

Pest Control Operators of California

November 10, 2023

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

RE: DPR Draft 2024 Strategic Plan

Dear Director Henderson,

I am writing on behalf of the Pest Control Operators of California (PCOC), the state association representing the pest management industry in California. PCOC is a 501(c)(6) non-profit association dedicated to protecting people, property and the food supply through environmental stewardship and legislative and regulatory advocacy. PCOC has served the business and educational needs of pest management industry professionals for 80 years.

Currently, PCOC represents the interests of our nine hundred plus members that help generate over 3.4 billion dollars' worth of pest management economic activity in California alone. In fact, PCOC members account for about 80 percent of the state's total volume of pest control business. We appreciate the opportunity to provide our feedback on the Department of Pesticide Regulation's (DPR) Draft Strategic Plan ("Strategic Plan") for 2024-2028.

While PCOC acknowledges the core values stated at the beginning of DPR's Draft Strategic Plan, the organization believes that these values are not consistently reflected in the goals outlined throughout the document. The Strategic Plan is heavily reliant on the Sustainable Pest Management (SPM) Roadmap, which PCOC does not fully support. The criteria for identifying Priority Pesticides also raise concerns, as many aspects of the plan hinge on addressing or replacing these priority substances, which presents uncertainties.

PCOC also has reservations regarding the timeline set forth in the Strategic Plan. Although it spans five years, several of the goals and sub-goals appear unattainable within this timeframe. This gives the impression that the document aims to redefine DPR rather than serve as a genuine strategic plan for the next five years.

We would also like to provide specific comments on some of the goals and sub-goals contained within the Strategic Plan:

Goal 1.1, point 3: There are already SPM certifications in place for urban pest management, and IPM certifications are readily available to the licensed industry. Introducing an SPM certification in addition to these certifications could create confusion and complexity in the industry.

Goal 1.2: PCOC supports DPR's investment in scientific research to improve the registration process but opposes the idea of using this research solely to replace Priority Pesticides.

PCOC has concerns about the definition of "efficacious alternatives". The products which we use are federally and state registered and meet current safety standards. The efficacy of any new alternative must be equal to or exceed what we are currently using to continue to protect our customers and their homes. PCOC is willing to work closely with governmental staff to evaluate any new products and their ability to meet the needs of all Californians.

Goals 1.3 & 1.4: These goals primarily focus on reducing Priority and High-Risk Pesticides. As previously mentioned, PCOC does not support efforts to eliminate these pesticides without first identifying them or exploring alternative solutions.

Goal 2.1, point 3: This point appears redundant as it is already part of the SPM Roadmap. If its inclusion is intended to provide clarification, similar points prioritized within the SPM Roadmap should also be incorporated into this document.

Goal 2.2: Enhance DPR's statewide regulatory capacity in partnership with the County Agricultural Commissioners (CACs). By 202_, increase collaboration with CACs on county and state pesticide use enforcement activities to strengthen pesticide use compliance, to address repeat violations and offenders, and to inform mitigation measures. By 202_, evaluate regulations governing pesticide use around schools and take appropriate action to improve processes that support safe pest management around schools. By 202_, develop and annually offer a comprehensive training for CAC staff biologists.

Goal 2.3: PCOC supports this goal as it addresses an area where DPR acknowledges the need for improvement. Additionally, it is crucial in preventing illegal pesticide sales and the entry of unauthorized products into the state.

Goal 2.4: PCOC has worked closely with DPR in advancing fumigation and pest control safety and standards. PCOC implemented the Fume Enforcement Program in key fumigation volume counties. It has included Los Angeles, Orange, Santa Clara and previously San Diego counties. This is an industry funded program to increase revenue for the Agricultural Commissioner's Offices in the above-mentioned California counties. Operators pay \$8 per fumigation to fund the program in the county. It allows for more scrutiny and inspections to be conducted on fumigation structures enhancing safety for residents, workers, and bystanders. PCOC fumigation enforcement committee meets quarterly with the member counties to review their findings to continue to raise the bar on safety, quality and meeting the requirements of the label and state regulations. Registrants are utilized to perform additional training for operators when they are identified to improve compliance.

In addition, PCOC participates with DPR, County Ag Commissioners and the Structural Pest Control Board to attend training for new staff biologists. Industry performs sessions on safety devices and equipment. In addition, industry performs demonstrations on fumigations and pest control treatments so attendees can get real world experience. The training is conducted in both the northern and southern part of the state annually when funding allows.

PCOC recognizes that many of the goals outlined in the plan may be ambitious and potentially unattainable given the current budget and resource constraints faced by DPR. We strongly

recommend that DPR refrains from publishing such goals until a clear budget and resource allocation plan is established.

In closing, PCOC appreciates the opportunity to provide input on this strategic plan. POCO representatives look forward to our continued collaboration between our organization and DPR to ensure that pest management is safe, effective, and sustainable.

Respectfully submitted,

Michael E. Wilson
Chief Executive Officer
Pest Control Operators of California
michael@pcoc.org



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