August 24, 2026

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RE: DPR Scientific Prioritization and Review Committee (SPARC)

Californians for Pesticide Reform (CPR) – a coalition of over 200+ member groups seeking to strengthen pesticide policies - and Pesticide Action and Agroecology Network (PAN) are submitting comments subsequent to the August 7, 2026 SPARC Committee meeting. Because the 15th day of the comment period fell on Saturday, August 22, we are submitting these comments on the next business day, consistent with Government Code § 6707.

CPR and PAN appreciate DPR's commitment to eliminate 'Priority Pesticides' by 2050 through the formation of, and collaboration with, the SPARC committee.The Sustainable Pest Management Roadmap, published by DPR in 2023, sets a 'North Star' goal of eliminating Priority Pesticides by 2050 and making sustainable pest management the de facto pest management system in California. Drawing on the expertise of the aforementioned groups, enclosed is a roadmap below for how our coalition believes DPR should institute the ambitious goals of the state.

Priority Pesticides Roadmap (see below): ***California must set clear timelines and eliminate priority pesticides well before 2050, implement systems-level alternative practices, and provide stronger state support to SPM-bound growers.***

We appreciate DPR's goal to eliminate priority pesticides by 2050, but this goal remains nebulous until concrete timelines, phase out plans, and cross-agency collaboration commence. For a successful phase out of priority pesticides, DPR's plan must contain the following elements:

Understand the Current State of Pesticide Use in California (What exists today and who is affected?)- We were disappointed that DPR did not provide the SPARC committee members with data on current use and trends regarding the extent of pesticide use in the state of California. California continues to use millions of pounds of pesticide active ingredients each year, with 176 million pounds applied in 2023 alone, even as pesticide efficacy declines due to superweeds and rapid pest resistance, driving increasingly toxic chemistries that exacerbate community and environmental health harms. DPR also failed to provide sufficient context for the Committee to understand the chronic delays in its risk assessment and reevaluation processes, which often take years and sometimes decades to complete—during which pesticides generally remain registered and in use, potentially allowing harmful exposures to continue while DPR studies risks it has already identified. Nor did DPR explain that there are generally no enforceable statutory or regulatory deadlines requiring completion of a risk assessment or reevaluation within a specified timeframe. Understanding the scope of pesticide use and current regulatory failures is critical for committee members to discern the severity of community impacts, prioritize resource allocations, support proportional solutions, create a baseline for measuring progress, and avert minimization of the problem.

Prioritize Action over Re-Identification of Priority Pesticides

DPR must utilize pre-existing resources instead of re-inventing the wheel. DPR should begin with OEHHA's identification of hazardous and volatile pesticides in the CalEnviroScreen 5.0 report (beginning on page 99)[1] that identify pesticides with the greatest potential to expose and harm surrounding communities. DPR should also develop a complementary list of highly hazardous, non-volatile pesticides that pose particular risks to agricultural workers and others who handle pesticides or enter treated fields. That list should begin with pesticides DPR has already identified as reproductive toxicants[2]—including abamectin, ethylene glycol, oxadiazon, oxytetracycline hydrochloride, streptomycin sulfate, and thiophanate-methyl—as well as heavily used fungicides listed under Proposition 65 as carcinogens, including mancozeb, chlorothalonil, and captan. DPR should then identify any additional high-use, non-volatile pesticides that pose significant risks to workers and other occupationally-exposed populations.

[1] CalEnviroScreen 5.0 Technical Report - https://oehha.ca.gov/sites/default/files/media/2026-06/calenviroscreen50reportf2026.pdf

[2] Use Trends of Pesticides on the State's Proposition 65 List of Chemicals that are 'Known to Cause Reproductive Toxicity': Pounds Applied

In addition to recommending these baseline lists as starting points, we urge DPR to group and collectively prioritize for elimination classes of pesticides, starting with organophosphates (OPs) and fumigants.

- Decades of research links organophosphate exposure to serious health harms, including neurodevelopmental damage[3], IQ loss[4], and autism-related traits[5]. Approximately 7.5% of all pregnant Californians live within 0.6 miles of agricultural OP applications, and the rates climb to 24-50% in five central coast counties: Ventura, Monterey, Santa Barbara, San Benito, and Santa Cruz.[6] Many OP pesticides are still heavily used in CA, including malathion (ban. EU [2008]), dimethoate (ban. EU [2019]), acephate (ban. EU [2004]), naled (ban. EU [2012]), and bensulide (ban. EU [1990]), albeit prohibited by other agricultural economies.[7]
- Fumigants can cause acute poisoning through inhalation, including severe eye and respiratory irritation, breathing difficulty, nausea, dizziness, and, at high exposures, serious injury.[8] Longer-term exposure to some fumigants is linked to cancer and damage to the nervous system, lungs, liver, kidneys, or other organs, making off-site exposure a serious concern for workers and nearby communities.[9] Further, fumigants exacerbate the climate crisis by releasing volatile organic compounds (VOCs) that mix with chemical constituents in the air to generate ground-level ozone (O_3).[10] Ozone is a crop-injurer, respiratory toxicant, and short-lived greenhouse gas that contributes significantly to global warming. In addition, at least one fumigant (sulfuryl fluoride) is itself a greenhouse gas (one pound emitted has roughly the 100-year warming impact of 4,630 pounds of CO_2)[11], while research has found that soil fumigation can dramatically increase

