CPR Californians For Pesticide Reform

PAN PESTICIDE ACTION NETWORK • NORTH AMERICA

BEYOND PESTICIDES

Friends of the Earth

CLEAN WATER ACTION

California Rural Legal Assistance Foundation Advocates For Justice

NRDC NATURAL RESOURCES DEFENSE COUNCIL

CENTER FOR FARMWORKER FAMILIES

SAFE AG SAFE SCHOOLS

SASS Safe Agriculture Safe Schools

daily acts every action makes a ripple

S·AG·E SUSTAINABLE AGRICULTURE EDUCATION

AIM AGRICULTURAL INSTITUTE of MARIN

FACTS Families Advocating for Chemical & Toxics Safety A project of Center for Environmental Health

Know your Environment. Protect your Health. ewg

PSR LA Physicians for Social Responsibility Los Angeles

MONTEREY BAY CENTRAL LABOR COUNCIL AFL CIO THE UNION OF THE UNIONS

CRPE

LYMPHOMA FOUNDATION of AMERICA

November 12, 2021

Re: Strategies for moving agriculture in California toward agroecological practices

Sustainable Pest Management Workgroup members
via Aimee Ryan, aimee@aginnovations.org

Dear Members of the Sustainable Pest Management Workgroup:

The undersigned organizations thank you for your work in the new Sustainable Pest Management Work Group. We are enthusiastic about the possibilities for making California's pest management safer and healthier.

We urge the Sustainable Pest Management (SPM) Work Group to take a holistic approach to this issue. Integrated Pest Management, which has been promoted for decades as a more sustainable solution to the excessive use of synthetic pesticides, in practice too often results in chemical control as the basis of pest management. Many IPM practitioners too quickly turn to pesticide use, and pay insufficient attention to ecology and to the ecological functioning of agroecosystems.

In practice, synthetic pesticides simply are not compatible with biological and regenerative agroecosystems except as spot treatments. So, it is a false premise that they can be 'integrated'. Negative impacts of pesticides on non-target insect species are equally well known. These negative impacts on soil fauna can have serious deleterious effects on soil organism populations and their key functions., , ,

Instead, we urge the SPM to call for adoption of agroecological practices rooted in ecological pest management. Agroecological farming and ecological pest management work with the environment to support soil and plant health and to boost plants' natural defense mechanisms, making plants more resistant and less attractive to pests. Rather than focusing on the management of individual species of pests, ecological pest management emphasizes preventive strategies that enhance the immunity of the agroecosystem as a whole.

With this in mind, we have six action items we would like to recommend to the work group.

1. The work group should recommend that California expand technical assistance services (including through UC Cooperative Extension) on organic farming and ecological agriculture to a minimum of 15 additional counties.

The multiple benefits of organic pest management have been increasingly well documented. Carbon sequestration, and its role in the mitigation of climate change, is one of these critical benefits. A new meta-analysis documents organic management practices that significantly increase carbon sequestration. Other benefits include improved soil health and associated resilience to pests and disease.

Organic farmers, whether experienced or just transitioning, need expert pest management advice in order to be successful. Conventional growers interested in reducing their use of pesticides also need technical support from experts in ecological pest management. A critical component of this is local outreach and extension specialists.

Increased extension expertise will expand the multiple benefits of sustainable pest management, including organic farming, as well as provide support for the development of pest management strategies at a landscape scale. Special support should be provided for historically-underserved farmers, including socially-disadvantaged farmers, on whom local and regional food access disproportionately depends.

There is an urgent need for agroecological expertise and support in counties with the highest levels of pesticide use. Eight of the top ten counties in the state for pesticide use are in the San Joaquin Valley, with the remaining two on the Central Coast: Fresno, Kern, Tulare, San Joaquin, Madera, Merced, Monterey, Stanislaus, Kings and Ventura. Use in these counties in 2018 ranged from 35.7 million pounds in Fresno to 6.1 million pounds in Ventura.

Five of those counties (Fresno, Kern, Merced, Monterey and Ventura) are also among the eleven California counties with gross sales of organic production over $100 million dollars in 2019. The state's sole organic specialist, Dr. Muramoto, is based in the County of Santa Cruz, where sales of organic production are also over $100m.

We request that you recommend state funding for an organic and ecological agriculture extension specialist in each of the ten highest-pesticide-use counties listed above, plus five additional counties with gross sales of organic production over $100 million. The resulting 15 counties are:
Fresno, Imperial, Kern, Kings, Madera, Merced, Monterey, San Benito, San Diego, San Joaquin, Santa Barbara, Sonoma, Stanislaus, Tulare, and Ventura.

2. The work group should recommend that the state set organic procurement goals and purchasing incentives for schools, hospitals, and other public institutions in order to expand markets for organically-produced food in California.

Institutional procurement is one of the most powerful mechanisms for incentivizing better production practices and creating stable markets that enable farmers who are interested in transitioning to organic practices to do so successfully. California public schools should be incentivized to prioritize the purchase of organic foods in order to prevent direct exposure to pesticide residues on food, and, by encouraging organic production, to reduce pesticide exposure for children living in the state's agricultural regions. State-run institutions such as hospitals should be incentivized in the same way. By vastly expanding the market for organic production, the state can play a major role in shifting California agriculture to more sustainable pest management practices.

3. The work group should recommend that California allow recipients of WIC (Women, Infants, and Children) to use WIC vouchers to purchase organic foods

Organic options for WIC provide important benefits for pregnant women and infants in California. According to USDA, WIC serves about half of our infants. Recent research has documented that increasing organic diet components quickly and effectively lowers pesticide exposure, - an essential public health intervention for young children, who are particularly vulnerable to the health threats posed by pesticide exposure.

