

Executive Board

(Systemwide Senate Review) Proposed Presidential Policy on Integrated Pest Management

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*Robert Horwitz
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*Chair of the Assembly of the Academic Senate
Faculty Representative to the Regents
University of California
1111 Franklin Street, 12th Floor
Oakland, California 94607-5200*

December 21, 2021

**SUSAN CARLSON, VICE PROVOST
ACADEMIC PERSONNEL**

Re: Proposed Presidential Policy on Integrated Pest Management

Dear Susan:

As requested, I distributed for systemwide Senate review the proposed Presidential Policy on Integrated Pest Management. Nine Academic Senate divisions and one systemwide committee (UCPB) submitted comments. These comments were discussed at Academic Council's December 15 meeting and are attached for your reference.

We understand that the policy follows the 2019 report of the Herbicide Task Force convened by former President Napolitano, who also suspended the use of glyphosate-based herbicides and other "high-red tier" pesticides at UC pending the approval of this systemwide policy. The policy establishes requirements for the implementation of an Integrated Pest Management Program (IPMP) at each UC location, as well as minimum requirements for, and oversight of, the use of pesticides systemwide. The policy identifies pesticides as high risk ("red"), medium risk ("yellow"), or low risk ("green"). It calls for the formation of local Integrated Pest Management Committees (IPMCs) who will decide whether to allow the application of pesticides in a given UC location, and it requires pesticides in the highest tiers to undergo stricter oversight and use justification.

In general, the Senate supports the goals of the policy to regulate the University's use of pesticides to better support sustainability goals, minimize human or environmental hazards, and establish uniform requirements and oversight of pesticides across the UC system. However, reviewers also articulated several concerns and suggestions for improving and clarifying the policy. As a general matter, many faculty found the policy to be out of their area of expertise and lacking in sufficient background or detail to make it accessible to a non-expert audience. Some of the most pointed observations came from faculty in schools and colleges of Agricultural and Environmental Sciences, Biological Sciences, and other disciplines with relevant academic connections to the topic. We encourage policy authors to consider all comments as they refine the policy.

First, reviewers found areas of the policy to be overly general and insufficient to address the full range of potential pests, pesticide needs, and risks at diverse campus locations and facilities that include academic buildings, dorms, and agricultural research stations. Other reviewers found the policy to be too specific in places. For example, the policy defines “pests” to include microorganisms, which are often friendly and beneficial to the ecosystem.

Senate reviewers expressed support for continued restrictions on the use of glyphosate and other pesticides known to be harmful to human health and the environment, and emphasized that the University should minimize, if not prohibit outright, the use of red tier substances except in specific circumstances. Concern was expressed that the policy calls for the use of “target specific” pesticides, which we know may still have negative cascading effects on the biodiversity of the surrounding environment. The policy should address the safety of subcontractors who do landscaping and pest management and include provisions that ensure protections for these workers.

In addition, there are concerns that the policy will increase costs and bureaucracy and create a new unfunded mandate. Estimates of the annual cost of implementing the IPMP should be made public. Finally, Senate reviewers were left puzzled by several questions, including why and under what circumstances the University would permit continued use of red tier materials, and to what extent UC expects the policy to change campus use of pesticides relative to today or to before the 2019 moratorium.

We appreciate the opportunity to comment and encourage policy authors to continue consulting faculty when possible, including UC faculty and Cooperative Extension Specialists at Agricultural Experiment Stations with relevant expertise in Agricultural and Environmental Sciences.

Please do not hesitate to contact me if you have additional questions.

Sincerely,

A handwritten signature in dark ink, appearing to read "Robert Horwitz", is positioned above the typed name.

Robert Horwitz, Chair
Academic Council

Cc: CFO Brostrom
Academic Council
Campus Senate Directors
Executive Director Baxter

Encl.



320 STEPHENS HALL
UNIVERSITY OF CALIFORNIA

November 19, 2021

ROBERT HORWITZ
Chair, Academic Council

Subject: Systemwide Review of Proposed Presidential Policy on Integrated Pest Management

Dear Chair Horwitz:

The Council of the Berkeley Division (DIVCO) has no comments on the *Proposed Presidential Policy on Integrated Pest Management*.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ronald Cohen'.

