



November 10, 2023

Julie Henderson, Director
Department of Pesticide Regulation
1001 I Street
Sacramento, CA 95814

Subject: CDPR Draft Strategic Plan 2024-2028

Dear Director Henderson,

Syngenta appreciates the opportunity to comment on the *Draft Strategic Plan 2024-2028*. CDPR's (California Department of Pesticide Regulation) role as a science-driven, risk-based state regulatory authority is essential for protecting human health and the environment while enabling pest management.

Syngenta aligns strongly with the first goal to "Increase Access to Safe, Effective, Sustainable Pest Management." Syngenta is a research and development-based company that is a world leader in bringing forward innovative products that serve both end users and society. As the draft notes, "Pest management protects public health and the environment and supports a stable, healthy food supply for all Californians."

The draft identifies registration branch performance as an important enabler of sustainable pest management. Syngenta specifically supports goal 1.2, "Improve timeliness and transparency of science-based evaluation and registration of pesticide products." This goal is supported by further objectives to issue projected evaluation timeframes, and to initiate pesticide registration evaluations within 30 days of receiving necessary information. To complement these important steps, CDPR can also adopt timeframe standards for individual registration actions and evaluation stations. Improvements in this area benefit all stakeholders and are core to CDPR's mission.

While Syngenta is broadly supportive of the top-level goals outlined, there are some specific goals and objectives that raise concern. Goal 1.3 includes objectives to begin a process of initiating formal mitigation for at least two identified priority pesticides, and for completing formal mitigation for at least two identified priority pesticides. A strong reevaluation capacity is an important part of CDPR's regulatory program. However, the number of mitigations should be based on the results and timing of CDPR of assessments, instead of a fixed target.

The draft includes other worthy goals, such as increasing language access. Syngenta looks forward to working with CDPR, in concert with USEPA's efforts, on implementing strategies to improve language access.

In addition to the four top level goals and 14 subgoals identified, the report includes 53 specific objectives to be completed between 2024 and 2028. Many of these objectives are ambitious, and involve developing, establishing, initiating, or expanding programs and activities. In reviewing this draft plan, stakeholders would benefit from a clearer view of the funding source and amount for these activities.

Thank you for your consideration of these comments. We look forward to continued opportunity to engage in this process.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ben Sacher", is written over a light blue horizontal line.

Ben Sacher

Lead, State Affairs