



December 18, 2017

Michelle Ramirez
Office of Environmental Health Hazard Assessment
Sacramento, CA

Via email: <https://oehha.ca.gov/comments>.

RE: Comments opposing Safe Use Determination (SUD) for chlorothalonil use on food

Dear Ms. Ramirez:

We are writing to strongly oppose the granting of a Safe Use Determination (SUD) for chlorothalonil residues on food because Syngenta's methodology severely underestimates exposure and because there is inadequate data available on California specific consumption patterns.

Chlorothalonil is listed as a pesticide known to cause cancer because it has been shown to cause cancer of the stomach and kidneys in animal tests. This fungicide is used on over 50 crops in California with heaviest use on the food crops almonds, broccoli, carrots, celery, onions, potatoes, prunes, fresh and processing tomatoes and in landscape maintenance and flower production. Use rose from 736,000 pounds in 2007 to over a million pounds per year in 2011 -2015. Residues are also found on food products imported into California including cranberries, green beans and edible pod peas.

Syngenta's methodology for even Tier 1 residue calculations drastically underestimates potential dietary exposures to chlorothalonil by using mean 2 day consumption data from NHANES and fraction of crop estimated to have residues in the calculations.

Syngenta acknowledges that their methodology is less conservative than the tier 1 approach used by OEHHA in 2012 to calculate tomato product residues. In 2012 OEHHA used the mean 1 day consumption data and did not use an adjustment factor based on fraction of crop with residues. We note that celery would exceed the NSRL if adjustment for fraction of crop treated (estimated at 47.2%) was not used (see pg 6 of Syngenta spreadsheet).

Reductions of residue estimates due to processing also seem excessive. We note that DPR RCD for Dietary Exposure did not use processing adjustment factors. For green beans, USDA and USEPA use the same 0.05 adjustment factor for canning and light cooking, which doesn't make sense. Without the 0.05 processing factor, the one day mean consumption level for green beans would exceed the NSRL of 41 ug/day (see page 10 of Syngenta spreadsheet).

We conclude that neither Syngenta's current approach nor OEHHA's 2012 approach is adequate. Californians consume larger quantities of many individual fruits and vegetables than the national average and individuals who follow recommendations to eat 7 servings of fruit and vegetables per day consume far more. In addition, national mean consumption values will not capture ethnically-mediated differences in diets. For example, some Asian-American diets are significantly higher in vegetable consumption - green beans, edible pod peas and celery are a frequent component of these diets and all three have high average residues of chlorothalonil. Dietary consumption estimates used for any SUD determination should be protective of all California populations - including ethnic differences and people who are following the health guidelines to consume large quantities of fruits and vegetables.

Syngenta claims to have used the highest single residue level ever measured between 1992 and 2013 in their calculations. However, PANNA analyses of USDA pesticide residue data have identified much higher maximum residue levels for some crops including maximum residue levels much higher than the NSRL for cranberries, green beans, celery and tomatoes (attachment and ref). As detailed above, adjustment factors for estimated percent of crop treated and processing may account for some of this discrepancy.

Because of the very limited testing of produce for chlorothalonil residues and lack of California specific estimates of consumption and residues, there is too much uncertainty in estimation of dietary intake of chlorothalonil to support a Safe Use Determination for any single food, let alone the extensive list of foods Syngenta is proposing for a SUD.

Farmworkers and pesticide applicators already are exposed to chlorothalonil residues at work. Syngenta's exposure estimates do not account for these combined exposures.

We urge you to reject this petition for a SUD. Please let us know if you would like to meet to discuss our concerns.

Sincerely,



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