



May 8, 2025

Jennifer Teerlink, PhD
Deputy Director and Science Advisor
Department of Pesticide Regulation
1001 I St., Sacramento, CA 95814

Subject: Comments on DPR's Proposed Pesticide Prioritization Process

Dear Dr. Teerlink,

Thank you for the opportunity to comment on the Department of Pesticide Regulation's (DPR) proposed Pesticide Prioritization Process. We appreciate DPR's commitment to transparency, scientific rigor, and stakeholder engagement, as outlined in the "Accelerating Sustainable Pest Management: A Roadmap for California" report, to advance sustainable pest management (SPM). The TriCal Group of Companies are California's largest and most experienced fumigation specialists and committed to the safety of all communities that we serve. Agricultural communities statewide rely upon fumigants as one of the most important tools to manage pests and produce healthy fruits and vegetables for California and beyond. Fumigants increase production up to fourfold, which provides an adequate supply of affordable fruits and vegetables for California communities and much of the world. Unlike many other pesticides that are sprayed onto crops, fumigants are applied to the soil prior to planting and do not leave pesticide residue on harvested fruits and vegetables. Other benefits of fumigation include a reduced reliance on other crop inputs such as water, fertilizers, and other pesticides that contribute to greenhouse gas emissions from their conveyance and application. The TriCal Group is also a leader in residential, structural, and food processing pest management, protecting the state's housing, domestic and international trade markets. TriCal is proud to provide a vital tool to keep healthy, fresh foods in production in California and is honored to be part of communities statewide—providing good local jobs, producing fresh foods, conducting safe and efficacious applications, and serving California's agricultural communities for over 60 years.

We've worked with DPR for decades to evaluate new methods and application techniques that foster industry-wide improvements and reduced-risk pest management. TriCal has consistently led the introduction of measures to increase safety, and we continually improve practices, protections, and mitigation measures. TriCal has developed better application methods over the years, pioneered the use of "Totally Impermeable Films" for fumigations, and adopted state-of-the-art equipment. We pride ourselves on our continuous commitment to improve techniques and equipment. TriCal has also been a longstanding partner in exploring fumigant alternatives for decades, including researching and evaluating steam treatment, Anaerobic Soil Disinfestation (ASD), and solarization.

Our company fully supports the goal of fostering pest management practices that are sustainable, effective, and protective of human health and the environment. Pest management is critical to modern society, enabling the reliable and affordable production and supply of healthy, fresh fruits and vegetables, safeguarding trade and economic activity, providing essential vector control to protect public health, preventing property damage from pests such as bed bugs, cockroaches, rodents, and termites, and preserving natural lands and ecosystems. Given these significant societal roles, careful consideration of any limitations placed on pest management tools must be taken with utmost seriousness, particularly in the context of affordability.

We urge DPR to prioritize affordability, recognizing the struggles faced by Californians due to rising living costs. Affordable access to fresh fruits and vegetables is essential for public health, especially for low-income families. Additionally, ensuring pest management remains affordable is critical to protecting families from rodent and insect infestations that significantly impact health and quality of life.

While we appreciate the goals outlined in the SPM roadmap, we respectfully express strong concern regarding the 2050 goal of eliminating priority pesticides from use. DPR's regulatory framework has been rooted in managing and mitigating risks, not categorically eliminating pesticides solely due to the existence of toxicity or potential hazard. We believe a risk-based regulatory approach remains the most scientifically sound, practical, and economically responsible pathway. Rather than outright elimination, we advocate for a continued focus on mitigating risks through targeted regulatory measures, scientific advancements, and improved application methods.

Furthermore, we strongly agree with DPR that a pesticide's inherent hazard profile alone should not be the primary driver for prioritization. Pesticides, by their very nature, are designed to manage pests and thus carry inherent toxicity. Instead, prioritization should consider how pesticide products are used, potential exposure scenarios, and their risk to human health and the environment. We support the inclusion of comprehensive monitoring data, pesticide illness data, and other relevant studies and data when prioritizing pesticides.

We agree with DPR's proposed makeup of the Scientific Advisory Committee, emphasizing scientific expertise in pesticides and pest management. Given the unique and specialized nature of fumigation, which is critically important in both agricultural and urban pest management, we strongly suggest the committee include subject-matter expertise in fumigant applications and stewardship. Additionally, we recommend including committee members with specific expertise in pest exclusion programs, emergency exemptions, quarantine, and other critical uses that are required for trade and at nurseries.

