 26, 2023 11:26:25 AM

-----Original Message-----

From: jdtallal@everyactioncustom.com <jdtallal@everyactioncustom.com>
Sent: Saturday, May 20, 2023 3:14 PM
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), which is much more than other states say is safe, is bad news for farmworkers. That the EPA would allow essential farmworkers to be routinely exposed to highly toxic pesticides, which could be replaced by organic practices, is disgusting..

The carcinogen 1,3-D is a pre-plant soil fumigant used to control nematodes. It's allowed on all crops and often used with chloropicrin, another highly toxic fumigant. The National Institute of Health's (NIH) PubChem gives the following warnings: "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.

Sincerely,
Ms. Jimmy Tallal
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