[3] Suarez-Lopez, J.R., Gould, C.F., Vashishtha, D. *et al.* Acetylcholinesterase activity from childhood to young adulthood. *J Expo Sci Environ Epidemiol* **36**, 818–826 (2026). https://doi.org/10.1038/s41370-026-00866-7
[4]Bouchard, Mary F., et al. "Prenatal Exposure to Organophosphate Pesticides and IQ in 7-Year-Old Children." *Environmental Health Perspectives*, vol. 119, no. 8, 2011, pp. 1189–95.
[5] Sagiv SK, Harris MH, Gunier RB, Kogut KR, Harley KG, Deardorff J, Bradman A, Holland N, Eskenazi B. Prenatal Organophosphate Pesticide Exposure and Traits Related to Autism Spectrum Disorders in a Population Living in Proximity to Agriculture. Environ Health Perspect. 2018 Apr 25;126(4):047012. doi: 10.1289/EHP2580. Erratum in: Environ Health Perspect. 2018 Jul 05;126(7):079001. doi: 10.1289/EHP4002.
[6] Rotkin-Ellman M, Carpenter C, Richardson MJ, English PB, Gunier RB, Harley KG. Temporal trends of agricultural organophosphate pesticide use in California and proximity to pregnant people in 2021. BMC Public Health. 2025 Sep 30;25(1):3121. doi: 10.1186/s12889-025-23939-y.
[7] European Commission. *EU Pesticides Database*. Directorate-General for Health and Food Safety, 2026, ec.europa.eu/food/plant/pesticides/eu-pesticides-database/start/screen/active-substances. Accessed 24 Aug. 2026.
[8] Lee SJ, Mehler L, Beckman J, Diebolt-Brown B, Prado J, Lackovic M, Waltz J, Mulay P, Schwartz A, Mitchell Y, Moraga-McHaley S, Gergely R, Calvert GM. Acute pesticide illnesses associated with off-target pesticide drift from agricultural applications: 11 States, 1998-2006. Environ Health Perspect. 2011 Aug;119(8):1162-9. doi: 10.1289/ehp.1002843.
[9] Shekhar C, Khosya R, Thakur K, Mahajan D, Kumar R, Kumar S, Sharma AK. A systematic review of pesticide exposure, associated risks, and long-term human health impacts. Toxicol Rep. 2024 Nov 30;13:101840. doi: 10.1016/j.toxrep.2024.101840.
[10] Sharma, Asha, et al. *Pesticides and Climate Change: A Vicious Cycle*. Pesticide Action Network North America, Jan. 2023, www.panna.org/wp-content/uploads/2025/05/202308ClimateChangeEng-Aug23-.pdf.
[11] California Council on Science and Technology, *Fumigant Use in California and an Assessment of Available Alternatives: Phase II Report on Structural Fumigation with Sulfuryl Fluoride* (2026), p.2, https://www.cdpr.ca.gov/wp-content/uploads/2026/02/ccst_structural_fumigation_report_phase_2.pdf

emissions of nitrous oxide, a greenhouse gas roughly 270-300 times more climate potent than CO_2.[12] 1,3-Dichloropropene is a carcinogen that severely impacts the livelihoods of farmworkers and farmworking communities.

Transition Strategy and Timeline (How and when will we get there?)

DPR's 2050 pace is too slow to sufficiently protect communities from priority pesticides. The SPM roadmap defines priority pesticides as 'pesticide products, active ingredients, and groups of related products within the context of specific product uses or pest/location use combinations that have been deemed to be of greatest concern and warrant heightened attention, planning, and support to expedite their replacement and eventual elimination.' Eliminating priority pesticides 24 years from now unnecessarily increases the toxic burden of bodies, especially in farmworkers and farmworking communities. The placement of a pesticide, or better yet, a class or category of pesticides, on a list of priorities for elimination, with milestones and timelines, is a motivator for growers to start using less harmful alternatives and adopt sustainable pest-management practices. ***DPR should accelerate the transition away from priority pesticides to prevent more people from developing adverse health effects associated with harmful pesticides.***

As part of this process DPR should prioritize hazardous pesticide classes and active ingredients—not spend years determining whether individual product/crop/pest/location combinations separately qualify as Priority Pesticides. The identification process itself must move quickly, and once a pesticide active ingredient or class is designated a priority, elimination should proceed on an equally urgent timeline rather than becoming another prolonged review process.

