

California Tomato Research Institute

Dear Director Henderson:

The membership of the California Tomato Research Institute works hard to ensure our pest management practices protect our communities, our farms and the environment. Through our assessment, these members invest annually in research which explores alternatives to currently used pesticides, into the development of genetic resistance for our crop, and into the research infrastructure (primarily through the UC system) which we rely on to perform these trials and continue this important work. We do this because we want the industry to continue to thrive in California. We have confidence in the federal, state and local oversight of pesticide use enforcement. Considering these rules and regulations, I do not believe that statewide notification is necessary in anticipation of pesticide applications. Should the Department of Pesticide Regulation continue to move forward with this project, I ask that DPR 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 to County Agricultural Commissioners should remain as it is 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.
- Personally identifying information, such as acreage treated or exact location should not be included. This information is critical to grower, applicator and employee safety.
- Advanced notice will very likely trigger appeals of NOIs and stall applications. The Department should prepare for these administrative burdens, act quickly to protect the right to farm, and prepare diligently for extended liability for crop loss. We use these materials to protect our crop from major loss. Not making these applications at the right time, as IPM practices suggest, will have an impact on yield and system wide sustainability.

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

Sincerely,

Zach Bagley

Managing Director

California Tomato Research Institute, Inc.

www.tomatonet.org

About us: Founded in 1968, the CTRI is an independently funded, voluntary Board of processing tomato growers. As the industry's research sponsor, the Institute's purpose is to identify, fund and direct research to maintain and enhance the economic viability of California's processing tomato industry with

emphasis on production, product quality and the environment. In a given year the processing tomato growers of California are responsible for 95% of the total U.S. production of this crop; approximately one third of the world's global production with an annual farm-gate value of over \$ 1.5 Billion.

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