

Julie Henderson, Director
Department of Pesticide Regulations
alternatives@cdpr.ca.gov

Date March 13, 2023

Dear Ms. Henderson,

On behalf of the 32 organizations and individuals, we are happy to provide the following comments on the Sustainable Pest Management Roadmap.

We are encouraged to see and fully support the following 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 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.

In order to meet this goal, we recommend 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 2030 goal to **reduce synthetic pesticide use by 50% and reduce highly hazardous pesticide use by 75%**.

2. SPM Priorities Advisory Committee

We support 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.

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.

3. 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.

4. Boosting Organic Production and Procurement is Essential to Achieve SPM Goals

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 aligning 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).

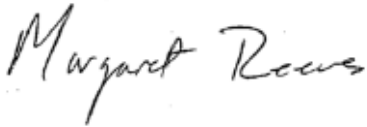
Organic is one of the only certification systems (Appendix 8) **that definitively prohibits the use of “priority pesticides”** and other synthetic pesticides while also being readily available at scale in the marketplace. Organic production is, by far, the best known, most widely practiced production 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, including support 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.

5. Building/Expanding Technical Assistance

The Roadmap clearly describes that widespread transition to SPM will require substantial investment in building a well-coordinated and vastly greater capacity across the state of technical assistance providers including pest control advisors, crop advisors, farm advisors, etc. to help producers in both urban and rural settings transition to organic or other pesticide-reducing practices. These **TA providers must be thoroughly and effectively trained in soil health, organic practices and ecosystem management to enhance natural enemy populations and reduce pests.** Historically underserved farmers and Indigenous communities should receive priority access to TA services.

In conclusion, we support the 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 state efforts to provide technical assistance, risk mitigation, and market support to farmers implementing or interested in organic and other verifiable SPM practices. Finally, we encourage the Department of Pesticide Regulation, in partnership with the Department of Food and Agriculture, to educate the Legislature about the SPM Roadmap and its commitments through hearings and other mechanisms to ensure its commitment to funding and implementing the Roadmap.

In appreciation,



Margaret Reeves, Pesticide Action Network



Angel Garcia, Californians for Pesticide Reform

Katie Huffling, Alliance of Nurses for Healthy Environments
Hardy Kern, American Bird Conservancy
Austin Price, Berkeley Food Institute
Daniel Gluesenkamp, California Institute for Biodiversity
Anne Katten, California Rural Legal Assistance Foundation
Rebecca Spector, Center for Food Safety
Nayamin Martinez, Central California Environmental Justice Network
Sarait Martinez, Centro Binacional para el Desarrollo Indigena Oaxaqueño (CBDIO)
Andria Ventura, Clean Water Action
Lupita Sanchez, Coalition Advocating for Pesticide Safety
Faith Grant, Conejo Climate Coalition
Denny Rosatti, Conservation Action Fund for Education
Jan Dietrick, Dietrick Institute for Applied Insect Ecology
Bill Allayaud, Environmental Working Group
Catherine Dodd RN PhD , Families Advocating for Chemical and Toxics Safety
Kendra Klein, Friends of the Earth
Patti Wood, Grassroots Environmental Education
Lucia Sayre, Health Care Without Harm
Lendri Sarah Purcell, Jonas Philanthropies
EunMi Cho, Learning Disabilities Association of California
Amy Ziff, MADE SAFE / NTC
Zen Honeycutt, Moms Across America
Cesar Lara, Monterey Bay Central Labor Council
Lena Brook, NRDC (Natural Resources Defense Council)
Ron Whitehurst, Rincon-Vitova Insectaries, Inc.
Yanelly Martinez, Safe Ag Safe Schools - Monterey Bay
Rachel Altman, Santa Barbara Standing Rock Coalition
Kathleen Wheeler, Ventura Climate Coalition
Jeanette Acosta, Weaving Earth
Stephen Knight, Worksafe