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May 8, 2025

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

RE: Comment Letter - DPR Proposed Pesticide Prioritization Process

Dear Director Morrison:

Kahn, Soares & Conway (KSC) represents the Pyrethroid Working Group (PWG) on matters pertaining to safe and effective pesticide management and related issues. On behalf of the PWG we appreciate the opportunity to provide comments on the Department of Pesticide Regulation's (DPR) proposed approach to developing a pesticide prioritization process.

We submit this letter to help inform DPR of the PWG's proactive stewardship efforts that are occurring to protect the environment through safe and responsible pyrethroid pesticide use, and the importance of this critical tool. We have partnered with several associations to submit joint comments regarding this proposed pesticide prioritization process. Together, we've expressed significant concerns about DPR's development of a new, resource-intensive framework that lacks explicit legislative authorization from either previous statutes or AB 2113. Instead, we encourage DPR to prioritize improving California's pesticide registration system and enabling pathways that facilitate access to a more comprehensive set of tools that meet environmental and productivity goals.

By prioritizing the development of a more diverse toolkit that addresses both environmental concerns and productivity needs, we can better serve all stakeholders. Recentring focus on registration process efficiency ensures timely access to safe, effective pest management solutions while preserving DPR's risk-based assessment framework and fulfilling its fundamental mission to support food and fiber production. Should DPR choose not to act on this recommendation, we value the opportunity to express our support for the group comments provided, which emphasize the importance of establishing a scientifically rigorous process that achieves these objectives.

By way of general background, PWG is a recognized authority for research and information regarding pyrethroid-based pesticides. As the leading manufacturers of pyrethroid pesticides, PWG members work with federal, state and local regulators to ensure that their products are used properly. The PWG is comprised of the following companies: AMVAC Chemical; BASF Corporation; Bayer CropScience; FMC Corporation; Syngenta Crop Protection; and Valent USA LLC.

The use of pyrethroids provides many public health benefits. Pyrethroids are used on target insects such as mosquitoes, cockroaches, bed bugs, ticks and other public health pests, which can spread diseases to humans. When applied correctly, pyrethroids pose little threat to the environment.

As DPR has identified surface water monitoring as a key data source in their proposed process, it's worth highlighting that the PWG has played a pivotal role for more than ten years in educating pest control professionals, homeowners, and gardeners about appropriate pesticide application methods that safeguard water quality through a program developed and executed in partnership with DPR. The PWG has also launched its newest stewardship program that specifically targets agricultural uses of pyrethroid pesticides. Brief descriptions of the PWG's on-going and newly launched stewardship programs are as follows:

- Apply Responsibly is a stewardship program aimed at educating gardeners and homeowners about the proper use of pesticides – especially how to prevent runoff into waterways. Along with DPR, the Apply Responsibly program has also partnered on public awareness campaigns with municipalities, including the Cities of Roseville and Santa Clarita.
- “Protégé Su Hogar” or “Protect Your Home,” is a Spanish language program, primarily focused in Los Angeles and Southern California. The program is geared toward stewardship of homeowner use of pyrethroids in urban communities.
- “PWG2PMP,” is a stewardship program for structural pest control professionals, and it consists of educational materials and videos.¹ This industry alliance effort aggressively promotes DPR's label changes to ensure proper application methods are being followed to protect California waterways. The PWG2PMP program includes providing Pest Control Operators (PCOs) with the most current policies, regulations and training pertaining to pyrethroids.

PWG also supports ongoing research into practical tools for farm use. This research seeks to limit pesticide runoff from farms into nearby waterways. Through these efforts and

¹ Pyrethroid Working Group PWG 2 PMP Website, available at: <https://www.pwg2pmp.com>

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others, the PWG seeks to ensure proper use of these important materials for protection of the environment.

In conclusion, pyrethroids remain essential tools for both public health protection and agricultural production, and when applied according to guidelines, they present minimal environmental risk. As DPR evaluates prioritization strategies to advance sustainable pesticide management objectives, we encourage a focus on strengthening the efficacy of the current pesticide registration processes in ways that facilitate innovation in pest management technologies and access to a more comprehensive set of tools.

On behalf of the PWG, we appreciate the opportunity to comment on the proposed approach to developing a pesticide prioritization process. Please contact me at tdunham@ksclawyers.com if you have questions regarding the comments contained herein.

Sincerely,

KAHN, SOARES & CONWAY, LLP



Theresa A. Dunham

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