



CALIFORNIA WALNUT COMMISSION

101 Parkshore Drive, Suite 250

Folsom, CA 95630-4726

(916) 932-7070

Fax: (916) 932-7071

info@walnuts.org

An Equal Opportunity Employer and Provider

November 18, 2022

Ms. Mary Jane Coombs
Branch Chief, Industrial Strategies Division
California Air Resources Board (CARB)
E-mail: maryjane.coombs@arb.ca.gov

RE: Petition to Regulate Sulfuryl Fluoride Comments

Dear Ms. Coombs:

The California Walnut Commission (CWC) represents over 4,500 walnut growers and 76 handlers who process and ship walnuts to customers around the world. California accounts for 99% of U.S. production of walnuts and supports more than 85,000 full-time equivalent jobs. In terms of value, walnuts are the 4th leading agricultural export from the state and valued at just over \$1.02 billion.. Exports have continued to account for almost two-thirds of shipments while the domestic market accounts for the remaining amount.

The diversification of export destinations, including Europe, Asia, and the Middle East, has allowed the walnut industry to remain competitive, yet balanced, despite trade barriers. CWC appreciates this opportunity to reiterate the importance of having a safe, viable, environmentally responsible, and efficacious pest management tool available for the California walnut industry, and urges the California Air Resources Board (CARB) to deny the Petition to Regulate Sulfuryl Fluoride (Petition) filed by the Center for Biological Diversity and Californians for Pesticide Reform on October 27, 2022.

Sulfuryl Fluoride must remain available to the agricultural industry. For walnuts and other food commodities, Sulfuryl Fluoride fumigation has numerous advantages over other treatments, including greater efficacy on target pest species, lack of pest resistance, shorter treatment times, consistency with an Integrated Pest Management (IPM) approach, and the lack of residues on hard surfaces and food processing equipment.

The extensively regulated federal and state processes and requirements allow walnut handlers to meet industry demands, while protecting worker, bystander, and customer health and safety, and the environment. All of the impacted walnuts are safely fumigated in walnut handler chambers to sanitize them from insect infestation prior to processing. The walnuts are then transferred to another building where they are washed, treated, and sorted by quality. Most of these in-shell walnuts can be processed, washed, treated, packaged, and sent to the Port of Oakland or other locations within 18 to 20 hours of receipt at walnut handler facilities across California.

The largest market for in-shell walnuts in the world is the European Union, especially during the holiday season in December. It takes roughly 5 weeks or more to ship these nuts from California to Germany. Therefore, the shortest possible processing schedule is critical for the walnut industry to meet the European Union market demand and associated logistical constraints.

Sulfuryl Fluoride fumigation products protect the world's food supply from stored product pests and preserve the flow of commerce, as many foreign purchasers of US commodities, including walnuts, require fumigation of bulk shipments. In many export markets, it is vitally important that commercial fumigation operations continue to be able to use Sulfuryl Fluoride under current rules and regulations as there are no practical alternatives available. These agricultural benefits are just one of the many benefits of Sulfuryl Fluoride use that petitioners ignore.

CWC appreciates this opportunity to express our strong opposition to the Petition. The walnut industry, and the agricultural industry as a whole, needs safe and effective pest management tools, such as Sulfuryl Fluoride, to support and grow California's thriving agricultural economy. We encourage CARB to take into consideration real-world, science-based, safe, and environmentally responsible working solutions to ensure that Sulfuryl Fluoride remains a viable option for the industry. Eliminating Sulfuryl Fluoride will greatly impact or eliminate the ability to manage stored product pests economically and effectively and meet industry demands.

Thank you for your consideration. Should you have any questions or comments, do not hesitate to reach out.

Respectfully submitted,

Joshua Rahm

Director, Technical & Regulatory Affairs, California Walnut Commission

jrahm@walnuts.org