Pesticide Action & Agroecology Network,CPR,Farms to Grow, Kitchen Table Advisors, Lideres Campesinas (Sakereh Maskal)

What would make an SPM procurement resource useful enough that it would be used to make business decisions?
The California SPM Food Procurement Coalition, comprised of over 33 organizations spanning grassroots advocacy, policy advocacy, CA growers and food hubs, 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.

Per DPR's SPM Advisory Charter, the SPM Advisory Committee is tasked with 'Identification and championing of procurement and supply chain opportunities.' To support the state's procurement-related initiatives and legislative goals to reach 20% organic acreage by 2045 and meet 60% CA-grown targets by 2026, the aforementioned groups are eager to offer our embedded expertise. This could include informing the development of institutional procurement policies and guidelines, SPM-compliant metrics, incentives, and community-driven solutions to realize our group's commitment to supporting all growers, and ensuring access to contracts for small-scale and Black, Indigenous, and People of Color (BIPOC) growers.

Successful implementation of SPM procurement necessitates the support and technical expertise of food hubs (e.g., facilitating the aggregation, storage, processing, distribution and marketing of regionally produced food products), procurement policy specialists, BIPOC and small-scale growers, technical assistance providers, state agency personnel, and food system advocates. To support DPR with outreach, the SPM Food Procurement Coalition has compiled diverse stakeholder recommendations from leaders in the field. These recommendations are designed to shield growers from burdensome, top-down mandates while also providing a means to verify and record compliance with SPM criteria, principally the elimination of the use of highly hazardous pesticides and protection of ecosystem services.

CRITICAL FIRST STEP: DPR should finalize the list of certifications that are in accordance with SPM criteria and prohibit the use of hazardous pesticides. To create equal access to smaller diversified farmers who do not hold one of the SPM compliant certifications detailed in our Procurement Coalition's compliance proposal, the state should also recognize farmer-led participatory guarantee systems, such as Certified Naturally Grown, that are becoming increasingly common around the globe.

DPR's 2025-2028 Strategic Plan in Goal 1.1 states "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." Defining SPM-compliant farms is critical for moving forward the state's SPM goals. The state will need to make a dedicated effort to reach small-scale, BIPOC growers, accounting for 21% of the state's producer population, to secure institutional contracts. The USDA's 2012 Census of Agriculture reported BIPOC producers had, on average, smaller farm sizes, and research has shown that socially disadvantaged farms are less likely to specialize in cash grains, soybeans and other field crops. Further, 15% of Hispanic operations and 32% of non-Hispanic Asian operations specialized in specialty crops, surpassing all other demographic groups. Small, diversified farms manage pest pressures in line with SPM more readily than producers of crops in monoculture. Crop diversification generally reduces the incidence of pests and disease due to increased population of natural enemies which disrupts the pest activity compared to monoculturing which makes agricultural landscapes more susceptible to pests and diseases.

On September 3, 2025, the SPM Food Procurement Coalition submitted an SPM compliance proposal detailing the certifications we identified as compliant with SPM. Our coalition's analysis of third-party farm-level certifications that prohibit the use of highly hazardous pesticides revealed the following certifications: USDA Organic, Certified Pesticide Free, Demeter, Rainforest Alliance, Regenerative Organic, Sustainably Grown, Xerces Bee Better, Bird Friendly, Real Organic Project, as well as some additional certifications such as Mendocino Renegade and Lodi Rules. We concur with the SPM Advisory Committee members that the Certified Organic designation should be prominent as an SPM-aligned certification. Also, we were pleased to hear that the participatory guarantee system (PGS) Certified Naturally Grown (CNG) was also identified as clearly SPM-compliant. CNG is a community-based, farmer-verified system that follows standards akin to the NOP organic standards. While CNG has only six current certifications in California, it has over 750 certifications in the U.S. and Canada. Participatory Guarantee Systems use farmers and community members to verify production practices against organic standards instead of a 3rd party inspection system. Globally, over 1.3 million producers utilize PGS spanning over 75 countries, although only a handful of growers are CNG certified in CA. The Procurement Coalition enthusiastically supports the state in scaling up SPM-compliant agriculture. To ensure successful implementation, DPR should work closely with civil society and farmer-led Food Hubs to assist growers in obtaining verifiable certifications and PGS-based certifications that prohibit the use of hazardous pesticides, such as CNG. Further, the state should allocate resources to CNG and CDFA's Organic Transition program to help growers become SPM-compliant. This unleashes vital economic opportunities and supports the state's environmental sustainability, equity, and public health goals through strategic food purchasing.

Defining SPM compliance is a prerequisite before we can begin to educate Procurement Directors at state institutions about the importance of procuring SPM-grown food. Without a definition, Food Hubs are also unable to educate their growers about becoming SPM-compliant, and successfully secure institutional procurement contracts. We urge DPR to use their list of 30 SPM-aligned certifications to develop a tiered process for buyers in which Tier 1 is mandatory and includes all certifications that prohibit the use of the internationally-recognized list of Highly Hazardous Pesticides or the Office of Environmental Health Hazard Assessment (OEHHA) list of volatile and hazardous pesticides. Tiers 2 and 3 would address additional SPM categories; incentives (to be determined) would increase as the tiers increased.

