

Chlorpyrifos Alternatives Work Group

Summary of Comments from Public Roundtable Sessions

Overview

The Chlorpyrifos Alternatives Work Group shared an outline of its draft action plan with the public at three public roundtable sessions (in Fresno, Oxnard and Sacramento) in January of 2020. The goal of these meetings was to get input on the draft recommendations that the Work Group could incorporate into its final recommendations.

The meetings were open to all interested members of the public. Notification for the meetings was both through the Department of Pesticide Regulation's (DPR) communication channels (listservs, web) as well as through the networks of Workgroup members. Interpretation was available in Hmong, Mixteco and Spanish in Fresno, Mixteco and Spanish in Oxnard, and Spanish in Sacramento. Space was provided for children to work and play during the Fresno and Oxnard meetings. Light refreshments were offered.

The format of the meetings included an introductory presentation of the Workgroup recommendations followed by breakout group roundtable sessions. Each breakout group had both a host and a scribe whose role was to ensure each participant had an opportunity to speak if they wished.

Participants were asked to respond to three questions during the breakout session:

1. What suggestions or comments would you like to share about the draft recommendations?
2. Where do you see opportunities for farmers, workers, and communities to work together to increase the use of safer pest management practices?
3. Where would you like to see more research done or funding providing to create a more sustainable and healthy agricultural system?

The answers to these questions were captured on flipcharts (primarily in the speaker's original language, other times the simultaneous interpretation was summarized) and were transcribed (and if necessary translated) by DPR staff. This information was then synthesized into 12 general themes that arose from across the meetings.

Caveats to the input and the themes

The participation in the public meetings was robust. Over the three meetings approximately 300 individuals attended and provided input. Because of the scale and format of the meetings, the data presented must be interpreted with these caveats:

- The transcription of input from the public necessarily abbreviated what was spoken. Only the essence of the speaker's comment was captured. While scribes were asked to check to ensure what was captured was accurate, the length of some of the comments received, the skill of the hosts and scribes, and the clarity of the speakers may have impacted the accuracy of some of the information captured.
- Significant input was collected in languages other than English. This also adds the potential for error in capture and in translation.
- The input captured reflects differing understandings about the intended scope of the Work Group's draft action plan. For example some participants expressed that the plan was too broad

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and others that it was not broad enough. Because of this, the conversations during the sessions at times ranged beyond the scope of the draft plan.

- What is reflected below are 12 broad general themes. Themes are overarching messages that reflect common sentiments shared broadly by participants. For simplicity in reading, the themes are clustered in 5 general buckets.
- For each theme, representative quotes from participants were selected. These quotes represent comments expressed by at least two participants. Quotes have been edited for clarity.
- This summary does not include comments about the process of developing the plan. There were additional comments about the composition of the Work Group, and requests for further public input on future stages of the plan.

Themes

On Farm Needs

The plan for alternatives to chlorpyrifos needs to be robust and specific

- The plan is broad but has no near-term solutions. We need specifics – what alternatives are there, how much money will there be for research and adaptation.
- The plan needs a timetable and sequence for the recommendations, milestones, and deliverables to be able to adjust course.
- There are short-term needs that cannot wait 5 years – pest explosion risk – what impact (pests, crops) will be most affected. Need short list of priorities.
- Good recommendations, but out of sync. We need specific solutions, now.
- Provide a systematic plan to assist the growers with their pest control and cultural practices.
- What about disposal of existing chlorpyrifos stocks? What about the future? Need information now.

Growers need answers immediately for crops that are at risk

- Farmers are worried what they will do next – alternatives are a long process – hard to fast track pesticide regulation.
- Is the Work Group looking at emergency situations? i.e. invasive pests – need a regulatory mechanism – not seen in the draft plan – there are mechanisms but will they be available?
- A safety valve is needed where there is no alternative for a crop/pest combination
- The ban on chlorpyrifos will create a void of pest management options for some minor crops; this should be a big concern.

Some of the listed alternatives are not proven effective or sufficient

- There needs to be efficacy data tied to the alternatives to make the list worthwhile.
- What are the criteria for alternatives? Agriculture isn't simple – it is rare to have 1 to 1 effective replacements. Cost effectiveness is a concern.

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- We need appropriate alternatives to address gaps. Chlorpyrifos was good for cross protection and longer lasting impact (14-day residual). Newer products have more narrow focus (1 pest vs 3) plus shorter impact (7-day residual). This could mean more spraying of chemicals. Some of the alternatives are worse for beneficial insects which could mean more pests (example: thrips kill spider mites) which again means more spraying.
- Most of the alternatives listed are not effective for certain pests.

Public and Worker Health

The listed alternatives need to be screened for public and environmental health

- Will the alternatives also be dangerous to workers and the public?
- Near-term lists of alternatives need public health guard rails (e.g. developmental risk or carcinogens).
- Concern about hazards associated with alternatives – combine table of alternative practices with information on health effects to allow tiering.
- Define what we mean by “safe alternative” – define goal posts for an acceptable alternative (for example, neonicotinoids and bees).
- Consider other actions versus other active ingredients (i.e. 1,3-dichloropropene, Pyrethroids). Consider the cumulative impact. Process versus comparisons – look into future, and not just by active ingredient.
- Might face same issues with an alternative – Don’t want to look at short term – focus on better practices/long-term - why are bio pesticides not on the readily available alternative list.

