

California Fresh Fruit Association

Dear Director Henderson:

As a member of the agricultural community, the California Fresh Fruit Association (CFFA) has confidence in the federal, state, and local oversight of pesticide use enforcement to robustly protect communities and the environment in California. Rules and regulations have been developed and improved over decades in our state. Therefore, statewide notification is not necessary in anticipation of pesticide applications.

Should the Department of Pesticide Regulation continue to move forward with this project, CFFA asks the Department to consider the following items:

- Notification should be limited to pesticide products that are already subject to Notices of Intent.
- Timeframes to submit Notices of Intent (NOI) to County Agricultural Commissioners should remain as they are in current practice.
- 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).
- Personal identifying information, such as acreage treated or exact location, should not be included—this is critical to the safety of growers, applicators, and employees.
- Because of the high probability that advanced notice will trigger appeals of NOIs, stall otherwise safe applications by properly certified applications, and interfere with timely agricultural operations, the Department should prepare for these administrative burdens, particularly on counties, act quickly to protect the right to farm, and prepare for extended liability for crop loss.

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

Sincerely,

Adam Borchard

Director of Government and Public Policy

California Fresh Fruit Association