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DPR Strategic Plan 2024-28 Public Comment 11/10/2023

The Strategic Plan covers many important topics, such as the need for environmental justice, mitigation of the climate crisis, and protection of public health, as well as soil, air, and water quality. The Department of Pesticide Regulation has failed over the years to make meaningful progress in pest management. The Strategic Plan, on paper has several actionable recommendations. However, the timetable is far too slow to mitigate the ongoing harm of using pesticides. The protection of workers and of frontline communities and transition to regenerative organic agriculture needs to be greatly accelerated, to avoid further damage.

Current pesticides are the descendants of the nerve gas weapons of World War I. Most are nerve toxins and are inherently dangerous to other living creatures beyond the target pests. Unlike toxic materials used in a factory or laboratory, these poisons are used in the environment and subject to wide dispersal and unintended consequences. They cannot be recalled and we cannot control their effects. Likewise, genetically modified crop plants are proposed as an opportunity for continued use of increasingly toxic pesticides. This irrational and environmentally hazardous solution must be avoided. Prevention is the only viable approach, so pesticide use needs to be immediately, not incrementally, tightly regulated and eventually abolished.

In my profession, Medicine, we use medications and interventions that have risks as well as benefits. Unlike the agro-industrial complex, we use chemicals and procedures judiciously and review their efficacy periodically. Some dangerous but possibly therapeutic interventions, such as Salvarsan (arsenic) for syphilis, were discontinued when safer and more effective therapy (penicillin) became available.

I hope that you listened to the young people speaking up at your meetings. They reminded you that you represent all of us, not just agribusiness and the chemical industry. The lives of these young people and their families have been harmed; they represent the front-line communities. They do not want their children and grandchildren to be sacrificed as you slowly implement the Strategic Development Plan over the course of the twenty-first century.