



June 30, 2026

Karen Morrison, Director
California Department of Pesticide Regulation
1001 I Street, Sacramento CA 95814
Karen.Morrison@cdpr.ca.gov

RE: SPM ADVISORY COMMITTEE

Dear Director and Sustainable Pest Management Program Staff:

Californians for Pesticide Reform (CPR) appreciates DPR's adoption of the Sustainable Pest Management (SPM) Roadmap, the formation of the SPM Advisory Committee, and the Department's recognition that California must transition toward more sustainable approaches to pest management.

During the initial meeting of the SPM Advisory Committee on June 15, 2026, we were encouraged by discussions regarding:

- improving pesticide use data, including urban pesticide use reporting and incorporation of target pest and disease information into pesticide use reporting systems to better understand pest pressures, critical uses, and potential alternatives;
- using state institutional procurement to act as a key driver of SPM;
- increasing grower participation, peer-to-peer learning, and landscape-scale approaches to pest management;
- incorporating SPM training into continuing education requirements for pest control advisors;
- developing hazard indices and classification systems, such as color-coded approaches, that help identify the least harmful pest management practices and products; and
- establishing tools and metrics for measuring progress toward sustainable pest management

Critical Next Step: Establishing Timelines, Milestones, and Phase-Out Pathways to Eliminate Priority Pesticides by 2050

The most visionary and important component of the Roadmap is its commitment to the "North Star" goal of eliminating the use of Priority Pesticides by 2050 through a transition to sustainable pest management practices. *Above all else, we recommend that the SPM Advisory Committee be charged with developing, by June 2027, a timeline, process, and interim milestones for achieving this crucial goal.*

145 E Hermosa St, Lindsay, CA 93247
559-239-9411 • www.PesticideReform.org

We are concerned by statements made by DPR staff during the June 15 meeting indicating that the SPARC Committee will not identify a list of Priority Pesticides but will instead focus on mitigation recommendations and prioritized actions within DPR's existing authorities.

We appreciate that mitigation measures are an important part of reducing immediate harms from hazardous pesticide use. However, mitigation alone cannot substitute for the Roadmap's broader commitment to eliminate the use of Priority Pesticides by 2050. If DPR does not charge the SPM Advisory Committee and SPARC with helping identify Priority Pesticides¹, develop reduction milestones, and establish phase-out pathways, California risks creating a process that manages continued use of hazardous pesticides rather than driving the transition away from them.

It is critical that DPR establish transparent interim targets, milestones, and transition timelines that provide growers, pest control operators, researchers, technical assistance providers, and others with clear expectations regarding future priorities. Such planning would help identify where additional research, incentives, and support are needed while providing certainty regarding the direction of California policy.

Measuring Progress and Ensuring Accountability

California should establish transparent methods for tracking reductions in Priority Pesticide use, adoption of sustainable pest management practices, environmental outcomes, and other indicators of progress. Any pesticides under consideration for Priority Pesticide designation should be publicly identified, and Priority Pesticides should be tracked using pesticide use reporting data to measure and publicly report reduction trends over time.

The Committee should develop clear metrics for supporting transition and for measuring progress toward the Roadmap's goals. Developing and maintaining these metrics should be considered one of the Committee's core responsibilities.

The Committee Needs a Comprehensive Understanding of All Tools Available to Support SPM

A recurring theme throughout the meeting was discussion of certain grant programs, incentives, and technical assistance programs² that could support transition to sustainable pest management.

- We appreciated DPR's interest in developing materials to help make information regarding these SPM-related funding and technical assistance opportunities more useful

¹ California already has access to scientifically vetted information regarding some of the state's most hazardous agricultural pesticides. As a starting point, DPR should consider using the pesticides already identified and prioritized by the California Office of Environmental Health Hazard Assessment (OEHHA) in CalEnviroScreen 4.0

(<https://oehha.ca.gov/media/downloads/calenviroscreen/report/calenviroscreen40reportf2021.pdf>)

and then organizing those pesticides into broader categories based on common hazards, modes of action, environmental persistence, or exposure concerns. Such categories could include neurotoxic pesticides, including organophosphates and other cholinesterase-inhibiting pesticides, PFAS pesticides, and particularly hazardous application methods such as fumigation, aerial spraying, and air-blast spraying.

