Department of Pesticide Regulation Pesticide Prioritization Process Workshop: Summary of Public Feedback

On April 8, 2025, the Department of Pesticide Regulation (DPR) held a workshop to provide an overview of the department's proposed pesticide prioritization process – a data-driven, transparent, and coordinated approach to identify and prioritize risks posed to human health and the environment by pesticide use. The workshop also outlined the structure for an advisory committee to inform that process. Public feedback collected following the workshop during an open public comment period held between April 8 - May 8, 2025, was used to develop the **Scientific Prioritization and Review Committee** (SPARC). Materials detailing SPARC, including charter, roles and responsibilities, and application for membership, were informed by public comments received. All comments can be found online.

The following is a generalized summary of requests, ideas, suggestions, and recommendations DPR received through written feedback, organized by topic along with responses to recommendations

Topics

Interaction Between DPR Committees

DPR received questions about how DPR's committees interact and if they will work in combination or independently. There were requests for DPR to clearly define where this committee links to other DPR committees as well as other state agencies.

DPR has a number of advisory committees each with individual roles and objectives that act independently of each other. Detailed information on the purpose and role of each of DPR's Committees can be found on <u>DPR's website</u>. DPR is responsible for coordinating engagement and information sharing between committees where appropriate. DPR engages with other California agencies. The Pesticide Registration and Evaluation Committee (PREC) is an interagency committee tasked with advising DPR on its regulatory actions and decisions on the proposed registration, renewal, and reevaluation of pesticide products. DPR's work may necessitate more specific engagement in areas of overlapping authorities or interest. The SPARC Roles and Responsibilities document articulates DPR's responsibility to coordinate specific opportunities for engagement and information sharing between committees.

Authority

Stakeholders had questions about DPR's authority to assemble SPARC and how the committee's role aligns with DPR's responsibilities including Assembly Bill 2113, signed in to law in July 2024.

The SPARC Charter includes a section on "Authority" that details SPARC's role in supporting DPR in carrying out DPR's statutory obligation to develop an orderly program

for the continuous evaluation of all pesticides registered in California. The section details how SPARC is in alignment with SPM implementation, AB 2113, and DPR's 2024-2028 strategic plan.

Sustainable Pest Management Roadmap Goals

Comments were received related to broader SPM implementation and alignment with the SPM Roadmap's goals.

The SPM Roadmap consists of recommendations and goals to accelerate a systemwide transition to sustainable pest management. DPR's 2024-2028 strategic plan details specific goals related to SPM implementation across all of DPR's work. Development of SPARC builds on the SPM Roadmap recommendation of establishing state-level prioritization process and advisory body consistent with DPR's authorities and responsibilities. SPARC will also strengthen public involvement and transparency of continuous evaluation and mitigation efforts.

Communication

Comments focused on the opportunities for public engagement throughout the prioritization process. There were questions about how DPR will ensure transparency on the process. There were requests to make the potential priorities list available to the public, and there were also concerns about having a publicly available list before the potential priorities have been reviewed.

SPARC Roles and Responsibilities document includes information on public participation and transparency. This includes posting meeting agendas and summaries, recommended priorities from SPARC and the public, and public comments received. The department will post to our website summary information for all submitted potential priorities including but not limited to active ingredient(s), exposure end point of concern, and the person(s) or organization(s) submitting. The outcome of this process and final list of department priorities will be reflected in updates to DPR's Continuous Evaluation and Mitigation Update Table (CEMT).

Alternatives Analyses

Comments were received about what considerations should be taken when evaluating alternatives, including feasibility, efficacy, regional differences, resistance management, and economic considerations, and inclusion of alternative practices. There were questions on role of CDFA's Office of Pesticide Consultation and Analysis (OPCA).

Further information on alternatives discussion and work are detailed in the Roles and Responsibilities document. DPR will continue to work closely with CDFA's OPCA on any activities related to pest management alternatives or potential impacts to

agricultural crops. DPR's work related to alternatives would not be duplicative of OPCA's efforts.

Prioritization Process and Submittal of Potential Priorities

Stakeholders had questions and comments about the prioritization process, including methodology, types of data relied upon, number of potential priorities, candidate priorities, and current mitigation and continuous evaluation activities including reevaluations.

The SPARC Roles and Responsibilities document includes more detailed information on the prioritization process. The <u>Continuous Evaluation and Mitigation Update Table</u> will be updated at least annually and reflects DPR's current priorities including shifts that may occur with new priorities. Additional information on the structure and process for submitting potential priorities may be provided once SPARC has been established and may be informed by committee members.

SPARC Membership

DPR received many comments on specific experience or knowledge for prospective members. Requests ranged from specific scientific knowledge and education; expertise in a single commodity or type of pesticide; expertise in environmental policy and management; specific career history such as UC Extension or Pest Control Advisers; having a regulatory background; as well expertise in food safety, agricultural economics, sustainable resource management, or medical background.

DPR has provided a more detailed description of areas of expertise that would be considered as a part of the SPARC application for membership. These descriptions have been informed by the numerous comments received on this topic.