



California Notice 2025-12

TO: Pesticide Registrants and Other Stakeholders

SUBJECT: Submission Prioritization Pilot

BACKGROUND

The Department of Pesticide Regulation's (DPR's) mission is to protect human health and the environment by fostering sustainable pest management and regulating pesticides. To support the mission, the Pesticide Registration Branch (PRB) continually seeks to identify opportunities to improve efficiency, transparency, and consistency in the registration process.

Historically, PRB has processed submissions in the order received ("First In, First Out") to maintain equity across applicants. However, with the implementation of the California Pesticide Electronic Submission Tracking (CalPEST) system, DPR can now better track and categorize submissions. Leveraging this capability, DPR is implementing a six-month pilot program to evaluate whether select submission types can be prioritized to reduce overall processing time and alleviate workload backlogs.

PURPOSE OF THE PILOT

The Submission Prioritization Pilot is a short-term initiative designed to help reduce the current backlog of amendment submissions by identifying and prioritizing specific submission types that are subject to imminent federal deadlines or require minimal processing. This pilot introduces a temporary pre-screening step within each Regulatory Scientist (RS) team's workload queue to streamline the selection process. To assist the pre-screening and prioritization process, DPR recently acquired a document comparison tool that will enhance the efficiency of label reviews. DPR aims to improve overall processing timelines while continuing to ensure timely review of all other submissions.

The pilot will focus on prescreening and prioritizing amendment submissions previously received through the CalPEST Portal through **November 3, 2025**. DPR will complete the prescreen and prioritization process for eligible amendment submissions within six months of the pilot's implementation. DPR will still continue to review all submission types during this time.

ELIGIBLE SUBMISSIONS FOR PRIORITIZATION

Amendment and notification submissions eligible for prioritization under this pilot include:

- Label amendments to comply with U.S. EPA interim or final registration decision documents
- Non-FIFRA related notifications
- Minor label amendments that require minimal processing and no scientific evaluation (e.g., company related changes, removal of uses, correction of typographical errors, reformatting of labels, graphic changes)

- Label amendments that are subject to U.S. EPA existing stock disposition provisions and have an expiration date prior to May 10, 2026 (the end date of the pilot program), as specified in the applicable federal approval correspondence
- Any formulation additions or revisions that do not involve label changes of any type

Note that submissions that include changes beyond the scope of these criteria will not be eligible for prioritization in this pilot.

GUIDANCE FOR REGISTRANTS

If a registrant wishes to provide additional information to assist DPR in the pre-screening process for prioritization consideration, they can:

- Ensure their previously submitted cover letter clearly indicates whether the amendment meets prioritization criteria (e.g., existing stocks, compliance with U.S. EPA interim decision, CSF changes only). If a cover letter was not submitted or the previously submitted cover letter lacks sufficient detail, registrants are encouraged to upload a new or revised cover letter. All cover letters must be submitted by December 1, 2025.
- Alternatively, registrants may contact the Tree team directly by December 1, 2025 to provide the CalPEST ID number along with a clear justification for why the submissions meets the prioritization criteria (e.g., existing stocks, compliance with U.S. EPA interim decision, CSF changes only).

Priority decisions will be based on the most current labels available at the time of the pre-screen. Submissions may lose priority status if newly uploaded labels include revisions that fall outside the established priority criteria. No action is required if the original submission already meets the prioritization criteria.

PILOT EVALUATION

PRB will closely monitor the impacts of the six-month pilot. Key evaluation metrics will include:

- Reduction in average processing time
- Total number of prioritized submissions completed

DPR will periodically review metrics and assess whether any refinements or expansions to the pilot program are needed to ensure meaningful progress in reducing the backlog.

If you have questions regarding this notice, please contact the Registration Ombudsperson at Registration.Ombudsperson@cdpr.ca.gov.

Original signed by

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Date