



[PCPA.Comments@cdpr.ca.gov](mailto:PCPA.Comments@cdpr.ca.gov)

Kara James  
Pesticide Registration Branch  
1001 I Street  
Sacramento, CA 95814-4015

Dear Ms. James,

I am writing in regard to the PCPA Imidacloprid Review. As a consultant to the Grower Shipper Association of Central California (GSA), my main area of focus is pest management issues. Members of GSA include most cool season vegetable growers operating in Monterey, Santa Cruz, and San Benito County. In 2019, I prepared a report for the association which relied on CA DPR's 2017 Pesticide Use Reports. The GSA report continues to serve as a quick reference for our staff when issues arise regarding materials our industry is most reliant on. Among insecticide applications, imidacloprid ranked in the top five for most of the major cool season vegetable crops grown on the Central Coast. The following summarizes that information:

<b>CROP</b>	<b>IMIDACLOPRID RANKING</b>
Leaf Lettuce	3
Head Lettuce	5
Broccoli	5
Cauliflower	2
Spinach	3

Insecticides used more often than imidacloprid were those used primarily for control of lepidopteran pests. Those materials tend to be used more frequently due to their short window of efficacy. Narrowing the focus to materials used for aphid and whitefly control, imidacloprid ranked either first or second for those crops listed. That not only speaks to the efficacy and reliability of this material, but also to the fact that there are very few options available for control of insects with piercing-sucking mouth parts. Resistance management is already challenging. We would have to resort to using older chemistries which are harsher on the environment and which pose a higher risk to workers.


Since it was registered, imidacloprid has played a critical role in our industry's ability to control Lettuce Mosaic Virus, which is transmitted by the Green Peach Aphid and the Lettuce Aphid. By employing a multi-prong approach which includes clean seed, a lettuce free period, and aggressive aphid control, we have not seen a major outbreak since the 1990's. It's not a coincidence that imidacloprid was registered shortly after that last outbreak. This material was a true game changer for lettuce growers throughout the State. It has contributed to the continued success of this crop which ranked as the 6<sup>th</sup> largest agricultural commodity in California in 2020 with an annual value of 2.28 billion dollars.

We are very concerned that if imidacloprid were no longer available for use on lettuce, a resurgence of the virus could occur. While it is difficult to quantify what the economic impact of a mosaic outbreak might be, growers on the Central Coast have recently experienced an outbreak of Impatiens Necrotic Spot Virus, also insect-vectored, but by thrips, which are not controlled by imidacloprid. We estimated that in 2020 in Monterey County, the lettuce industry suffered gross revenue losses in the range of 70 to 100 million dollars due to INSV. I use this only to illustrate the consequences of not having adequate tools to control insects that act as vectors for viruses. Losing a tool like imidacloprid for use on high value specialty crops like those grown on the Central Coast would have big financial consequences.

Imidacloprid has been used safely by our industry for many years. It has a good worker safety profile compared with older chemistries. And while we are aware of the concerns regarding bee health, the majority of our crops are not attractive to bees. We do not want to trivialize the detection of imidacloprid in ground water. However, given the widespread use of this material in many parts of California for many years, there does not appear to be a widespread trend of detections. Additionally, most of the detections were close to the reporting threshold and all of the detections were far below the reference level associated with human health concerns. This suggests that cancellation of this material would not have a measurable impact on human health in California. Cancellation would have a major negative impact on California agriculture.

When considering the future of imidacloprid, we encourage CA DPR to consider the benefits this material provides to a large sector of the agricultural industry. A decision to curtail usage would substantially impact many crops, along with the many people who work to produce those crops in California.

Sincerely,



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