



The California Environmental Health Initiative

Science at the intersection of human health and agriculture

Oct. 30, 2015

To: California Air Resources Board

Subject: Comments on SLCP strategy: include sulfuryl fluoride in CARB's GHG inventory and study alternatives to it

The pesticide sulfuryl fluoride (SO_2F_2) is being increasingly used in California to replace the highly toxic pesticide and GHG methyl bromide. SO_2F_2 is also a potent greenhouse gas (GHG). Replacing one significant contributor to global climate disruption with another is not a solution. In addition, SO_2F_2 poses a significant public health risk, particularly to children. According to California Department of Pesticide Registration statistics, California used 3 million pounds or half of the global total of SO_2F_2 in 2013.

We ask that:

SO_2F_2 be added to CARB's GHG inventory

CARB initiate expedited study of alternatives to SO_2F_2

We applaud CARB's efforts to lead the world in reducing SLCPs and ask that that effort be internally consistent by counting and reducing the amount used of SO_2F_2 .

Sincerely,

Nan Wishner, Board member