



CACASA's List of Requests/Concerns for consideration by the California Department of Pesticide Regulation

CACs are responsible for much more than Pesticide Use Enforcement. Under the umbrellas of the California Department of Food and Agriculture and United States Department of Agriculture, the array of additional mandated programs we run is expansive, including: Exotic Pest Detection, Pest Exclusion, Pest Management, Pest Eradication, Seed, Apiary, Statistics, Direct Marketing, Eggs, Organics, Weights & Measures, to list only a few. Additionally, CACs play a vital role in Phytosanitary Export of agricultural commodities, enabling our agricultural industry to prosper in the worldwide market and protecting our trading partners.

CACs need increased support from your agency in order to fulfill our pesticide use enforcement responsibilities and are asking that DPR:

- Recognize that one of the many roles of California Agricultural Commissioners is the enforcement of existing pesticide laws and regulations in California and formally express DPR's commitment to support the California Agricultural Commissioner system.
- Collaborate with CACASA on clarifying the role and responsibilities of each entity with respect to enforcing pesticide use enforcement regulations. As part of this collaboration, it should be noted that DPR should:
 - Support and strongly defend CACs from individuals and agencies that would question the integrity of the work we do to protect our communities.
 - Uphold the highest standard of integrity by being clear when interacting with stakeholders regarding the role DPR plays and what the agency can and cannot do.
 - Not make promises to stakeholders that could negatively impact the state's pesticide use enforcement regulatory program without first evaluating and consulting with other stakeholders that may be impacted by such decisions.
 - Actively communicate regulatory protections in place for our communities, the work of CACs, and the several regulatory changes that have taken effect the past few years aimed at continually addressing community concerns.
 - Do not engage in personnel issues involving CACs, citing and respecting the public law that provides procedures for the dismissal of an Agricultural Commissioner.
 - Emphasize the established hierarchy for addressing issues of concern that prioritizes direct outreach with CACs and then CACASA to gather critical information and evidence.
 - Recommit to follow existing agreements that allow all press releases issued by DPR involving activities of CACs to be reviewed and approved by CACASA prior to distribution.
 - Refrain from promising community members Notification pilots or BETA's, as a priority in counties with known environmental justice conflicts.

California Agricultural Commissioners and Sealers Association



- Defend California's pesticide use enforcement regulatory program from individuals that use misinformation to sway policy makers and alarm the public about pesticide risks, misuse, and environmental impacts that are not based on science or factual accounts.
- Prioritize pesticide use enforcement training of regional DPR offices and CAC staff with a clear timeline for delivering this training.
- Refrain from adding and imposing unfunded mandates upon CACs that are outside the scope of pesticide laws and regulations.
- Acknowledge that the Agricultural Commissioners/Sealer of Weights and Measures system is broader and more complex than just pesticide use enforcement and that our critical work is essential for the viability of the State's overall economy.