



To Whom It May Concern,

On behalf of the American Pistachio Growers (APG), I appreciate the opportunity to provide feedback on the Department of Pesticide Regulation's (DPR) proposed Pesticide Prioritization Process presented at the April 8th workshop.

APG represents a diverse membership of pistachio growers throughout California, and we strongly support the goals of sustainable pest management (SPM) that align environmental responsibility with practical agricultural production. Financial sustainability, which underpins environmental and community outcomes, must be a core consideration in regulatory development.

We commend DPR's efforts to increase transparency, stakeholder inclusion, and science-based analysis in the pesticide evaluation process. However, we urge caution in implementation to ensure that growers are not left without viable, cost-effective tools due to premature or overly broad restrictions. A few key considerations and recommendations:

1. Prioritization Process Must Include Economic Impact Assessment

Risk identification should be balanced with the economic feasibility of alternatives. Many "low-risk" options, including biopesticides or mechanical controls, may not yet meet efficacy or cost thresholds in specialty crops like pistachios. Inclusion of a grower economic viability metric in the prioritization process is essential.

2. Advisory Committee Should Include Agricultural Production Expertise

While we support the broad representation outlined, we strongly urge that commodity-based agricultural expertise (including growers, PCA/CCAs, and other tree nut specialists, advisors and consultants) be explicitly included to ensure realistic assessment of pest pressures, regional agronomics, and available tools.

3. Realistic Timelines and Capacity for Alternatives Must Be Verified Before Cancellation

The process outlines that cancellation is a potential outcome if mitigation is not feasible. However, a confirmed pathway to effective alternatives—commercially viable, scalable, and registered—must be in place before cancellation of any product used in integrated pest management systems.

4. Submission of Priorities Must Not Be Used for Advocacy Without Scientific Basis

We strongly recommend safeguards to prevent anecdotal or advocacy-driven submissions without data from moving forward in the process. DPR's reputation as a science-first agency depends on maintaining a high evidentiary bar.

5. Prioritize Investment in SPM Alternatives Research Concurrently

The transition to SPM requires investment. DPR's continued support for research grants, incentive programs, and registrant engagement will be critical. A clear roadmap aligning mitigation decisions with DPR-funded alternative development will prevent regulatory gaps that could hinder crop protection.

In closing, APG supports a robust and adaptive SPM framework and welcomes the opportunity to work with DPR in identifying shared goals that enhance environmental health without compromising the financial and operational sustainability of California agriculture.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Coelho', with a stylized, flowing script.

Joseph Coelho

Director of Sustainability and Member Outreach

American Pistachio Growers

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