Ronald C. Cohen
Professor of Chemistry
Professor of Earth and Planetary Science
Chair, Berkeley Division of the Academic Senate

Enclosures

cc: Mary Ann Smart, Vice Chair, Berkeley Division of the Academic Senate
Jocelyn Surla Banaria, Executive Director, Berkeley Division of the Academic Senate



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December 7, 2021

Robert Horwitz
Chair, Academic Council

RE: Proposed Presidential Policy on Integrated Pest Management

Dear Robert,

The proposed Presidential Policy on Integrated Pest Management was forwarded to all standing committees of the Davis Division of the Academic Senate. Six committees responded: Research (COR) and the Faculty Executive Committees of the College of Agricultural and Environmental Sciences (CAES), the College of Biological Sciences (CBS), the College of Engineering (COE), the School of Nursing (SON), and the School of Veterinary Medicine (SVM).

Though committees agree that it is important to develop IPM programs and procedures, they expressed concerns about the structure and implementation of the proposed policy:

- (CAES): This policy assumes that a program and procedures can be effectively developed for all UC Davis properties even though each location has a great disparity in the pests, potential pesticide risks, etc. (e.g., structural pests on campus buildings vs. agricultural pests on research farms). Many of our concerns have already been clearly defined in the UC Davis Institutional Pesticide Management Committee (IPMC) response to UCOP on this same proposed policy, and we support all the points made by this committee.
- (CAES): In addition to the points the IPMC made, we note a potential problem in Section V.2.c.i on page 12, where the policy stipulates that pesticides should be selected that are: “2. target specific;” and “3. not known to be harmful to non-targets [sic] species such as beneficial organisms, wildlife, or aquatic species.” Pesticides are often not target specific and could potentially impact other species if they come into contact with the pesticide, yet these pesticides can often be applied in a manner that is target specific. This should be clarified, for if the pesticide must truly impact only one species when applied, regardless of the application method, then few if any would be allowed for use.
- (CBS): Including microorganisms in the definition of “pests” is problematic given the vast diversity of naturally occurring microorganisms and our rapidly evolving knowledge of their roles in human and animal health and ecosystem function. This is, at best, an unnecessary complication, and can lead to an endless and ever changing list of “pests.” From a policy and practical perspectives, it seems unwieldy and counterintuitive to have the same rules and regulations apply to insects and viruses. We recommend that a clear distinction be drawn between “conventional” pests and potentially harmful microbes. At the same time, some

attention needs to be paid to the widespread but often unhelpful and unnecessary use of antimicrobial compounds.

- (CBS): We suggest replacing “living man” with “living human,” keeping in mind that plants and fungi as well as animals are associated with healthy microbiomes.

Lastly, COE and SON note that the proposed policy discusses neither the costs of implementation nor who would bear them. These costs should be more transparent.

The Davis Division appreciates the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Tucker", with a stylized flourish at the end.

Richard P. Tucker, Ph.D.
Chair, Davis Division of the Academic Senate
University of California, Davis

Enclosed: Davis Division Committee Responses

c: Hilary Baxter, Executive Director, Systemwide Academic Senate
Michael LaBriola, Assistant Director, Systemwide Academic Senate
Edwin M. Arevalo, Executive Director, Davis Division of the Academic Senate

November 19, 2021

Richard Tucker

Chair, Davis Division of the Academic Senate

RE: Request for Consultation on Proposed Presidential Policy on Integrated Pest Management

Dear Richard:

The Committee on Research (COR) has reviewed the Request for Consultation (RFC) of the Proposed Presidential Policy on Integrated Pest Management. The majority of the membership believes that this request is out of our expertise as a committee. Members questioned: 1) Does the policy have protections in place for research animal exposure? 2) Are there implications for research, such as crop management, that are not on pesticide use, but might require pest control?

Sincerely,

A handwritten signature in black ink, appearing to read 'Cyndi Schumann', with a stylized, cursive script.

