



May 8, 2025

Karen Morrison
Director, Department of Pesticide Regulation
1001 I Street, P.O. Box 4015
Sacramento, CA 95812-4015

RE: Comments in Response to the Department of Pesticide Regulation's Proposed Pesticide Prioritization Process

Dear Director Morrison:

On April 8, 2025, the Department of Pesticide Regulation (DPR) convened a public workshop to provide details regarding DPR's proposed approach to developing a pesticide prioritization process and structure for an associated advisory committee. We appreciate the opportunity to provide comments in response to DPR's request. The comments provided in this letter reflect the common viewpoints of the agricultural organizations (herein referred to as "organizations") that have signed below.

Beyond the lack of authority, DPR's proposal is inadequate in several respects, including science-based decision-making. The new, resource-intensive process DPR seeks to adopt is not statutorily authorized pursuant to AB 2113, which was approved by the Legislature and Governor in 2024 following extensive negotiations involving industry and the Newsom Administration. Specifically, it was agreed that AB 2113 would assist DPR with its financial deficit and substantially improve its pesticide registration and re-evaluation process through increased staffing (Food & Agricultural Code Section 12840).

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Notwithstanding the foregoing, DPR's proposal would exceed its core functions, misuse AB 2113 funds and ignore the Legislature's rejection of DPR's 2024 budget request to fund the proposal. In alignment with the statutory requirements detailed in AB 2113, we urge DPR to focus resources and priorities on the registration of pest management tools, expediting reevaluation efforts to meet the statutory targets prescribed, and halt activities associated with this proposed prioritization process.

Should DPR not act on this recommendation, we appreciate the opportunity to comment on this proposed framework and our organizations offer the following evaluation of the proposal:

1. Governance structure, decision making, and interaction with other DPR committees and Agencies.
2. Submission and identification of priority pesticides and associated alternatives analysis.
3. Scientific Advisory Committee areas of expertise.
4. Prioritization of identification of pest management tools that align with AB 2113.
5. Other issues.

PART 1 GOVERNANCE STRUCTURE, DECISION-MAKING, AND INTERACTION WITH OTHER DPR COMMITTEES AND AGENCIES

Governance Structure & Decision-Making

A key goal in DPR's Strategic Plan is to create and implement a science-driven process for prioritizing high-risk pesticides, identifying alternatives, and developing appropriate mitigation strategies. Such a process should include:

1. Evidence-based decision-making based upon scientifically relevant data and research.
2. Incorporation of the scientific method of forming a hypothesis, testing it and revising accordingly.
3. Peer review by external experts with direct scientific and field level knowledge of the realities of pest management options and opportunities.
4. Transparent reasoning, methodologies and data that can be publicly reviewed.
5. Adaptive management to adjust decisions based on new evidence or changing conditions.

As this governance framework takes shape, stakeholders must clearly understand the decision-making methodology. To that end, our organizations ask the following:

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1. Will authority be delegated to external entities, conducted by DPR through a transparent procedure, or determined through some alternative mechanism?
2. How will various decision-making steps be transparently communicated and stakeholder input evaluated? For example, will all proposed lists be publicly noticed through the DPR list-serve, with a written comment period, public meeting discussions including significant opportunity for public comment, decisions clearly documented and provided, and a clearly articulated appeal process?
3. Will there be a public process including written comment periods?
4. If the prioritization process calls for additional mitigation or reevaluation, will that be based on the same threshold standards that are required for the current mitigation or reevaluation procedures?
5. How will DPR prioritize reevaluations or mitigations that run simultaneously to this process?
6. If a prioritization recommendation is found to require no additional action, who makes this decision, through what process, and what steps follow? Any prioritization denials should require that new or additional data accompany resubmissions.
7. Will DPR respond publicly if they deny a proposed priority submitted by the advisory committee or the public?
8. How will progress be measured?

We recommend that DPR implement transparent governance protocols for pesticide prioritization recommendations and decisions that clearly define:

1. How scientific evidence is evaluated.
2. Which stages of the process are open to stakeholder input.
3. What criteria (consistent with DPR's current risk-based framework) determine prioritization rankings.
4. How public and expert input is incorporated into final decision-making.
5. When and how decisions can be reviewed and revised.

The proposed framework references that prioritization results in three outcomes: product reevaluation, use mitigation, or cancellation. The prioritization process threatens to result in lower priority products or active ingredients being pushed higher in the queue rather than those DPR has determined by science to be necessary and appropriate. This will inevitably result in longer reevaluation processing times and potential litigation.

DPR must consistently emphasize that committee recommendations are not regulatory actions. The legal framework for registration, mitigation and reevaluation decisions must remain intact and preserved regardless of this proposed process.

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Interaction with Other DPR Committees and State Agencies

We would appreciate additional guidance regarding how various existing DPR committees and sister State Agencies will work together or separately within this process. Where will their interlinking obligations be structured to ensure that systems are enabled to deploy new findings, capacities, and pest management solutions. How will this process coincide, conflict, or complement existing regulatory efforts?

DPR Committees

DPR has several committees in place, chartered to address specific cross-functional priorities. These include the Agricultural Pest Control Advisory Committee (APCAC); Pesticide Registration and Evaluation Committee (PREC); and Pest Management Advisory Committee (PMAC). Each committee's charter addresses specific cross-functional priorities. APCAC and PMAC, statutorily constructed committees, have been habitually delayed or meetings have been cancelled in recent years and, in certain cases, staff managing these committees have yet to be replaced.

To that end, our organizations ask:

1. How will the recommendations of the proposed committee be incorporated into review, discussion and consideration of items before these committees or vice versa?
2. How will the work of these committees be considered in the review and prioritization process that this new committee would implement?
3. How will DPR balance incorporating a new committee's priorities into its existing workload, while achieving goals for required committees that face ongoing delays?
4. How will the recommendations of each of these committees be reconciled within DPR?
5. How will this new committee be resourced? Will DPR be drawing funds away from other relevant priorities that more appropriately align to the requirements in AB 2113?

Concurrently, DPR is in the process of instituting an Environmental Justice Advisory Committee (EJAC). The EJAC's mission and processes should remain distinct and separate from the pesticide prioritization framework. Maintaining each committee's independence preserves the integrity and specific focus of each initiative. The established DPR committees mentioned above are science-based, and a science-driven prioritization process will require formal consultation with these scientific committees for technical evaluation and methodology review. The EJAC should maintain a separate function

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focused on community engagement, educational initiatives, and broader environmental justice outreach.

State and Federal Agencies

AB 2113 highlights the need to identify methods for enhancing coordination both within and between agencies and programs that handle agricultural and urban pest management (Food & Agricultural Code Section 11520). California's pest prevention, detection and control systems are the most efficacious ways in which to accelerate the goals referenced in AB 2113. DPR can tap into the expertise and capacity of U.S. EPA, USDA-APHIS, CDFA, County Agricultural Commissioners, and the vast networks of licensed pest control advisers and farm practitioners to identify pest issues early and take quick action to protect the state's landscapes and resources.

The April 8 workshop PowerPoint presentation on Pesticide Prioritization Process¹ refers to involvement from several other State Agencies. We request further clarification and propose that these agencies maintain an external, consultative role, engaged only at DPR's specific request, and limited to their established regulatory and statutory frameworks.

PART 2 SUBMISSION AND IDENTIFICATION OF PRIORITY PESTICIDES AND ASSOCIATED ALTERNATIVES ANALYSIS

Pesticide decisions must consider their impact on broader pest management systems rather than evaluating active ingredients or an individual pesticide in isolation.

