July 8, 2026

Dr. Nan Singhasemanon, Chair
Pesticide Registration and Evaluation Committee (PREC)
California Department of Pesticide Regulation
via email to: Nan.Singhasemanon@cdpr.ca.gov

SUBJECT: Risk assessment and mitigation for PREC agenda Sept 18, 2026

Dear Dr. Singhasemanon:

We are writing to request that you agendize a status report on DPR's risk assessment and mitigation efforts for the PREC meeting scheduled for September 18, 2026.

PREC's upcoming meeting on September 18, 2026 represents five years since we initially requested a PREC presentation about mitigation actions to reduce risks that DPR's own risk assessments have already identified as excessive. On July 2, 2021 we submitted an open letter requesting a mitigation report to PREC[1].

There have been improvements during those five years, thanks in part to mandates imposed by the California Legislature. DPR has created, and routinely updated, a webpage summarizing current status and future timelines for risk assessment, re-evaluation, and mitigation[2]. The clarity and completeness of that webpage have made it easier for all stakeholders to track progress.

Nonetheless, we continue to believe that PREC should play an active role in reviewing DPR's past achievements and future plans. As a start, **we request a presentation about the status of risk assessments and re-evaluations related to human health, and mitigation to address health risks identified, at the September 18, 2026 PREC meeting.**

The following are some of the points that we would like to have addressed in that presentation:

1. **Reasons why DPR missed its deadlines for carbaryl and paraquat dichloride.**

During the past year, DPR met the deadlines it set for itself for most pesticides listed on the "continuous evaluation" webpage.[iii] In contrast, DPR recently delayed its deadline for carbaryl by

[1] Californians for Pesticide Reform, and California Rural Legal Assistance Foundation. 2021. *PREC should promote transparency about DPR's risk assessment and mitigation*. Open letter dated July 2, 2021. Available at: https://www.pesticidereform.org/wp-content/uploads/2021/07/FINAL-Open-letter-to-PREC-re-Risk-Assessment-July-2021-1.pdf

[2] CDPR. 2026. *Continuous Evaluation and Mitigation Update.* Available at: https://live-cdpr-ca.pantheonsite.io/look-up-pesticide-info/continuous-evaluation-and-mitigation-update/

18 months, and for paraquat dichloride by 12 months (Table 1, below). We would like more information about what forced those delays.

2. **Overall slow progress and long timelines.**

We remain concerned both about the long time required to complete risk assessments, and the long time required to proceed to mitigation, once a risk assessment or re-evaluation has identified unacceptable risks. To mention just two examples:

- **Carbaryl.** DPR's scientists identified unacceptable carbaryl risks 12 years ago[3]. Estimated cancer risks for some categories of field workers are higher than **1 new cancer per 100 workers**, which is an egregiously high risk. Why has DPR not taken action to mitigate those risks? Instead, DPR recently delayed its mitigation deadline to Q2 2028.
- **Propargite.** DPR scientists first identified unacceptable propargite risks 12 years ago[4], then DPR did nothing until recalculating exposures with greater precision 5 years ago[5]. Meanwhile, both pesticide handlers and fieldworkers have continued to risk cancer and skin burns. The current restricted entry interval of 30 days[6] still falls far short of protecting table grape workers during harvest and other work activities. Where is DPR's sense of urgency?

It is appropriate for PREC to ask DPR for specific ideas on speeding up these processes. As one example, why is it necessary to wait for a mitigation scoping analysis until after a risk assessment has identified unacceptable risks?[7][8] Risk assessment and mitigation analysis are conducted by separate staff working in two separate DPR branches. So, why can't they be carried out simultaneously, potentially saving years?

In addition, DPR's June 2026 *Reevaluation Report* proposes: "Instead of reviewing all possible risks for a pesticide, DPR focuses on the specific toxicity or exposure pathways that need attention." That sounds promising, but let's make sure that ag handlers and fieldworkers are prioritized when DPR decides what "needs attention".

