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June 24, 2022

California Air Resources Board (CARB)

1001 I Street

Sacramento, California, 95814

Submitted Online at <http://www.arb.ca.gov/lispub/comm/bclist.php>

Re: The 2022 Scoping Plan must include more ambitious organic agriculture and pesticide reduction targets

Dear Chair Randolph:

On behalf of the 68 undersigned organizations we thank you for the opportunity to comment on the 2022 Draft Scoping Plan. We appreciate that organic agriculture and pesticide reduction have been included in the draft Scoping Plan for the first time, and urge the Board to keep these critical points in the plan. We also appreciate the reference to the importance of the Sustainable Pest Management Working group's recommendations in achieving California's climate goals.

However, the level of ambition of the Scoping Plan must be increased to maximize the benefits that diversified organic agriculture and reduced pesticide use uniquely provide.

We urge CARB staff to adopt the following recommendations:

1. Include an accelerated and more ambitious organic agriculture target of 30% of agricultural acreage being organically-farmed by 2045

The current target of 20% of acreage being organically-farmed by 2045 does not even keep pace with the current market growth of organic production in California, where organic production increased by 44% from 2014 to 2019 according to CDFA's own data¹. The Scoping Plan is intended to provide California with a path toward ambitious climate goals, and organic agriculture has a key role to play in achieving these goals. We urge CARB to adopt our 30% target by 2030 to maximize the climate benefits that organic farming provides.

2. Include a 50% reduction target in synthetic agricultural pesticide use by 2030, in line with other agricultural economies

We appreciate the inclusion of pesticide use reduction as an intended outcome of transitioning the state towards climate-smart agricultural practices and organic farming (p. 65). In order to measure whether this outcome is being achieved, a target and progress metrics must be adopted. We urge that the Scoping Plan adopt the European Union's Farm to Fork target of a 50% reduction in synthetic pesticide use by 2030 and a 90% reduction in highly hazardous pesticide use by 2050.

3. Exclude pesticide use from the Scoping Plan as a climate-smart strategy

We are concerned that herbicide use has been identified in the Scoping Plan as a climate-smart management strategy for the forest, shrublands and grasslands sectors. The dangers of synthetic pesticide use to the environment, human health and the climate are significant, while many other safer and more ecologically-friendly management strategies exist to reduce the spread of invasive species². Wildfire risk can be mitigated through other effective strategies, such as Indigenous cultural burns³. We call for the Scoping Plan to include these safer and more sustainable management strategies rather than incentivizing increased pesticide use.

4. Include in the final Scoping Plan the commitment to conduct further research on pesticides, including on the disparate impacts of pesticide use, and to provide support to communities affected by pesticides

¹ California Department of Food and Agriculture. (2020). California Agricultural Statistics Review, 2019–2020. https://www.cdfa.ca.gov/is/organicprogram/pdfs/2019_2020_California_Agricultural_Organic_Report.pdf

² Cal-IPC 2020. Best Management Practices for Non-Chemical Weed Control. Report to California Department of Pesticide Regulation under grant number 18-PML-G002. 291 pp. <https://www.cal-ipc.org/resources/library/publications/non-chem/>

³ Schelenz, Robyn. How the Indigenous practice of 'good fire' can help our forests thrive. University of California. April 6, 2022. <https://universityofcalifornia.edu/news/how-indigenous-practice-good-fire-can-help-our-forests-thrive>

We are pleased that the Scoping Plan includes a commitment to conduct additional research on pesticides but urge that this research also include an assessment of the disparate health impacts of pesticides on communities in California. We also ask that the Scoping Plan call for creation of a Community Support Fund that would provide funding for direct, community-designed protections from synthetic agricultural pesticide use.

5. Remove all implications in the Scoping Plan that the climate-smart agricultural practices included in the modeling would inherently result in synthetic pesticide reductions

We urge the removal of all language that assumes that the adoption of certain agricultural practices, other than explicit reduction in pesticide use and adoption of organic farming, will result in synthetic pesticide reduction. "Climate smart practices", especially when adopted in isolation, do not guarantee pesticide use reduction. Some of the management strategies modeled by CARB, such as no till on conventional fields, could actually *increase* synthetic pesticide reliance, unless organic agriculture and chemical pesticide use reduction are prioritized in conjunction with these strategies. This point is made clear by the [USDA](#): "Herbicides such as 2,4-D, atrazine and paraquat enable farmers to manage weeds with less tillage... And in the absence of tillage, farmers depend more heavily on herbicides to keep weeds at bay."

6. Deploy direct incentives to farmers to reduce pesticide use, similar to financial mechanisms for healthy soils practices and organic agriculture

We are excited to see that the draft Scoping Plan highlights the importance of financial mechanisms to support organic farming. Similarly, we need financial support to help farmers, especially smaller and BIPOC producers, to transition to ecological pest management practices. Moreover there is an overwhelming need for technical assistance providers with a background in ecological pest management and organic farming. Therefore, financial mechanisms must be provided to support increased technical assistance to reduce pesticide use, as well as direct incentives for farmers.

Thank you for considering our recommendations.

Sincerely,



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Co-Directors

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