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pesticide prioritization process

Thanks for the opportunity to provide input into the development of the SPM's prioritization process. This key goal of the SPM Roadmap sets a goal of elimination, not continuous reassessment, not mitigation, not feasibility, not substitution with another inadequately-tested product. Those of us living in agricultural communities will need some convincing that the process will be fair, timely, and effective.

Now, when our federal government is attempting to dismantle DEI, California must hold the line on social and environmental justice. The recently launched notification project is a step in the right direction, but the list of chemicals is way too short, and from the viewpoint of workers and residents in agricultural communities, the steps around revisions and enhancements are much too slow.

For the transition to more sustainable agriculture, prioritization of chemicals to eliminate is a key step. Because of how widely and heavily they're used, it makes sense to put fumigants like 1,3-D and chloropicrin at the top of the list, but there are other highly toxic pesticides not currently restricted.

You say you want the prioritization task to be data driven, yet you are relying on very limited monitoring data (as well as apparently imprecise methodology). The current process for assessment and mitigation is painfully slow. DPR has relied on priority lists that shift in order and number, and is already years behind schedule in reassessments and mitigations. Meanwhile, the science of pesticides and disease causation is rapidly changing, or has been prior to funding now being pulled by the current federal administration. And assessing one active ingredient at a time does not reproduce how doses of chemicals are delivered in the real world.

Here's the sequence and expedited timeline I'd like to see:

- > Identify a list of at least 20 pesticides, or, preferably, group by pesticides with similar mechanisms of action and/or uses. (You could start with 10 if 20 is too many.)
- > Let PCAs, growers, and manufacturers know that these 10/20/groups will be under surveillance with plans for phase out.
- > Add the chemicals/ groups of chemicals deemed highly hazardous and slated for elimination to the Restricted Chemicals list requiring SprayDays notifications.
- > Support work on alternate practice practices and innovative products, non-toxic products with a focus on replacement of listed products.
- > The goal: May the best management win! Use a sustainability matrix with the lowest toxicity weighted at least equally with the best costs and yields.
- > Keep track using PURs and expanded and enhanced monitoring.
- > Is use decreasing? Aim for zero ASAP, not by 2050. Since you'll be using AB 2113, you will need to show your progress to the legislature.
- > And of course, the system should be set up with incentives for decreased use, and for development and promotion of least toxic best practices, real IPM, not product substitution.

While setting targets for elimination is important, this process **MUST** occur in the context of the holistic transition referenced in the SPM. Prime example: fumigants are toxic to humans, but they're also toxic to our soil. Prevention of pests and plant diseases is based on healthy soil, and ag chemicals and practices bad for our soil and ecosystem health should be phased out ASAP. Farmers need support for the transition, and farmworkers and ag communities deserve to live, work, and go to school without fear of being poisoned.

That's the goal of SPM: decreased use of toxic chemicals overall, increased resilience and equity in our ag and pest control systems, as well as elimination of priority pesticides. All actions taken should be in furtherance of that goal.