



CALIFORNIA  
**FRESH FRUIT**  
ASSOCIATION

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February 18, 2022

Ms. Kara James  
Pesticide Registration Branch  
California Department of Pesticide Regulation  
1001 I Street  
Sacramento, CA 95814-4015

**RE: PCPA Imidacloprid Comments**

Dear Ms. James:

The California Fresh Fruit Association (CFFA) appreciates the opportunity to comment during the review process of imidacloprid pursuant to the Pesticide Contamination Prevention Act (PCPA). CFFA is a voluntary public policy agricultural trade association representing growers, packers, and shippers of California's table grape and deciduous tree fruit commodities, including apples, apricots, cherries, figs, nectarines, peaches, pears, persimmons, pomegranates, plums, as well as blueberries and kiwifruit.

Imidacloprid is an important neonicotinoid active ingredient used in integrated pest management (IPM) for table grapes and tree fruit crops, serving as an effective control measure against a variety of insects and vectors, such as aphids, leafhopper, and mealybugs. Its use has been thoroughly vetted and proven safe by best available scientific data, analysis, and procedure.

In the notice from the California Department of Pesticide Regulation (DPR) dated September 21, 2021, DPR claims that it detected residues of imidacloprid in 15 groundwater wells at concentrations that exceeded the reporting limit of 0.05 parts per billion (ppb), with detections ranging from 0.051 to 5.97 ppb. According to the well monitoring data available from DPR's website, a total of 658 individual samples were obtained from 365 wells across California from 2003 to 2020. 627, or over 95%, of the samples were below the reporting threshold. Of the fewer than 5% that were above that level, the highest detection of 5.97 ppb is nearly 50 times lower than DPR's reference level of 283 ppb, which is the level of detected imidacloprid residues in water at or below which health concerns are not anticipated. DPR conducted a thorough and robust human health risk assessment to arrive at the reference level.



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With the mean and median values of detections above 0.05 ppb at 800 and 3100 times, respectively, lower than the reference level, DPR's data set indicates that the presence of imidacloprid in wells is not a widespread or acute concern. Based on empirical analysis of DPR's data, imidacloprid has not polluted, does not threaten to pollute groundwater in California, and does not pose a risk to public health.

For most of the crops that CFFA represents, California produces the vast majority of the U.S. domestic production (e.g., 99% in the case of table grapes). Additionally, California farmers grow their produce in accordance with California's environmental and health and safety standards and regulations, which are stricter than other U.S. states and most foreign countries. Without access to the safe and reliable use of imidacloprid, the ability of California's farmers to domestically grow nutritious fresh market produce for Californians will be substantially compromised.

Thank you for your consideration of these comments. If there are any questions or additional information that the California Fresh Fruit Association may provide, please contact me.

Sincerely,

A handwritten signature in black ink that reads 'Adam Borchard'. The signature is fluid and cursive.

Adam Borchard  
Director of Government and Public Policy  
California Fresh Fruit Association