

Bayer CropScience



Ms. Denise Alder
Staff Environmental Scientist
CA Department of Pesticide Regulation
1001 I Street
Sacramento, CA 95812-4015

April 26, 2010

Bayer CropScience
P. O. Box 12014
RTP, NC 27709
Tel. 919 549-2303

Subject *CDPR Reevaluation of Imidacloprid Products*
Bayer CropScience Submission of Protocols

Dear Ms. Alder:

In response to protocol requirements set forth in your letter dated February 24, 2010 (Ca ID# 236274, 236473) Bayer CropScience is submitting draft protocols for CDPR review. Enclosed are five protocols, one for each of the following crop groups: cotton, cucurbits, pome fruit, strawberries and fruiting vegetables.

Currently we are working towards locating sites with the appropriate treatment history. As discussed previously, we would appreciate receiving a letter from CDPR addressed to the County Agricultural Commissioners and growers in order to gain their cooperation for this endeavor. Until actual sites are selected, we are unable to finalize details for these protocols.

Bayer CropScience is currently researching and developing sampling techniques for nectar from different crops. Again, this may necessitate future modifications to the protocols.

We understand that CDPR would like to receive data as soon as possible. We will be providing citrus data this year, and anticipate collection of data on cotton and fruiting vegetables in 2010 if at all possible. Data on cucurbit, apple and strawberry will be collected in 2011.

Bayer CropScience intends to remove the use on almonds from our imidacloprid product labels. This information has been shared with other imidacloprid registrants who are relying on our data to satisfy California's requirements. If no data are generated on almond, CDPR has suggested stone fruit as an alternative crop. Please provide 2009 PUR data on stone fruit as such data were not included on the PUR reports recently generated. Should stone fruit data be required, we will submit a protocol.

Please contact me directly should you have any questions regarding this response.

Sincerely yours,

Ms. Debra Krueger
State Regulatory Manager

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ID# 83302

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Attachment: Study Titles and Report Nos. for five (5) protocols enclosed with this letter