May 8, 2025

Submitted online via Public Comment Portal

Dr. Jennifer "JT" Teerlink, PhD
Deputy Director and Science Advisor
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1001 I Street
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Re: *DPR Pesticide Prioritization Workshop*

Dear Dr. Teerlink,

CropLife America (CLA) and RISE (Responsible Industry for a Sound Environment)® would like to thank you for the opportunity to provide comments regarding the information presented at the Department of Pesticide Regulations' *Pesticide Prioritization Workshop*. As you work to refine the draft proposal, we offer the following background and considerations, recognizing that robust processes are already in place to evaluate pesticide products for safety.

Established under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), pesticides are already rigorously reviewed, evaluated, and approved for sale and use by the EPA on an ongoing basis, ensuring they meet the most current safety and scientific standards. FIFRA requires the EPA to engage in a risk-benefit analysis in its regulation of pesticides. A thorough and holistic approach that relies on sound science and robust data and ensures that risk conclusions are as closely tied to real-world conditions as practicably possible. We are concerned that the process outlined fails to recognize the robust pesticide regulatory review, oversight and enforcement system that is in place and ongoing.

We support and promote science-based policy and regulatory processes necessary in the regulation of pesticide products at both the state and federal level. In addition to the extensive review and approval process U.S. Environmental Protection Agency (EPA) applies to pesticides, the California Department of Pesticide Regulation (DPR) also reviews pesticides before they are

registered or used in the state. This dual layer of oversight and enforcement helps ensure safe and proper pesticide use across California through state registration of pesticides, certification of pesticide applicators, and enforcement and research activities. DPR registration and regulation of pesticides also promotes consistency with federal regulation and scientific standards, particularly those for human health and safety and the environment. To avoid regulatory duplication or divergence, we encourage DPR to clearly articulate these additional risk evaluations will align with or supplement existing U.S. EPA risk assessments.

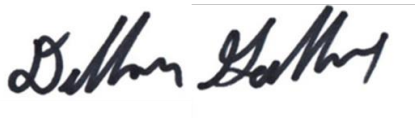
We kindly ask for greater clarity on the criteria DPR will use to identify and prioritize pesticides for review. Specifically, it would be helpful to understand whether prioritization decisions will rely solely on hazard indicators or also account for factors such as existing mitigation measures, historical use patterns, and the regulatory status of the product at the federal level. Establishing clear thresholds and publishing decision rationales will enhance transparency and enable stakeholders to anticipate upcoming reviews. Additionally, pesticide registrants would benefit from guidance on how EPA assessments and federal data will be incorporated into DPR's prioritization and reevaluation process. If DPR intends to request new data from registrants, we encourage the agency to provide clear expectations, timelines, and procedures for submission.

We request clarification on how DPR intends to define and evaluate the feasibility of alternative products or practices. Factors such as efficacy in real-world conditions, economic viability, product availability, and resistance management should all be considered when determining whether an alternative is a practical substitute. To support consistent and transparent decision-making, we encourage DPR to develop a standardized framework for evaluating alternatives. Additionally, in situations where risks can be effectively mitigated, we urge DPR to prioritize risk management strategies—such as updated training—over product cancellation, in order to maintain access to critical pest management tools.

CLA and RISE appreciate DPR's commitment to inclusive public participation and recommend that the department establish regular, structured avenues for stakeholder input outside the Scientific Advisory Committee (SAC). Options such as biannual roundtables, listening sessions, or written comment opportunities would help ensure registrant voices are heard throughout the process. While we understand DPR's goal of avoiding conflicts of interest, the exclusion of registrant representatives from the SAC may limit access to important technical expertise—particularly regarding product chemistry, use patterns, and the feasibility of proposed alternatives. To address this, we recommend the formation of a dedicated technical advisory group or stakeholder forum to provide registrant input in parallel with the SAC's work.

In conclusion, we commend DPR for initiating a collaborative and forward-looking process and respectfully ask that these considerations be addressed to ensure a balanced, inclusive, and effective prioritization program. We welcome the opportunity to participate further as this initiative develops and would be pleased to provide additional technical insight if helpful.

Sincerely,



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RISE (Responsible Industry for a Sound Environment)® is the national trade association representing manufacturers, formulators, distributors, and other industry leaders engaged with specialty pesticides and fertilizers used by professionals and consumers. Learn more at www.pestfacts.org.

CropLife America (CLA) represents the manufacturers, formulators, and distributors of crop protection products in the United States. CLA member companies produce, sell, and distribute virtually all the crop protection products used by American farmers. Learn more at www.croplifeamerica.org.