Priority Pesticide Identification

The SPM Roadmap defined priority pesticides as, "pesticide products, active ingredients, and groups of related products within the context of specific product uses or pest/location use combinations that have been deemed to be of greatest concern and warrant heightened attention, planning, and support to expedite their replacement and eventual elimination"². The SPM Roadmap acknowledges that this definition was not reached by consensus. We note that it also presents a fatal flaw. Should the prioritization process work as envisioned, a priority product's impacts may be mitigated to remove it from listing, therefore not necessitating "eventual elimination". DPR should establish a scientifically

¹ DPR, *Pesticide Prioritization Process*, p. 15, available at:

https://www.cdpr.ca.gov/wp-content/uploads/2025/02/pesticide_prioritization_process_workshop.pdf

² DPR, *Accelerating Sustainable Pest Management: A Roadmap for California*, p. 20, available at:

https://www.cdpr.ca.gov/docs/sustainable_pest_management_roadmap/spm_roadmap.pdf.

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grounded process that preserves agricultural productivity and sustainability, rather than incorporating this flawed definition.

DPR must use a risk-based prioritization process rather than a hazard-based methodology. Risk assessments evaluate potential for harm and severity under specific conditions, while hazard assessments only identify the possibility of harm without considering likelihood or exposure. Though agencies like OEHHA may use hazard-based evaluations, DPR must fulfill its statutory obligations when assessing priority pesticides by considering impacts, reevaluation, and mitigations through a comprehensive risk-based framework.

The identification process should use standardized qualification criteria for determining priority pesticide status that are also used by the public and committee members. These criteria should include diverse data sources: peer-reviewed studies, cost-benefit analyses, risk assessments, geographic/climate data, alternatives analysis, mitigation necessity assessment (see "Attachment A"), and previous findings.

Establishing robust criteria gives DPR a scientific basis to decline prioritization requests when appropriate. We strongly recommend narrowing the scope of review to specific products and host combinations as was specified in the SPM Roadmap³. Evaluating broad categories such as active ingredients or entire pesticide classes contradicts the feasibility of reviewing only eight pesticide products annually as currently proposed.

Additionally, a product's inclusion on this prioritization list could inadvertently signal that its regulatory future is uncertain. It is imperative that DPR clearly communicate that selection for priority review does not equate to registration revocation, inevitable mitigation or reevaluation or indicate any predetermined regulatory outcomes. The methodology must include defined exit points for cases when products are evaluated by the committee and determined to require no additional evaluation or action (See "Attachment A").

Alternatives Analysis

DPR has no statutory role regarding alternatives analysis. DPR does not have the pest, plant disease, ecological or agricultural expertise to make those determinations or to identify viable, effective, and sustainable alternatives for elimination of pests in agricultural commodities.

^{3 3} DPR, *Accelerating Sustainable Pest Management: A Roadmap for California*, p. 7, available at: https://www.cdpr.ca.gov/docs/sustainable_pest_management_roadmap/spm_roadmap.pdf.

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Effective pesticide prioritization requires comprehensive alternatives analysis. Considerations must be made related to resistance management; minor and major crop use; multiple alternatives; economic viability; commercial availability; products as well as management practices; mitigation options; opportunity costs of public health implications (e.g., rodents and zoonotic diseases); professional recommendations and licensed applicators; regulated community response; and the importance of working across multiple regions and commodity types.

Methodologies that yield positive results in one region or micro-climate may prove ineffective when implemented elsewhere. Further, established materials often have accepted Maximum Residue Levels (MRLs) across global markets, and any alternative's ability to meet export MRL requirements for California crops must factor into decisions. Unexpected pest outbreaks must be anticipated, including scenarios where a previously effective product loses registration yet could have addressed an emerging threat, or where application is permitted but no products are available in California. Further, replacing an established pesticide typically requires multiple alternatives, as individual substitutes generally offer narrower efficacy ranges.

Chlorpyrifos serves as a compelling case study demonstrating why effective alternatives must be identified and validated before essential agricultural tools are phased out of production systems. Chlorpyrifos served as a cornerstone insecticide within Integrated Pest Management (IPM) systems across numerous crops due to its exceptional efficacy, significant value in resistance management strategies, and critical role in controlling both invasive species and managing endemic pest outbreaks.

In the nearly five-year period since California discontinued chlorpyrifos use, agricultural producers across multiple crop varieties have been forced to increase insecticide application frequency due to alternative products' narrower efficacy spectrum and control range. Concerning developments have been cited in several cropping systems including increasing insecticide resistance and notable declines in beneficial insect populations. Chlorpyrifos previously served as a critical insecticide for managing lygus bugs and Diamondback Moths, two pests that have become increasingly problematic in recent years in areas where they were previously manageable.

Currently DPR lacks both staffing and resources to conduct a thorough alternatives analysis. While we support appointing scientifically qualified committee members (as detailed in Part 3 below), assigning full alternatives analysis responsibility to this proposed committee is neither practical nor advisable. Rather, the Office of Pesticide Consultation and Analysis (OPCA) has the legislative mandate to assess the agricultural impacts of all DPR regulatory packages, including conducting alternatives analysis.

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OPCA's responsibilities naturally include reviewing any significant registration or mitigation changes, and due to their role in all final decision-making processes, it is essential that they be included in any alternatives analysis considerations made by this committee (see external engagement in "Attachment A").

Any alternatives analysis must also be vetted by professional pest control advisers who are equipped to make determinations of efficacy, appropriateness and understand plant physiology and entomology. Finally, it cannot be underemphasized that an alternatives analysis cannot consider products that are not registered or available for use in California; rather it should be limited to the products and/or practices that can be readily utilized, not hypothesized. Failure to consider this only dismisses the reality of DPR's backlog and increasing registration timelines on pending products that have yet to be rectified. The focus of the proposed committee should not be prioritizing elimination of higher ranked products but rather expanding the availability of alternatives that provide a greater variety of effective tools.

PART 3 SCIENTIFIC ADVISORY COMMITTEE AREAS OF EXPERTISE

California maintains the most comprehensive pesticide review and analysis process in the world. It is important that members of the proposed committee have a strong understanding of DPR's regulatory standards and processes to allocate resources toward developing and ensuring access to pest management solutions that are both safe and effective, enforcing safe pesticide use regulations and laws, and conducting continuous monitoring of pesticides to protect agriculture, public health and the environment. We encourage DPR to empanel a true cross section of stakeholders with deep scientific knowledge as a part of the prioritization advisory committee in alignment with the governance recommendations noted in Part 1. This must include committee members who:

1. Employ evidence-based decision-making grounded in scientific data and research.
2. Possess practical knowledge of viable pest management alternatives and their potential for all crop types and agricultural systems.
3. Demonstrate expertise in applied sciences to connect the insights of licensed pest control advisers and farm practitioners with research and data when making pesticide prioritization recommendations.

Committee member recommendations must be appropriately vetted against these key characteristics to ensure a science-based approach to this process.

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Agricultural expertise on the committee is critical to relay the specific scientific knowledge requirements stated above. We recommend DPR include a Pest Control Adviser (PCA); a California Agricultural Commissioner or Deputy; a representative of registrants (e.g., Western Plant Health Association); University of California Agricultural Extension Specialists; an agricultural economist; and an agronomist.

We highly recommend the inclusion of Cooperative Extension advisors who can translate scientific findings into practical field applications. These specialists provide critical context about how pest management tools function in agricultural settings, preventing isolated or theoretical analysis of active ingredients divorced from their actual use patterns and efficacy against current pest and disease challenges. Similarly, university researchers who conduct applied pesticide trials with direct agricultural relevance, such as Section 18 emergency exemption studies, and who collaborate regularly with growers and licensed pest control advisers, bring valuable perspective that bridges scientific rigor with practical implementation. These specialized practitioners and researchers can also bring critical input and analysis to discussions about the feasibility of alternatives.

