

California Nurses for Environmental Health and Justice

Dear Ms.Henderson

While the Department of Pesticide Regulation proposed revised “spray days” notification system will provide increased public access to planned pesticide application it does not include identification of exact location. The California Nurses for Environmental Health are concerned about the impact of incomplete information regarding the application of pesticides in the communities where patients live. Notifications of intention to use pesticides within one mile as proposed does not suffice, the public needs to be able to access the exact location of planned pesticide application.

Accessible exact location is necessary for those residing, working and going to school in nearby communities being able to take precautions against pesticide harms. Having the information regarding the exact location of a pesticide application would be important for health care providers when patients present at health care facilities believing they have been exposed to pesticides. As health care providers nurses are particularly concerned for the most vulnerable including pregnant women, children, elderly and those with existing chronic health conditions.

First responders and medical personnel need immediate access to names of these chemicals, and where and how they were applied when patients report symptoms and/or significant exposures. The Department of Pesticide Regulation should consider a 24 hour hot-line for information access. Additional information on health concerns and follow up with pesticide exposures are needed beyond first aid measures provided on product labeling. Beyond Poison Control links to Safety Data Sheets and the National Poison Data System should be provided.

Emerging science is showing that both the timing of exposure and genetic factors can increase risk, sometimes without causing acute symptoms. Scientific research confirms, the threat of exposure to many pesticides tends to increase the closer one lives or comes in contact to pesticide application sites. A recent meta-review that assessed six studies noted “All [six studies] found that the greater the distance [from the pesticide application], the lower the levels in pesticide concentrations in dust, outdoor and indoor air.”¹

Thank you for your consideration

Vanessa Forsythe RN MSN Policy Committee Chair California Nurses for Environmental Health and Justice

¹Deziel et al., 2017, Gibbs et al., 2017, Gunier et al., 2011, Hogenkamp et al., 2004, Kawahara et al., 2005, Ward et al., 2006

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CleanEarth4Kids

Climate Health Now

"Keep Marching...your ancestors are all the proof that you need that progress is possible not guaranteed...keep marching on...the future demands that we fight for it now"