



CALIFORNIA WALNUT COMMISSION

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PCPA Imidacloprid Comments

Attn: Kara James Pesticide Registration Branch

1001 I Street Sacramento, CA 95814-4015

RE: Pesticide Contamination Prevention Act (PCPA) Imidacloprid Review

Dear Ms. James:

The California Walnut Commission (CWC) is writing to express support for the continued use and availability of Imidacloprid. Imidacloprid is critically important to U.S. walnut production. The CWC represents the California walnut industry, comprised of over 4,500 family farms and 86 handlers that generate more than 85,000 jobs directly and indirectly, and just under \$1 billion in farm gate product value. Walnuts are California's tenth largest valued agricultural commodity and 99% of English walnuts grown in the United States are produced in California.

Walnut growers require access to new and emerging technologies in order to stay competitive. Therefore, the CWC strongly supports safe and responsible product usage of what is currently proven effective and available. Effective insect pest management is one of many critical components of producing a successful walnut crop. Walnut growers utilize Neonicotinoids such as Imidacloprid as part of their integrated pest management programs due to the exceptional insect pest control it offers during the process. Imidacloprid is one of the important tools in the grower toolkit to responsibly manage pests and prevent economic crop losses. Further, it also provides an alternative for rotation management when used in conjunction with other insecticides to prevent resistance buildup.

During usage over the years, data has shown that Imidacloprid, when used according to label directions, pose no unreasonable risk to humans, wildlife, or the environment. Without access to Imidacloprid, walnut growers will be forced to use other insecticides which may be less effective, less benign to the environment, of greater acute toxicity to applicators and bystanders, and/or higher in cost. Furthermore, when the CDPR undergoes the review process we urge that CDPR conducts a science-driven review and focus on the clear data which indicates a low percentage of detection, low levels in the samples and the lack of trend for Imidacloprid groundwater detections. When walnut growers apply crop protection products, such as Imidacloprid, it's after careful scouting to confirm a treatment is necessary. It is by no means applied by ground, and when foliar applications are conducted, the maximum label rate is not used. Generally one application is sufficient, and a majority of growers are done applying it for the season.

Imidacloprid is also an essential tool for growers to control walnut husk fly, aphids and a list of other pests that have become a major threat to the California walnut industry in recent years. For walnut husk fly, a detrimental pest to the walnut industry, Imidacloprid is the only insecticide that can control young larvae in the husk. Growers control the adult flies before they lay eggs. If there is oviposition, then the grower can use Imidacloprid to suppress the hatching larvae. A common practice is to combine an adulticide with an ovicide for optimal control.

Imidacloprid insecticide is proven to be effective against flatheaded borers (multiple species) in other states. In California, within the last 5 to 7 years, the industry has seen an increased infestation of this pest in walnuts causing economic damage. A number of young walnut orchards were attacked by this pest, and growers ended up re-grafting/replanting the entire orchards of impact, which is an extremely costly process. The resurgence of flatheaded borers is most likely driven by the droughts that California has been experiencing, as these borer pests prefer high temperature and dry conditions. Since this pest is difficult to control with other contact insecticides from both efficacy and economic points of view because of its' internal feeding nature inside the bark of the walnuts, the only systemic control option is Imidacloprid. Subsequently the rise of the borer will likely increase in the future due to the climate change-related factors in California (where 99% of English walnuts are produced in the US), and researchers are looking to Imidacloprid as the most promising insecticide to control the borer. Therefore, the availability of Imidacloprid will help combat these types of newer problematic pests such as flatheaded borer and other wood-boring insects that do not have other reliable alternatives, especially since Organophosphates such as Chlorpyrifos have been banned for agricultural use in California and the US.

Similarly, walnut twig beetles transmit the deadly thousand canker disease, reported in several walnut orchards in San Joaquin Valley in the last 2 to 3 years (a globally renowned walnut production region). Imidacloprid is one of the best candidates to look at its' efficacy against the beetle based on the studies here and in other places of interest and impact.

In closing, Imidacloprid is critically important to U.S. walnut production. Walnut growers and PCAs who provide product recommendations strictly follow state, federal and local regulations ensuring that products are safely and responsibly used in accordance with label guidelines. The CWC appreciates the efforts conducted by the CDPR and the opportunity to communicate the importance of Imidacloprid to the industry, and lack of alternatives available.

The CWC strongly supports the continued access to Imidacloprid by U.S. walnut growers. If you should have any questions about the previous information listed, please do not hesitate in contacting me. Thank you for your consideration on this important matter.

Respectfully submitted,

Joshua Rahm

Director, Technical & Regulatory Affairs
California Walnut Commission