

California Walnut Commission

Dear Director Henderson:

On behalf of the California walnut industry via the California Walnut Commission (CWC), I am writing to express formal comments regarding the statewide pesticide notification system. The CWC represents over 4,500 family farms and 69 handlers that generate over 85,000 jobs directly and indirectly, and almost \$700 Million in farm gate product value. Walnuts are one of California's largest agricultural commodities and 99% of English walnuts grown in the United States are produced in California.

As a member of the agricultural community, I work hard to ensure our industry's pest management practices protect our communities, our workers, our farms and the environment. I have confidence in the federal, state and local oversight of pesticide use enforcement. Considering these rules and regulations, I do not believe that the changes to the CDPR's Advance Pesticide Notification System are necessary in anticipation of pesticide applications.

Should the Department continue to move forward with this project, I ask the Department to consider the following items:

1. Notification should be limited to pesticide products that are already subject to Notices of Intent (NOI)
2. Timeframes to submit Notices of Intent to County Agricultural Commissioners should remain as it is in current practice
3. Public notifications should only include what information is absolutely necessary: product applied, intended date and time of application, and general geographical location (base, meridian, township, range, and section)
4. Personally identifying information, such as acreage treated or exact location, should not be included—this is critical to grower, applicator and employee safety
5. Because of the high probability that advanced notice will trigger appeals of NOIs and stall applications, the Department should prepare for these administrative burdens, act quickly to protect the right to farm, and for extended liability for crop loss.

As this system is implemented, I encourage the Department to engage early and often with the agricultural community to be sure that negative consequences are managed.

Sincerely,

Joshua Rahm

Director, Technical & Regulatory Affairs, California Walnut Commission



CALIFORNIA WALNUT COMMISSION

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July 25, 2024

Statewide Pesticide Notification System Formal Comments

Attn: Julie Henderson, Department of Pesticide Regulation

PO Box 4015, Sacramento, CA 95812-4015

Email: dpr23003@cdpr.ca.gov

RE: Statewide Pesticide Notification System

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