The health and safety needs of farmworkers needs to be part of the plan

- Need industrial hygienists involved in this process for worker protection. To be involved in every step of the way as we transition. Use array of comparative genomic hybridization (aCGH) biological monitoring methods to connect data from exposed farmers/workers.
- Need a health person to help the County Agricultural Commissioners.
- Provide education to the farmworkers. Education provided while workers on the clock and are being paid. Once they are educated, create a whistleblower protection.
- Accessibility to pesticide application safety information is not enough, have to include language access.
- Find a way to examine the health of those who have been exposed.

The Regulatory System

The regulatory system needs to improve its review of emerging alternatives

- There are new registration processes in DPR that are extremely burdensome and prevent products from being available to growers. DPR says it should take 2 years to register a new product but it is longer and has gotten worse.
- Need a process for ensuring that alternatives are reviewed in a timely manner.
- The registration process is broken and there are many hurdles for registrants in California.

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- It is expensive to register a product for a single crop and pest (for example small industries like persimmon-growers cannot afford this).
- The switch for safer alternatives needs to come from the top down (government regulators) rather than farmworkers and communities.

Enforcement of existing regulations needs to be strengthened

- Increase inspection and enforcement to ensure farmworkers are protected and aware.
- There is a disconnect in the rules versus the practices. It would be useful to have an established group that can do outreach to workers and peer to peer workgroups on personal protective equipment.
- Need to have a posting of the highest toxicity of all pesticides used, and enforcement of personal protective equipment regulations.

We need to strengthen notification and reporting systems

- Growers and local communities can work together. When growers let the community know when there will be a spray, there is more transparency and mutual benefit.
- The power of reporting: we should keep reporting and work together, report the information and learn about the consequences of exposure.
- There is a very short time for communication about pesticide drift.
- There should be comprehensive, accurate real-time reports on how much/what is being sprayed and when. The return entry interval needs to be communicated to workers.
- There needs to be a conversation on how to properly report misuse. Provide more access to reports for all workers and regular people.
- We are neighbors. Pesticide application should not take place in school hours.

Investments Needed

We need long-term investment in research on topics ranging from pest management to human health and behavior change

- Consistent funding is needed for a long-term plan, on the scale of 50 years rather than 5 years.
- Research funding needs to focus more on the effect on the human body.
- More research is needed on costs and benefits of sustainable agriculture.
- More research is needed on effects of pesticides to environment.
- More funding for prevention/education/data collection from farm workers.
- Research is needed to support more effective outreach to farmworkers, growers and consumers.
- Long term research is needed to see if alternatives work. Need to research how things play out in the field, not just in laboratory settings.

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We need to invest in improved agriculture systems and the infrastructure to support them

- Want to see bigger, broader change – need investment and technical support to work towards common ground.
- Funding is needed to grow the next generation of researchers, growers and pest control advisors.
- County crop advisors have not been replaced - funding is needed to sustain that model.
- Continued funding to support pest exclusion (border stations) and detection.
- More incentives and support to small farmers-they can be an example/leaders to the industry.
- Support farmers (to produce) and the community (for organic production consumption). This investment will benefit the public by reducing costs of health impacts from pesticides.

Build More Understanding

We need to build more understanding between rural communities, growers, and consumers

- We need to create trust and bridge gaps between DPR and the environmental justice community. DPR should get people together.
- Pesticide use does not just affect the fieldworkers, it affects everyone. We all need to learn more about this.
- We need to understand each other's (researchers, farmers, health workers) perspective.
- County Agricultural Commissioners should bring groups together to interface with the growers, workers and community. Commissioners should have a representative that workers can call directly.
- Invest in community education. There is no understanding until someone in the family suffers.
- People need to understand the declining usage rates and why and where chlorpyrifos was being used.
- We need to communicate the robust regulatory system that we have, support understanding of enforcement practices, and share case study examples of how different pest management tools have worked.

CA needs a broader conversation around farming and pesticide use

- This is a lot of investment for a single pesticide, but it is not that different from other pesticides. Long-term investments should be broader than one active ingredient.
- Alternatives are not the solution – real goal to understand pesticides – concern to force an alternative – understand bigger picture.
- Changing systems is more than just chemical substitution. Big, broad change is needed. State can assist with procurement and markets.
- Need to build foundational health of farms rather than identify a replacement chemical. Take a systems approach and build up beneficial insect communities; it takes time for science to catch up.

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- We need more long-term thinking. This seems “rushed”. Chlorpyrifos is used a lot in CA – hear the need for a replacement but need to look at long term issues such as mono-cropping, etc.
- Dissolution of BIFS plus less money for UCANR was disappointing. Good to hear this may improve. Larger framework is needed in the pest management discussion. We need broader discussion, not just about chlorpyrifos (use was already declining).
- We should move towards a non-chemical approach long term – discussion of equality in food consumption is needed.

This document was prepared by Ag Innovations, a non-profit collaboration and facilitation organization hired to facilitate the Chlorpyrifos Alternatives Workgroup. 3/3/20.