

October 30, 2015

California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Sulfuryl Fluoride not adequately addressed in SLCP Draft Strategy

I am writing to urge the California Air Resources Board to more completely and comprehensively address sulfuryl fluoride (SO₂F₂) in the Draft Short-Lived Climate Pollutant Reduction Strategy (Draft Strategy), consistent with the requirements of SB 605.

Sulfuryl fluoride is an extremely potent short-lived climate pollutant, reported in the Strategy to have a 20-year GWP of 6,840 and effectively comprising 25% of the states F-gas emissions. It is an extremely toxic pesticide of grave public health concern; it is a neurotoxin, the cause of fatalities, illness and disabilities among workers and the consuming public.

Because of this, sulfuryl fluoride has been banned in Europe from 2007 onwards in agriculture and from 2010 on, in quarantine/pre-shipment uses.

The U.S. EPA proposed in 2011 to ban the national use of sulfuryl fluoride over a three-year period, finding that “when combined with other fluoride exposure pathways, including drinking water and toothpaste, EPA has concluded that the tolerance (legal residue limits on food) [of sulfuryl fluoride] no longer meets the safety standard under the Federal Food, Drug, and Cosmetic Act (FFDCA) and the tolerances for sulfuryl fluoride should be withdrawn.”¹ At least 45 published studies have reported an association between fluoride and reduced IQ in children.²

Despite these moves in Europe and the USA to eliminate the use of sulfuryl fluoride, its global use is increasing rapidly (e.g., by roughly 5%/year 1999-2007³) with California as leader in its use. California is the world’s largest single emitter of this potent SLCP.

¹ <http://archive.epa.gov/agriculture/ag-center-archive/web/html/napr11.html#sulfuryl>

² <http://fluoridealert.org/studies/brain01/>

³ “Sulfuryl fluoride in the global atmosphere”, J Huang et al., Journal of Geographic Research, Vol. 114, Issue D10

The SLCP legislation (SB 605, Lara) assigns the duty to “complete a comprehensive strategy to reduce emissions of short-lived climate pollutants in the state” including, by definition, sulfur hexafluoride.

However, within the draft Strategy, SO₂F₂ is barely mentioned, with but a summary paragraph in the Strategy, repeated verbatim in Appendix A. In terms of “identifying research needs to address any data gaps” (SB 605), the research needs (Appendix B) has only one sentence regarding SO₂F₂.

Additional requirements of SB 605 that have not been met include:

- “Complete an inventory of sources and emissions of short-lived climate pollutants”

Rationale: Each sector of use needs to be fully identified and characterized before emissions can be addressed. It is not enough to refer to DPR records.

- “Assessment of the current status of controls that directly or indirectly reduce emissions”

Rationale: there are alternatives available in every sector, each with its own considerations. These must be fully described and assessed before emissions can be addressed.

- “Identification of opportunities and challenges for controlling emissions”

Rationale: again, alternatives to SO₂F₂ exist and need to be fully identified

- “Recommendations to further reduce emissions”

Rationale: without specific recommendations on next steps, no Strategy has been identified, let alone a “comprehensive strategy” as mandated by SB 605.

A pollutant of this importance, being a serious threat to public health and the environment both as a growing climate-forcing agent, and as a dangerous pesticide, must be given full consideration in the Strategy as mandated by law. To ignore SO₂F₂ is to revert from California as leader in addressing climate change and public health, to California as promoter of the global adoption of this toxic short-lived climate pollutant.

Sincerely,

Margaret Reeves

Senior Scientist