Cyndi Schumann

Chair, Committee on Research

Proposed Presidential Policy on Integrated Pest Management

FEC: College of Agricultural and Environmental Sciences Committee Response

November 19, 2021

The Faculty Executive Committee of the College of Agricultural and Environmental Sciences (CA&ES) discussed the Proposed Presidential Policy on Integrated Pest Management at its meeting on 26 October 2021.

After reviewing the proposed policy, we have concerns as it is as currently constructed. We agree that the development of IPM programs and procedures is important for safe and effective use of pesticides. However, this policy assumes that a program and procedures can be effectively developed for all UC Davis properties even though each location has a great disparity in the pests, potential pesticide risks, etc. (e.g., structural pests on campus buildings vs. agricultural pests on research farms). Many of our concerns have already been clearly defined in the UC Davis Institutional Pesticide Management Committee (IPMC) response to UCOP on this same proposed policy, and we support all the points made by this committee.

In addition to the points the IPMC made, we note a potential problem in Section V.2.c.i on page 12, where the policy stipulates that pesticides should be selected that are: “2. target specific;” and “3. not known to be harmful to non-targets [*sic*] species such as beneficial organisms, wildlife, or aquatic species.” Pesticides are often not target specific and could potentially impact other species if they come into contact with the pesticide, yet these pesticides can often be applied in a manner that is target specific. This should be clarified, for if the pesticide must truly impact only one species when applied, regardless of the application method, then few if any would be allowed for use.

In conclusion, stated goal of this process is of value, but we argue that a number of adjustments are needed to be made to make this a practical, functional policy. We strongly encourage UCOP to review the feedback provided by the UC Davis IPMC to better understand many of these concerns.

The CA&ES faculty appreciates the opportunity to comment.

November 10, 2021

Richard Tucker
Chair, UC Davis Division of the Academic Senate

RE: Proposed Presidential Policy on Integrated Pest Management

Dear Richard,

The Faculty Executive Committee of the College of Biological Sciences has reviewed the request for consultation regarding the Proposed Presidential Policy on Integrated Pest Management. Members of the FEC believe that this policy is timely and hope that the UC can make good use of its intellectual resources in the pest management area to improve its practices. We also have several comments for your consideration.

1. Including microorganisms in the definition of “pests” is problematic given the vast diversity of naturally occurring microorganisms and our rapidly evolving knowledge of their roles in human and animal health and ecosystem function. This is, at best, an unnecessary complication, and can lead to an endless and ever-changing list of “pests”. From a policy and practical perspectives, it seems unwieldy and counter-intuitive to have the same rules and regulations apply to insects and viruses. We recommend that a clear distinction be drawn between “conventional” pests and potentially harmful microbes. At the same time, some attention needs to be paid to the widespread but often unhelpful and unnecessary use of antimicrobial compounds.
2. We suggest replacing “living man” with “living human” and keeping in mind that plants and fungi as well as animals are associated with healthy microbiomes.

The CBS FEC appreciates the opportunity to comment on this proposal. We hope our comments will be helpful in developing this policy.

Artyom Kopp
On behalf of the CBS Faculty Executive Committee

Proposed Presidential Policy on Integrated Pest Management

FEC: College of Engineering Committee Response

November 19, 2021

The Faculty Executive Committee of the College of Engineering discussed the proposal for a presidential policy on integrated pest management at its regular meeting on Nov. 2, 2021.

Some questions and concerns were raised by Committee members. Though it is not made explicit in the proposal, the Committee infers that this proposal was precipitated, at least in part, by the recent litigation involving the herbicide Roundup. The Committee notes that the proposed structure may lead to an improved UC response to future developments of that kind. Against that hypothetical, however, the proposal would introduce a rather extensive bureaucracy that is sure to increase costs, in the form of additional UC personnel, increased training, and higher rates for external service providers who would require UC certification. The proposal is silent on the matter of these costs and how they would be borne (and by whom). In many respects, the regulatory structure that the proposal seeks to establish would appear to duplicate others at the state and federal levels that may have similar aims. Overall, the Engineering FEC would find it easier to support a proposal that is more transparent about the problems it seeks to fix, and more detailed about the costs it would incur.