²

to potential applicants and echo Committee members' call for inclusion of additional information, including: clear eligibility requirements, which practices are supported, average award sizes, technical assistance availability, application timelines, and whether funding is currently available (to our knowledge, for example, neither the Organic Transition Pilot Program nor the Pollinator Habitat Program are allocating new funds).

- We recommend adding to this resource list by analyzing other incentives and support offered by additional partner agencies, universities, extension programs, Resource Conservation Districts, nongovernmental organizations, and other relevant entities who are advancing sustainable pest management.
- DPR will need to allocate time and resources to increasing farmers' access to safer pest management practices and products, with an emphasis on practices. The support for and adoption of new tools and products will get the support of those entities whose economic wellbeing benefits from their sale and adoption. On the other hand, the agroecological practices that individually, and more effectively in combination, function to PREVENT pest problems will require more government support as they do not benefit from private sector support afforded the suppliers of commercial products.
- We also recommend the Committee receive information regarding the overall scale of these investments and whether current funding levels for these programs and initiatives are sufficient to support the transition envisioned by the Roadmap.

In addition to these incentives that can *support* adoption of pest management practices, DPR should also clarify the regulatory tools at its disposal that could act to *discourage* continued use of the most hazardous pesticides, such as reevaluations, restricted-material classifications, enforcement priorities, and pesticide-use reporting.

As part of this process the Committee should assess whether existing regulatory tools are sufficient to achieve the Roadmap's goals. This discussion should include, for example, whether DPR's current ponderous reevaluation process and timelines are adequate, whether additional resources or statutory changes are necessary, and whether DPR should take a more precautionary approach to registering new pesticides when safer and feasible alternatives already exist.

Assess Current Structures That Could Inhibit Progress Toward Sustainable Pest Management

The Committee should also explore whether existing structures align with the Roadmap's long-term objectives:

- **Mill Fee:** DPR's budget, for example, is substantially supported by the mill assessment on pesticide sales, raising important questions about how the Department will be funded as California seeks to reduce reliance on hazardous pesticides. The Committee should consider whether reforms to the mill assessment could better reflect the societal and environmental costs associated with the most hazardous pesticide products while encouraging transition toward safer alternatives and sustainable pest management practices.
- **Pest Control Advisors:** Similarly, the Committee should also examine whether existing pest-control advising structures align with the goals of sustainable pest management. In particular, it's concerning that some pest control advisers who work for pesticide dealers may receive commissions or other financial incentives tied to pesticide sales. This creates

an inherent tension with SPM goals because advisers may benefit financially from recommending pesticide use rather than non-chemical approaches, prevention-based practices, or lower-risk alternatives.

- **Cost Analyses:** The Committee would benefit from a discussion of the broader economic costs associated with pesticide-dependent pest management systems. California incurs significant costs associated with pesticide contamination, environmental degradation, public health impacts, regulatory oversight, monitoring, remediation, and other downstream consequences of pesticide use. Yet these costs are not reflected in DPR's pesticide regulatory decisions. A comprehensive assessment of these costs could help policymakers and regulators better understand the economic benefits of transitioning toward more sustainable pest management systems. The Committee should explore whether California's decision-making frameworks adequately account for environmental, public health, and community impacts when evaluating pest management policies and how they contribute to or alleviate racial and other social disparities.

Without understanding the full range of available tools as well as current structures that may be inhibiting progress toward sustainable pest management, it will be difficult for the Committee to evaluate how to best position California to achieve the Roadmap's goals.

Understanding Degree of SPM Alignment of Key Agencies' Resources, Funding and Staffing (at least for DPR, CDFA)

The Committee would also benefit from a clearer understanding of how current agency budgets, staffing levels, and resources align with implementation of the Roadmap. Future meetings should include presentations from at least DPR and CDFA regarding staffing levels, funding sources, program priorities, and resource gaps.

