September 16, 2026

Members of the Pesticide Registration and Evaluation Committee (PREC)
California Department of Pesticide Regulation
Via email

Re: Usurpation of PREC's legal "consultation and public review" role

Dear PREC members,

On behalf of the statewide coalition Californians for Pesticide Reform, we call on you to challenge the unlawful usurpation by the Department of Pesticide Regulation (DPR) of your Committee's mandatory consultation role regarding pesticide reevaluation.

DPR has a legal obligation to consult with PREC on pesticide reevaluation decisions. This obligation is clearly stated in California Code of Regulations Title 3, section 6252, and reaffirmed by DPR and the PREC's own charter:

1. **Title 3. Food and Agriculture, Division 6. Pesticides and Pest Control Operations, Chapter 2. Pesticides, Subchapter 1. Pesticide Registration, Article 12. Consultation and Public Review, § 6252. Pesticide Registration, Renewal, and Reevaluation Consultation**

"This section applies to the registration, renewal of registration, and reevaluation of pesticides.

The Department **shall consult** on decisions proposed pursuant to this section with public agencies which have jurisdiction by law over the use of pesticides or over activities or resources which may be affected by the use of pesticides. In doing so, the Director shall establish an interagency advisory committee that shall be known as the Pesticide Registration and Evaluation Committee. This committee shall meet bimonthly or more often when requested by the Director. The Pesticide Registration and Evaluation Committee shall consist of the following members: . . ."

2. In its online description of PREC, DPR states that the role of the PREC is "**to advise** DPR on its regulatory actions and other pesticide decisions."

3. The PREC Charter states that the committee's job is to "**Consult** with the Director of DPR on the registration, renewal of registration, and reevaluation of pesticides as required by 3 CCR section 6252."

In summary, the law states, and DPR and the PREC's own charter affirm, that the PREC's role is to "consult" or "advise".

It was with deep concern, therefore, that we received an email, on which all PREC members were copied, from PREC Chair Nan Singhasemanon on July 22, 2026 in which he stated: "Moving forward, we expect SPARC [Scientific Prioritization and Review Committee] meetings to be the primary venue for discussions related to pesticide continuous evaluation and mitigation efforts. DPR plans to provide updates on specific actions to the PREC, as guided by the charter, and in other DPR meetings and public workshops where appropriate."

It appears that DPR now plans to use the SPARC for consultation and advice, and demote the PREC to a passive recipient of information. This is quite plainly an illegal transfer of the responsibility, assigned to you in law, to consult and advise. California law requires two-way engagement with the PREC before decisions are made. DPR's plan to "provide updates" is one-way, after-the-fact, and falls far short of the legal requirement to "consult." In contrast to the PREC, the SPARC is convened by DPR and has no basis in law.

Moreover, the PREC, not SPARC, includes interagency expertise vital and relevant to the task of consultation on pesticide reevaluation. The SPARC not only lacks participation by "public agencies which have jurisdiction by law over the use of pesticides or over activities or resources which may be affected by the use of pesticides" (3 CCR Section 6252), but also includes some plainly-conflicted representatives of the regulated industry.

We ask you in the strongest possible terms not to allow this usurpation of your regulatory role. We urge you to formally request a written legal opinion from DPR counsel or the Attorney General's office.

As a first step, we ask that you take the opportunity at the upcoming PREC meeting on Friday September 18 to request that the legality of DPR's proposal be agendized for discussion.

Sincerely,

Mayra Sanchez, Californians for Pesticide Reform

Anne Katten, California Rural Legal Assistance Foundation

To PREC members:

Stanley Armstrong, California Air Resources Board
Katherine Sutherland-Ashley, Office of Environmental Health Hazard Assessment
Kristen Pidcock, CalRecycle
Wendy Linck, State Water Resources Control Board
David Fairman, State Water Resources Control Board
Jonathan Williams, State Water Resources Control Board
Mai Ngo, Department of Toxic Substances Control
Fatemeh Ganjisaffar, California Department of Food and Agriculture
Kevi Mace, California Department of Food and Agriculture
Matt Hengel, UC Davis
Kari L Arnold, UC Davis
Ryan Bourbour, Department of Fish and Wildlife
Krista Hoffman, Department of Fish and Wildlife
Garrett Keating, Department of Industrial Relations
Elizabeth Marder, California Department of Public Health
Tom Ineichen, Structural Pest Control Board
Kathleen Boyle, Structural Pest Control Board
Fabiola Estrada, US EPA
Stephen M Scheer, CACASA

CC: Karen Morrison, DPR
Nan Singhasemanon, DPR
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Celia Pazos, DPR