

SPM EXTERNAL SUMMARY OF PUBLIC COMMENTS

Last updated: 6-20-23

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Summary

On January 26, 2023, the state joined leaders from a diverse range of backgrounds to release the [Sustainable Pest Management Roadmap for California](#), which charts a course for the state’s transition to sustainable pest management in agricultural and urban settings. The Roadmap was developed over nearly two years by a diverse, cross-sector group of stakeholders representing conventional and organic agriculture, urban environments, community and environmental groups, tribes, researchers, and government.

The Department of Pesticide Regulation (DPR) opened a public comment period between January 26-March 13, 2023 to seek feedback from the public on the prioritization and implementation of next steps outlined in the Sustainable Pest Management Roadmap.

The department reviewed all comments received as part of its initial steps in implementation planning. [Full comments are available for review on the department’s website hosting platform](#), which is also linked in Appendix 2.

The following report broadly summarizes the comments received to organize feedback by key themes. The themes mirror language from the Roadmap, including the identification of “Keystone Actions” and “Leverage Points,” which are the areas the Roadmap identifies as most critical for immediate action by state, public and private organizations to accelerate and achieve a systemwide shift to sustainable pest management.

In total, DPR received 4,876 emails during the 2023 public comment period. Of those, 115 comments were unique. This report includes a full list of the organizations, community groups and associations that provided feedback to DPR in Appendix 1.

Keystone Action: Prioritize Prevention

Definition: Strengthen California’s commitment to pest prevention by proactively preventing the establishment of new invasive pest species, and by proactively eliminating pest-conducive conditions both in agricultural and urban settings.

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Summary of comments:

- Invasive pest prevention leads to reduced pest pressure and pesticide use. Prevention is more cost effective than eradication.
- Historically proven and non-controversial methods of pest prevention have the potential for the greatest impact on reducing pesticide use.
- It is critical for the state to initiate action as soon as possible and eliminate pest-conducive conditions broadly across the state.
- Implementation requires increases in state funding and programs, including:
 - CFDA's High-Risk Pest Exclusion (HRPE) Program
 - Comprehensive Pest Prevention Program Analysis Update and periodic review
 - CalTrap initiative
- It is critical to achieve multi-agency and cross-sector collaboration and leverage the expertise and capacity of U.S. Environmental Protection Agency (EPA), U.S. Department of Agriculture's Animal and Plant Health Inspection Service (USDA-APHIS), California Department of Food and Agriculture (CDFA), County Agricultural Commissioners (CACs), and Pest Control Advisors (PCAs).

Keystone Action: Coordinate State-Level Leadership

Definition: Create an accountable and connected leadership structure so that we effectively embed SPM principles across agencies. Identify ways to improve coordination within and between agencies and programs for both agricultural and urban pest management. Enhance DPR's ability to champion SPM practices in urban and agricultural settings. Promote the development of alternatives to Priority Pesticides by encouraging research and innovation.

Summary of comments:

- Structured State-level leadership will be critical for performing the needed work to reach the North Star goals by 2050.
- Work with state, federal, county and city agencies to decrease their pesticide use by monitoring their usage and providing education.

Priority Action: Establish a state-level prioritization process and advisory body for Priority Pesticides

Definition: The state should establish a scientific process with stakeholder and public input to advise on identification and prioritization of Priority Pesticides for replacement, eventual elimination, and/or other actions aimed at reducing usage. The process should consist of a multistakeholder advisory body representing diverse scientific and stakeholder experts, including both public and state-agency representatives. This advisory body (the "Sustainable Pest Management Priorities Advisory Committee") and the prioritization process would require support from a fully funded DPR scientific and other staff.

Summary of comments:

- Include scientific expertise and members representing registrants, growers, applicators, and Pest Control Advisors (PCAs) in the advisory committee who know the chemistry and use patterns of different pesticides.
- Concerns with special-interest groups steering the agenda and/or financially benefiting from decisions made.
- Include representatives of pesticide-impacted communities.

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- Include Traditional Ecological Knowledge along with science-based decision making.
- Provide compensation for members whose participation is dependent on receiving compensation.
- Meet regularly, be publicly accountable, co-create agendas with DPR, and be professionally facilitated.
- Provide Senate and Assembly Agriculture Committees regular updates.

Keystone Action: Invest in building SPM knowledge

Definition: Significantly reinvest in SPM-focused research and outreach so that all pest management practitioners have equal and adequate access to the support and resources necessary to develop and implement their own SPM system in a way that effectively manages pests, minimizes adverse impacts to humans and the environment, and is economically viable.

