

November 10, 2023

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

Dear Director Henderson:

The Animal Health Institute (AHI) appreciates the opportunity to comment on the Department's draft 2024-2028 Strategic Plan. AHI is the national trade association representing pioneer manufacturers of animal health products - the pharmaceuticals, biological products and feed additives used in modern food production, and the medicines that keep livestock and pets healthy. Our members also research, develop and market a range of federally regulated pesticide products that are used in livestock production and used to protect pets from pests that can carry diseases that threaten the health and welfare of animals and humans alike. As such we have an interest in this proposed Strategic Plan.

Our members are committed to the health and welfare of not only animals, but also humans and the environment. Our federally regulated pesticide products must be safe and effective when used as intended and must meet strict quality standards. The review of these products includes an environmental assessment. While this federal approval process is rigorous, time-consuming and resource intensive, companies must also achieve the goal of delivering products at a reasonable cost and convenient for consumers to use. Both research and experience have shown consumers to be price sensitive.

With all of these challenges in mind, we ask that Goal 1.3 include an evaluation of the viability of alternatives that meets a standard commensurate with the active ingredient and product which it is proposed to replace. In its evaluation process of high-risk pesticides, alternatives and mitigating measures, it is critical for the Department of Pesticide Regulation to ensure that any proposed alternative has a rigorous review which has been investigated not only for efficacy and safety, but also for economic viability. The review should include those who are seasoned experts in regulatory product development to ensure these high standards are met. The economic viability must consider distribution, manufacturing and scale up, as well as cost to the consumer. Doing so will help to ensure that any alternative will meet the market needs, in addition to being safe to humans, animals and the environment.

When considering registration of pesticides including application directly to animals, the Department of Pesticide Regulation should consider low volume administration, infrequent (e.g. monthly) applications, high standards, use according to label, safety to animals and humans,

convenience, protection from parasites and their associated diseases, and a minimal impact on the environment when compared to large-scale agricultural/industrial use of pesticides.

Thank you for this opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mandy Hagan', with a stylized flourish at the end.

Mandy Hagan
Director, State Government Affairs