



July 6, 2026

Department of Pesticide Regulation
1001 I Street
Sacramento, CA 95814

Re: DPR 26-001 Pesticide-Treated Seeds

Dear Director Morrison:

The California Farm Bureau (Farm Bureau) appreciates the opportunity to comment on the Department of Pesticide Regulation's (DPR) proposed regulations implementing Assembly Bill 1042 regarding pesticide-treated seeds. Farm Bureau represents more than 23,000 farmers and ranchers across California, many of whom rely on treated seed as an important pest management tool for protecting crops during establishment.

Farm Bureau supports the Legislature's goal of improving transparency surrounding pesticide-treated seed and recognizes DPR's responsibility to implement AB 1042. However, we believe the proposed regulations place unnecessary reporting and administrative burdens on growers when less burdensome alternatives exist that would provide DPR with more accurate information while still accomplishing the objectives of the statute.

Adopt the Least Burdensome Reporting Alternative

The Initial Statement of Reasons states that DPR considered alternatives and concluded that no equally effective, less burdensome option exists. Farm Bureau respectfully disagrees.

The Department's objective is to better understand the use of pesticide-treated seed in California. While we support this objective, requiring growers to submit monthly pesticide use reports is neither the least burdensome nor the most effective means of obtaining that information.

Growers purchase seed that has already been treated, packaged, and labeled. They are not responsible for treating seed and frequently do not possess the detailed information DPR seeks regarding treatment formulations, active ingredient quantities, or other treatment records. As a result, the proposal requires growers to report information that originates with another entity.

Conversely, seed treatment facilities, manufacturers, distributors, and CDFA-registered seed sellers already maintain these records as part of their normal business operations. California already has an established regulatory framework governing these entities through the California Department of Food and Agriculture. Farm Bureau encourages DPR to evaluate whether reporting by seed sellers or distributors, either directly or on behalf of growers as contemplated by AB 1042, could satisfy the Department's data collection goals while substantially reducing burdens on growers.

The proposed reporting framework assumes growers are the most appropriate source of treated-seed information. Requiring growers to report information generated elsewhere increases the likelihood of incomplete or inconsistent reporting while shifting responsibility away from those maintaining the underlying records. Collecting information closer to the source of the treatment would likely improve both the quality and consistency of the data DPR ultimately receives.

DPR's Economic Analysis Underestimates Implementation Costs

The Initial Statement of Reasons concludes that the proposal will have minimal economic impacts because many operations already submit pesticide use reports for conventional pesticide applications.

Farm Bureau believes this conclusion understates the practical costs of implementation. Even for growers familiar with pesticide use reporting, the proposal requires new recordkeeping procedures, additional coordination with seed suppliers, employee training, record retention, and time spent obtaining and verifying information that may not be readily available at the farm level. These activities represent real administrative costs that are not fully reflected in the Department's analysis.

Impacts on County Agricultural Commissioners

Farm Bureau recognizes that county agricultural commissioners are best positioned to comment on the operational impacts of this proposal, and we respect their independent role in this rulemaking process. The comments below reflect Farm Bureau's perspective based on our members' ongoing interactions with county agricultural commissioners throughout the state.

The Initial Statement of Reasons concludes that county agricultural commissioners will experience minimal impacts because existing workload can be redirected. Farm Bureau is concerned that this assumption overlooks the practical realities facing county enforcement programs. Redirecting existing resources necessarily means fewer resources are available for education, inspections, compliance assistance, and other existing responsibilities. Before adopting the regulations, DPR should more fully evaluate how additional reporting, review, and enforcement responsibilities will affect county implementation.

Request for Clarification

Farm Bureau appreciates that the proposed regulations exempt the planting of pesticide-treated seed from certain worker protection requirements and from pesticide application restrictions near school sites under specified conditions. We request additional clarification regarding how these provisions will be implemented in practice.

Specifically, we ask DPR to clarify how the designation of pesticide-treated seed as a pesticide will interact with existing worker safety requirements and the Department's ongoing efforts to expand the use of unmanned aerial systems (UAS). Farm Bureau encourages DPR to ensure the final regulations do not unintentionally create barriers to subsequent drone applications or other emerging technologies that improve precision, efficiency, and worker safety.

Farm Bureau appreciates DPR's willingness to engage stakeholders throughout this rulemaking process. We respectfully request that the Department reconsider the proposed grower reporting framework and evaluate whether California's existing seed regulatory infrastructure, together with reporting by seed sellers or distributors, can achieve the objectives of AB 1042 in a more accurate and less burdensome manner. We look forward to continuing to work with DPR to develop a practical regulatory framework that provides meaningful data while minimizing unnecessary burdens on growers and county agricultural commissioners.

Sincerely,

A handwritten signature in black ink, appearing to read "Isabella Quinonez", with a stylized, flowing script.

Isabella Quinonez

Assistant Director, Public Affairs