

California Nurses for Environmental Health & Justice

To: Department of Pesticide Regulation

Re: 2024-2028 DPR Draft Strategic Plan Commentary
https://www.cdpr.ca.gov/docs/dept/planning/strategic_plan.pdf

Dear Department of Pesticide Regulation,
Below are our recommended changes to your 2024-2028 DPR Draft Strategic Plan. We have structured our comments by section of your proposed draft.

Mission & Vision statement:

Mission: "We protect human health and the environment by fostering sustainable pest management and regulating pesticides."

Vision: "A California where pest management is safe, effective, and sustainable for everyone."

While the overall strategic plan is an improvement from 2018, the 2018 mission statement explicitly states DPR's responsibility of "minimizing risk." We would like that statement restored.

We appreciate your commitment to fostering sustainable pest management (SPM) and will be monitoring DPR's progress. Our definition of "sustainable" incorporates both qualitative and quantitative costs to human health and the environment ♦ it goes beyond profits and yields.

Core Values

As nurses, we share DPR's core values: accountability, collaboration, integrity, and continuous improvement.

With reference to accountability, we like to see measurable results. A plan of this scale and importance requires metrics of success in order to be enforceable, similar to California's Climate Adaptation Strategy. This includes assessing the cost to human and environmental health if we continue to use synthetic pesticides as a mainstay of California agriculture production.

We believe that the DPR could make significant improvements by collaborating more effectively with other state agencies both within CalEPA ♦ such as OEHHA ♦ and in other branches of the California government, namely CDPH.

We also feel strongly that either or both of your advisory groups, the SPM Advisory Group and the newly mandated Environmental Justice Advisory Committee would benefit from having the knowledge and outlook of a licensed healthcare professional with experience in pesticide effects, exposure factors, and risk communication.

In terms of integrity, the importance of your commitment to scientific review cannot

be understated. Emerging science on combined and cumulative effects, impacts of very small doses on cell replication, and neurological development and variation in genetic sensitivity should be considered when weighing evidence on the side of caution.

As health care providers, informed consent is a component of integrity to which we adhere. This right to informed consent in the face of pesticide exposure applies to farmworkers, agricultural communities, and consumers and is a responsibility of DPR in collaboration with California Department of Food and Agriculture (CDFA) and California Division of Occupational Safety and Health (Cal/OSHA).

Continuous improvement is a task with which nurses are continuously charged. In this plan, we need measurable, short- and long-term goals, with the ultimate goal being weaning California agriculture from dependence on synthetic chemicals, restoration of biological systems, and both adaptation to and mitigation of climate change.

Diversity Equity and Inclusion Commitment:

We applaud and celebrate the passage of AB 652, which establishes an Environmental Justice advisory committee for DPR. The passage of this bill gives our California frontline communities a powerful voice in the fight for environmental and racial justice. In your statement, we propose replacing the term "disadvantaged" with "vulnerable communities most directly impacted by pesticide use." These communities include Black, Latine, and Indigenous people, our elders, those with chronic health conditions, people of reproductive age, and children.

In presentation of data and information, we as nurses hold to the principle of the right to understand. DPR must employ accessible language and literacy levels, as well as the use of graphics and icons in materials related to pesticide safety.

With regard to making your workplace inclusive, a valuable practice is to encourage all employees to participate in studies of working conditions, site inspections, investigations, and monitoring. DPR employees can and should listen to and engage directly with the aforementioned communities most impacted by pesticides.

Strategic Goals

The introduction to the Strategic Goals states that "pest management protects public health and the environment and supports a stable, healthy food supply for all Californians."

A stable, healthy food supply for all Californians is not yet a reality ❖ not all Californians have reliable access to food, let alone healthy food. To achieve this goal, our state's plans must build capacity to decentralize our agricultural production and delivery systems. COVID-19 and climate disasters have shown us the importance of a local food supply. Many of our disadvantaged families, both urban and rural, live in food deserts, where fresh fruits and vegetables are hard to find and costly. California boasts that we feed the world. We need to feed Californians first.

Goal 1: Increase Access to Safe, Effective, Sustainable Pest Management

Sustainable Pest Management (SPM) means transforming our agricultural systems, not rushing new chemicals into use to replace those being phased out. The focus must

remain on just systems, healthy soils, and rapid reduction of hazardous chemicals.

Goal 1.1: Develop partnerships and collaborations for implementing sustainable pest management.

The composition and exact purpose and duration of the SPM advisory group lacks clarity, aside from being tasked with identifying priority pesticides. Regardless, this group must include toxicologists, agroecologists, health care professionals, and members of frontline communities.

