Documentation of the Diverse Benefits and Uses of ProFume® gas fumigant in the United States

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On January 19, 2011, the United States Environmental Protection Agency (EPA) opened a docket (EPA-HQ-OPP-2005-0174) for the public to comment on the proposed withdrawal over time of food tolerances for fluoride and sulfuryl fluoride (ProFume® gas fumigant). This docket closed on midnight July 5, 2011. Eighty letters were submitted to the docket in support of food tolerances for ProFume. These submissions were made by 30 trade associations, 18 food processors, 22 fumigators, five distributors, three key University researchers, the USDA, the Sulfuryl Fluoride Agricultural Coalition (SFAC), and Dow AgroSciences. The submissions document the unique attributes of ProFume, challenge the legal and technical foundation of the EPA proposed action, offer alternative solutions, and identify severe economic impacts if the proposed action is adopted. These impacts include increased consumer food prices, food supply interruptions, loss of jobs and manufacturing in the United States, reduced food exports, company bankruptcies, and more importation of processed foods from outside the United States.

These letters document in the public record diverse benefits and uses for ProFume not previously published in the scientific literature or reviewed at scientific meetings. These letters provide a valuable reference resource on ProFume. This presentation will summarize themes and key comments made in these letters.

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