



California Department of Pesticide Regulation
May 8, 2025

RE: Pesticide Prioritization Process & Scientific Advisory Committee

I am writing this letter on behalf of Naturipe Berry Growers (NBG), we thank you for the opportunity to submit commentary on CDPR's Pesticide Prioritization Process. NBG is a California headquartered company founded in 1917, the oldest and one of the largest strawberry grower-shippers in North America. I am also a professional entomologist and IPM specialist who cares deeply about the protection of biodiversity, human health, and agriculture's critical role in food security.

The California Strawberry industry supplies ~90% of the nation's fresh strawberry fruit on less than 1% of California's farmland with some of the highest household penetration levels of any produce – in short we are feeding the nation healthy nutritious food through a highly efficient supply chain. Strawberry and other specialty crops in this region have very narrow soil and climatic requirements, limiting acreage to the central coast California counties of Monterey, San Luis Obispo, Santa Barbara, Santa Cruz, and Ventura. Every year strawberry is reported as the most important crop for these county's local economies. Prime production regions face encroachment from urban expansion, threats from existing compliance regulations, and exorbitant rising costs of production.

At the same time, we recognize that strawberries are a crop with heightened susceptibility to disease and insect pest issues that can be devastating to our crop, which necessitates the use of a broad range of tools. Therefore, the industry is an important stakeholder in next steps for pesticide prioritization towards our shared sustainable future. In my 16+ years of conducting research in the trenches with the industry towards the adoption of next generation tools for pest management, it is clear that the industry shares and invests in CDPR's mission and vision to conduct pest management that is safe, effective, and sustainable for all Californians, despite any outside perception otherwise.

It is critical that we collectively land on a process that is evidence-based, scientifically supported, results in the intended impacts through measurable outcomes, and is feasible for all stakeholders to implement. A fair constitution of the Scientific Advisory Committee members will be imperative for us to come to an outcome that is collaborative, meaningful and impactful for all California stakeholders. I respectfully ask that CDPR consider including a member on the Advisory Committee who is well versed in the intricacies of commercial strawberry production beyond just pathology or entomology, and who has a comprehensive understanding of the industry's needs without bias in either direction. That is, candidates who have a conflict of interest in promoting new pest management tools through investment or other business endeavors should not be considered, as no candidate who has investment in the strawberry business would likely be considered either. Bias goes in both directions.

Thank you for your consideration of these additional comments. We support CDPR's efforts towards a holistic, whole-system approach and believe that there are viable pathways towards an optimized outcome with efficient use of limited resources. The program will be successful if not greenwashed, and if industry allies can be at the table and work collaboratively on next steps in the development of this policy.

Sincerely,

Hillary Q. Thomas-Sanchez, Ph.D.
Research & Technical Director
Naturipe Berry Growers