Understanding how DPR and CDFA allocate staffing and resources will help illuminate department priorities. For example, DPR continues to devote substantial resources to registering new pesticide products while reevaluations often take many years to complete and alternative pest management approaches receive comparatively less regulatory attention. If California is serious about achieving the goals of the SPM Roadmap, the Committee should understand whether and how current staffing and resource allocations are aligned with a transition toward sustainable pest management.

We appreciate recent investments related to sustainable pest management, including the hiring of DPR's first economist and additional staff within the SPM program. However, the Committee cannot evaluate whether agency resources are aligned with the Roadmap's goals without a more complete picture of staffing and funding across the department. We recommend that both DPR and CDFA provide the Committee with department-wide staffing and budget overviews, including major program areas, staffing levels, funding sources, recent growth trends, and how resources are being directed toward implementation of the Roadmap.

Provide a More Complete Picture of Interagency SPM Collaboration³

Many of the resources necessary to support grower transitions exist outside DPR. Achieving the Roadmap's goals will require coordination among DPR, CDFA, the California Natural Resources Agency, CARB, the University of California, Resource Conservation Districts, and many others.

We appreciate DPR's efforts to coordinate with partner agencies, but we believe the Committee would benefit from a more comprehensive understanding of these partnerships. Future meetings should identify all agencies involved in implementation, describe their respective roles and responsibilities, explain how often coordination occurs, and provide examples of work products, initiatives, or projects that have resulted from these collaborations.

Because many of the resources necessary to support grower transitions are administered by agencies other than DPR, understanding how these partnerships function will be critical to evaluating implementation progress and identifying opportunities for improvement.

Learning from Existing SPM-Related Ag Programs and Addressing Grower Barriers

Extensive analyses exist regarding barriers that growers face in accessing existing grant, incentives and technical assistance programs intended to support sustainable farming practices. We recommend DPR staff pull these resources together as a starting point for deeper analysis.

- For example, research examining the Healthy Soils Program⁴ suggests that much of the funding has supported relatively incremental practices rather than more transformative agroecological approaches that reduce reliance on external inputs through biodiversity, ecological functions, and natural pest regulation. The Committee should discuss what lessons can be learned from these experiences and how future investments can better support the long-term systems changes envisioned by the Roadmap.
- Particular attention should be paid to barriers facing small-scale growers, socially disadvantaged farmers, and growers who may have limited access to technical assistance or grant-writing support.

Support Farmer Networks, Demonstration Projects (Especially Organic Infill and Reduced Pesticide Use Near Schools), and Knowledge Hubs

Grant programs constitute only a fraction of the support needed to help farmers transition to sustainable pest management practices. Farmer-to-farmer networks, demonstration projects,

³ We also recommend coordination between DPR Committees, including the SPM Advisory Committee, SPARC, EJAC, PMAC and the PREC.

⁴ Systemic change or input substitution? The impact of the Healthy Soils Program on agroecological transitions within California food systems:

https://www.researchgate.net/publication/389547381_Systemic_change_or_input_substitution_The_impact_of_the_Healthy_Soils_Program_on_agroecological_transitions_within_California_food_systems#fullTextFileContent

trusted local farm-support organizations, peer-learning opportunities, and resource-backed Indigenous-led and other agroecological knowledge hubs are all essential for the successful and widespread adoption of sustainable pest management.

The Committee should receive regular updates on organic transition projects, alternatives demonstration projects, and other efforts that showcase practical alternatives to hazardous pesticides, particularly near schools, childcare centers, parks, and other sensitive sites.

With respect to demonstration or pilot projects, we urge DPR to prioritize and support projects that help growers transition acreage within one mile of schools to organic or other sustainable pest management systems, with an immediate focus on eliminating fumigants and other high-risk pesticide uses in these sensitive areas. Decades of community advocacy have underscored the special vulnerability of children to pesticide exposures and the importance of reducing pesticide use near schools, childcare centers, and other locations where children spend significant time. Because of the special public interest in protecting children, successful demonstration projects near schools have the potential to become particularly influential models for broader adoption, helping to overcome skepticism and accelerate implementation of sustainable pest management practices elsewhere.