Summary of comments:

- SPM becoming the de facto system in California is predicated on alternative tools, technologies, and support services.
- Bolster the UC IPM and cooperative extension efforts.
- Encourage private industry research. Product development is expensive and more achievable by private industry. Focus state resources on education and technical assistance.
- Partner with organizations already involved in public outreach to promote SPM education.
- The state and federal government should support and accelerate research that responds to immediate needs while anticipating future needs.
- Focus research on organic practices to yield economic and environmental benefits to a wide range of California farmers.
- Educate the public about the need to reduce pesticide usage. Foster a greater acceptance of weeds and insects through education about the need for biodiversity. Discourage public demand that public spaces be manicured.

Leverage Point: Align pest control advisors (PCAs) with SPM

Definition: By 2030, all pest control advisors (PCAs) have received meaningful training in SPM and are incentivized to promote it in the field. PCA advice is guided by SPM principles and practices and their recommendations are not commission-driven.

Summary of comments:

- Integrating SPM into training, licensing, and new CEs will enable PCAs to drive SPM forward. This will provide PCAs professional recognition as experts and legitimize SPM adoption.
- Train PCAs in soil health, organic practices, and ecosystem management to enhance natural enemy populations and reduce pests.
- Consult with licensed applicators during implementation.
- Reconcile certifications (CDFA's and others) under one umbrella within the license to determine industry SPM standards already in place and safeguard against redundancies.
- PCAs are highly skilled professionals with extensive training requirements. These professionals do not require additional mandates.
- Historically underserved farmers and Indigenous communities should receive priority access to SPM services.

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Keystone Action: Improve California’s Pesticide Registration Processes and Bring Alternative Products to Market & Goal: Eliminate Priority Pesticides by 2050

Definition of Keystone Action: Create mechanisms to improve DPR’s registration review process and to prioritize and expedite safer, more sustainable alternative products to high-risk pesticides, and improve processes for evaluating currently registered pesticides.

Definition of Priority Pesticides: “Priority Pesticides,” which we are intentionally capitalizing, refer to 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. The criteria for classifying pesticides as “Priority Pesticides” includes, but is not limited to hazard and risk classifications, availability of effective alternative products or practices, and special consideration of pest management situations that potentially cause severe or widespread adverse impacts. The identification of these Priority Pesticides will be conducted by DPR under advisement of the multistakeholder Sustainable Pest Management Priorities Advisory Committee. Priority Pesticides are a subset of high-risk pesticides. We define “high risk” pesticides as active ingredients that are highly hazardous and/or formulations or uses that pose a likelihood of, or are known to cause, significant or widespread human and/or ecological impacts from their use.

Summary of comments:

Timeline comments:

- The timeline of eliminating Priority Pesticides by 2050 should be shortened to 2030 to prevent exposure to pesticide impacted communities, consumers, farmers, pollinators, and wildlife.
- Carefully phase out Priority Pesticides to allow for knowledge gaps to be effectively managed.
- Pesticides should not be prioritized for elimination until effective alternatives are registered and available. Any list will begin movement forward to eliminate those products.
- Expedite registration timelines for all new products. No product in the registration queue is less sustainable than currently registered products.

Other comments:

- Prioritize pesticides with effluent concentrations above aquatic toxicity thresholds.
- Concern that pesticide options needed to control harmful invasives and maintain food production will be removed. New alternatives might not be as effective and may reduce agricultural productivity.
- Concern with economic vitality as a pillar of SPM. Ensure it does not outweigh human health and equity pillars.
- Current pesticide testing is not rigorous enough (i.e., synergistic effects between AIs and adjuvants). Fast-tracking alternative pesticides should not result in less testing.
- Pesticide registrants are currently developing safe and effective products that undergo rigorous risk assessments both by the U.S. EPA and DPR. No additional action is needed.
- Identify where DPR evaluations overlap with EPA’s review and eliminate redundancies.

Leverage Point: Activate Markets to Drive SPM

Definition: Strong market demand for California-grown sustainable and socially just agricultural products is an important linchpin in driving a widespread shift toward sustainable pest management. Buyers of agricultural products can be a powerful engine of change toward on-farm SPM approaches by leveraging their procurement power and prioritizing high-standard, California-grown products. But this

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must be done in ways that align with on-farm conditions and constraints and which don't unduly burden growers already stretched thin with complex demands Strategic and coordinated action to build buyer and market demand for California-grown, socially just, and sustainable food would accelerate SPM and enhance the market for these products.

Summary of comments:

- Growers that substantially reduce pesticide use through SPM must verify the reduction and then be rewarded through preferential access to markets or favorable pricing.
- Organic should be considered an SPM-compliant system, including farmers participating in California's Organic Transition Program.
- State procurement policy should prioritize organic growers. Boost organic production and procurement. Fund The CDFA's Farm to Community Food Hubs Program which addresses aggregation and distribution for small and medium-sized organic farmers to sell to large institutions.
- Use of the term "sustainable" may confuse the public and dilute the Organic market.
- Do not create a new SPM standard, but rather aligning SPM procurement criteria with existing standards verified by third party audit programs.
- The state should allow the free market and consumers make market decisions.

