



CALIFORNIA DEPARTMENT OF
FOOD & AGRICULTURE

Karen Ross, Secretary

July 19, 2019

Val Dolcini, Acting Director
California Department of Pesticide Regulation
1001 I Street
Sacramento, CA 95812-4015

Dear Mr. Dolcini,

Re: Proposed Toxic Air Contaminant Control Measure for Chlorpyrifos

The California Department of Food and Agriculture (CDFA) has reviewed the Department of Pesticide Regulation's (DPR) proposal titled "Proposed Toxic Air Contaminant Control Measure for Chlorpyrifos," dated and received July 1, 2019. The proposed regulatory action would cancel registrations of chlorpyrifos products currently known to cause spray drift or dietary exposures. We provide these comments as required by FAC section 11454.2, and the January 15, 2019 Memorandum of Understanding.

Chlorpyrifos is an insecticide used on many of California's crops including fruit, nut, vegetable, grain, and fiber crops. The primary crops using chlorpyrifos, including alfalfa, almond, citrus, cotton, grape, and walnut, had a combined farmgate value of \$17 billion in 2017. Chlorpyrifos use in California has been restricted three successive times since 2015. The most recent Chlorpyrifos Interim Recommended Permit conditions instituted this year limit use to very specific circumstances and a few critical pest problems where few or no alternatives were available. County Agricultural Commissioners report that chlorpyrifos use has declined substantially after each successive restriction (2015, 2018, and 2019) and use this year is confined to a very low number of applications.

CDFA has not completed its economic analysis, expected September 2019, but it is likely that cancellation of chlorpyrifos will increase pest management costs in several of California's major crops, including alfalfa, almond, citrus, cotton, grape, and walnut. Alternatives to chlorpyrifos are in some cases considerably more expensive or require multiple applications to achieve similar efficacy. Some alternative insecticides are also more disruptive to biological control, resulting in secondary pest outbreaks, others have limited use owing to resistance issues or export restrictions, and others are under regulatory scrutiny for a variety of reasons. In short, California growers currently have few options for replacing chlorpyrifos.

If DPR's risk assessment suggests low exposure risk for chlorpyrifos bait and granular formulations, CDFA recommends that these products be exempted from cancellation. Some of these products have no effective replacements and are important for controlling key pests in crops such as citrus and grapes.





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CDFA appreciates the opportunity to provide comments on this proposed regulation. Please feel free to contact me should you have any questions. I can be reached at 916-654-0433 or secretary.ross@cdfa.ca.gov.

Yours truly,

Karen Ross
Secretary