We also encourage the inclusion of a committee member who brings an agricultural economics perspective, adding valuable insight into the realities of maintaining a viable agricultural industry. This perspective must be integrated from the outset to ensure proper evaluation of comprehensive cost-benefit analyses that capture both immediate impacts and long-term economic consequences, including the continued availability of pest management tools.

DPR has recommended excluding registrants from the committee, which we presume includes those representing conventional, organic, and biological materials. Considering this recommendation, we ask that all potential committee members disclose any conflicts of interest and be disqualified if they have received research grants or other funding that could compromise their independent decision-making in this process.

We recommend DPR form commodity group working groups to evaluate alternatives' effectiveness for California agriculture. Without field expertise, assessments will miss minor crops, pest/disease trends, and trade standards—remaining theoretical rather than practical.

PART 4 PRIORITIZATION OF IDENTIFICATION OF PEST MANAGEMENT TOOLS THAT ALIGN WITH AB 2113

Pest and disease management challenges continue to grow in number and complexity statewide and multiple methods are needed to slow the progress of resistance to

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pesticidal tools. DPR's statutory mandate to "provide for proper, safe, and efficient use of pesticides essential for the production of food and fiber..." (Food & Agricultural Code Section 1150) must remain at the forefront of decision making, resource prioritization and allocation. DPR must take actions to protect the state's food supply while improving the current registration process's effectiveness and efficiency, as required in AB 2113.

SPM Roadmap

It is critical to note that the SPM Roadmap is not in state statute or DPR's legislative charter. Moreover, it is our understanding the work group was encouraged to develop recommendations without regard to cost or implementation timeline and that items, including this proposed process, were not developed through consensus. Implementing just one of nearly one hundred recommendations that were intended to be implemented simultaneously, is not indicative of DPR's good faith effort to realize SPM Roadmap's shared vision.

DPR must carefully evaluate provisions from the SPM Roadmap against its statutory requirements. In the aggregate, the cost to implement all the provisions in the SPM Roadmap is estimated to be in the billions. AB 2113 set forth funding and direction that was added to the Food and Agricultural Code, stating, "It is the intent of the Legislature that, when the department hires staff due to the mill increases described in Section 12841 and registration fee increases in 2024, the department prioritize hiring for positions within the pesticide registration branch," (Food & Agricultural Code Section 12840). DPR must prioritize transparency, efficiency, and timeliness in the registration process above all other considerations, including this proposed prioritization process.

There are certainly elements of the SPM Roadmap that have cross-sector value and align to AB 2113, including an expeditious registration process. The SPM Roadmap also references the state's prevention, detection, and treatment system as one of the most efficacious ways in which to accelerate SPM, in addition to alternative tools, systems, technologies, and support services. The adoption of these tools and mechanisms requires a substantial commitment to advancing research that responds to immediate priorities while anticipating future needs. A functional registration system is necessary to effectively bring all these pieces together.

DPR Strategic Plan 2024 – 2028

The recently adopted DPR Strategic Plan encourages focus on strategic goals that include an accelerated pathway for the registration of feasible alternatives to priority *high-risk*

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pesticides and tools that cover pest management gaps to increase access to safe, effective, sustainable pest management.

The strategic plan suggests improving timelines and transparency of science-based evaluation and registration of pesticide products. Other associated deliverables include issuance of a public timeline for scientific data evaluations by 2025; creating an accelerated pathway for the registration of feasible alternatives to priority *high-risk* pesticides and tools that cover pest management gaps by 2025; initiating pesticide registration evaluations within 30 days of receiving necessary information beginning by 2026; and updating and clarifying current data requirements for new pesticide technologies by 2027. ⁴

This goal and associated priorities complement the registration process improvements detailed in AB 2113 and we recommend DPR focus considerable attention to meeting the following statute requirements.

In 2024, the California State Auditor reported it took an average of more than 3.5 years to process registrations for pesticides with new active ingredients and major new uses, twice as long as it took in 2019⁵. Analysis conducted by Exponent® in 2024 found that for new active ingredient and major use Section 3 registrations, the timeframe for registration can take up to 3,210 days, equating to more than 8 years, 9 months (see "Attachment B"). Agricultural materials consistently experience longer review timelines than the overall average suggests, particularly for new active ingredients and Major Use Section 3 registrations. Improving the registration system and process best facilitates the priorities and goals of the SPM Roadmap, DPR's 2024-2028 Strategic Plan and AB 2113. Further, the registration system should be a gateway to prioritizing and reevaluating pesticides to ensure that viable alternatives are available to growers before DPR imposes additional reevaluation or mitigation measures on existing products.

We urge DPR to focus resources on initiatives that fulfill AB 2113 requirements for improving the registration process to address pest and disease management challenges facing agricultural producers statewide. We encourage DPR to review this process's value if it fails to meet AB 2113's timelines and accountability measures for registrations, licensing, and reevaluations. If DPR proceeds with this proposed process, we respectfully request a written description detailing how funds for this prioritization process were separately accounted for from AB 2113 funds.

⁴ DPR, *Strategic Plan 2024-2028*, p. 8, available at:

https://www.cdpr.ca.gov/wp-content/uploads/2024/12/strategic_plan_2024-28.pdf

⁵ *California State Auditor, 2023-128 Department of Pesticide Regulation*, p. 3, available at

<https://www.auditor.ca.gov/wp-content/uploads/2024/07/2023-128-Report.pdf>

PART 5 OTHER ISSUES

In reviewing fiduciary accountability, resource constraints, and statutory mandates as it relates to this proposed process, we encourage DPR to also consider and respond to the following questions:

1. We have been made aware of concerns from stakeholders regarding the market signals that this process might reverberate to registrants, as well as premature third-party action based on recommendations from this committee, which could lead to early removal of legally registered products without viable and complete alternative sets identified.
 - a. Will a safe harbor provision apply to any materials added to this prioritization list?
 - b. How will registrants be included in the process?
 - c. Will a standard reevaluation automatically initiate? If so, how will reevaluation timelines be met, especially considering the Legislature's focus on ensuring DPR becomes more effective, efficient and timely in their current registration process?
2. How will DPR communicate thoughtfully about this process to the public, Legislature, other advisory committees, and State Agencies?
3. We have received questions regarding how this process will interact with current mitigation activities. AB 2113 makes no change to the mitigation analysis process currently in place, but clarity around how this process complements, rather than interferes, will be important.
4. How will biological products be integrated into the assessment framework? These solutions serve as complementary tools rather than standalone replacements for currently registered chemicals and may themselves be determined to be high risk and prioritized. What communication strategies will ensure this distinction is clearly conveyed within any alternatives analysis?

CONCLUSION

Once again, we offer our appreciation for the opportunity to provide comments on DPR's proposed pesticide prioritization process. We encourage DPR to engage with all stakeholders, halt the proposed pesticide prioritization process and instead focus resources on fulfilling AB 2113's statutory requirements by improving the pesticide registration system and focusing on enabling a system that facilitates access to a more comprehensive set of tools that meet environmental and productivity goals. This approach would better serve all stakeholders by ensuring timely access to safe, effective pest management tools while maintaining DPR's risk-based assessment framework and core

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mandate to support food, fiber and floral production. Resources should be directed toward registration process improvements that facilitate innovation in pest management technologies and align with the specific accountability measures outlined in AB 2113.

Thank you for providing the opportunity to comment on this proposed process. We respectfully request a meeting to further discuss the contents of the letter prior to further workshops or committee meetings. Please contact us if you have any questions.