Finally, traditional Ecological Knowledge (TEK) remains underrepresented in IPM and SPM frameworks despite offering valuable insights into ecosystem stewardship, biodiversity, and non-chemical approaches to pest management. Contemporary Indigenous-led initiatives are important but often underrecognized contributors to holistic ecological knowledge systems and should be supported as part of California's broader transition to sustainable pest management.

Prioritize State Institutional Procurement

Institutional state procurement policies represent perhaps the most significant market-shaping opportunity available to advance sustainable pest management.

- We are concerned that several Roadmap commitments related to procurement appear to have fallen behind schedule, including commitments regarding:
 - establishment of an SPM purchasing criteria task force and
 - development of purchasing criteria for agricultural products grown in accordance with SPM principles. Attached is a document highlighting the Strategic Plan deadlines we believe have been missed so far, including key ones related to procurement.
- California's Farm to School Program represents a largely untapped opportunity to accelerate adoption of sustainable pest management by using public purchasing power to reward and expand markets for growers implementing SPM practices.

We also recommend that the Committee establish work groups, as the original SPM Work Group did, to collaborate with DPR on developing a verifiable definition of on-farm SPM compliance, as well as purchasing criteria and procurement protocols for state agencies that purchase fresh produce.

Learning from Successful SPM Transitions in Other Countries/States

Finally, the Committee would benefit from a review of successful pesticide-reduction and sustainable farming initiatives implemented in other states and countries. Several countries have achieved meaningful reductions in pesticide use through combinations of pesticide fees, transition assistance, technical support, farmer networks, procurement programs, regulatory measures, and targeted investments in sustainable agricultural practices.

A review of these experiences could help identify effective strategies, lessons learned from implementation challenges, and opportunities for adapting successful approaches to California's unique agricultural and regulatory landscape.

The Roadmap's goals are ambitious and worthy of support. Achieving them will require more than incentives alone. It will require clear priorities, measurable milestones, accountability, adequate resources, coordinated interagency action, support for growers, and a willingness to use the full range of tools available to the state.

We look forward to working with DPR and the Committee to help ensure that California successfully achieves the vision set forth in the Sustainable Pest Management Roadmap.

With thanks for your consideration,

A handwritten signature in black ink, appearing to read "Sarah C. Aird". The signature is fluid and cursive, with the first name "Sarah" being more prominent.

Sarah C. Aird
Policy Director

Missed or Delayed Deadlines

Although DPR's First Strategic Plan Progress Update indicates that DPR has not missed deadlines, details are scant, and it's clear DPR has missed at least a few important target deadlines. The Committee should receive regular updates regarding the status of these commitments.

By 2025, in collaboration with CDFA and others and with public input, compile a list of certifications of agricultural and pest management practices, such as organic certifications, consistent with SPM, and develop a process for documenting IPM/SPM practices for California-grown produce.

By 2025, establish a science-based pesticide prioritization process, informed by a diverse, cross-sector advisory Committee, external engagement, and public input, to prioritize pesticide use risks, identify and evaluate the availability and feasibility of alternatives, and take expeditious action for completing mitigation.

By 2025, increase the number of integrated pest management and SPM technical assistance resources that DPR provides by 10% each year.

By 2025, in partnership with CDFA and UC ANR, increase by 300 the number of Pest Control Advisors trained in sustainable pest management crop practices as part of a holistic approach to reducing pest pressures.

By 2025, develop metrics for analyzing compliance trends and regulatory effectiveness across pesticides, repeat violations, repeat violators, application methods, and counties.

By 2025, establish ongoing ecosystem monitoring and collect information on the impacts of pesticide applications to organisms in the environment, targeting areas most impacted by pesticide use and providing timely public access to the monitoring data and information.

By 2025, evaluate regulations governing pesticide use around schools to inform additional actions to support safe pest management around schools.

By 2025, expand efforts to coordinate and collaborate with a broad range of interested parties representing and serving those who work with or near pesticides, such as community-based organizations, CAC offices, community health workers and organizations, and growers to provide training and resources to migrant and other workers in multiple languages.

By 2025, assess language access needs, including Indigenous languages, across department programs to expand and enhance connection points, services, resources, and safety information offered by DPR.

By 2025, establish collaborations with community-based health organizations to share information on pesticide safety training and enforcement.