The availability of alternatives should not determine whether a pesticide is prioritized or whether an unacceptable risk is allowed to continue. Nor should the absence of a ready replacement become a basis for extending the use of a particularly hazardous pesticide indefinitely. Where existing evidence already supports immediate mitigation, cancellation, or suspension under DPR's existing authority, the Priority Pesticide process must not delay that action. Notably, California accounts for nearly 40% of all national organic sales, and every crop cultivated in CA can be grown *without* harmful pesticides.

At the same time, DPR must establish transparent interim targets, milestones, and elimination timelines that provide growers, pest control operators, researchers, technical assistance providers, and others with clear expectations about the direction and pace of California policy. Use-specific information can help identify where additional research, incentives, technical assistance, and

[12] D. Wang et al., "Stimulation of Nitrous Oxide Production Resulted from Soil Fumigation with Chloropicrin," *Atmospheric Environment* 37 (2003): 3501–3507. See also U.S. EPA, "Understanding Global Warming Potentials," reporting a current 100-year GWP for N_2O of 273 times CO_2. https://www.sciencedirect.com/science/article/abs/pii/S1352231003004126. See also K. Spokas, D. Wang & R.T. Venterea, "Greenhouse Gas Production and Emission from a Forest Nursery Soil Following Fumigation with Chloropicrin and Methyl Isothiocyanate," *Soil Biology & Biochemistry* 37 (2005): 475–485.

transition support are most needed, but it should be used to facilitate and accelerate elimination—not to repeatedly reconsider whether a hazardous pesticide should be eliminated at all.

Growers deserve clarity, predictability, and meaningful support through this transition. DPR's timelines should therefore address not only pesticide prioritization, risk assessment, mitigation, and elimination, but also how DPR will adjust its own staffing and budget to support the transition to safer and more sustainable pest-management practices. Those timelines should be coordinated with clear cross-agency milestones showing how DPR, CDFA, and other farmer-serving agencies will provide technical assistance, bridge funding, crop-insurance reforms, training in ecological practices, and other financial and practical support.

Growers who rely on the use of priority pesticides for pest control will remain tethered to the pesticide treadmill, initiating a never-ending loop of pesticide use followed by superweed resistance and the need to apply pesticides with greater toxicity. Thus, successful transition to SPM necessitates embracing ecological pest management alongside clear endpoints for priority pesticide use, ensuring growers possess efficacious tools for sustaining profitable, productive agricultural operations. DPR should work with CDFA and other relevant agencies to ensure that users of Priority Pesticides are equipped to halt their use, while making clear that transition assistance is a means of achieving elimination, such that a lack of product-based alternatives does not preclude DPR from protecting public health and the environment.

We also recommend that the SPM Advisory Committee be charged with developing, by June 2027, a transparent process, timeline, and interim milestones for identifying and eliminating Priority Pesticides by 2050, including near-term targets that prevent both the prioritization process and subsequent elimination process from stretching over decades.

Impact, Equity & Risk Assessment (How will we prioritize communities on the frontlines of pesticides?) - Communities with high CalEnviroscreen environmental burden and cumulative impact scores, elevated percentages of Black, Indigenous, and People of Color (BIPOC) populations, and farmworking communities should be prioritized for targeted elimination of priority pesticides. These communities are routinely exposed to a cocktail of pesticides, and suffer from numerous acute and chronic health conditions. ***DPR should co-analyze CalEnviroScreen scores with priority pesticide applications when considering mitigation strategies, and areas for immediate elimination. DPR should also analyze ag commissioner records for violations of priority pesticide applications, pesticide-related hospitalizations, and grievance logs tied to on-farm conditions. Finally, DPR should receive robust community input on any proposed mitigation strategies.***

