



April 29, 2023

SUBMITTED VIA EMAIL

Tulio Macedo, Chief
Pesticide Registration Branch
Department of Pesticide Regulation
916-324-3527

Re: Comments regarding proposed changes to the Pesticide Registration Branch workload assignments

Dear Mr. Macedo:

The Biological Products Industry Alliance (BPIA) appreciates the opportunity to provide comments to the Department of Pesticide Regulation (DPR) regarding the proposed changes the Pesticide Registration Branch workload assignments.

BPIA is a not-for-profit organization that promotes the responsible development of safe and effective biological products including biopesticides, biofertilizers, and biostimulants. These beneficial tools are used for commercial agriculture, forestry, golf courses, home gardens, horticulture, ornamentals, and more. BPIA also supports public health through education, outreach, and advocacy activities at the state, federal, and international levels. BPIA's membership includes both large and small producers of biological pest control products or biopesticides used extensively by farmers in California.

BPIA understands that the DPR is considering shifting workload assignments from a company-assigned research scientist to active ingredient ("AI")-assigned teams to maximize efficiencies and reduce potential backlogs created by company-based individual workloads. However, per the Notice, the team's AI assignments will not be based on groupings such as antimicrobial, biopesticide, conventional, or other pesticide types to achieve the goal of each team being skilled in all pesticide types. Although BPIA understands the reasoning for this decision, BPIA would like to encourage the DPR to consider establishing a stand-alone team focused solely on the review of biological pesticides, especially for the following reasons:

1. Due to their unique mode of action that typically renders biological pesticides as "reduced-risk," biologicals have a different set of data requirements from conventional or antimicrobial pesticides. Having a dedicated team that fully understands the unique set of data requirements for biological pesticides will be an asset in facilitating the expedited review of a biological pesticide application.
2. We understand that the state of California is committed to encouraging the development and use of low-risk pesticides as an alternative to conventional chemical pesticides. This commitment can be further cemented by assigning a stand-alone biologicals review team that fully understands the distinct nuances of biologicals, their unique data requirements,

and their important role in moving towards more sustainable food production. The efficient, effective approval of safer pesticides as well as a transparent, predictable process in decision making is a shared goal for the BPIA membership and DPR. We believe that a stand-alone biologicals review team is a strong step towards achieving this goal.

Should you have questions about or wish to have further discussion regarding these comments, please contact me. Thank you for your consideration of these comments and for the opportunity for stakeholder engagement on this important issue.

Respectfully submitted,

BIOLOGICAL PRODUCTS INDUSTRY ALLIANCE

A handwritten signature in black ink that reads "Keith J. Jones". The signature is written in a cursive, flowing style.

Keith J. Jones
Executive Director