Jennifer Clarke

What types of SPM projects should DPR fund? Some ideas for projects to focus on:

- Active ingredients or products on DPR's Continuous Evaluation and Monitoring table
- Emerging pest threats
- Pest prevention
- Pest management coordination between different landscapes, neighbors, and communities

Note: All projects should have an SPM focus.
Emerging pest threats
Pest prevention

How can DPR turn information we gathered on third-party food certifications with IPM requirements into a useful resource without endorsing any particular certification or creating a new certification?
I would like to call the committee's attention to the California Bountiful Foundation's research and studies, particularly as it considers how growers might demonstrate sustainable pest management. https://www.californiabountifulfoundation.com/research-studies

At a recent meeting, a committee member strongly urged that organic certification be placed high on the list of ways to demonstrate SPM. Organic certification can provide useful documentation for growers who hold it. However, I am concerned that giving it priority could overlook the SPM practices used and documented by growers who are not certified organic.

I especially encourage the committee to review the Foundation's Economic Considerations for Conceptual Organic Policy Targets. This analysis examines a proposed target of 30% organic acreage and uses processing tomatoes to illustrate how a large shift in production could affect growers, organic and conventional markets, and consumers. It is an economic assessment of a conceptual acreage policy, not an assessment of certification as an SPM measure. Its relevance to this discussion is the reminder that policy choices involving organic production need careful evaluation of their practical and economic effects.

The Foundation also commissioned research on pesticide restrictions and registration delays using lettuce as a case study. That work is pertinent as the committee considers how SPM recommendations may affect growers' available pest management tools and decisions.

I encourage DPR to assess growers' documented pest management practices directly, including prevention, monitoring, use of cultural and biological approaches, and the basis

for treatment decisions. Organic certification can be one source of evidence, but it should not receive priority simply because it is a familiar certification. The committee's approach should recognize credible SPM practices across California's diverse production systems.

Thank you for considering these studies as the committee continues its work.

If you could have one tool or resource to activate markets for produce grown using SPM, what would you want that tool or resource to do?
I would want a resource that evaluates consumer demand, willingness to pay, and the economic effects of proposed SPM market incentives before they are implemented.

The California Bountiful Foundation's *Economic Considerations for Conceptual Organic Policy Targets* provides relevant context. Using processing tomatoes as a case study, the analysis illustrates how government policies that expand organic production without corresponding consumer demand could depress organic prices, undermine grower profitability, and disrupt both organic and conventional markets.

DPR should consider this research when developing tools to activate markets for SPM produce. Any approach should recognize documented SPM practices across production systems (organic and conventional) and be grounded in demonstrated demand, grower viability, and measurable benefits.