

Julie Henderson, Director
Department of Pesticide Regulations
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Date March 13, 2023

Dear Ms. Henderson,

On January 26, 2023 the CA Department of Pesticide Regulation released the [Sustainable Pest Management Roadmap](#), the result of nearly two years of a multi stakeholder collaborative process. Pesticide Action Network and Central California Environmental Justice Network, a member of Californians for Pesticide Reform, were actively engaged, as were partners representing farmworkers and indigenous communities, and a range of experts in the science and practice of agroecology, the politics of food and farming, and public health. The diverse groups were able to reach consensus on approval of the document. We, the following organizations and individuals, applaud the process and product of that agreement, and identify particular priorities and actions to achieve the admirable goals set.

To achieve the Roadmap's transformative goals, DPR must enhance collaboration among agencies and institutions, both within and beyond CalEPA (e.g. CDFG, CARB, Water Resource Board, DNR, CDPH). DPR and partners will face enormous challenges, especially from those well-resourced entities determined to maintain the status quo of continued reliance on the use of synthetic pesticides. We look forward to collaborating with DPR to face these challenges and to fully support those parts of the Roadmap that most directly address these Roadmap statements:

“Exposure to harmful pesticides carries risks – to our health and to our environment – and these risks are disproportionately borne by communities already overburdened by pollution. If we truly want to build a healthy and safe California for all, we must phase out and replace the highest-risk pesticides....”

“The Sustainable Pest Management Roadmap recognizes how the management of pest pressures is strongly interconnected with resilient farms and ecosystems, and the health of farmworkers and communities.”

“The critical actions outlined in the roadmap include prioritizing [pest] prevention, coordinating state-level leadership, investing in building knowledge about sustainable pest management,”

We support the Roadmap's high level goal of eliminating the use of “Priority Pesticides” by transitioning to sustainable pest management (SPM) practices rooted in holistic systems of ecosystem management that build resilience to climate stressors while enhancing resilience to pest pressures and supporting community health. At its core, SPM is about preventing pest problems by eliminating pest conducive conditions in both urban and rural settings through the use of biological and cultural approaches to ecosystem management that foster healthy, resilient farms and landscapes. Our shared aim is to eliminate the use of hazardous agricultural pesticides and reduce overall pesticide use through statewide implementation of SPM at all levels of production and among all producers.

Building on these areas of agreement, we advocate the following:

1. Earlier Target Dates

While we fully support the phase out of “priority pesticides” including all highly hazardous pesticides as defined in the Roadmap, **the target date of 2050 is unacceptably late.** Pesticide-impacted communities, consumers, farmers, pollinators and other wildlife cannot and should not have to wait that long. We urge the state to adopt a stronger goal that **by 2030, we reduce synthetic pesticide use by 50% and reduce highly hazardous pesticide use by 75%.**

To achieve this, a timeline with benchmarks should be generated, beginning with the various target dates included in the report. Attention to leverage points and design guidance proposed in the Roadmap can provide opportunities to expedite the multi-faceted tasks required to transform our present agricultural system to incorporate the many co-benefits of an agroecological approach. In pursuit of this goal, and to reduce community harms, we propose this additional target: **By 2030, transition 30% of total agricultural acreage to organic.**

2. Setting priorities for elimination of highly hazardous pesticides must engage those skilled in alternative methods, and reflect community concerns

Reflecting our primary concern for the safety and wellbeing of farmworkers and residents of agricultural communities throughout the state, we are keenly interested in seeing the creation of the **Sustainable Pest Management Priorities Advisory Committee** (p.32) charged with identifying the priority pesticides for rapid reduction and a clear pathway for SPM implementation. It is essential that this multi-stakeholder committee include representatives of pesticide-impacted communities and pest management practitioners and *exclude* any individuals whose personal or professional interests are served by the continued use and sales of synthetic pesticides, especially those potentially deemed “priority pesticides.” This group must meet regularly, be accountable to the general public, co-create agendas with DPR, be professionally facilitated, and provide compensation for members whose participation is dependent on receiving compensation. **The Advisory Committee should be engaged in the initial determination of the “candidate list of potential priorities”** (Appendix 9) rather than wait until the DPR staff has made an initial determination.