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Which partnerships should DPR engage to activate markets for SPM?

DPR should work with the Department of General Services (DGS) to increase sourcing volumes from SPM-compliant individual farms and from regional, farmer-led food hubs (FLFH), and food hub networks.

Food hubs aggregate produce from nearby farms to reach the volume that large institutional buyers require. Small-scale and BIPOC growers rely on Food Hubs to reach markets their operations could not serve alone because of the transportation logistics, volume, infrastructure, or financial risk. Without Food Hubs, state procurement contracts tend to flow to the largest farms and distributors, which often source from operations that do not use SPM-aligned practices. Aggregation is therefore essential to the SPM Roadmap goal of increasing state-purchased food grown using SPM by 50% by 2030, and it opens institutional markets to the small, diversified growers best positioned to help meet that goal.

FLFHs are independently owned regional Food Hubs whose core purpose is expanding market access for small scale growers. We recommend that DPR and DGS recognize a Food Hub as farmer-led when it (1) is not a division or subsidiary of a larger distribution company, (2) sources primarily from farms under 50-100 acres and (3) identifies the farm of origin, production practices, and certifications for the products it sells. The state already distinguishes community-scale hubs by size: CDFA's Farm to Community Food Hubs Grant Program excluded Food Hubs with an average annual gross income above $5 million over the prior three years.

FLFH's shorten supply chains and operate on modest margins, so growers keep a larger share of each sale. They maintain food safety plans, hold organic handler certification, and support their growers' Good Agricultural Practices (GAP) certification, giving institutional buyers the compliance assurances they require. FLFHs also keep money circulating in regional economies. A Cornell study found a Food Hub gross output multiplier of 1.75 and an employment multiplier of 2.14. A UC Davis study of the Sacramento region found that locally marketing farms generate $1.86 in regional economic activity per dollar of sales, compared with $1.42 for other producers, largely because they buy most of their inputs within the region. Most importantly for SPM, FLFHs keep small, diversified farms economically viable, sustaining the crop diversity and biological pest control at the core of the Roadmap. Many of these growers already practice SPM without holding a certification, and FLFHs are the most direct channel for helping them document it.

Currently, California hosts 14 FLFH's, and in 2025, CDFA allocated 13.75 Million in funding to the Farm to Community Food Hubs program to 12 nonprofits, Tribal-led organizations, and farmers to implement and expand community food hubs throughout the state. To support the longevity, financial viability, and resilience of Food Hubs, DPR should support Food Hubs in the following ways:

DPR should work with DGS to integrate Food Hubs into procurement criteria

FLFHs are the connective tissue between small, BIPOC, and agroecological growers and state institutions, and they are essential to meeting the state's existing procurement targets, including 60% California-grown by 2026. DGS should award additional evaluation points in institutional RFPs to bids that source through FLFHs, scaled to the share of the product that is SPM-verified. This weighting would let FLFHs compete on the value they deliver rather than on price alone, and would give their member growers a direct incentive to become SPM-compliant. DPR and DGS should work with the Procurement Coalition to identify ways to support Food Hubs in RFP's to incentivize Food Hub members to become SPM-compliant and support the state's sustainability targets. DPR should also work with the SPM agricultural economist and explore legislative avenues to support Food Hubs to meet low price points that preclude Food Hubs from securing institutional procurement contracts. DPR should also incorporate an appropriate grace period to allow Food Hubs to achieve SPM-compliance.

DPR should aid Food Hubs in achieving SPM compliance via intermediaries who have cultural competency and skill level expertise on food hub compliance, logistics, and accounting.

One prominent goal of the SPM Roadmap is to increase the amount of state purchased food grown using SPM by 50% by 2030. Success, in part, is reliant on participant growers in Food Hubs attaining SPM verification. Goal 13,14, and 15 (D) in the SPM Roadmap states 'Expand and improve CDFA programs to increase access and funding for farmers, especially for farmers from socially disadvantaged or historically marginalized communities, to support near-term grower transition to SPM'.

DPR/CDFA should create venues by which procurement directors/institutional buyers can interface with Food Hubs

The UC Procurement system facilitates direct institutional and supplier buyer pairings. This system works by categorizing specific goods and services, where users can locate campus buyers and establish sourcing relationships, negotiate contracts, and manage pricing. DPR and CDFA should work with the Procurement Coalition and UC Procurement to help suppliers become SPM-compliant and educate procurement directors about the importance of procuring SPM-grown foods. DPR should also create other avenues for state institutional staff in coordination with technical assistance providers (Resource Conservation Districts, UC resources, non-profits, etc.) to support Food Hubs with accessing and executing procurement contracts.

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(1) Food and Agriculture Organization of the United Nations (FAO). Participatory Guarantee Systems (PGS) for Sustainable Local Food Systems. FAO, 2018, https://openknowledge.fao.org/server/api/core/bitstreams/271c894c-7eb3-45fd-8f7a-e00f17133ac1/content. [1]
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