



November 18, 2022

Mary Jane Coombs  
Branch Chief, Industrial Strategies Division  
California Air Resources Board (CARB)

**Re: Petition to Regulate Sulfuryl Fluoride to Reduce the Use of the High Global Warming Potential Pesticide**

The National Pest Management Association (NPMA) is a non-profit organization established in 1933 to support the pest management industry. NPMA has over 5,500 member companies from around the world, including nearly 5,000 U.S.-based pest management companies that account for about 90% of the \$10.6 billion U.S. structural pest control market.

Professional pest control firms use sulfuryl fluoride to perform fumigations throughout the United States and its territories. Our member companies take their role of protectors of public health, food, and property extremely seriously and we welcome further dialogue with California Air Resources Board (CARB) on the Petition to Regulate Sulfuryl Fluoride filed by the Center for Biological Diversity and Californians for Pesticide Reform.

Petitioners' contentions about sulfuryl fluoride's contributions to climate change are misleading. Concentrations of sulfuryl fluoride in the atmosphere are negligible compared to other greenhouse gases.<sup>1</sup> For example, the ratio of carbon dioxide to sulfuryl fluoride concentrations in the atmosphere is greater than 164 million to one, and the ratios of methane and nitrous oxide to sulfuryl fluoride exceed 740,000 and 130,000 to one, respectively. Furthermore, sulfuryl fluoride use also reduces greenhouse gas emissions by preserving existing structures—one of the many sulfuryl fluoride benefits ignored by petitioners.

Petitioners' also claim that there are "viable alternatives" to sulfuryl fluoride fumigation. Sulfuryl fluoride is used to control pests in many situations in California and provides a method of control for many pests and situations in which no alternative control methods exist. Even petitioners acknowledge that more research regarding treatment alternatives is needed. More than

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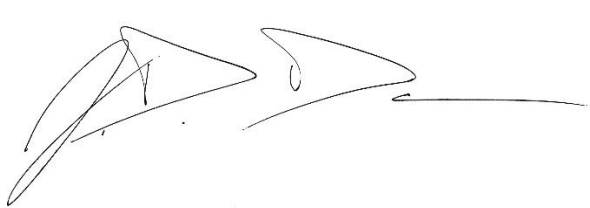
<sup>1</sup> Meinshausen, M., Nicholls, Z. R. J., Lewis, J., Gidden, M. J., Vogel, E., Freund, M., Beyerle, U., Gessner, C., Nauels, A., Bauer, N., Canadell, J. G., Daniel, J. S., John, A., Krummel, P. B., Luderer, G., Meinshausen, N., Montzka, S. A., Rayner, P. J., Reimann, S., Smith, S. J., van den Berg, M., Velders, G. J. M., Vollmer, M. K., and Wang, R. H. J.: The shared socio-economic pathway (SSP) greenhouse gas concentrations and their extensions to 2500, *Geosci. Model Dev.*, 13, 3571–3605, <https://doi.org/10.5194/gmd-13-3571-2020>, 2020.

45 years of research has failed to identify new alternatives that are equally as effective as sulfuryl fluoride.

In addition, petitioner’s claim that “[r]egulating sulfuryl fluoride as a GHG and reducing its use will decrease associated health hazards” is unfounded. The public health concerns described by petitioners fall squarely within the jurisdiction of, and are already addressed by, the United States Environmental Protection Agency (USEPA) and the California Department of Pesticide Regulation (DPR). The USEPA is the primary regulatory agency for all pesticides in the United States.<sup>2</sup> Federal law—the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)—governs pesticide regulation and authorizes the states to enact more stringent regulation. DPR is the primary regulatory agency for pesticide use and enforcement. DPR protects human health and the environment by regulating pesticide sales and use and oversees one of the most comprehensive state pesticide regulation programs in the nation. DPR’s integrated network of regulatory activities includes measures to mitigate potential health risks to sulfuryl fluoride applicators and bystanders, and the monitoring of potential health and environmental impacts from sulfuryl fluoride use.<sup>3</sup>

On behalf of the structural pest management industry, for the reasons stated herein, NPMA strongly 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.

Sincerely,

A handwritten signature in black ink, appearing to read 'J.D. Darr', is written over a horizontal line. The signature is stylized and somewhat cursive.

J.D. Darr  
Director, Legislative & Regulatory Affairs  
National Pest Management Association (NPMA)

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<sup>2</sup> <https://www.epa.gov/pesticides>.

<sup>3</sup> <https://www.cdpr.ca.gov/docs/dept/factshts/main2.pdf>.