Under the program, states determine which foods are eligible for purchase using WIC funds. California prohibits WIC recipients from purchasing organic milk, eggs, bread, and various other staples. Neighboring states Washington and Oregon both allow more organic options for WIC participants than California does.

Increasing organic options in WIC will have important benefits for pest management in California. Changing the parameters for what is allowed for purchase in WIC is a straightforward way of increasing the demand for organic food and thereby increasing the number of organic farms and organic acreage in the state. Fortunately, the administration has the power to simply direct WIC to allow for more organic food purchasing in California.

We ask you to recommend that the state allow WIC recipients to purchase organic options for all WIC food categories.

4. The work group should recommend that California adopt a policy similar to the European Union's Farm to Fork strategy as an effective way for the state to meet its existing climate, health and biodiversity goals, and that the state incorporate component goals, timelines and benchmarks into its current initiatives.

The EU Farm to Fork strategy is designed to create a food system that has a neutral or positive environmental impact, helps to mitigate climate change and adapt to its impacts, and reverses the loss of biodiversity.

With respect to pest management, California should mirror three goals found in the EU strategy:

1) reduce the use and risk of chemical pesticides by 50% by 2030
2) reduce the use of more hazardous pesticides by 75% by 2030 (this ensures that the overall pesticide reduction in goal 1 will include significant reductions in use of hazardous pesticides)
3) achieve 30% of total farmland under organic production by 2030.

According to the European Commission, "Farm to Fork strategies point to a new and better balance of nature, food systems and biodiversity; to protect our people’s health and well-being, and at the same time to increase the EU’s competitiveness and resilience. These strategies are a

crucial part of the great transition we are embarking upon." California should follow this exciting lead.

California is developing several critical climate and biodiversity initiatives, such as the five-year 2022 Scoping Plan, the Natural and Working Lands Climate Smart Strategy, and the California Climate Adaptation Strategy. It is critical to include concrete benchmarks for the reduction of synthetic pesticide use and increased organic acreage in these efforts. Objectives related to pesticide reduction need to come with ambitious timelines and implementation metrics, and be applied consistently across all state agency documents and programs.

5. The work group should support expansion and improvement of CDFA programs to increase access and funding for farmers interested in implementing healthy soils practices, adopting biological pest management strategies, and transitioning to organic farming, especially for socially disadvantaged farmers.

Two CDFA programs – the Biologically Integrated Farming Systems (BIFS) program and the Healthy Soils Program (HSP) – provide promising avenues for expanding sustainable pest management practices in California. Significantly more funding should be allocated to BIFS and for the development of a new organic transition program to help meet the needs of farmers interested in shifting toward agroecological methods. CDFA should also ensure that the Healthy Soils Program eligible practices include ecologically-based pest management conservation practices that require pesticide use reductions during the project period.

It's critical that CDFA incorporate farmers' feedback, especially that of socially-disadvantaged farmers and farmers of color, as these programs are implemented year over year. In order to succeed, these programs must meet the needs of a diverse array of California's farmers.

6. The work group should recommend that the state provide sufficient and consistent funding for (1) the University of California Division of Agriculture and Natural Resources (ANR) UC Organic Agriculture Institute at Kearney Agriculture Research and Extension Center, and (2) ANR's plan for a Biological Control Research Center in the upgrade of the Hansen Agricultural Research and Extension Center (HAREC).

These two Research and Education Centers need support to enable the paradigm shift to agroecological farming systems in two farming regions of severe drought and accelerated warming. ANR is currently in process of moving HAREC from Santa Paula to Kearney, in the Oxnard plain. UC has a systemwide goal of providing a high-visibility, statewide resource to promote the science of biological pest control. Such agroecology programs should be vertically integrated throughout UC's educational system to fulfill the ten bold recommendations to strengthen IPM for all Californians that are described in the 2018 "Roadmap for Integrated Pest Management--Systems Thinking to Build Better IPM for All Californians".

Thank you for considering our recommendations.

Sincerely,

Jane Sellen and Sarah Aird, Co-Directors
Californians for Pesticide Reform

Asha Sharma, California Organizing Co-Director
Pesticide Action Network

Kari Hamerschlag, Deputy Director Food and Agriculture Program
Friends of the Earth

Anne Katten, Pesticide and Work Health and Safety Specialist
California Rural Legal Assistance Foundation

Jay Feldman, Executive Director
Beyond Pesticides

Lena Brook, Director, Food Campaigns
Natural Resources Defense Council

Dr. Ann Lopez, Executive Director
Center for Farmworker Families

Maya Flores, Community Organizer
Safe Ag Safe Schools

Megan Kaun, Organizer
Sonoma Safe Agriculture Safe Schools

Andria Ventura Legislative and Policy Director
Clean Water Action

Renee Donato Nelson, President
Clean Water and Air Matter (CWAM)

Nichole Warwick, Leadership Institute Programs Manager
Daily Acts

Sibella Kraus, President
Sustainable Agriculture Education

Andy Naja-Riese, Chief Executive Officer
Agricultural Institute of Marin

Catherine J. Dodd, PhD, RN, Advisor
Families Advocating for Chemical and Toxics Safety (FACTS)

Paid Selwyn, Co-chair
Preserve Rural Sonoma County

Sara McCamant, Garden Program Manager
Ceres Community Project

Bill Allayaud, California Director of Government Affairs
Environmental Working Group

Mechelle Perea Ryan, FNP, Professor
CSU Stanislaus

Martha Dina Arguello, Executive Director
Physicians for Social Responsibility - Los Angeles

Cesar Lara, Executive Director
Monterey Bay Central Labor Council

Caroline Farrell, Executive Director
Center on Race, Poverty and the Environment

Belita Cowan, President
Lymphoma Foundation of America