Proposed Presidential Policy on Integrated Pest Management

FEC: School of Nursing Committee Response

November 19, 2021

We support this proposal and request that the annual cost of implementing this pest management program be made public for all.

December 7, 2021

Robert Horwitz, Chair
Academic Council

Re: Proposed Presidential Policy on Integrated Pest Management

Dear Chair Horwitz,

The Irvine Division discussed the proposed presidential policy on integrated pest management at its December 7, 2021 Cabinet meeting. The Council on Faculty Welfare, Diversity, and Academic Freedom (CFW) also reviewed the policy. CFW's feedback is attached for your review.

Cabinet members recommended one addition to point three in CFW's comments:

*3. Members raised concern regarding the safety of subcontractors who do landscaping and pest management and called for clearer oversight **and protection** of these workers.*

The Irvine Division appreciates the opportunity to comment.

Sincerely,



Joanna Ho, Chair
Academic Senate, Irvine Division

Encl: CFW memo

Cc: Georg Striedter, Chair Elect-Secretary
Gina Anzivino, Interim Executive Director



November 19, 2021

**JOANNA HO, CHAIR
ACADEMIC SENATE – IRVINE DIVISION**

Re: Systemwide Review of Proposed Presidential Policy on Integrated Pest Management

Systemwide Senate Chair Robert Horwitz has circulated for review a proposed Presidential Policy on Integrated Pest Management (“IPM”). The Council on Faculty Welfare, Diversity, and Academic Freedom (CFW) discussed this issue at its meeting on November 9, 2021, and would like to submit the following comments:

1. Members strongly recommended that his policy include University Hills’ public landscaping and perhaps extend to private residences as well.
2. According to the proposed policy, “when the decision to use Pesticides is made, the Pesticide(s) selected should be: 1) effective; 2) target specific; 3) not known to be harmful to non-targets species such as beneficial organisms, wildlife, or aquatic species; 4) not known to contaminate surface or groundwater; and 5) least hazardous to humans.” Under the 1976 toxic substance Control Act toxic substances are generally considered safe until proven dangerous. However, 99% of the chemicals now on the market have not been tested. It was stated that there are often lower cost methods that use chemicals that may be toxic but haven't been proven toxic, and higher costs (including labor) that are definitely safer. We might, in principle, want to opt for safer and less hazardous options, even if it might increase costs. However, oversight is currently limited because the services are subcontracted. The contractors typically choose a cost-saving cost option as long as the chemicals have not been proven hazardous.
3. Members raised concern regarding the safety of subcontractors who do landscaping and pest management and called for clearer oversight of these workers.
4. Pest management in special sites/circumstances and communications (page 11): “The IPMC may consider certain sites and situations as special circumstances and develop separate IPM Plans for those settings. Special circumstances may include but are not limited to archival facilities and rare specimens in botanical gardens.” However, within certain sites and with particular research, some faculty have species under study that must be protected and therefore pesticides cannot be used. Because of this, pest management has been a challenge, and communication and transparency about the plans have been a problem.



Sincerely,

A handwritten signature in black ink, appearing to read 'T. Dalton', with a large, stylized loop at the top.

Terry Dalton, Chair
Council on Faculty Welfare, Diversity, and Academic Freedom

C: Gina Anzivino, Associate Director
Academic Senate

Matthew Hurley, Cabinet Analyst
Academic Senate

December 6, 2021

Robert Horowitz
Chair, UC Academic Senate

Re: Systemwide Review of Proposed Presidential Policy on Integrated Pest Management

Dear Chair Horowitz,

The Divisional Executive Board, councils, and committees appreciate the opportunity to review the Proposed Presidential Policy on Integrated Pest Management. The Executive Board reviewed the proposal and divisional council and committee feedback at its meeting on December 2, 2021. Members unanimously endorsed the proposal.

