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November 17, 2022

Mary Jane Coombs, Branch Chief
Industrial Strategies Division, CARB

Dear Ms. Coombs:

On behalf of the over 1500 California pistachio growers and the 20 pistachio processors, I would like to provide comment on the proposed regulations on the fumigant sulfuryl fluoride (SF).

Storage pests of pistachios, principally Indian Meal Moth, Red Flour Beetle, and Navel Orangeworm, are currently controlled in storage and prior to shipment with phosphine/phosphide fumigations. The ability of phosphine/phosphide to control these pests appears to be eroding, especially when control is required for 30-45 days for shipment to export markets. While the pistachio industry does not currently use a large amount of SF, the ability to alternate/rotate fumigants of different mechanisms is important, even critical, to maintaining control of stored product pests.

Producing any crop will produce greenhouse gases that could contribute to climate change. It borders on the ludicrous to produce a crop that has a greenhouse gas footprint and then allow post-harvest losses.

The pistachio industry urges you to reconsider regulations that limit and phase out sulfuryl fluoride use as an agricultural fumigant.

Sincerely,

Bob Klein
Manager