



11/10/2023

Julie Henderson, Director
Department of Pesticide Regulation
1001 I Street, P.O. Box 4015
Sacramento, California 95812-4015

RE: DPR Draft 2024 Strategic Plan / Proyecto de Plan Estratégico del DPR para 2024

Dear Director Henderson and leadership of the Department of Pesticide Regulation,

The National Pest Management Association (NPMA), founded in 1933, is the only national trade group representing the structural pest management industry with over 5,000 members from around the world. We are proud to represent a multitude of small businesses through our members; over 80% have annual revenues of less than \$1 million. NPMA member companies manage pests including rats, mice, ants, cockroaches, bed bugs, mosquitoes, spiders, stinging insects, termites, and other pests in countless commercial, residential, and institutional settings in California. NPMA acknowledges the important role that pest management professionals play in controlling pests that are a threat to individual and public health.

Ensuring a robust regulatory agency that values collaboration, environmental protection, and sustainable pest management practices is a shared common goal between DPR and NPMA. We appreciate the opportunity to provide feedback on DPR’s Draft Strategic Plan (strategic plan) for 2024-2028. Overall, NPMA commends your goals for increasing access to safe, effective, sustainable pest management, tracking, evaluating, and enforcing safe pesticide use, fostering engagement, collaboration, and transparency, and promoting excellence and innovation. However, several of the 14 “measurable subgoals” have the potential to muddle the efficacy of the strategic plan if genuine efforts to collaborate with structural pesticide applicators do not occur:

By 202_, create a streamlined pathway for the registration of efficacious alternatives to high-risk priority pesticides and alternatives that cover gaps in priority pest management.

In the above subgoal of Goal 1.2, identifying the “gaps in priority pest management” is crucial to our industry. Our members are keen stewards of the environment and public health. This vital aspect of our industry is becoming more challenging with legislative efforts slowly chipping away at viable and effective pest management tools without determining “efficacious alternatives.” NPMA recommends DPR prioritize this subgoal to ensure that other laudable goals can be safely met without removing safeguards protecting California’s citizens from vector-bearing pests.

By 2022, establish a pesticide prioritization process, informed by a diverse, cross-sector SPM advisory group and consultation, external engagement, and public input, to take expeditious action on risk determinations and to identify and evaluate the availability of alternatives.

This subgoal of 1.3 is encouraging, as our structural pest control applicators are willing collaborators. We respectfully ask that a representative from the structural pest management industry or Pest Control Operators of California (PCOC) be a member of the SPM advisory group, to provide professional experience on the applicability and availability of alternative pest management tools.

Goal 3.3: Launch a statewide restricted material pesticide application notification system.

Lastly, this goal presents logistical challenges that, if not addressed, add unnecessary burdens to the pest management industry. Our members can traverse over 60 miles in a day, visiting anywhere between 6-10 cities and multiple counties depending on their location. If a restricted material pesticide application notification system requires written or even physical notification to persons, this can create a chain reaction of delays across pest management professional routes, denying Californians quick, safe, and effective pest control. The best way to develop an appropriate notification system that reflects this reality is to work alongside applicators in the state of California to determine the quickest way to notify needed persons.

NPMA's overall concern with DPR's Strategic Plan is that it groups many different "non-Ag" industries and prescribes one-size-fits-all mitigation measures to varied use patterns. "Non-Ag" industries are unique and can be differentiated by their use patterns that reflect an industry's purpose for using pest control products. Rules that DPR creates, with the good intention of regulating pesticides, could be appropriate for one industry but to the detriment of another. The specific nuances between the industries that use pesticides may seem insignificant, but they do make a huge difference when it comes to daily operations and appropriate control measures. Putting into effect a one-size-fits-all rule for these products could completely remove their use in structural pest management spaces, which primarily exist to protect the public from the risk pests pose.

The structural pest management industry is different from other industries not only by how we use pesticide products but also by our industry's mission statement. Our professional applicators perform highly targeted applications around the exterior perimeter of structures to protect the public from disease-carrying and property-destroying pests. At every job site, professional technicians develop comprehensive management plans that factor in the surrounding environment, including local wildlife and weather patterns, to deliver efficacious services that minimize the impact on non-target organisms and ecosystems. Our industry members pride themselves as protectors of public health and take this responsibility extremely seriously. Every day our professionals work to prevent major public health concerns and crises in their local community's homes, hospitals, and schools.

Regarding these concerns, NPMA respectfully requests the agency keep in mind that there are varying uses for pesticide products among trade industries. The subtle distinctions that separate us from other agricultural-related industries make a huge difference when it comes to managing the spread of diseases from pests to California's most vulnerable citizens. DPR's

vision in its strategic plan is bold, and its efforts to re-envision sustainable pest management in the state are laudable. We urge DPR to continue to engage and learn from the brain trust held within the pest management space and prioritize the inclusion of pest professionals in all measurables achieved through stakeholder engagement.

Thank you for the opportunity to engage in this issue, and please do not hesitate to reach out if you have any questions. We look forward to continued collaboration to ensure the health, safety, and protection of California's citizens and property from pests.

Sincerely,

A handwritten signature in black ink, appearing to read "Josh Reynolds". The signature is written in a cursive, flowing style.

Josh Reynolds
Manager of Legislative and Regulatory Affairs
National Pest Management Association
Direct: 703.688.9450