



MEMORANDUM

TO: Ms. Karen Ross
Secretary
California Department of Food and Agriculture
1220 N Street, Suite 400
Sacramento, California 95814

FROM: Dr. Karen Morrison
Assistant Director
916-445-3984

DATE: August 12, 2019

SUBJECT: RESPONSE TO COMMENTS ON "PROPOSED TOXIC AIR CONTAMINANT CONTROL MEASURES FOR CHLORPYRIFOS"

DPR acknowledges that the cancellation of chlorpyrifos may increase pest management costs and have other economic impacts. In addition, DPR has also received reports that some replacements for chlorpyrifos may disrupt some biological controls, resulting in secondary pest outbreaks because natural enemies have developed resistance to chlorpyrifos. However, DPR is not aware of any study evaluating the potential extent of this effect or how such effect might vary by alternative. DPR is cancelling chlorpyrifos to mitigate detrimental public health effects from dietary and spray drift exposure to chlorpyrifos. These detrimental public health effects outweigh the potential economic or pest management concerns described by CDFA. Similarly, while the use of chlorpyrifos has declined in recent years, applications allowed under the current recommended permit conditions will result in detrimental public health effects.

DPR understands that your economic analysis on the control measure will not be complete until September 2019 and looks forward to reviewing your analysis at that time. DPR also looks forward to actively participating with CDFA on the cross-sector alternatives work group to build on the economic analysis, and to identify, develop, and help growers transition to safer and more practical and sustainable alternatives to chlorpyrifos.

DPR's toxic air contaminant risk characterization document for chlorpyrifos focused on risks from spray drift and dietary exposures. Therefore, at this time, DPR is cancelling products that result in spray drift or dietary exposures of concern. This does not include bait/granular products because DPR lacks evidence at this time regarding drift and dietary exposure from granular applications. However, DPR will actively review exposures associated with chlorpyrifos products it did not propose to cancel.

We value and appreciate your consultation on DPR's proposed control measure for chlorpyrifos.