Stevan Pecic

What is your submittal about?

Please select one:
Active ingredient

Provide the name of the pesticide and, if possible, its Chemical Abstracts Service (CAS) Registry Number.

You may use DPR's CalPEST Public Search to look up the CAS Registry Number.
Halosulfuron-methyl (CAS#100784-20-1)
Imidacloprid (CAS#138261-41-3)

(Short Format) In one to three sentences, please describe your pesticide-related concern.

The description provided will appear in the online summary.
This is sprayed on grass, and trees in most HOA. During the spraying there is a sign - Chemical Treatment in Progress. Once it's done, the sign is removed.

(Long Format) Please describe your pesticide-related concern and why it should be a DPR priority.

What type of information should you include?

- **Who or what is affected** (e.g. worker, community, residential, consumer health, sensitive populations, environmental endpoint, pesticide use, or other human health or environmental concern)
- **Description of the situation of concern**, including use site (e.g., crop or residential), region, type of pesticide use and application method (e.g., ground spraying; soil

fumigation; bait applications; etc.)
Affected are kids, pets and in general all residents. These chemicals will end up in the ground water and being sprayed over again. One can claim that these chemicals are not soluble in water - this is just partially true, in the micromolar amounts, yes, they are.
My main concern here from a standpoint of medicinal chemistry and pharmacology: our body metabolizes chemicals. If a chemical is relatively safe (considered low toxicity) that doesn't mean that once in our system, it will stay the same. In contrary - all chemicals taken orally (e.g. dissolved in water) will go first to liver. This is called First Pass Effect and all drugs/chemicals taken orally will end up in liver first where our enzymes will start the metabolism. I will give you one example: the drug aspirin (acetylsalicylic acid) is not active in that form. It is metabolized in our body into salicylic acid, a compound that is active and possesses mild analgesic and anti-inflammatory effects. The same applies for pesticides and other chemicals -they might not be too toxic per se - but we don't have enough evidences that they will not be converted into some other toxic metabolites in our system.

Another important pharmacokinetic analysis is drug-drug interactions. If one chemical (Pesticide 1) is relatively safe, and the other chemical (let's call it Pesticide 2) is relatively safe to be taken separately, that doesn't mean that they are safe to be taken together. Aspirin is relatively safe to be taken and Advil too, but no one is taking them together. Please note, when I say drug-drug interactions it doesn't mean they will react to each other. It means that Pesticide 1 will react with your body, and it will affect how your body metabolizes the second chemical - Pesticide 2. In other words your body will not be able to metabolize the other chemical, or it will change the metabolism of the other drug.
We don't know much about drug-drug interactions but we know it is very complex and you heard about food-drug interactions, where certain food speed up or slow down the degradation of the drugs.
Another concern is the amount, while one can claim that the amounts they are spraying are low toxicity, i.e. less hazardous, we need to take into account the exposure, if someone is exposed for a long period of time, it doesn't matter the amount. Cancers are chronic metabolic diseases so measurment of acute toxicity in this case will not be valid approach. The key is a long-term monitoring and decreasing the risk by decreasing/replacing/removing both components - the hazard (pesticide) and the exposure.

What scientific information or additional information supports your submittal?

DPR will collect pesticide use reports, pesticide illness reports, environmental and human health data for each submission; submitters do not need to provide this information. Description of DPR collected data can be found on slide 52 of August 7th SPARC Meeting Slides.

Attach supporting documents using the “Upload a File” option below.

Please provide a brief rationale for each file you attach. Explain why each attachment is being included and how it supports your submittal.
I explained my concerns. Please check out the end points, i.e. the metabolites of these pesticides as well.