3. Ensure the SPM Roadmap Goals Include All California Pesticide Use, Including Pesticide-Treated Seeds

To meaningfully address harmful pesticide use statewide, DPR must ensure that pesticide-coated crop seeds, known as “treated seeds,” are included in the roadmap's goals for pesticide reduction. Currently, DPR exercises no direct regulatory authority over treated seeds, yet there is evidence suggesting that they may account for one of the largest and most widespread pesticide uses in the state. DPR’s own review of CDFR seed inspection data over the last decade reveals that a majority of seed treatment products identified—over two dozen—were not registered for use in California, and that the potential use of at least some active ingredients on seeds may greatly exceed all other tracked uses for those crops. DPR’s complete lack of knowledge or regulatory framework for treated seed use greatly undermines the Roadmap’s goals, as many future priority pesticide chemicals likely are or will be used as seed treatments, and those uses may balloon in response to

restrictions on other modes of application. DPR must exercise regulatory authority over treated seeds and account for their use within the Roadmap's goals.

4. Science-based decision making must incorporate both quantitative and qualitative knowledge

The SPM work group emphasized, and we agree, that **science-based decision making** is important. While science includes reductionist experimentation and epidemiological research, science-based decision making related to pest management must also include the wealth of empirical observation and historical, traditional, indigenous, place-based knowledge that are essential to our understanding agricultural ecosystems and how best to manage them to protect people, the environment, and the myriad ecosystem functions, or “co-benefits”, upon which we depend (p. 33 and Appendix 6). Implementing more complex, ecosystem-based systems of crop and pest management, requires information-intensive, grower-driven, on-farm decision making, exemplified by those farmers and their advisors who manage diversified organic and regenerative farms and landscapes. Furthermore, in a win-win situation, many of the approaches that build the resilience of agricultural systems to climate stressors also enhance resilience to pest pressures, greenhouse gas mitigation, and support community health in rural areas.

5. Establish a DPR Environmental Justice Advisory Committee (EJAC)

To fully support the envisioned transition, DPR will need both external support and internal systems to help keep the agency accountable to its mission “to protect human health and the environment ... by fostering reduced-risk pest management.” To assist DPR in achieving this, legislation has been introduced to establish a **DPR Environmental Justice Advisory Committee (EJAC)** (AB 652). Modeled after some of the more effective EJ advisory committees in the state, we strongly support this timely piece of legislation and believe this body will be critical in equitable implementation of the Roadmap and other DPR programs.

6. Boosting organic production and helping farmers adopt organic methods through marketing supports and procurement is essential

The market is a driver of on-farm practices. State procurement policy should prioritize organic growers as a key way to implement SPM. Other growers that substantially reduce pesticide use and/or sparingly rely on chemicals through implementation of SPM must be able to verify pesticide reduction and be rewarded for their efforts through preferential access to markets and/or favorable pricing. The state of California has substantial market power through its food procurement for government institutions, schools, hospitals, etc. The Roadmap identifies this economic power and calls for the establishment, by 2024, of **Procurement Criteria**. The Roadmap should also clearly note that the state will not create a new SPM standard, but rather align SPM procurement criteria with existing standards verified by third party audit programs (descriptors such as “regenerative” or “sustainable” are not alone sufficient to qualify as criteria).

Organic is one of the only certification systems (Appendix 8) **that definitively prohibits the use of “priority pesticides”** and other synthetic pesticides while also being readily available at scale in the marketplace. Organic production is, by far, the best known, most widely practiced production system to demonstrably achieve the SPM goals. It has well-established audit and verification systems as well as enforcement mechanisms. Therefore, we urge inclusion of an additional goal that

by 2030, 30% of total agricultural acreage in California be certified organic. Organic should also be considered, by default, an SPM-compliant system, and farmers participating in California’s Organic Transition Program should be considered “SPM” producers. The state should ensure that all organic farmers, regardless of resources, have access to organic certification, and should facilitate access to reimbursement through the federal cost-share program. Socially disadvantaged farmers and ranchers, and small farms that use a combination of biodiversity-enhancing practices such as intercropping, crop rotation, flower strips and hedgerows should be considered compliant once a consultative process defines “small” and determines a mechanism for verifying compliance, such as provision of an attestation regarding pesticide use.

7. Building/expanding Technical Assistance (TA) key, including creation of curricula and training in effective teaching methods for varied groups of learners

Technical assistance (TA) providers will be critical to the widespread transition to SPM. The Roadmap clearly recommends substantial investment in building a well-coordinated and vastly greater TA capacity for pest control advisors, crop advisors, farm advisors, etc. to help farmers and land managers in rural and urban settings transition to organic or other pesticide-reducing practices.

The UC, CSU and colleges providing training in agricultural production must increase faculty with expertise in agroecology generally, and biological control specifically, to develop relevant and adequate training curricula and to train a cadre of trainers, including farmer trainers, to work throughout the state. **TA providers must be thoroughly and effectively trained in soil health, organic practices and ecosystem management** to help design and implement practices to effectively enhance natural enemy populations, reduce pest populations and their impact, and to build crop resilience to pests. Historically underserved farmers and Indigenous communities should receive priority access to TA service (p. 40, 46). Trainers in technical assistance, as well as those training pesticide applicators and fieldworkers will need explicit training in effective teaching methods that accommodate language, literacy level, and prior knowledge-base. Furthermore, years of farmer training has demonstrated that most effective methods are interactive and participatory with the UN FAO farmer field school model widely recognized as one of the most effective.