Implementation First Step: Develop a plan, funding mechanisms, and programs to prioritize pesticides for reduction

Definition: By 2025, a first step in implementing these priorities, the SPM Work Group and Urban Subgroup call on the state to develop a plan, funding mechanisms, and programs to prioritize pesticides for reduction, and to support the practice change necessary to transition away from the use of high-risk pesticides in agricultural and nonagricultural settings.

Summary of comments:

- Securing reliable, long-term sources of funding will be needed for successful implementation.
- Funding must be thoroughly and carefully considered for prioritization of these provisions.
- Increase or tier the Mill assessment to align with transitioning to SPM. Tiers should be based on pesticide product workload to reflect the greater regulatory burdens posed by higher-risk pesticides.
- A public-private SPM foundation with transparent contractual obligations would help ensure a reliable funding stream.
- Costs should be borne by pesticide manufacturers, distributors, retailers, and users.
- The regulated community should not be fiscally responsible for SPM transition.

Appendix 1: List of organizations that submitted comments

The following list is organized alphabetically and includes the organizations and groups that submitted comment to DPR as part of the 2023 public comment period. Additional comments were received from the public, with a total of 4,876 comments received.

Agri Service
Agricultural Council of California
Agri-Valley Consulting

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Alliance of Nurses for Healthy Environments
Almond Alliance of California
American Bird Conservancy
American Chemistry Council
American Pistachio Growers
Bay Area Clean Water Agencies (BACWA)
Berkeley Food Institute
Calaveras County Department of Agriculture
California Agricultural Aircraft Association
California Agriculture Commissioners and Sealers Association (CACASA)
California Alfalfa and Forage Association
California Apple Commission
California Association of Wheat Growers
California Association of Winegrape Growers
California Blueberry Association
California Blueberry Commission
California Certified Organic Farmers (CCOF)
California Cherry Growers and Industry Association
California Citrus Mutual
California Citrus Quality Council (CCQC)
California Cotton Ginners and Growers Association
California Date Commission
California Farm Bureau
California Fresh Fruit Association
California Institute for Biodiversity
California Invasive Plant Council
California Pear Growers Association
California Rice Commission (CRC)
California Rural Legal Assistance Foundation
California Safflower Growers Association
California Seed Association
California State Floral Association
California Stormwater Quality Association (CASQA)
California Strawberry Commission (CSC)
California Tomato Growers Association
California Walnut Commission
Californians for Pesticide Reform
Center for Biocide Chemistries
Center for Food Safety
Centro Binacional para el Desarrollo Indigena Oaxaqueño (CBDIO)
Clean Water Action
CleanEarth4Kids.org
Coalition Advocating for Pesticide Safety
Community Alliance with Family Farmers (CAFF)
Conejo Climate Coalition
Conservation Action Fund for Education
CropLife America (CLA)

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Dietrick Institute for Applied Insect Ecology
Draslovka Agricultural Solutions
East Bay Pesticide Alert / Don't Spray California
Environmental Working Group
Families Advocating for Chemical and Toxics Safety
Far West Equipment Dealers Association
Fresno County Farm Bureau
Friends of the Earth
Grassroots Environmental Education
Health Care Without Harm
Heartland Health Research Alliance (HHRA)
Household & Commercial Products Association
Invasive Plant Management Program at the Santa Clara Valley Water District
Jonas Philanthropies
Learning Disabilities Association of California
Lyall Enterprises, Inc
Marin County Department of Agriculture, Weights and Measures.
Mellano & Company
Midpeninsula Regional Open Space District
Moms Across America
Monterey Bay Central Labor Council
Monterey Bay Safe Ag Safe Schools
Monterey County Farm Bureau
National Pest Management Association (NPMA)
Natural Resources Defense Council (NRDC)
Nisei Farmers League
North Coast Rivers Alliance
Olive Growers Council of California
Olive Oil Commission of California
Orange County Farm Bureau
Pesticide Action Network (PAN) with numerous organizations
Pesticide Free Zone, Inc.
Plant California Alliance
Potter Valley Tribe
Regenerate Ojai
Responsible Industry for a Sound Environment (RISE)
Rincon-Vitova Insectaries, Inc.
San Diego County Farm Bureau
Santa Barbara Standing Rock Coalition
Stanislaus County Farm Bureau
Syngenta
Tehama County Farm Bureau
The California Association of Pest Control Advisers (CAPCA)
the California Citrus Quality Council (CCQC)
The Ojai Transition to Organics
Transition to Organics
UAV-IQ

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Ventura Climate Coalition

Weaving Earth

Western Agricultural Processors Association

Western Growers Association

Western Plant Health Association (WPH)

Wine Institute & the California Association of Winegrape Growers (CAWG)

Worksafe

Yerba Buena Island Restoration

Appendix 2: Full comments

[Please view the full comments received by DPR on the department's website hosting platform.](#)