

Allison Johnson

Please see comments of the Natural Resources Defense Council attached. These comments are submitted by the organization, but only "Individual" is available in the "Submitted By" drop-down menu.



May 8, 2025

Submitted via [DPR Public Comments Website](#)

JT Teerlink, Deputy Director and Science Advisor
Department of Pesticide Regulation
1001 I Street
Sacramento, CA 95814

Re: Proposed Pesticide Prioritization Process & Scientific Advisory Committee

Deputy Director Teerlink,

Thank you for the opportunity to provide input on the Department of Pesticide Regulation's (DPR) [proposed pesticide prioritization process](#) and scientific advisory committee (SAC). DPR's pesticide prioritization process should ensure pesticides that pose widespread harm to ecosystems and people in California – such as neonicotinoids¹ – are addressed expeditiously and comprehensively. The information DPR has provided to date lacks adequate detail for us to determine whether the proposed process will achieve this foundational goal.

DPR requested input on the proposed prioritization process, the structure for submission of potential priorities, and the areas of expertise that should be represented on the SAC. We offer preliminary comments in all these areas below. We also urge DPR to promptly provide additional detail to stakeholders, to allow us to fully understand and assess DPR's proposed approach.

I. Prioritize Actual, Widespread Impacts in the Prioritization Process

A primary goal of the pesticide prioritization process should be to gather and take action on information about serious adverse impacts from pesticides that DPR may not already have in its possession or may not have adequately assessed. Pesticides that are widely used and pose cross-cutting threats should rank the highest and be addressed with urgency. DPR's proposed process appears to miss this mark.

DPR proposes that each year it will discuss up to four agency-identified priorities, two SAC-proposed priorities, and two public-proposed priorities. For the agency-identified priorities, DPR indicates it will base the agency's prioritization on active ingredient ranked lists for human health, aquatic organisms, pollinators, and terrestrial organisms, including lists that do not yet exist. It is not clear how DPR would weigh various active ingredient ranked lists against each other or compare the potential priorities that follow from the lists with the SAC and public-proposed priorities.

Rather than developing elaborate ranking systems within DPR focused on isolated categories of harm and putting less emphasis on SAC and public input, DPR's process should prioritize

¹ See NRDC Fact Sheet, *Neonics: The Toxic Truth* (May 2024), <https://www.nrdc.org/sites/default/files/2024-05/neonics-toxic-truth-fs.pdf>.

actively occurring adverse impacts, particularly where both people and the environment are at risk and the benefits to farmers are limited. For example, a pesticide that poses documented threats to people and other mammals, pollinators, birds, and aquatic ecosystems, accumulates in ecosystems over time, and has limited economic benefit to farmers should be identified as high priority. The priority assigned should follow from the substance and the harm, regardless of the source of the proposal. DPR should also leverage the Sustainable Pest Management Working Group's roadmap and input, to identify major opportunities for shifting to more sustainable options.

II. Keep Structures for Input Simple and Accessible

We support DPR's proposal for a simple process for submitting potential priorities. The process should allow anyone in the state impacted by pesticide use or concerned about the impacts of pesticide use on our environment to submit a priority with relative ease. DPR should clarify the timeframe and public notification process for submissions.

In addition, DPR should consider creating a form with checkboxes that align with the prioritization process, to improve the quality and consistency of information received. For example, the form could state: Are you concerned about impacts to: Humans, Pollinators, Aquatic Organisms, Terrestrial Organisms, Other (and allow multiple selections).

III. Prioritize Diverse Experience on the Scientific Advisory Committee

We support the SAC areas of expertise that DPR identified, but also propose adding several other areas, to ensure the SAC has the breadth and depth of knowledge necessary to protect California's diverse populations and ecosystems. DPR should consider seeking out expertise in: entomology, ecology, wildlife biology, conservation biology, organic agriculture, soil health and microbiology, agricultural extension, plant breeding, and public health.

DPR should also seek to strike a balance between experience and inclusivity on the SAC. While it is appropriate to require a demonstrated ability to work constructively and effectively in a multi-stakeholder environment, requiring prior service on a scientific committee would inappropriately narrow the pool of potential SAC members and prevent individuals at earlier stages of their careers from participating.