Lastly, in DPR's *Reevaluation Report*, why is there no consideration of improving the format of DPR's reevaluation documents? It should be possible to reduce their size, and thus the time required to write them, without compromising scientific rigor. For example, it is encouraging to

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[3] CDPR. 2014. *Carbaryl (1-naphthyl methylcarbamate) Occupational and Bystander Risk Characterization Document.* Available at: https://live-cdpr-ca.pantheonsite.io/wp-content/uploads/2024/10/carbaryl_final.pdf (accessed 6/30/2026).
[4] CDPR. 2014. *Propargite Risk Characterization Document (Occupational, Ambient Air, and Aggregate Exposures.)* Available at: https://live-cdpr-ca.pantheonsite.io/wp-content/uploads/2024/10/propargite_2014.pdf
[5] CDPR. 2021. *Revised Memorandum on Recalculation of Short-Term Handler and Reentry Worker Exposure Estimates for Propargite and Calculation of the Corresponding Margins of Exposure for Purposes of Mitigation*. Available at: https://live-cdpr-ca.pantheonsite.io/wp-content/uploads/2024/10/propargite_EAS_memo_september_2021.pdf
[6] CDPR 2025. *Propargite mitigation status update*. Available at: https://www.cdpr.ca.gov/wp-content/uploads/2026/03/HSM-25003.pdf
[7] CDPR. 2025. *Simazine Mitigation Status Updates.* Available at: https://live-cdpr-ca.pantheonsite.io/wp-content/uploads/2026/03/HSM-25005.pdf
[8] CDPR. 2022. *Propanil Mitigation Scoping Document.* Available at : https://live-cdpr-ca.pantheonsite.io/wp-content/uploads/2024/12/hsm22002.pdf

see that one of DPR's most-recent reevaluation reports, for neonicotinoids[9], is only 22 pages long, compared to hundreds of pages for many Risk Characterization Documents.

It is not PREC's job to come up with the answers, but it is your role to ask questions. DPR's slow progress causes human suffering.

3. **Too few pesticides are being evaluated.**

DPR's "continuous evaluation" website lists 19 pesticides or groups of pesticides for which DPR is evaluating risk or developing mitigation. That represents a lot of work, but it's simply not enough. The reason is, DPR currently manages **1,035 individual pesticide chemicals** ("active ingredients")[10]. At the rate DPR is working, it would take decades to assess even a fraction of this total.

As recently as 2011, DPR estimated that **82 active ingredients are "high" priority** for risk assessment[11]. It's appropriate to ask DPR about all of them. But to start, we would like to know the status of two active ingredients for which DPR began the risk-management process but then seemingly abandoned it:

- **Methomyl** (draft risk assessment posted online but then abandoned)[12]; and
- **Naled** (risk management directive to staff posted online but then ignored)[13].

DPR currently is complying only with the minimum requirements established by Assembly Bill 2113[14]. PREC should ask how DPR can move beyond that minimum, to address the huge backlog of pesticides that need to be evaluated.

4. **Need for public input into risk management decisions.**

Once DPR scientists have quantified health risks, managers within DPR's Director's Office make a behind-closed-doors assessment of whether those risks are acceptable. For example, how many additional cancer cases among agricultural workers are an acceptable trade off for allowing high-exposure uses to continue? DPR's *Reevaluation Report* calls this trade-off number a "risk threshold". DPR refers to such assessments as "risk management"[15].

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[9] Available at: https://www.cdpr.ca.gov/wp-content/uploads/2025/06/evaluating_potential_impacts_five_neonicotinoid_pesticides_aquatic_organisms_applications_nonproduction_outdoor_ornamental_plants_trees_turf.pdf

[10] CDPR. 2026. *Actively Registered Active Ingredients (AI) by Common Name.* Available at: https://apps.cdpr.ca.gov/docs/label/actai.cfm

[11] CDPR. 2011. *Prioritization and status of active ingredients for risk characterization: Report #52*. Memorandum from Gary Patterson, Chief, Medical Toxicology Branch to Pesticide Registration and Evaluation Committee (PREC) dated July 15, 2011. Originally posted on CDPR's public website (accessed 10/27/2017), archived here: https://www.pesticidereform.org/wp-content/uploads/2023/03/CDPR-2011-prioritization-for-risk-characterization-Report-52.pdf