Our healthcare and educational institutions must be included as markets for SPM-qualified products. We recognize that this falls outside of DPR's direct purview. However, it was included as a vital part of the SPM roadmap. Incentives might be required for these institutions to buy local, fresh food. DPR has a role in informing farmers of this option and raising community awareness.

Goal 1.2: Improve timeliness and transparency of science-based evaluation and registration of pesticide products.

When you mention a "streamlined pathway" to identify alternatives to priority pesticides, please do not compromise the critical importance of health evaluation. Bear in mind our history of registering chemicals that appeared safe in a laboratory, and were later implicated in adverse human effects. The "emerging science" you reference is revealing new knowledge of dose-response relationships ♦ there are many unknowns with regard to timing of exposure, genetic sensitivity, and cumulative and combined effects of multiple chemicals. Adjuvants as a factor in exposure and harm have also not been fully evaluated.

Goal 1.3: Develop and implement a prioritization process for reviewing, identifying and evaluating high-risk pesticides, and alternatives and mitigating measures for those high-risk pesticides.

The overarching goal is elimination of hazardous pesticides, not mitigation of pesticides.

Two priority pesticides identified per year is entirely too slow of a pace.

All priority pesticides must be eliminated much sooner than 2050, which is the year proposed in the SPM roadmap.

Goal 1.4: Facilitate and support SPM technical assistance and innovation in pest management in collaboration with all interested partners.

We question the use of the word "interested." The bulk of resources and technical assistance should be directed towards non-chemical alternatives to pesticides. Training and incentives for use of bottom-up Integrated Pest Management (IPM) must be provided. Best practice IPM addresses biological systems and strengthens plant and soil health, rather than adding a new synthetic product.

A five percent reduction per year is too slow and unreasonable. Some of these chemicals should have been eliminated years ago.

Goal 2: Track, Evaluate, and Enforce Safe Pesticide Use

We agree that data collection and enforcement should focus on impacted communities, and that data should be collected and available in accessible and

transparent ways. Data collection can be a tool for strengthening relationships with community partners.

Goal 2.1: Enhance and modernize DPR's collection of information and data to improve program policies, procedures, and priorities
DPR and other agencies have a history of insufficient monitoring and poorly presented data that is not shared in a timely manner. Responses to exceedances found via monitoring have been inconsistent, with fines much too small to leverage changes in behavior.

Evaluating health effects of pesticides in use requires current, easily accessible data. Publicly available PUR and PISP data are currently 5 years behind. In our outreach to medical professionals, we were shocked to discover that many medical providers are unaware of the PISP program. DPR has responsibility for the maintenance of these tools.

Decrease in the underreporting of pesticide illness and poisoning is critical understanding of the health consequences of exposure. We propose that DPR and CDPH collaborate on health care provider training in frontline communities, either as a funding requirement or as an incentive-based program. One suggestion would be to use money from violation fines to pay for these programs.

Goal 2.2: Enhance DPR's statewide regulatory capacity in partnership with the County Agricultural Commissioners (CACs)
It is impossible to measure improvement in outcomes without accurate understanding of exposure. This should involve field and other types of monitoring, effective oversight of pesticide use, and accurate reporting of illness and injury.

DPR needs to exercise statutory oversight and authority over County Agricultural Commissioners. Inconsistencies in implementation of regulations and enforcement are harming workers and putting children in schools and childcare centers at risk of exposures.

Goal 2.3: Enhance statewide enforcement of pesticide sales in California
It is alarming to discover how many pesticides capable of significant harm are easily available for purchase online. Exerting your authority over online sales may require assistance from other state agencies and authorities, but is key to protecting public safety.

Goal 2.4: Improve worker safety by increasing awareness and reducing potential for pesticide exposure
Efforts to expand collaboration with community-based organizations are laudable, but only if they are truly collaborative. Materials and events offered in multiple languages are essential to success, given the makeup of our farmworker population. In many agricultural communities, worker and bystander risks are equivalent. Please specify your plan to expand outreach to include all community members.

CalOSHA and DPR should be working in close alignment both in agricultural and non-agricultural settings, such as schools and hospitals.

DPR gets a substantial part of your budget from mill fees. Expenditures from these fees should be used for identifying violations, and for training and resources on worker safety. Since we concur with the concept that the polluter must pay, we believe the fees should be graduated; the more toxic the pesticide, the higher the tax. This provides the co-benefit of a disincentive for use of more toxic chemicals.

Farm Labor Contractor managers have been major barriers to farm workers getting adequate safety training and education on chemicals to which they are exposed. There needs to be both closer oversight and more stringent consequences for violations, including fines sufficient for deterrence.