<u>Governance, Resources, & Accountability (Who does what, with what resources?)</u> - To realize the goal of SPM, California must invest in infrastructure. DPR should work with other agencies, research institutions, and local communities to expand extension services and technical support and to build out UC Statewide Integrated Pest Management (UC IPM) so that it provides comprehensive pest-management guidance and alternatives for all crops grown in California, with particular emphasis on nonchemical, biological, cultural, and other least-toxic approaches. Risk-based crop insurance should reward ecological practices, while programs like the CDFA Healthy Soils and Biologically Integrated Farming Systems (BIFS) programs must be scaled up and tracked for results as part of a coordinated statewide strategy. Early adopters should be incentivized, and those transitioning should receive needed support. The goal should not be the eradication of pests, but the prevention of pest and disease problems through elimination of pest-conducive conditions and creation of resilient farming systems. Healthy soils, diverse cropping systems, and habitat-rich landscapes naturally suppress pest outbreaks.[13] Transitioning to ecologically-based farming yields countless co-benefits and various ecosystem services: improved air and water quality, improved community health, richer wildlife habitat, better carbon sequestration, greater resiliency, and continued profitability. Raveloaritiana *et al.,* 2026 found crop diversification increases financial profitability, biodiversity, pollination, soil quality, and carbon sequestration from 37-189%, over a 20-year duration with no adverse effects on crop yield, pest control, or climate regulation.[14] ***DPR should utilize inter-agency resources to the maximum extent possible to support growers' adoption of SPM, and prevent the uptake of less-toxic, albeit still harmful, pesticide substitutes that do not offer climate, public health, financial, or environmental benefits.***

<u>Success Measures and Post-Phase-Out Evaluation (How will we know it worked?)</u> - Success is measured by change on the ground. Metrics of success are critical for accountability, building community trust, and demonstrating impact. The first and most immediate benchmark of success should be a measurable decline in the use of Priority Pesticides, tracked through California's Pesticide Use Reporting database. DPR has the capacity, through the PUR database, of tracking trends in pesticide use by crop, region, acreage, and application method. Trend data should be both retroactive and proactive, and could be used to show when and where alternative practices and less toxic products effectively replace priority pesticides.

Over time, success should also be measured through broader outcomes as well. Additional metrics of success should resemble healthier communities with less water, soil, air and sediment

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[13] Systemic change or input substitution? The impact of the Healthy Soils Program on agroecological transitions within California food systems: https://www.researchgate.net/publication/389547381_Systemic_change_or_input_substitution_The_impact_of_the_Healthy_Soils_Program_on_agroecological_transitions_within_California_food_systems#fullTextFileContent

[14] Raveloaritiana, Estelle, and Thomas Cherico Wanger. "Long-Term Agricultural Diversification Increases Financial Profitability, Biodiversity, and Ecosystem Services: A Second-Order Meta-Analysis." *Nature Communications*, vol. 17, no. 1, 26 Jan. 2026, pp. 1–15, doi.org.

emissions of priority pesticides, public comments that are more positive-leaning, communities feeling empowered to identify alternative solutions, growers reporting satisfaction with the level of state-backed resources and technical support, enhanced interagency collaboration and civil society engagement, and systems-level disincentivization of pesticide use.

Requested Improvements for Future SPARC Meetings:

- **To foster active public participation, DPR should record and post all committee meeting recordings on its website**. The August 7 meeting was not recorded publicly. Communities deserve to know which pesticides will be mitigated or eliminated, and which ones will be left behind.
- **No SPARC meetings should end early.** The August 7 meeting ended early. An inaugural meeting is the appropriate time to discuss the extent of pesticide contamination in California.
- **All questions during the course of the meeting should be answered and visible to the public (either through publicly visible Q&A or allowing people to raise their hands and ask questions).** Not all questions from members of the public were answered on August 7. Inquiries are vital pieces of information for DPR, and responses to inquiries convey the importance of community member input. All questions should be addressed immediately, or followed up within 7-10 business days.
- **All questions and answers should be posted publicly on DPR's website for public review.**
- **All deadlines for public comment should have a date and time associated with the deadlines and they should be prominently and visibly posted on the SPARC pages of the DPR website**, not buried in presentations or QR codes.
- **DPR should focus on eliminating pesticide classes and pesticide active ingredients.** DPR talked at length about the proposed approach to analyze the myriad of pesticide products containing the active ingredient in question. This approach would take *years, and insufficiently protect communities from harmful pesticides, as more products come to market, and other harmful pesticides languish awaiting review.*
- **The SPARC Committee should be co-creating SPARC meeting agendas with DPR.** A committee member expressed the need for DPR to be more co-collaborative with agenda co-creation.
- **DPR should include community members' experiences regarding the harms of priority pesticides in question into SPM Advisory Committee discussions**, as place-based harms are useful parallels to research-backed evidence.

Conclusion

The SPM Roadmap is bold and necessary—but only if backed by timely action, systemic change, and real accountability. California can lead the nation by prioritizing prevention, embracing ecologically-based practices, and aligning resources with the urgency of our environmental and public health challenges. The path to eliminating hazardous pesticides lies not in slow deliberation, but in bold, coordinated action that prioritizes human health, ecological resilience, and long-term agricultural sustainability.

Sincerely,

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