Finally, DPR should build in safeguards to prevent individuals with conflicts of interest from serving on the SAC. Policies that mandate the disclosure of financial conflicts of interest (COI) among individuals serving on scientific committees are essential for ensuring transparency.² Across fields including pharmaceuticals, tobacco, nutrition, pesticides, and industrial chemicals, research has consistently shown that studies sponsored by industry or conducted by researchers with financial conflicts are more likely to yield findings and conclusions favorable to the sponsor's product.³ Efforts to obscure, minimize, misrepresent, or sow doubt about evidence of

² N. Chartres et al., Conducting evaluations of evidence that are transparent, timely and can lead to health-protective actions, *Environ Health* 2022 Dec 5;21(1):123, <https://pubmed.ncbi.nlm.nih.gov/36471342/>.

³ Jennifer B. Sass & Aaron Colangelo, European Union bans atrazine, while the United States negotiates continued use, *Int J Occup Environ Health*, 2006 Jul-Sep;12(3):260-7, <https://pubmed.ncbi.nlm.nih.gov/16967834/>; Jennifer B. Sass, Nathan Donley, & William Freese, Neonicotinoid pesticides: evidence of developmental neurotoxicity from regulatory rodent studies, *Front*

harm can contribute to weakened or delayed policies and practices needed to protect human health and wildlife. On an important scientific review committee such as this one, both real and perceived conflict risks must be considered, as even a perception of bias may reduce the public's trust in the recommendations of the SAC.

IV. Put the SAC and Prioritization Process into Action Promptly

Every day that harmful pesticides remain in use in our state, children are robbed of their full potential to grow and the ecosystems we depend on falter. We appreciate DPR's efforts to gather input, and we urge you to act on that input promptly and use the prioritization process to protect California's future.

Respectfully,

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Toxicol. 2024 Oct 2;6:1438890, <https://pubmed.ncbi.nlm.nih.gov/39415959/>; D. Michaels, Doubt is their product: How industry's assault on science threatens your health, 1st ed. New York: Oxford University Press (2008); D. Michaels, The triumph of doubt: Dark money and the science of deception, 1st ed. New York: Oxford University Press (2020); RF Goldberg & LN Vandenberg, The science of spin: Targeted strategies to manufacture doubt with detrimental effects on environmental and public health, Environ Health, 2021, <https://doi.org/10.1186/s12940-021-00723-0>; DE Barnes & LA Bero, Industry-funded research and conflict of interest: an analysis of research sponsored by the tobacco industry through the Center for Indoor Air Research, J Health Polit Policy Law, 1996, <https://doi.org/10.1215/03616878-21-3-515>; CL Soskolne et al., Toolkit for detecting misused epidemiological methods, Environ Health. 2021 Aug 19;20(1):90, <https://doi.org/10.1186/s12940-021-00771-6> (Erratum in: Environ Health. 2022 Nov 12;21(1):109, <https://pubmed.ncbi.nlm.nih.gov/34412643/>); Jennifer B. Sass & HL Needleman, Industry testing of toxic pesticides on human subjects concluded "no effect," despite the evidence, Environ Health Perspect., 2004, <https://doi.org/10.1289/ehp.112-1241878>; D Mandrioli, CE Kearns, & LA Bero, Relationship between research outcomes and risk of bias, study sponsorship, and author financial conflicts of interest in reviews of the effects of artificially sweetened beverages on weight outcomes: a systematic review of reviews, PLoS One, 2016, <https://doi.org/10.1371/journal.pone.0162198>; A Lundh et al., Industry sponsorship and research outcome: systematic review with meta-analysis, Intensive Care Med., 2018, <https://doi.org/10.1007/s00134-018-5293-7>; DE Barnes & LA Bero, Why review articles on the health effects of passive smoking reach different conclusions, JAMA, 1998, <https://doi.org/10.1001/jama.279.19.1566>; L Bero et al., The relationship between study sponsorship, risks of bias, and research outcomes in atrazine exposure studies conducted in non-human animals: systematic review and meta-analysis, Environ Int., 2016, <https://doi.org/10.1016/j.envint.2015.10.011>; V Yank, D Rennie, & LA Bero, Financial ties and concordance between results and conclusions in meta-analyses: retrospective cohort study, BMJ (Clinical research ed), 2007, <https://doi.org/10.1136/bmj.39376.447211.BE>.