Goal 3: Foster Engagement, Collaboration and Transparency

Community based initiatives on pesticide reduction should incorporate and build on the interest of the workers and farmers directly engaged. In order to have overall community safety in mind, DPR should require that the least toxic alternatives be used first.

Goal 3.1: Broaden opportunities for regular, transparent, and meaningful access to DPR.

For interactions to be meaningful and transparent, those community members who participate need to see the outcomes of their participation. Language, literacy, and media preferences must be considered when planning outreach and events.

We agree with your responsibility to educate communities on safe pesticide use, and expansion of SPM is needed. California has resources currently available on worker and consumer safety and IPM, and this information should be more widely available. Non-toxic alternatives should always be presented first for both agricultural and urban pest management. Community health workers should be included in these educational events. Materials should be developed with health workers in mind. Consider a possible "train-the-trainer" program for community health workers in collaboration with the California Department of Public Health (CDPH).

Goal 3.2: Improve information access and data sharing.

On the DPR website, there must be easier access to reporting pesticide-related illnesses.

Transparent access to information on specific pesticides should be displayed prominently, such as links to the National Pesticide Information Center (NPIC). A collaborative program with CalOSHA, CDFA, and CDPH is warranted to identify and address barriers to reporting.

Please do not abandon the Tracking California database. This system must be updated and data entered in a timely fashion (within 18 months). Other organizations are working on making this data available as public information and for targeted research. Please support their efforts.

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

This subgoal doesn't seem to acknowledge the feedback that communities gave about the pilot project. We suggest a phone application with an icon-based system for both reporting and exposure. We have not yet had the opportunity to review DPR's notification plan. Location information, links to NPIC, reporting of all priority pesticides, and anonymous access at minimum should be included.

Goal 3.4: Expand language access throughout California in collaboration with federal, state and local partners

Other state agencies did a great job of publishing multilingual resources during the COVID-19 pandemic. There is no reason that DPR cannot do the same.

Having 75% of health and safety resources in Spanish and at least one other language is unacceptable. 100% of health and safety resources should be in Spanish and at least three other languages depending on the needs of individual communities based on ethnic makeup.

Goal 4: Promote Excellence and Innovation

We recognize that both urgency and efficiency are important, while acknowledging that this involves a systems change.

Goal 4.1: Create and maintain a culture that supports and motivates excellence and professional development in workplace performance

We ask that you broaden "members of the scientific community" to include health care providers as leaders and as recipients of professional development.

Goal 4.2: Increase organizational efficiency and innovation.

Many of these systems to submit pesticide registration applications are already in place (or have models) both within DPR (e.g. electronic reporting systems which you have, but have not mandated people use) and across state departments.

We particularly agree with the urgent need to increase cross department and cross agency collaboration with partners at the local, state, tribal, and federal level on pest management initiatives. In order to be successful in this subgoal, DPR must forge and strengthen communication and collaboration with CDFA, California Air Resources Board (CARB), California State Water Resources Control Board, Office of Environmental Health Hazard Assessment (OEHHA), CDPH, and Cal/OSHA. Consider creating a flow chart/Venn diagram to clarify these relationships, both internally and to the public.

According to Governor Newsom's Executive Order N-8-23, which was mentioned in your DEI Commitment, California has "launched an all-of-government approach, working across agencies to deliver projects at the scale and pace necessary to maximize federal investment and deliver the benefit from that investment to all California communities." This Executive Order was targeted towards disaster response, both because of recent weather events and the long term effects of climate change. DPR is integrally tied to these consequences and owes Californians an active role in this "all-of government approach."

In order to both increase the capacity of soil to absorb and retain water as well as create environments that minimize heat stress to workers and residents, we must reduce use of fossil fuels used in production, transport, and distribution of pesticides. Of course, the co-benefits are reduction of toxic pesticide exposure to residents of agricultural communities, agricultural workers, consumers, and our overarching environment, flora, and fauna with which we share the planet.

To recap some issues of particular importance of us as nurses:
Inclusion of qualified health care professionals in the Sustainable Pest Management Advisory Group and the Environmental Justice Advisory committees.
Education and outreach to health care professionals on worker and community and safety, assessment of exposure and risk, and reporting illness and exposure.
Participation in development of a system for revising and implementing quality improvement measures with respect to progress towards Sustainable Pest Management, including human and environmental health indicators as measures of sustainability.
Emphasis on the importance of expanded monitoring and data access with results available for research.
Using emerging science means evaluating all available sources, including laboratory studies and epidemiology. The lived experiences of the workers and residents in communities of heavy pesticide use must not be discounted.

We will be sharing this information with other nursing organizations as it relates to human health and the environment.

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