Similar to the inclusion of pesticides within Integrated Pest Management (IPM) programs, DPR should also actively consider how pesticides can be effectively incorporated into Sustainable Pest Management (SPM) frameworks. Ensuring pesticides are used responsibly within an SPM framework can support sustainable pest management objectives, advancing public health, environmental safety, and affordability.

When evaluating the feasibility of pesticide alternatives, DPR should thoroughly consider potential tradeoffs and unintended consequences. This includes pest resistance, displacing one environmental impact for another (i.e., human health versus aquatic), economic impacts and affordability, and impacts on crop yield. DPR should also consider the full scope of input requirements, such as

increased labor, specialized equipment, application timing constraints, and access to outreach and educational resources.

Evaluating alternatives often extends beyond the state's purview. DPR should consider the important role of post-harvest fumigation in maintaining international and domestic trade. Import and export treatment schedules often mandate specific fumigants as a condition of market access. These treatments ensure commodities are free of pests that could devastate U.S. crops or introduce invasive species. Disruption to these practices could severely impact the global food supply chain, compromising both availability and affordability of U.S. agricultural exports.

Furthermore, pesticide tolerances are required for trade and the process for developing tolerances involves significant time and resources. The economic and food security consequences of restricted access to these tools would not only impact California producers but also trading partners and food-insecure populations that depend on reliable imports from the U.S. To maintain our role in global food security, it is vital that we retain access to tools required for safe and compliant trade.

We also urge DPR to consider the risks of economic and environmental leakage. Restricting pest management tools in California could shift food production to states or countries with weaker environmental and labor protections. Such displacement may result in increased and less-safe pesticide use, lower worker safety standards, and higher carbon footprints, undermining California's leadership in sustainability and public health. California agriculture operates in a competitive global market, and state-level decisions must be weighed in the context of broader economic, environmental, and human rights outcomes.

To effectively achieve a balanced and practical prioritization process, we urge DPR to incorporate the following considerations:

1. **Integrated and Holistic Pest Management Approach:** The prioritization process should clearly integrate Sustainable Pest Management (SPM) principles, emphasizing prevention, ecosystem resilience, economic impacts, and human health, consistent with California's broader environmental, affordability, and community health goals. A comprehensive, system-wide evaluation should guide the identification and management of priority pesticides, recognizing the complexity and interconnectedness of agricultural, urban, and rural pest management contexts.
2. **Feasibility and Efficacy of Alternatives:** DPR should prioritize a thorough, scientific evaluation of alternative pest management methods and products. It is essential that the practical availability, effectiveness, and affordability of these alternatives are validated prior

to any restrictive actions against current products. This will ensure growers and applicators continue to have effective and affordable tools available, safeguarding productivity, public health, and accessibility.

3. **Transparent and Inclusive Stakeholder Engagement:** Entities that use and apply pesticides must have meaningful representation in the prioritization process. We support the Roadmap's call for robust, structured engagement, including representation from agricultural and urban pest management professionals on relevant committees such as the Scientific Advisory Committee. Ensuring diverse stakeholder representation will help align pest management decisions with real-world experiences, constraints, and affordability considerations.
4. **Economic Impact and Job Preservation:** The prioritization process must explicitly account for the economic impacts, including potential disruptions to agricultural productivity, job markets, and economic vitality. Decisions must be assessed for their economic sustainability and affordability to ensure that pest management transitions are equitable and financially feasible for producers, pest management professionals, and consumers.
5. **Clear Communication and Predictable Timelines:** To foster effective collaboration and industry adaptability, DPR must maintain transparent, regular communication regarding prioritization criteria, required data, and timelines. Clearly defined processes for data submission and review will support fairness, accountability, and cooperation among stakeholders involved.

We reiterate our commitment to actively engaging with DPR to explore scientifically robust, economically feasible, and affordable alternatives to support sustainable pest management practices. We believe the inclusion of these considerations will ensure a balanced, fair, and meaningful prioritization process that meets California's ambitious pest management, sustainability, and affordability goals.

TriCal supports DPR's continued efforts to protect human health and the environment. We look forward to ongoing coordination on how best to steward necessary tools that benefit communities, consumers, and the environment. As a third-generation family-operated California business, we sincerely appreciate the opportunity to be part of DPR's process and look forward to continuing to work together to provide California with pest management that is safe, effective, and sustainable.

Best regards,

Mike Stanghellini, Ph.D.
Chief Science Officer, The TriCal Group