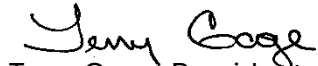
Sincerely,



Emily Rooney, President
Agricultural Council of California



Shirley Rowe, President
African American Farmers of California



Terry Gage, President
California Agricultural Aircraft
Association



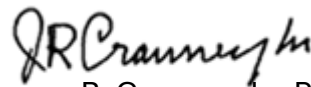
Ruthann Anderson, President/CEO
California Association of Pest Control
Advisers



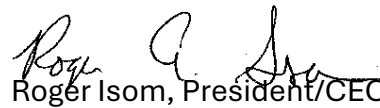
Michael Miiller, Director of Government
Affairs
California Association of Winegrape
Growers



Casey D. Creamer, President/CEO
California Citrus Mutual



James R. Cranney, Jr., President
California Citrus Quality Council



Roger Isom, President/CEO
California Cotton Ginners & Growers
Association
Western Tree Nut Association



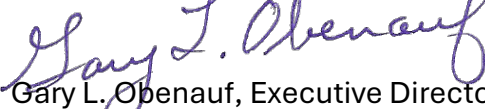
Christopher Reardon, Director of
Legislative Affairs
California Farm Bureau Federation



Daniel Hartwig, President
California Fresh Fruit Association



Katie Little, Director of Government
Affairs
California League of Food Producers



Gary L. Obenauf, Executive Director
California Specialty Crops Council

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Mike Montna, President/CEO
California Tomato Growers Association



Robert Verloop, Executive Director/CEO
California Walnut Commission



Christopher Valadez, President
Grower-Shipper Association of Central
California



Manuel Cunha, Jr., President
Nisei Farmers League



Ona Maune, Chair
Pyrethroid Working Group



Jon Gaeta, Director of State Affairs
RISE (Responsible Industry for a Sound
Environment)



Renee Pinel, President/CEO
Western Plant Health Association

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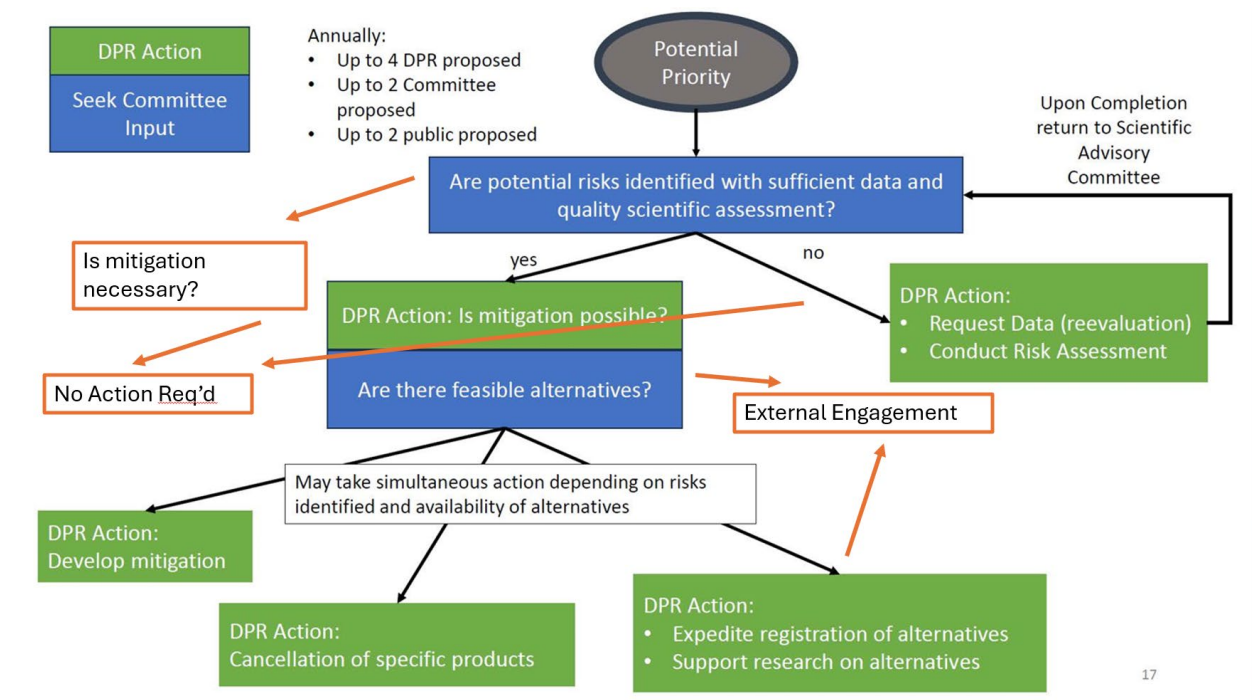
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Attachment A

Proposed edits to original schematic shared at the DPR Workshop on April 8, 2025⁶



⁶ DPR, *Pesticide Prioritization Process*, p. 15, available at https://www.cdpr.ca.gov/wp-content/uploads/2025/02/pesticide_prioritization_process_workshop.pdf

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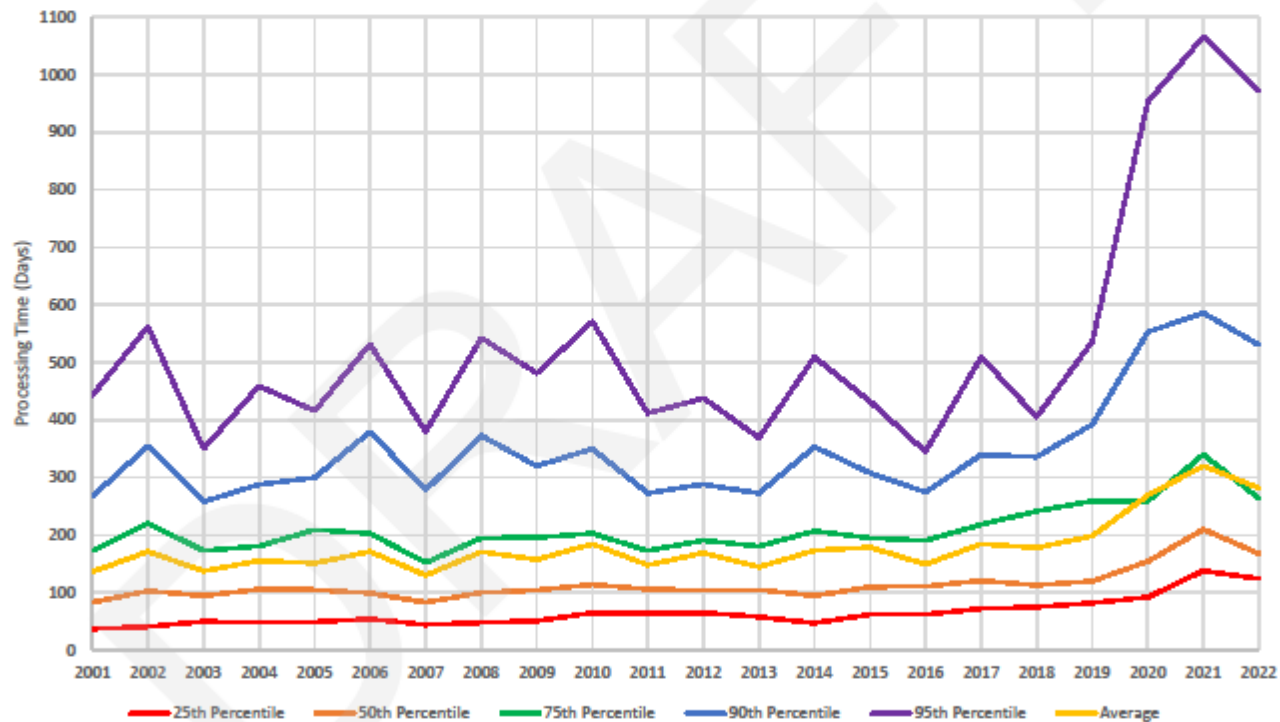
Attachment B

