



Via EMAIL and U.S. MAIL

January 6, 2023

Mary Jane Coombs

Branch Chief, Industrial Strategies Division
California Air Resources Board
1001 I Street, P.O. Box 2828
Sacramento, CA 95814
maryjane.coombs@arb.ca.gov

RE: Request to Deny Petition to Regulate Sulfuryl Fluoride

Dear Ms. Coombs:

On behalf of the 600 growers and 27 handlers in the California Prune industry, I'd like to express my concern about a petition recently filed with the California Air Resources Board (CARB) that seeks to do away with sulfuryl fluoride, a fumigant that our members need to prevent food borne diseases and comply with both federal food safety requirements and international export requirements.

Banning sulfuryl fluoride in California would threaten food safety and food security in California, the nation, and abroad, devastating California businesses, industries, and communities. Given the significant public health, environmental, and economic benefits of sulfuryl fluoride, and the tremendous costs associated with eliminating its use, we respectfully request that CARB deny the petition.

Sulfuryl fluoride (SF) fumigation is used commercially to comply with federal food safety laws and international export requirements mandating pest eradication from food before shipping. Without SF fumigation, California could not export some of its highest-value commodities, including dried fruits and nuts. California agricultural products account for billions of dollars in exports on an annual basis, and support thousands of jobs across the state. Typically, the California Prune industry exports 50% of its annual crop to international markets.

Sulfuryl fluoride is the primary and most effective alternative to methyl bromide for stored product fumigations. Sulfuryl fluoride guarantees complete elimination of pest infestations that can transmit serious and sometimes life-threatening food borne diseases such as *E.coli*, Salmonella, and Listeria. In addition to its unparalleled efficacy, SF fumigation has numerous other advantages over pest control treatments in the commodities setting, including pest resistance, shorter treatment timeframes that expedite processing and shipment of time-sensitive exports, and the lack of residues on hard surfaces or food processing equipment. The petition's sweeping statements about SF alternatives demonstrate a fundamental lack of understanding of pest management needs and practices in the commodities setting, as well as food safety and international export laws.

SF is already highly regulated by the federal government and in California as a restricted-use pesticide, as CARB readily acknowledges. The California Department of Pesticide Regulation enforces stringent mitigation measures to protect applicators, bystanders, and sensitive populations. As result, SF fumigation is safe when conducted in compliance with federal and state laws and regulations. SF is used judiciously along with other pest management methods as part of comprehensive Integrated Pest Management (IPM) programs designed to protect stored foods in a manner that minimizes unintended public health and environmental risks, as well as food commodity loss.

Finally, SF fumigation has a negligible impact on climate change. DPR tracks annual sulfuryl fluoride usage in California, and CARB uses this data to track sulfuryl fluoride emissions.^[1] The average atmospheric concentration of SF is extremely low compared to other greenhouse gases. For example, the ratio of methane to SF in the atmosphere is greater than 740,000 to one. And there is no indication in the published literature that atmospheric concentrations of SF will ever rise to a level that would contribute significantly to global GHG emissions. As evidenced by CARB's 2022 Scoping Plan for Achieving Carbon Neutrality, CARB has recognized there are more effective ways to regulate greenhouse gases in a way that meaningfully impacts climate change.

Again, we respectfully request that CARB reject this petition, and thank you for your time and consideration.

Respectfully,

A handwritten signature in black ink that reads "Donn Zea".

Donn Zea
California Prune Board
Executive Director

^[1] See CARB, *GHG Short-Lived Climate Pollutant Inventory*, at <https://ww2.arb.ca.gov/ghg-slcip-inventory>.