

RESEARCH AUTHORIZATIONS

A GUIDE TO UNDERSTANDING PESTICIDE REGISTRATION

THIS FACT SHEET WILL ANSWER THESE QUESTIONS:

- What is a research authorization?
- How do I apply?
- How do research authorizations and experimental use permits differ?

What is a research authorization?

With the exception of those exempted by [Title 3, California Code of Regulations \(3 CCR\) section 6268](#) (see below), a written authorization for research must be obtained from DPR before any experimental, unregistered use of a pesticide in California. A research authorization (RA) allows researchers to collect field data under California use conditions to support California registration of a pesticide product.

If the product and the proposed use are federally registered, there is no limit on the field size for the RA. However, any RA request for more than 100 acres per crop requires specific justification.

If the product or proposed use is NOT federally registered, the RA is limited to ten acres or less on land or one surface acre or less of water. If the product or proposed use is on more than 10 acres of land or one surface acre of water, the researcher must obtain a federal experimental use permit (EUP) from the U.S. Environmental Protection Agency (U.S. EPA). If a federal EUP is obtained, researchers have the option of either applying for an RA or registering the federal EUP in California on a conditional basis. Please note these are separate processes with different requirements and limitations. See DPR's handout, [Experimental Use Permits](#), for more information on EUPs.



RESEARCH AUTHORIZATIONS

An RA is a permit and not a registration. Under an RA, the product cannot be sold for the experimental use but must be provided free to any cooperator whose property is being used for experimental trials.

The following should be noted:

- A special number is assigned to each permit by DPR.
- Commodities treated with the product may not be used for food or feed unless:
 - (1) U.S. EPA has established a residue tolerance for the pesticide on the commodity and that tolerance has been met; **or**
 - (2) The pesticide is exempt from a tolerance.
- All commodities treated with a product for which a tolerance has not been established must be destroyed.
- An RA is not under the jurisdiction of U.S. EPA.
- A notice of application and a copy of the RA must be provided to the appropriate county agricultural commissioner's (CAC's) office at least 72 hours before an RA product application. See [3 CCR section 6264](#) for more information about notices of application.
- A plot map showing the exact location of the trial must be submitted to the CAC within seven days of trial initiation.
- An [Experimental Trial Report](#) must be submitted to the CAC at least 24 hours before a commodity treated under an RA is harvested or destroyed.
- After the last application, but within two weeks of the completion date of the RA, an [Experimental Pesticide Use Report](#) must be submitted to DPR, whether or not trials were initiated.

These entities are exempt from an RA:

- A pesticide registrant, if it operates the property on which the research is to be conducted and continues to be the operator of the property until the treated commodity is destroyed or harvested.
- Personnel employed by colleges and universities and engaged in pesticide research, if they are operating according to an established pesticide use and experimentation policy of the college or university.

How do I apply?

A researcher may request an RA by submitting a completed DPR form [DPR-REG-027a](#), *Pesticide Research Authorization*. There is no DPR application fee.

RESEARCH AUTHORIZATIONS

How do RAs and EUPs differ?

RA	EUP
Required for any experimental, unregistered use of a pesticide in California, regardless of the size of the test area. An RA is not under the jurisdiction of U.S. EPA.	Issued by U.S. EPA; DPR does not issue EUPs, but may conditionally register the EUP in California.
If product or proposed use is NOT federally registered, RA required on 10 acres or less on land or one surface acre or less of water. If used on more than 10 acres of land or one surface acre of water, must obtain a federal EUP. The EUP can be used under an RA or can be conditionally registered in California instead of an RA. Use on over 100 acres per crop requires specific justification.	Not required by U.S. EPA for research done on 10 acres or less of land, or one surface acre or less of water.
Effective for one year.	Effective normally one year, as specified by U.S. EPA. May be renewed, extended, or amended upon request and approval from U.S. EPA.
No DPR application fee.	\$1,150 DPR application fee for conditional registration.
Product cannot be sold for the experimental use and must be provided free to any cooperator whose property is being used for the trials.	Once conditionally registered by DPR, may be sold to specific researchers for use in research trials; not available to the public.
Treated commodities may not be used for food or feed unless U.S. EPA tolerance has been met or the pesticide is exempt from a tolerance. If no tolerance or exemption, treated commodities must be destroyed.	If there is no tolerance, U.S. EPA may establish a time-limited residue tolerance or exemption from tolerance before issuing. If no tolerance or exemption, treated commodities must be destroyed or fed only to experimental animals.
Exempt persons include: a registrant that is the operator of the property where research is conducted and continues to be operator until treated commodity destroyed/harvested; college and university personnel engaged in pesticide research, provided they are operating according to an established pesticide use and experimentation policy of the college or university.	Not required by U.S. EPA for laboratory or greenhouse tests; limited replicated field trials; or when the producer, applicator, or others conducting the test do not expect to receive any benefit in pest control.
The county agricultural commissioner (CAC) must be notified before initiation of the trial. Upon completion, an “Experimental Trial Report” must be submitted to the CAC and an Experimental Pesticide Use Report must be submitted to DPR.	May be subject to DPR pesticide use reporting requirements, in addition to U.S. EPA reporting.

For more information, please contact:

Lan-Xin Shi, Ph.D.

California Department of Pesticide Regulation
Pesticide Evaluation Branch
1001 I Street | P.O. Box 4015
Sacramento, CA 95812-4015
Telephone: (916) 445-4419
E-mail: RAs@cdpr.ca.gov

Shengjun Lu, Ph.D.

California Department of Pesticide Regulation
Pesticide Evaluation Branch
1001 I Street | P.O. Box 4015
Sacramento, CA 95812-4015
Telephone: (916) 324-3530
E-mail: RAs@cdpr.ca.gov



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