



*We Help Bring California's Goodness to the World*

November 21, 2022

VIA EMAIL (maryjane.coombs@arb.ca.gov)

Mary Jane Coombs, Branch Chief, Industrial Strategies Division  
California Air Resources Board  
1001 I Street, P.O. Box 2828  
Sacramento, CA 95814

**RE: Request to Deny Petition to Regulate Sulfuryl Fluoride filed by the Center for Biological Diversity and Californians for Pesticide Reform**

Dear Ms. Coombs:

I am writing on behalf of the California League of Food Producers (CLFP) to respectfully request that the California Air Resources Board (CARB) deny the Petition to Regulate Sulfuryl Fluoride (Petition) filed by the Center for Biological Diversity and Californians for Pesticide Reform (Petitioners) on October 27, 2022. The petition asks CARB to initiate a rulemaking and take other actions to add sulfuryl fluoride to its greenhouse gas inventory and phase out the use of sulfuryl fluoride in California.

CLFP represents the food processing industry in California. Our members include driers, dehydrators, nut producers, canners of fruits and vegetables, dairy processors and more. The food processing industry in California is vital to the California economy as the third largest industrial sector. Food processors generate an additional \$83 billion in value add to the \$43 billion agricultural industry. It is the mission of my members to provide a safe, affordable, and reliable food supply to consumers.

Sulfuryl fluoride is used by food processors as a structural and commodity fumigant to control a wide variety of pests which is critical to food safety. Sulfuryl fluoride facilitates billions of dollars in trade in dried fruits, nuts, and other commodities in California and is also used to comply with national food safety laws and international export requirements, which mandate pest eradication from food before shipping.

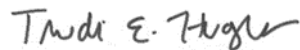
There are no viable alternatives to sulfuryl fluoride. None of the several possible alternatives listed by the petitioners are as effective or as efficient as sulfuryl fluoride.

Sulfuryl fluoride is already extensively regulated by a state and federal agencies to protect against the public harms alleged by the petitioners. There is no need for CARB to intervene or take action.

The California food and agricultural industries are facing unprecedented challenges with drought, supply chain issues and labor shortages. Adding more unnecessary restrictions on an already highly regulated fumigant would further burden the industry and jeopardize its mission to provide a safe, affordable and reliable food supply to consumers.

Thank you for your consideration in denying the petition to regulate sulfur dioxide filed by the Center for Biological Diversity and Californians for Pesticide Reform.

Sincerely,



Trudi Hughes  
President & CEO

cc: Dr. Steven Cliff, Executive Officer, CARB (Steve.Cliff@arb.ca.gov)  
Rajinder Sahota, Deputy Executive Officer, Climate Change & Research, CARB  
(Rajinder.Sahota@arb.ca.gov)  
Julie Henderson, Director, CDPR (Julie.Henderson@cdpr.ca.gov)  
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