Additional priority recommendations, not identified above, are as follows:

State Leadership

1. By 2030, California has implemented a system of incentives and financial risk management that integrates supply chain partners, educational institutions, private financial markets, and state and federal risk management programs to drive widespread adoption of SPM (Reducing Economic Risk, Goals, p.49)
2. Create the conditions needed to attract qualified, diverse applicants to agricultural extension roles (a “pipeline”), including meaningful compensation and other mechanisms that support agricultural extension as a career. Particular emphasis should be placed on populations that are underrepresented in entomology, plant pathology, and other applied agricultural sciences. (Enhance Knowledge, Research, and Technical Assistance, Priority Actions A, Guidance, p.41)

3. Support DPR to create a state level implementation work group to move from a focus on mitigating harm to a more holistic response, including ecologically-based pest prevention. This entity will include relevant state agencies and leaders from a range of key interest groups. It should receive dedicated funding and support and have dedicated scientific staff, incorporating relevant staff from the existing environmental monitoring division and other departments as helpful. (State-level Collaboration, Priority Action B, p.34)

Helping farmers transition

1. By 2030, every farm in California has access to free or affordable SPM education, training, and independent technical advice that is relevant to its crops, region, farm size, pest pressures, and language needs. (Enhance Knowledge, Research, and Technical Assistance, Goal 2, p.39)
2. Fund and encourage on-farm demonstration programs to show growers the value of SPM programs, building on the success of DPR's Pest Management Alliance grant program, BIFS, the Healthy Soils Program, the new Conservation Agriculture Planning Grants Program (CAPGP), Western SARE, and the former USDA Interregional Research Project No. 4 (IR-4) demonstration grant program (Enhance Knowledge, Research, and Technical Assistance, Priority Action E, p.44)
3. Add ecological pest management and pesticide reduction as eligible practices under the state's Healthy Soils Program and increase the budget annually to support expansion generally of that program. **(our addition)**
4. Accelerate development of regional pilot agriculture pest management collaboratives potentially selecting from among entities applying for the CDFA Healthy Soils Program Regional Block Grants, ensuring robust program evaluation, flexibility to combine the resources of state and federal grants with community investment and philanthropy for training in the principles and practice of agroecology including how to build healthy soil and manage pests without hazardous pesticides, in a regional peer-to-peer farmer support network that includes pest management in urban settings in the region. (Priority Action C and Additional Actions to Support Regional Pest Management Collaboration, Action A, p. 37)
5. Establish a grant program for Community Colleges and State Universities to renovate their curricula and course offerings, and to compensate instructors participating in Regional Agriculture Pest Management Collaboratives where they can observe educational successes and gaps. (Leverage the capacity of CCC and the CSU system, Priority Action A, ii, p. 40)
6. Prioritize investment in the UCANR Organic Agriculture Institute to increase its team of scientists monitoring farms and working with farmers to conduct on-farm experiments that address pest problems without synthetic pesticides. (Provide sufficient and consistent funding for basic and applied research, Priority Action A, i, c, p. 40)

Helping Pest Control Advisors Transition

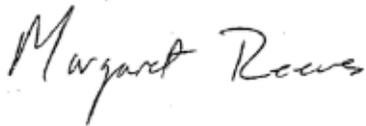
1. Expedite webinars and discussions at conferences for educators of Pest Control Advisors to consult about expanded content of academic course offerings, Continuing Education Units, and equity of access to SPM licensing as a career pathway for socially disadvantaged and

historically marginalized communities. (Require all PCAs to become trained in SPM, Priority Action A, p. 46)

2. Accelerate the exploration of how to shift incentives for PCAs away from advising chemical pest management, such as commissions for product sales, and towards recommending holistic SPM approaches and supporting products. (DPR should assemble an ad hoc work group to explore additional ways to remove structural barriers to SPM advice, Additional Action A, p. 48)

In conclusion, we fully support the ambitious goals of the Roadmap and strongly support the many proposed actions that center farmers, including small- and medium-scale urban and rural farmers and BIPOC farmers in implementing practices that focus on prevention of pest problems through ecosystem management. We also strongly support any and all efforts the state can support to provide technical assistance, risk mitigation, and market support to farmers implementing organic and other verifiable SPM practices.

In appreciation,



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