Subject: Wilbur-Ellis RAC Feedback
Date: Thursday, November 19, 2026 at 1:10:03 PM Pacific Standard Time
From: Juliet Williams
To: SUMMERS Sunny * ODA, BOND Colton * ODA
Attachments: image001.png

Hi Sunny & Colton,

After the RAC meetings, we had an internal discussion that raised a few items we wanted to share with ODA:

1. **603-057-0140(1)(b)(B) – Designated-agent address**

Could ODA clarify what address is intended to be captured for the designated agent? For example, does ODA expect the agent's residence address, employer/business address, or another address? Our designated agents would often be employees picking up product for the grower, so we would like to understand whether the grower/business address already associated with the transaction would meet the requirement.

2. **Supervision Requirements (5)(b) – Five-minute response by pedestrian travel**

The five-minute requirement may be difficult to meet during applications involving large agricultural fields. A supervisor and supervisee could be working in different areas of a large field where reaching the supervisee within five minutes on foot would not be physically possible. Wilbur-Ellis may also have situations where a single supervisor is overseeing multiple supervisees. We would appreciate additional clarification on how ODA expects the five-minute pedestrian-response requirement to be applied in these situations, and whether field size or other practical conditions were contemplated in developing the requirement.

3. **Pesticide Dealer Records – Applicator Category Resource**

I also wanted to follow up on a request we raised during the RAC process regarding a resource for dealers to identify the applicator category or categories applicable to a particular pesticide/product use. I appreciate that ODA indicated our request was being taken into consideration. This will be particularly important for our CSRs, who will need a practical way to cross-reference the categories held by the purchaser against the category applicable to the RUP being purchased. Do you have any additional information on whether ODA plans to provide such a resource or other guidance as part of implementation?

Thank you for considering our feedback.

Best,

Juliet Williams
Regulatory Compliance Specialist

Wilbur-Ellis
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