

Sara Grantham

Thank you for the opportunity to comment! Please see the attached comments from Beyond Pesticides, on behalf of our members in California, and/or visit the link here:

<http://bp-dc.org/bp-comments-to-cdpr-on-spraydays-may-2026>



BEYOND PESTICIDES

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May 1, 2026

California Department of Pesticide Regulation
California Environmental Protection Agency
3077 Fite Circle, Suite 100
Sacramento, CA 95827

Re: SprayDays Annual Status Update

Dear Madam/Sir,

These comments are submitted on behalf of Beyond Pesticides. Founded in 1981 as a national, grassroots membership organization that represents community-based organizations and a range of people seeking to bridge the interests of consumers, farmers, and farmworkers. Beyond Pesticides advances improved protections from pesticides and alternative pest management strategies that eliminate a reliance on pesticides. Our membership and network span the 50 states and the world.

We are writing in response to the California Department of Pesticide Regulation's (DPR) first annual progress update for the SprayDays California program.^{1,2} The report, in outlining system performance, user engagement, and improvements implemented as a result of feedback, shows how the program has been used during its first calendar year of operation (March 24 – December 31, 2025) for providing statewide pesticide notifications. Beyond Pesticides and many advocates stress that while this system allows the opportunity to be aware of pesticide applications, it focuses on individual responsibility to keep track of when chemicals are sprayed and ignores the need for systemic change that is available with alternative methods.

Since launching SprayDays California last year, "DPR continues to connect thousands of Californians to real-time pesticide information and refine the first-of-its-kind system through public engagement"¹ to inform when highly regulated pesticide applications are planned in nearby agricultural areas. This gives 24- to 48-hour notices to those who sign up; however, it only includes pesticides that are identified by the California DPR as restricted materials requiring the Notice of Intent (NOI) process.

The report notes that over the past year, the SprayDays program has incorporated 89,679 website views, 4,327 text and email notification sign-ups, and 96,000 notifications sent

to users statewide.¹ After public feedback, updates to enhance the system included expanded language access, but requests, such as to include additional pesticides that are not restricted materials, still need to be addressed.^{1,2}

Background

Growing out of the passage of AB 617 *Community Emissions Reduction Act* in California, passed in 2017, farmworker safety advocates have long been urging an implementation strategy that provides notification of pesticide spraying. In late 2017, the California Air Resources Board (CARB) began implementation of AB 617, a bill enacted with the stated intent of addressing the air quality crisis in many communities of predominantly people of color who are disproportionately harmed by toxic chemicals. While the overall goal of the law is to reduce air pollution in these communities, farmworker advocates have sought to operationalize a pesticide spraying notification system to warn communities when nearby spraying is scheduled to take place.³

The idea behind notification programs and transparency in government is that it enables those potentially exposed to take precautionary measures to reduce exposure, which may or may not be possible given the ability of people, workers, or families to secure adequate protection from drift and the chemicals' intrusion into homes, schools, and other buildings. However, requirements for public disclosure of toxic pesticide ingredients have historically had the effect of encouraging pesticide users and manufacturers to find less hazardous products or ingredients. When the U.S. Environmental Protection Agency (EPA) announced a policy to require chemical companies to disclose on pesticide product labels inert (typically undisclosed chemicals) ingredients "of toxicological concern" (List 1 inert ingredients), they began removing the toxicants from their products.⁴ EPA no longer updates List 1 or others, including List 2-4.⁵

In an era of federal deregulation, funding freezes and deep cuts, and elimination of publicly disclosed data, this California program is providing a public service for frontline and fenceline communities to access more information on pesticide use. Living amid chemical pollution creates the need for immediate mitigation measures in an attempt to reduce exposure. Mitigation measures, however, are often found to be lacking because of ongoing risks that may be reduced, but not eliminated, despite the adverse effects of low-dose and chronic exposure,⁶ and the availability of nontoxic practices that current policies do not require.⁷

While public health advocates view notification as a step that may allow people to leave a treatment area or take shelter to reduce exposure, groups continue to express concerns about a focus on notification to the exclusion of addressing the root causes of exposure—chemical-intensive agriculture, despite the viability of organic compatible practices and products. A public notification system places the burden on rural, farmworker, and working-class communities of color who are expected to easily access the existing information dissemination system with known flaws. In addition to DPR not embracing an alternatives

assessment in its pesticide registration program, not all people have readily available access to a telephone or computer to subscribe or receive the notification messages from the SprayDays program.⁸

While advancing a strategy to transition chemical-intensive agriculture to certified organic practices, which render highly toxic chemicals unnecessary, Beyond Pesticides has supported mitigation measure policies, including neighbor and public notification systems, across the nation for years, but recognizes the limitations of mitigation measures and the need to urgently transition agriculture to nontoxic practices. Beyond Pesticides has written extensively that focusing on mitigation efforts (buffer zones, notification systems, etc.) fails to identify the root cause being the failure of EPA to adequately assess the lack of pesticide essentiality and pesticide hazards in the face of unprecedented chronic illness diagnoses, biodiversity collapse (pollinators, birds, and butterflies alone), and the climate crisis. In partnership with farmers, community organizers, public health professionals, and some policymakers, we believe that adopting land management and food supply chain systems rooted in organic principles and criteria translates to a pesticide-free future—one that inherently protects farmworkers, farm communities, and those disproportionately at elevated risk of harm from pesticides.