Sincerely,



Jody Kreiman
Chair
UCLA Academic Senate

Cc: Jessica Cattelino, Vice Chair/Chair Elect, UCLA Academic Senate
Shane White, Immediate Past Chair, UCLA Academic Senate
April de Stefano, Executive Director, UCLA Academic Senate



OFFICE OF THE ACADEMIC SENATE
LEROY WESTERLING, CHAIR, ACADEMIC SENATE
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MERCED, CA 95343

December 7, 2021

To: Robert Horwitz, Chair, Academic Council

From: LeRoy Westerling, Chair, UCM Divisional Council

Re: Proposed Presidential Policy on Integrated Pest Management

The proposed Presidential Policy on Integrated Pest Management was distributed for comment to the Merced Division Senate Committees and the School Executive Committees. The following committees offered several comments for consideration. Their comments are appended to this memo.

- Committee on Academic Planning and Resource Allocation (CAPRA)
- Committee on Faculty Welfare and Academic Freedom (FWAF)
- Faculty Advisory Committee on Sustainability (FACS)

CAPRA believes that the overall concept of the proposed policy is a good one and the committee supports it. However, the policy appears to place a significant amount of responsibility and requirements on each campus to implement its own policy. Implementing the policy will require new resources at UC Merced as we will have to hire new staff with background and training in entomology. Rather than require each campus to implement its own policy for pests that are common across California, CAPRA suggests that UC Davis or UC ANR (who have experts in entomology and IPM management background) could draft a general guideline for IPM management of all common pests that all UC campuses can use.

FWAF endorses the proposed policy and appreciates the policy's effort to minimize any human or environmental hazards from the use of pesticides.

FACS considered the policy and were also informed somewhat by the contemporaneous review of the revisions to the Presidential Policy on Sustainable Practices. Overall, FACS strongly supports the development of an IPM for the UC and encourage that it be implemented also with a plan to increase the diversity of California endemic plants across UC campuses and other properties. Specific comments from FACS members are appended to this memo.

Divisional Council reviewed the committees' comments via email and supports their various points and suggestions.

The Merced Division thanks you for the opportunity to comment on this proposed policy.

CC: Divisional Council
Hilary Baxter, Executive Director, Systemwide Academic Senate
Michael LaBriola, Assistant Director, Systemwide Academic Senate
Senate Office

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SANTA BARBARA • SANTA CRUZ

ACADEMIC SENATE, MERCED DIVISION
COMMITTEE ON ACADEMIC PLANNING AND RESOURCE ALLOCATION
KEVIN MITCHELL, CHAIR
kmitchell@ucmerced.edu

UNIVERSITY OF CALIFORNIA, MERCED
5200 NORTH LAKE ROAD
MERCED, CA 95343

October 11, 2021

To: LeRoy Westerling, Chair, Division Council

From: Kevin Mitchell, Chair, Committee on Academic Planning and Resource Allocation (CAPRA)

A handwritten signature in black ink, appearing to read "Kevin Mitchell".

Re: Proposed Presidential Policy on Integrated Pest Management

CAPRA believes that the overall concept of Integrated Pest Management (IPM) is a good one and the committee supports the Presidential Policy. However, the policy appears to place a significant amount of responsibility and requirements on each campus to implement its own policy. Implementing the policy will require new resources at UC Merced as we will have to hire new staff with background and training in entomology. Rather than require each campus to implement its own policy for pests that are common across California, CAPRA suggests that UC Davis or UC ANR (who have experts in entomology and IPM management background) could draft a general guideline for IPM management of all common pests that all UC campuses can use.

We appreciate the opportunity to opine.

cc: Senate Office

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SANTA BARBARA • SANTA CRUZ

ACADEMIC SENATE, MERCED DIVISION
COMMITTEE ON FACULTY WELFARE AND ACADEMIC FREEDOM
DAVID JENNINGS, CHAIR
djennings3@ucmerced.edu

UNIVERSITY OF CALIFORNIA, MERCED
5200 NORTH LAKE ROAD
MERCED, CA 95343

NOVEMBER 4, 2021

To: LeRoy Westerling, Chair, Divisional Council

From: David Jennings, Chair, Committee on Faculty Welfare and Academic Freedom (FWAF)

