



WESTERN AGRICULTURAL PROCESSORS
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November 14, 2022

Ms. Mary Jane Coombs
Branch Chief
Industrial Strategies Division
California Air Resources Board
P.O. Box 2815
Sacramento, CA. 95814

Re: ***Petition to Regulate Sulfuryl Fluoride***

Dear Ms. Coombs,

On behalf of the 180 tree nut hullers and processors of almonds, walnuts, pecans and pistachios that are members of the Western Agricultural Processors Association (WAPA), we wish to express our sincere opposition to the petition to regulate sulfuryl fluoride as filed by the Center for Biological Diversity and Californians for Pesticide Reform. This petition is based on false and overstated claims and fails to recognize the numerous regulatory protections already in place as well as the many public health, environmental and economic benefits that sulfuryl fluoride provides over other pest management methods.

The petitioners claim that regulating sulfuryl fluoride and reducing its use will decrease associated health hazards. This is simply not true. First of all, sulfuryl fluoride was introduced as an alternative to methyl bromide. In addition, it is already heavily regulated by the U.S. Environmental Protection Agency (EPA) and the California Department of Pesticide Regulation (CDPR) through measures that include reporting requirements, use restrictions and risk management measures designed to protect pesticide applicators and bystanders.

For the tree nut industry, California's phase out of methyl bromide left sulfuryl fluoride as one of the only remaining alternatives capable of eliminating the pests that infect and spoil tree nuts after harvest and during processing and shipment. None of the alternatives proposed by the petitioners have been proven effective in the field. Most are not even applicable to treatment of tree nuts. Moreover, the petition addresses all food commodity applications in just two sentences, making vague assertions about prevention of pest infestations through "careful management of equipment and conditions, such as keeping the product at appropriate humidity levels" and "updating the facility ... to be well sealed, clean, and regularly maintained." These statements demonstrate a fundamental lack of understanding of pest

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management needs in the tree nut industry and do not provide any evidence supporting the petitioner's proposed remedies.

California's tree nut crops are a source of nutritious foods for millions of people worldwide. They also generate billions of dollars in annual revenue and support thousands of jobs in California communities. California's current regulation of sulfur dioxide strikes the balance necessary to protect public health and the environment while preserving effective pest management tools for the tree nut industry.

In closing, we strongly urge CARB to deny the petition to regulate sulfur dioxide. Should you have any questions regarding these comments, please contact me at (559)455-9272 or via email at roger@agprocessors.org.

Sincerely,



Roger A. Isom
President/CEO