Moving Forward

While it is valuable to develop tools for the most at-risk communities and workers to protect themselves and their loved ones from exposure, Beyond Pesticides continues to support these efforts coupled with structural changes to risk assessment and organically managed land and food systems that are productive and profitable. Despite EPA's approval of pesticide active ingredients for use in agriculture, scientific studies show that the pesticide registration standards that must protect against "unreasonable" risk to health and the environment under *Federal Insecticide, Fungicide, and Rodenticide Act's* (FIFRA) are not met.⁹ Beyond Pesticides and organic advocates have long maintained that the failure of EPA to consider the viability, productivity, and profitability of organic practices and product alternatives to conventional pesticides, alongside the wide body of scientific literature documenting adverse effects, means the agency's registration of toxic pesticides has not been subject to the complete assessment that is required. The same is true for nonagricultural pesticide active ingredients and formulations. In this context and given the availability of less and nontoxic alternatives, EPA has failed in its responsibility to ensure that these chemicals, registered for use under FIFRA, will not cause unreasonable adverse effects.

Any perceived benefits of pesticide products are overstated, improperly considered, and are very much diminished by the availability of alternative pest management that incorporates alternative cultural practices and/or less toxic products. The environment, wildlife, and the public do not benefit from the use of these chemicals, and while notification of the spraying of pesticides helps to provide warnings to the public, it is not protective enough for the individuals working in or living near agricultural areas where toxic pesticides are used.

The ubiquitous nature of pesticide contamination and the scientific evidence on the subsequent adverse health and environmental effects support their removal from use. With a holistic strategy, such as with organic-compatible products and practices, California DPR should require that all pest management systems transition to organic practices, as defined by the federal *Organic Foods Production Act*. When evaluated, it is clear that organic is successfully mitigating the escalating public health, environmental, and climate crises, as EPA inaction on identifying, remediating, and preventing pesticide contamination throughout the country contributes to a growing problem.

We urge California DPR to elevate its efforts to advance organic agriculture and land management methods, which will lower the cost of notifying individuals in agricultural areas that toxic pesticide spraying will occur. To truly protect all Californians and the environment, the transition to the elimination of pesticides is imperative.

Thank you for your consideration of our comments.

Respectfully,

A handwritten signature in black ink, appearing to read "Sara Grantham". The signature is fluid and cursive, with a large, stylized flourish at the end.

Sara Grantham

Science, Regulatory, and Advocacy Manager

¹ California Department of Pesticide Regulation (2026) DPR Releases First Annual Progress Update for Nation's First Statewide Pesticide Notification System. Available at: <https://www.cdpr.ca.gov/2026/03/10/dpr-releases-first-annual-progress-update-for-nations-first-statewide-pesticide-notification-system/>.

² California Department of Pesticide Regulation (2026) SprayDays California: First Annual Status Update. Available at: https://www.cdpr.ca.gov/wp-content/uploads/2026/03/spraydays_first_annual_status_update.pdf.

³ Beyond Pesticides (2025) Landmark Agricultural Pesticide Use Notification Takes Form, as Efforts to Eliminate Pesticides Gain Traction. Available at: <https://beyondpesticides.org/dailynewsblog/2025/04/landmark-agricultural-pesticide-use-notification-takes-form-as-efforts-to-eliminate-pesticides-gain-traction/>.

⁴ U.S. Environmental Protection Agency (1987) Inert Ingredients in Pesticide Products. Available at: <https://bpdc.org/assets/media/documents/EPA%20NOTICE%201987.Inert%20Ingredients%20in%20Pesticide%20Products.pdf>.

⁵ U.S. Environmental Protection Agency (2025) Categorized Lists of Inert Ingredients (Old Lists). Available at: <https://www.epa.gov/pesticide-registration/categorized-lists-inert-ingredients-old-lists>.

⁶ Beyond Pesticides (2026) Pesticide Exposure Again Linked to Neurotoxic Effects in Humans and Wildlife in Comprehensive Review. Available at: <https://beyondpesticides.org/dailynewsblog/2026/03/pesticide-exposure-again-linked-to-neurotoxic-effects-in-humans-and-wildlife-in-comprehensive-review/>.

⁷ Beyond Pesticides (2025) EPA Webinar Today on New Self-Directed Pesticide Restrictions, Criticized as Lacking Accountability. Available at: <https://beyondpesticides.org/dailynewsblog/2025/09/epa-webinar-today-on-new-self-directed-pesticide-restrictions-criticized-as-lacking-accountability/>.

⁸ Beyond Pesticides (2025) California Launches Updated Notification of Pesticide Spraying, Farmworkers Call for Organic on Fields Near Homes and Schools. Available at: <https://beyondpesticides.org/dailynewsblog/2025/09/california-launches-updated-notification-of-pesticide-spraying-farmworkers-call-for-organic-on-ag-fields-near-homes-and-schools/>.

⁹ Beyond Pesticides (2026) Pesticide-Induced Diseases Database. Available at: <https://www.beyondpesticides.org/resources/pesticide-induced-diseases-database/overview>.