DPR Timelines – Averages and Percentiles

OVERALL REGISTRATION TIMELINES

DRAFT – March 29, 2024

All Section 3 New Product Registrations
Does not include supplemental distributor products

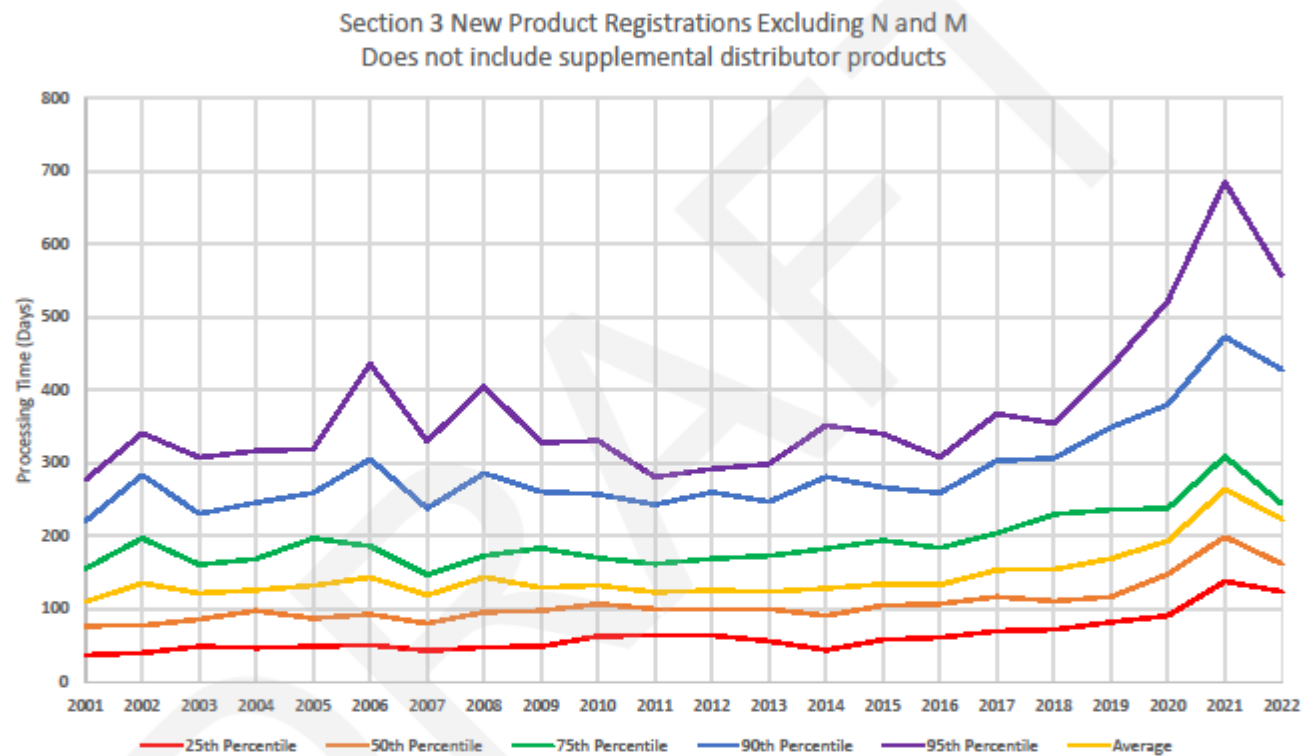


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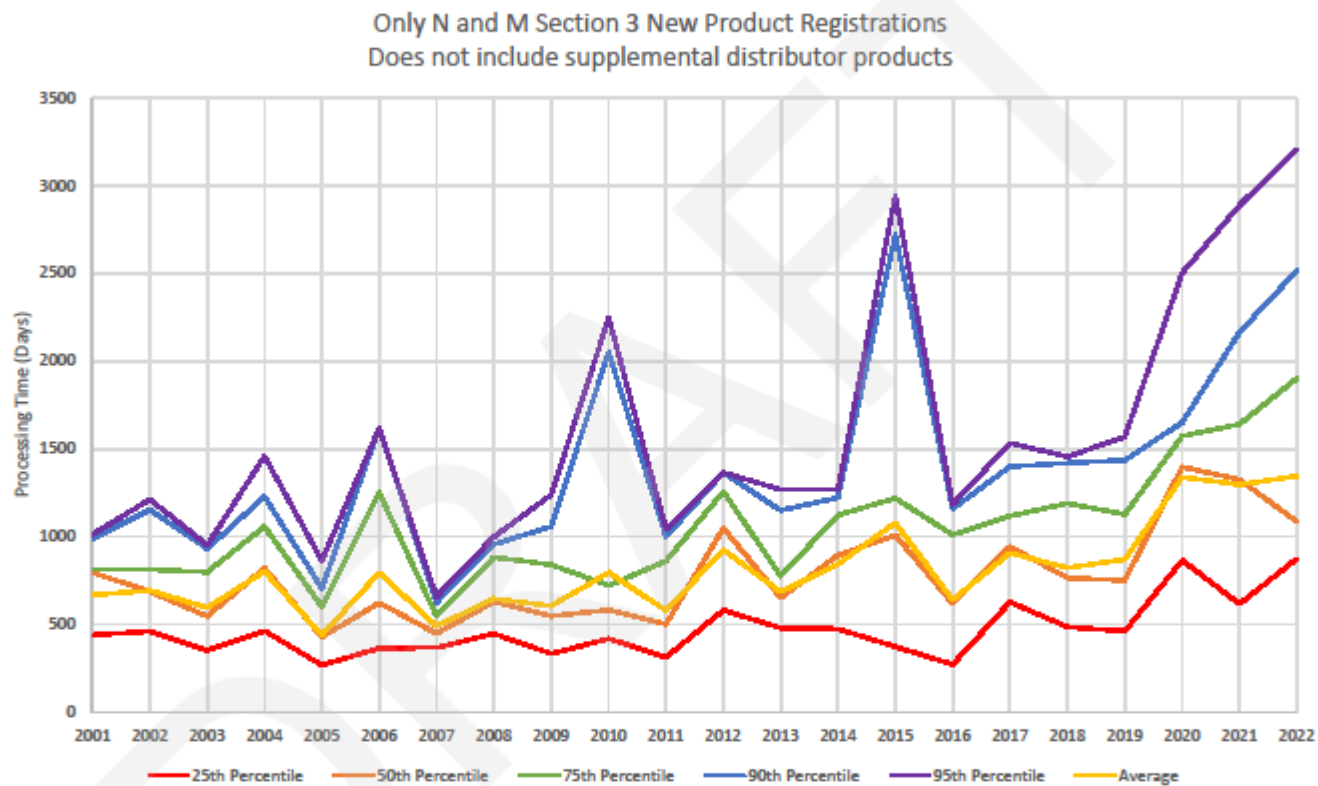


