

Talking Points

Below are questions that DPR has indicated they would like farmers to comment on. For farmers who wish to participate but do not have time to prepare detailed responses, provided are some simple responses for your use.

Question 1 – Do you currently follow voluntary or mandatory notification requirements for pesticide applications made around schools? If so, what are the requirements and do you have any concerns about following those requirements?

Suggested response if notification is required - Yes, as a responsible grower/applicator, I follow the notification requirements mandated by my county agricultural commissioner [or other entity]. Should a concern arise, I would discuss the matter with the CAC office.

Question 2 – What should DPR consider when developing a regulation that may include notification requirements for pesticide applications made near schools?

- a. Should DPR require notification for certain types of pesticides (fumigants, insecticides, category I, II, or III) or application methods (e.g., aerial, orchard sprayer, ground equipment)? Explain.
- b. What distance should DPR consider for pesticide applications scheduled near school grounds to trigger notification?
- c. What time periods should DPR consider to trigger notification for pesticide applications made near schools?

Suggested response to all parts – DPR should only develop regulations that are based on science or documented evidence of a problem. I already follow the numerous laws, regulations, permit conditions, and label instructions that are currently in place to protect people, including school children.

Question 3 – If notification is required, how and when should you provide notification? What communication tools should be used to notify school administrators? What are the impacts/concerns of providing notification?

Suggested response – I do not believe notification requirements should be required above and beyond what is already required on the product label or by the CAC. Additional notification requirements by the grower or the CAC would unfairly result in added costs and stress resources.

Question 4 - Do you currently follow voluntary or mandatory restrictions for pesticide applications made around schools? If so, what are the requirements and do you have any issues with following them?

Suggested response – As a conscious grower/applicator – I follow all mandatory or voluntary requests by the CAC when applying pesticides around schools. Should a concern arise, I would discuss the matter with the CAC office.

Question 5 – What should DPR consider when developing a regulation that may include restrictions on pesticide applications near schools?

- a. Should DPR restrict the time(e.g. while school is in session) when applications may occur? Explain.
- b. Should DPR restrict certain types of pesticides (fumigants, insecticides, category I, II, III) or application methods (e.g., aerial, orchard sprayer, ground equipment)? Explain.
- c. Should DPR set a distance from the school grounds where applications aren't allowed or should be restricted?

Suggested response – DPR should only develop regulations that are based on science or documented evidence of a problem. I already follow the numerous laws, regulations, permit conditions, and label instructions that are currently in place to protect people, including school children. Application restrictions can result in decreased yields and create other issues that result in economic losses. To subject growers or applicators to such restrictions without science or data to support the need is unfair.

Question 6 - Do you have any issues or concerns about coordinating or managing pesticide application restrictions with school administrators, CACs, or pest control businesses?

Suggested response – Farm management requires coordination with various entities. However, since the proposal is unwarranted, there's no need for a response.

Question 7 - Are there any other impacts to your farming operations that you would like to express?

Suggested response – There are numerous concerns with this proposal.

1. As members of the community, as parents, as humans, farmers care about school children. The proposal unfairly targets growers who farm near schools and insinuates that we need protections above and beyond those already in place. DPR's own data and science do not support this proposal.
2. In many cases, schools have been built many years since the land has been farmed. This proposal unfairly targets growers that could have economic impacts. DPR's own data and science do not support this proposal. The inferred public right-to-know violates a grower's right to farm.
3. DPR's own data and science do not support this proposal.