



PEST CONTROL OPERATORS OF CALIFORNIA

November 15, 2022

Dear Mrs. Coombs,

I am writing you on the behalf of the Pest Control Operators of California (PCOC) to comment on the Petition to Regulate Sulfuryl Fluoride (Petition) filed by the Center for Biological Diversity and Californians for Pesticide Reform with the California Air Resources Board (CARB) on October 27, 2022, seeking to ban the use of sulfuryl fluoride (SF) in the State of California.

SF is the active ingredient used in the control of drywood termites and other wood destroying organisms as well as insect and vertebrate pests such as bed bugs, food destroying beetles, moths, and even cockroaches in extreme circumstances. Over decades of use this product has been proven over time to be uniquely effective without building any sort of resistance in the target pest population. It stands unique among treatment alternatives as it is the only treatment that can provide 100% control of these organisms in a wide variety of construction types.

This use of this product plays a significant role in real estate transactions in this state. The cryptic nature of drywood termites, in many circumstances, can cause undetected infestation to go unnoticed as there may not be any outward evidence of activity. Current detection equipment on the market is limited in its ability to detect hidden activity with accuracy. This Limitation of detecting equipment may leave drywood infestations undetected and hence untreated, leading to continued damage to structures. In situations where activity is noted, elements of the colony may also be in additional locations causing the intervention to be insufficient to control the entire infestation. Without a comprehensive treatment like fumigation that treats the entire structure, there is no assurance that all of the drywood termites and other pests are controlled when a family moves into their new home.

Any of the alternatives to whole structure fumigation are spot treatments limiting their control to a specific localized area within a structure. Localized treatments are limited to areas where evidence is present. Colonies can quickly recover from a partial treatment and damage to the structure can continue uninterrupted. Beyond the limitation of the breadth of the treatment, many of the alternatives have negative side effects of causing damage to the structure. For example, heat can warp or melt building materials and building insulated materials are designed to prevent the changes in temperatures that can limit the heating and freezing being used to achieve control.

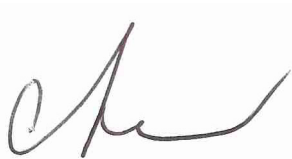
This year, the Formosan termite (*Coptotermes formosanus*) has been noted to be spreading in Southern California. This is an invasive species that causes significant damage in the structures that it infests. The most effective treatment for this aggressive invasive species is SF.

The use of the product is integral to the structural pest management industry. There is an entire license category for the use of this product and performing the service using SF that is regulated by the Structural Pest Control Board. In many cases, this product is the only product that can provide property owners with an assurance that an infestation is controlled.

The elimination of SF would cause a significant increase in the use of alternative pesticides and the use of electricity for heat treatments. Heat treatments of structures requires a significant amount of energy that comes with a carbon cost. Eliminating SF will increase the use of alternative pesticides and increase the introduction of carbon related to the electricity used for heat treatment. Those consequences could be a step backward for California.

At this time and for these reasons PCOC would ask the California Air Resources Board deny the Petition.

Sincerely,



Chris Reardon
Executive Vice President
Pest Control Operators of California



Darren Van Steenwyk
Legislative Committee Chair
Pest Control Operators of California