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Year	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022
<i>All Section 3 New Registrations (Including New AIs and Major New Uses, Excluding Supplemental Distributor Products)</i>																						
25th percentile	37	41	50	48	49	54	44	48	51	65	64	65	58	47	62	62	72	75	82	92	138	124
50th percentile	83	103	95	106	105	99	83	100	104	114	106	104	105	95	110	111	121	113	120	154	210	168
75th percentile	173	221	173	181	209	203	152	195	196	203	173	191	180	207	195	191	218	242	259	259	340	264
90th percentile	267	355	258	288	300	380	278	373	320	350	273	288	273	354	308	275	340	336	392	553	586	530
95th percentile	443	562	350	459	416	532	380	543	482	571	412	438	369	509	432	345	510	405	536	953	1066	972
<i>All Section 3 New Registrations (Excluding New AIs, Major New Uses, and Supplemental Distributor Products)</i>																						
25th percentile	37	40	49	47	49	51	43	48	49	63	64	64	56	44	58	61	70	72	82	91	138	124
50th percentile	77	78	86	98	88	93	81	96	98	107	100	100	100	91	105	107	117	111	117	148	199	162
75th percentile	156	197	161	169	197	186	147	173	184	170	162	169	173	183	194	184	204	230	236	238	309	244
90th percentile	220	284	231	246	259	306	238	286	261	258	243	260	247	281	267	259	303	307	349	381	473	428
95th percentile	277	341	308	317	319	436	330	405	328	331	281	292	299	352	340	308	367	355	432	522	685	556
<i>Only New AI and Major New Use Section 3 New Registrations (Excluding Supplemental Distributor Products)</i>																						
25th percentile	440	461	353	463	268	365	368	447	333	418	314	581	480	474	373	272	627	485	462	865	617	875
50th percentile	796	688	546	820	428	623	448	629	548	582	502	1050	652	895	1008	620	943	765	750	1398	1326	1086
75th percentile	814	814	798	1058	602	1252	547	883	840	722	861	1258	776	1124	1219	1012	1118	1190	1128	1573	1642	1902
90th percentile	986	1154	932	1229	705	1619	625	957	1058	2050	1000	1365	1149	1223	2721	1158	1400	1420	1436	1651	2165	2516
95th percentile	1013	1212	952	1459	864	1619	659	1000	1238	2245	1043	1365	1268	1267	2946	1185	1533	1456	1570	2503	2889	3210

DPR Timelines – Averages and Percentiles

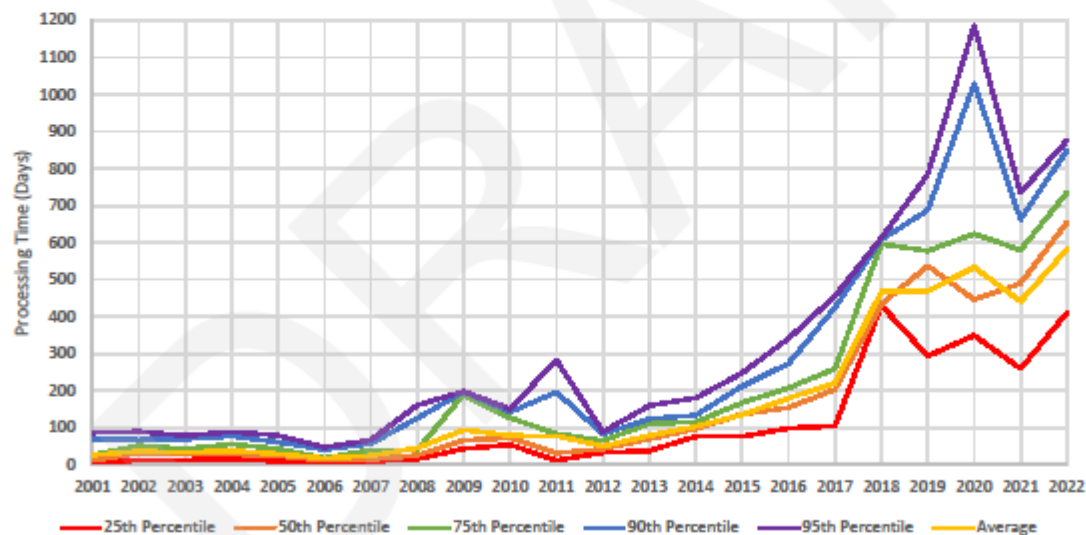
STATION-SPECIFIC EVALUATION TIMELINES

DRAFT – March 29, 2024

It is important to note that following that may lead to deviations in the data presented herein and DPR-generated data:

- We do not have access to predecisional action data. As such, depending on the timing of our Public Records Act requests, we may not have every action finalized by each station in each year if the overall action was still predecisional. We have annotated one instance of this artifact below as an example of this impact.
- We treated actions that were evaluated multiple times by a station as separate data points (e.g., in cases where the station had not recommended registration initially and subsequently reevaluated the action).

Ecotoxicology: All Section 3 New Product Registrations
Does not include supplemental distributor products



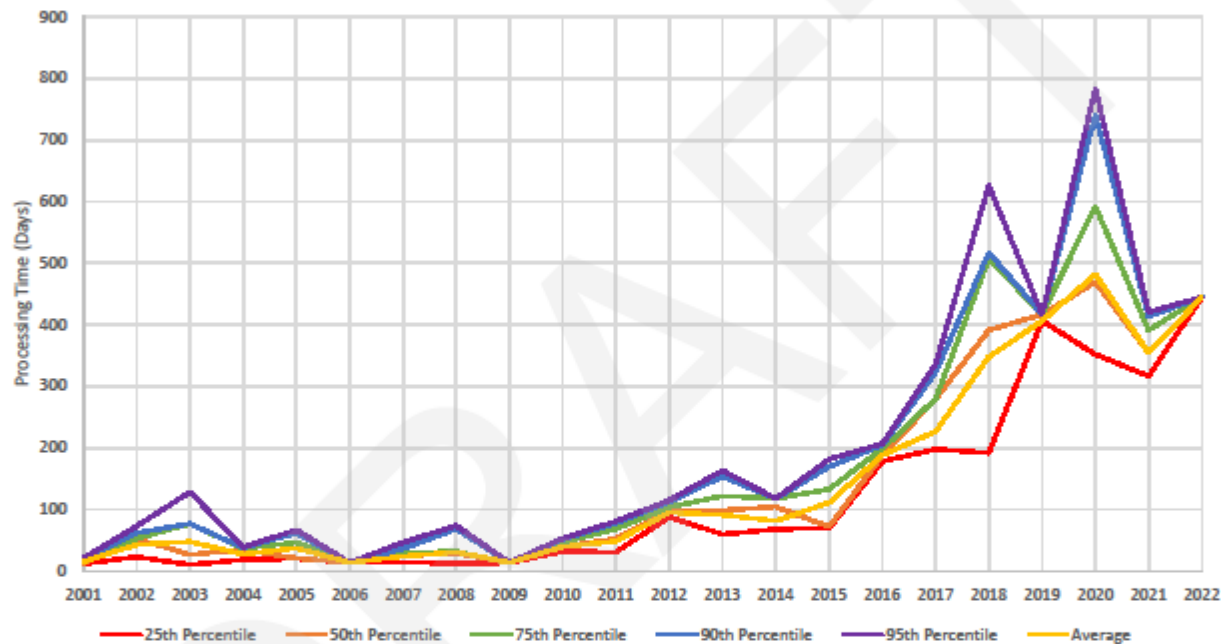
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Ecotoxicology: All Section 3 Product Amendments