[12] CDPR. 2015. *Methomyl Draft Risk Characterization Document*. Available at: https://live-cdpr-ca.pantheonsite.io/wp-content/uploads/2024/10/methomyl_draft_rcd_11-10-15_wth_app_-IV.pdf

[13] CDPR. 2002. *Risk Management Directive – First Addendum to the Naled Risk Characterization Document.* Actual document available via Public Records Act request. Document title listed on: https://live-cdpr-ca.pantheonsite.io/active-ingredient/naled/

[14] California Assembly. 2024. *Assembly Bill no. 2113 Pesticides*. Available at: https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202320240AB2113

[15] CDPR. 2017. *Risk Management*. Chapter 6, pp. 52 - 56. In: *A Guide to Pesticide Regulation in California 2017 Update*. Available at: https://www.cdpr.ca.gov/wp-content/uploads/2025/07/dprguide_2017.pdf

On the “continuing evaluation” webpage, this critical decision-making step is hidden behind a bland phrase: “If rulemaking or other mitigation is required”. But who should decide whether risk is high enough to “require” mitigation? What constitutes an acceptable level of risk is a decision about what kind of society we want. Therefore, such decisions should be made with input from the public. In particular, input should come from the groups most likely to be exposed to the health risks of pesticides, including agricultural workers and residents who live close to fields. We call on PREC to urge DPR to include meaningful public participation in the risk-management process.

Thank you in advance for resuming PREC's traditional role of promoting transparency about DPR's risk assessment and mitigation. This is one of the best ways for PREC to live up to its stated mission: "to foster communication and understanding on pesticide issues".[16] As an important step, we ask you to include risk assessment and mitigation on the formal agenda of the September 18, 2026 PREC meeting. Indeed, PREC should agendize both risk assessment and mitigation at least once every year.

Sincerely,

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[16] CDPR. 2018. *Pesticide Registration and Evaluation Committee (PREC) Charter*. Available at: https://www.cdpr.ca.gov/wp-content/uploads/2024/07/preccharter.pdf

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Table 1. DPR failed to meet some deadlines for evaluating and mitigating health risks

For an additional 16 pesticides or pesticide groups not shown here, during the past year DPR met (or nearly met) deadlines that it set for itself.[a, b]

Pesticide	Deadline that DPR promised as of 6/30/2025[a]	Deadline that DPR now proposes (6/30/2026)[b]
Carbaryl	Develop mitigation for any identified risks by **Q1 2027**.	Develop and propose mitigation for any identified risks by **Q2 2028** - - 18 month delay And we've already been waiting 12 years: *DPR identified unacceptable risks to handlers and field workers in 2014*[c]
Paraquat dichloride	Complete review of public comments by **Q3 2025**.	DPR to determine next steps for registrants and complete review of public comments by **Q3 2026 - -** 12 month delay *Good news: DPR's ongoing reevaluation triggered most registrants to cancel their paraquat registrations.* *Bad news: The remaining registrants have failed to submit final study protocols and final study results by the dates DPR required. Nonetheless, DPR remains committed to completing any necessary mitigation by Q1 2029.*

Sources:

a CDPR. 2025. *Status of Department of Pesticide Regulation Actions to Continuously Evaluate Pesticides and Mitigate Risks (as of June 30, 2025).* Available at:

https://live-cdpr-ca.pantheonsite.io/wp-content/uploads/2026/01/Continuous-Eval-Table-Memo-June-2025-Archive.pdf (accessed 6/30/2026).

b CDPR. 2026. *Continuous Evaluation and Mitigation Update*. Available at : https://live-cdpr-ca.pantheonsite.io/look-up-pesticide-info/continuous-evaluation-and-mitigation-update/ (accessed 6/30/2026).

c CDPR. 2014. *Carbaryl (1-naphthyl methylcarbamate) Occupational and Bystander Risk Characterization Document*. Available at: https://live-cdpr-ca.pantheonsite.io/wp-content/uploads/2024/10/carbaryl_final.pdf (accessed 6/30/2026).