

January 10, 2008

Mr. Charles Andrews, Chief
Pesticide Registration Branch
California Department of Pesticide Regulation
P.O. Box 4015
Sacramento, CA 95812-4015

Dear Mr. Andrews,

On behalf of the Biopesticide Industry Alliance (BPIA), we would like to thank you for inviting our members to participate in your training and outreach improvement dialogue. Throughout the years, the Department has actively worked to make the registration process more transparent and to assist the regulated community with applying for and obtaining pesticide registrations. At this time the Pesticide Registration Branch is actively seeking input on the effectiveness of its' training program, outreach materials and programs and materials to be developed. BPIA welcomes the opportunity to provide our comments on these topics and would welcome further discussion as desired.

Several BPIA members met with you and Ms. Rachel Kubiak, DPR Ombudsman, on December 14, 2007. At that time, you indicated that you are seeking input on the following topics: effectiveness of workshops, outreach materials, and the website, as well as any other outreach topics that the BPIA stakeholders' believe would provide improved outreach to the regulated community. In this meeting, you asked that BPIA provide written comment to you by March, 2008.

As you requested, BPIA members have compiled the following comments which are presented in order of importance.

Website & Materials. For many registrants, the website is the primary site for obtaining information and guidance. It is their first point of contact for obtaining guidance and information and for this reason we recommend that the web-based materials be the top priority. We encourage the Department to review the materials currently on the website and to develop user-friendly materials targeted at the regulated community. These should include the following:

- P Registration Manual. BPIA encourages the Department to develop a registration manual that provides applicants with step-by-step guidance on what documents and data are required and what must be submitted for each type of registration or label revision (label amendments and label revisions made by notification). It should clarify when fees are due

to the Department and when fees are not due (i.e. label amendment fees, notification, etc.). This manual should also include basic information on on-going requirements once a product becomes registered (annual renewals, quarterly mill assessment, as well as pesticide brokers licenses etc.).

P Fact Sheets. Fact Sheets on specific topics would provide solid guidance to the regulated community. Fact Sheets on the following topics would assist the regulated community:

- Registration Process – to include intake processing through licensing.
- Data Evaluation - how it is determined which evaluation groups will review a submission and how evaluations are conducted
- California Efficacy Data Requirements

P Questions and Answer Website. Similar to Fact Sheets, a registration Question and Answer sheet on California registration topics would be helpful. This could be similar to the Q & A sheets developed by the Department for Mill Assessment or similar to the EPA interactive website on labeling¹ that allows for questions to be submitted on-line.

P CA Stamped-Accepted Labels Available on-line. California Stamped Accepted Labels should be made available on-line. This will allow companies that are submitting label amendments to more easily provide accurate descriptions of the label changes as compared to the current California label. Note that current links on the DPR website to the National Pesticide Information Retrieval System (NPIRS) do not provide the users with CA-specific information related to label claims or use sites accepted in California.

Workshops. In general, BPIA believes that while helpful, the large workshops that encompass all agricultural and home and garden products (conventional/synthetic, biochemical, microbial and organic pesticides) are too broad and not conducive to interaction or discussion of specific topics. It is recommended that the Department participate in smaller, more focused workshops lasting 1 day or less. A workshop specific to biochemical and microbial registration issues, including data evaluation topics such as efficacy, would be more meaningful to BPIA participants and would allow for more direct interaction by all participants. In the interest of good participation, BPIA would be very interested in scheduling its Sacramento meetings to coincide with workshops.

¹ http://www.epa.gov/pesticides/regulating/labels/label_review_faq.htm

Thank you again for inviting BPIA to participate in the Department of Pesticide Regulation's Registration Branch outreach improvement program. We welcome the opportunity to work with the Department in the future and are available to discuss the above suggestions on the outreach program with you at your convenience.

Sincerely,

Michael Beevers
Executive Director
(559) 977-0568