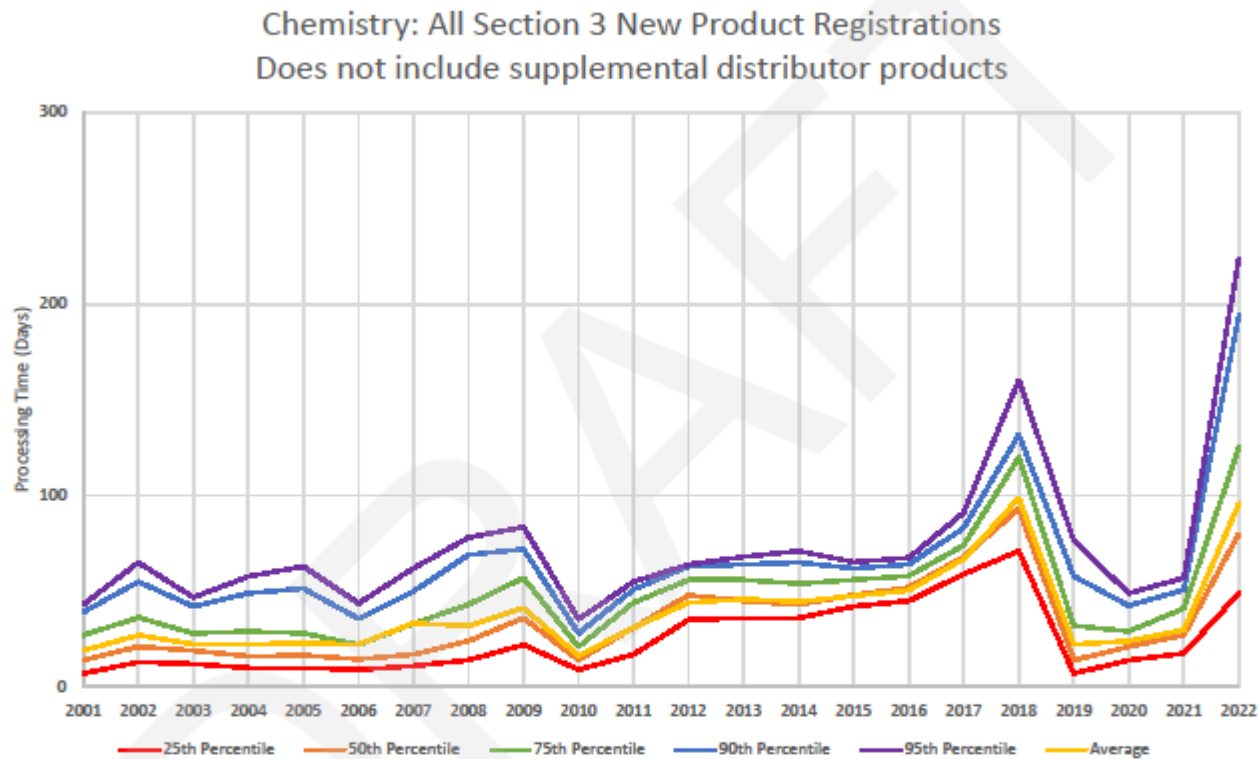
*Note that the data we received from DPR only included one action in 2022 and two actions in 2021 that Ecotoxicology finalized compared with two actions in 2022 and three actions in 2021 identified in CA Notice 2023-7. These discrepancies, which impact the averages presented herein relative to those presented in CA Notice 2023-7, are potentially due to DPR having access to predecisional actions whereas we do not and/or the timing of our Public Records Act requests.

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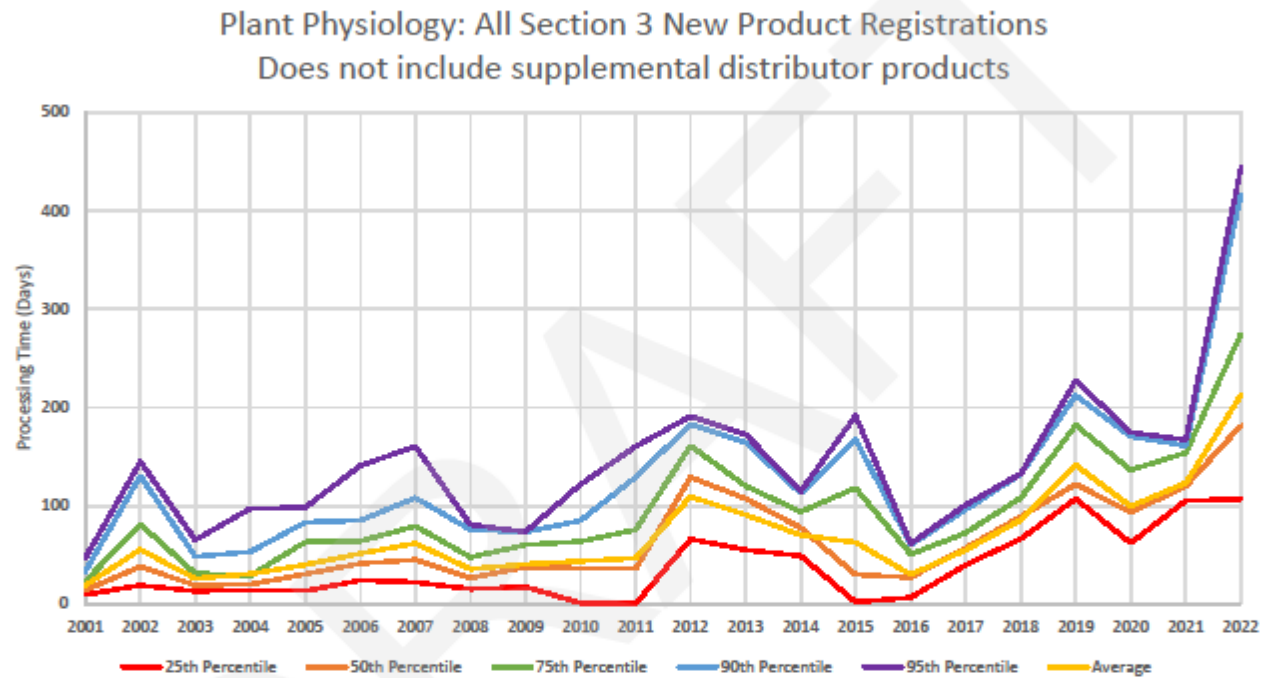


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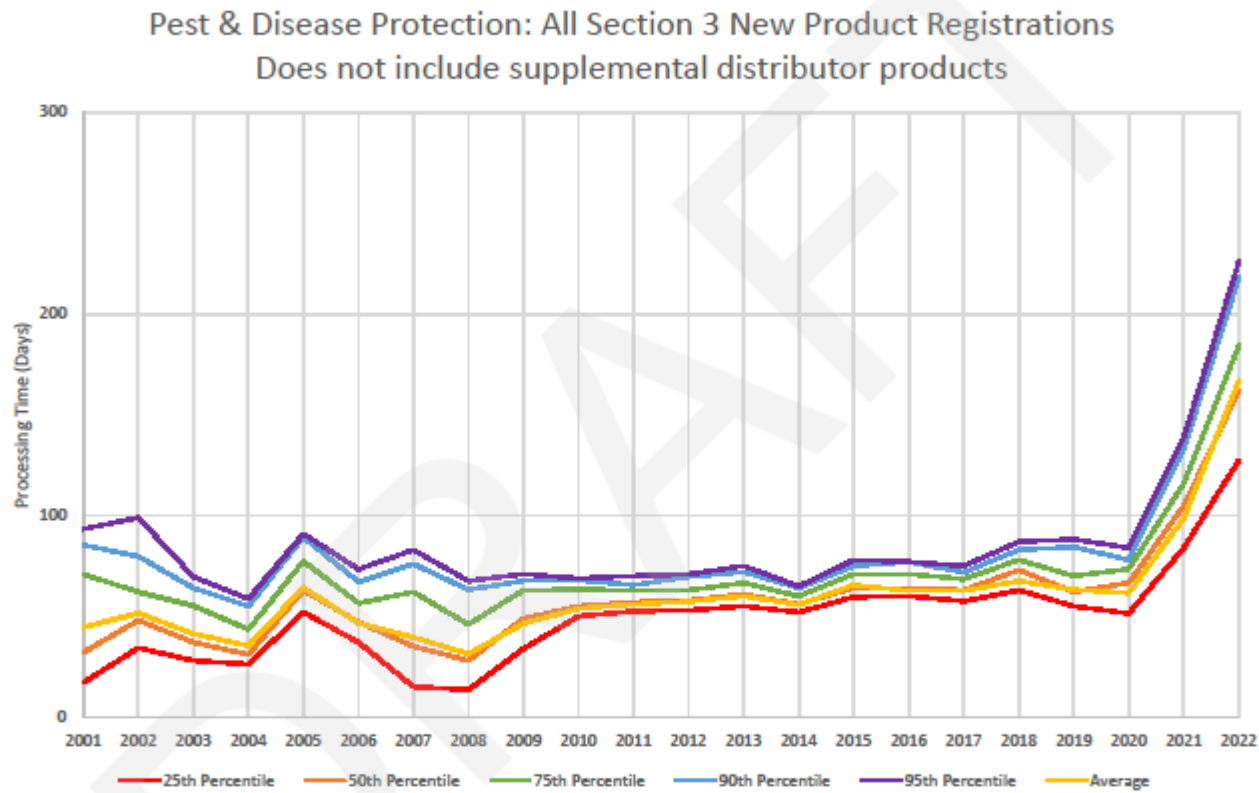


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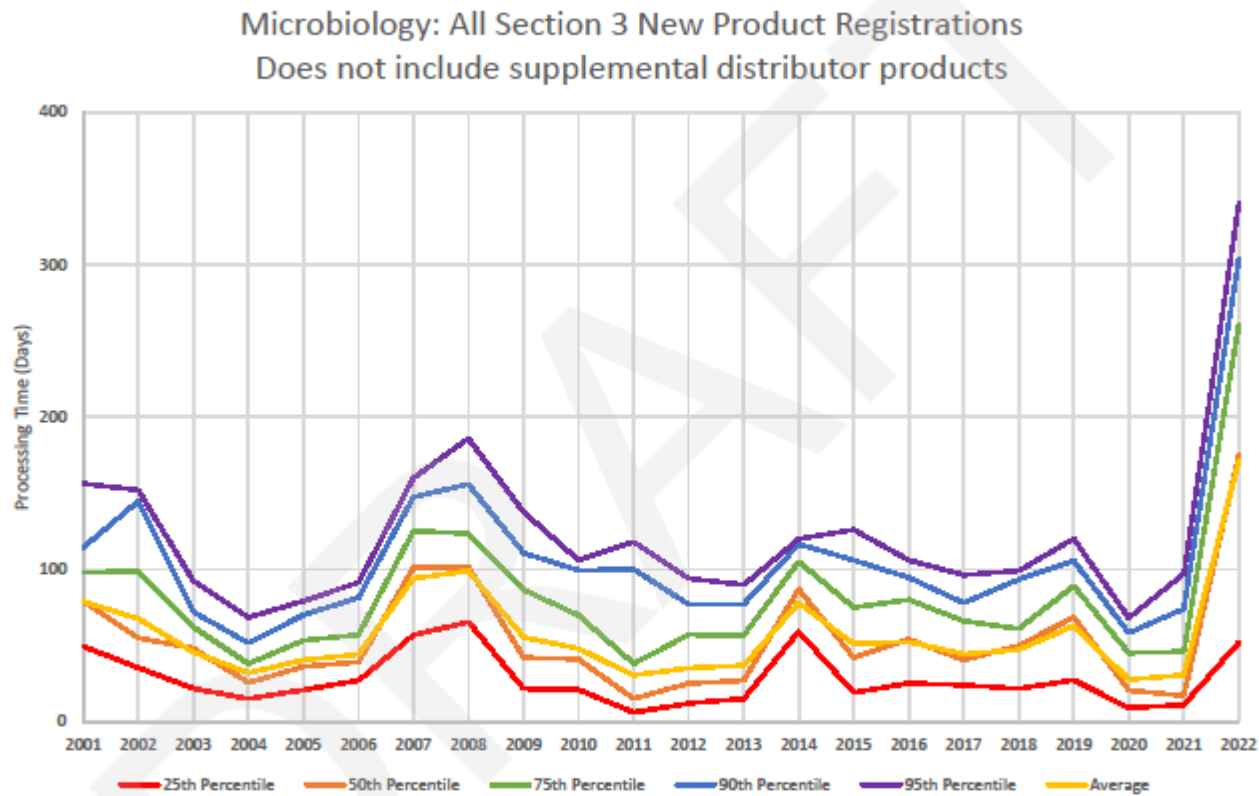


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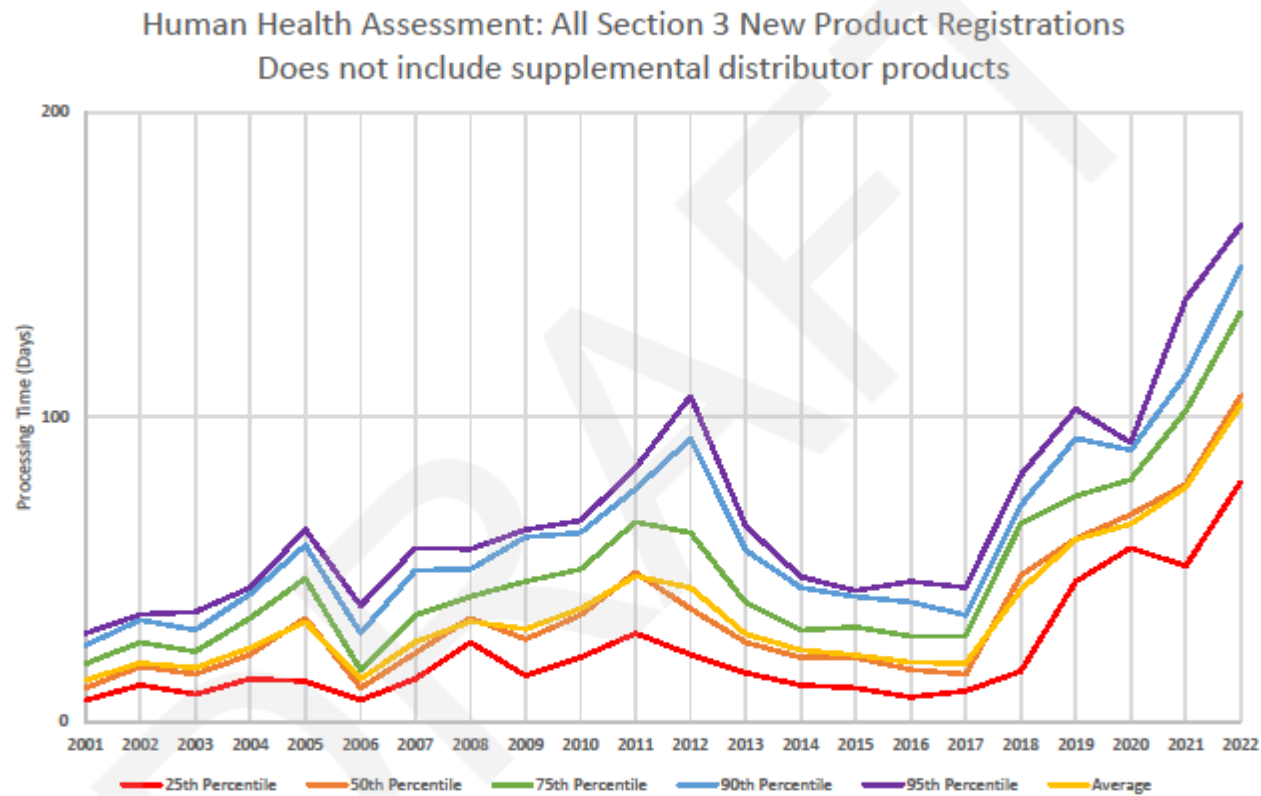


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