Re: Proposed Presidential Policy on Integrated Pest Management (IPM)

FWAF has reviewed the [proposed Presidential Policy on Integrated Pest Management \(IPM\)](#). FWAF acknowledges that it lacks the relevant expertise to affirm the details of the policy, but appreciates its effort to minimize any human or environmental hazards from the use of pesticides, as expressed in the passages of the policy below:

"Pesticide use in an IPM Program must occur only after the consideration of applicable risks to human and ecosystem health, and the determination, based on a careful and thorough evaluation, that other alternatives are not effective in obtaining the level of Pest management desired. This Policy requires that all Pesticide use be performed in a manner that mitigates risks to safety, health, and the environment and ensures compliance with all applicable laws and regulations."

"The IPM Program must minimize the risk from both Pests and Pest management practices to humans, natural and cultural resources, and the environment by focusing on prevention and ecosystem-based management before any use of Pesticides. This will reduce UC's dependence on Pesticides and ensure a proactive approach in the handling of Pests."

FWAF is pleased to endorse the proposed policy, and appreciates the opportunity to opine.

cc: Senate office

23 November 2021

Faculty Advisory Committee on Sustainability Comment on UC Policy on Integrated Pest Management:

Dear Chair Westerling,

Thank you for the option to comment on the *UC Policy on Integrated Pest Management (UCPIPM)* and for collating these responses. The Faculty Advisory Committee on Sustainability (FACS) considered the *UCPIPM* policy and were also informed somewhat by the contemporaneous review of the revisions to the *Presidential Policy on Sustainable Practices*. Overall, we strongly support the development of an IPM for the UC and encourage that it be implemented also with a plan to increase the diversity of California endemic plants across UC campuses and other properties. Increasing biodiversity has long been understood to have positive outcomes for pest management (e.g. Gurr et al. 2003; Tooker & Frank 2012; Redlich et al. 2018) and using native species enhances biodiversity conservation, drought adaptation, and pollinator diversity. Pesticide use is also a major environmental injustice issue in the San Joaquin valley. Given the short time available for comment on the *UCPIPM*, our approach has been simply to collate comments from FACS members, below.

Sincerely,

Michael N Dawson

Chair, and on behalf of, FACS

- III.D.a. (p18) Given a research exemption, we strongly encourage required reporting/recording, even if via a straightforward exemption request procedure. In research settings, we are required already to track all chemicals; inobtrusive integration of pesticide possession and use recording by EHS/RSS and purchasing should be possible.
- IV.(I): Contractors: in (a) it is stated that contractors should adhere to “this Policy”, but they should also adhere to the local IPM... so could be changed to “this Policy, and the local IPM plan”
- V.1.a. (p9) Hazard evaluation and/or tiering should take into account non-UC pesticide use near UC facilities, especially use of pesticides with same mechanism of action or in same chemical family
- V.1.b. (p9) When information is available, hazard evaluation, tiering, and reporting should also include “inactive” ingredients
- V.(2a) There are some very loose terms here, such as “should” and “should consider”. Following the language in (iii), consider editing (i) and (ii) to be:
 - (i) “UC Locations *must* follow a process of Adaptive Management”
 - (ii) “UC Locations *must* solicit stakeholder engagement
- V.2.a.iii.1.a. (p10) List of “affected stakeholders” should include non-UC local community residents and environmental justice organizations
- V.2.a.iii. (p10) Local IPMCs/IPM Plans should be able to move particular chemicals to more restricted tiers for their particular location, based on local circumstances, such as non-UC

pesticide use (eg, almond orchards near UC Merced), i.e. the local environment should be considered as part of the risk mitigation.

- V.2.b. (p12) When information is available, “inactive” ingredient quantities should also be recorded
- V.(2c) It isn’t clear how 3rd party contractors will interface with the IPMC in following the IPM... will 3rd party contractors be considered Pesticide Applicators and/or Application Supervisors, or both/either? If so, will they directly interface with the PUA software? Should there be an IPM Coordinator overseeing contractor activities, and if so, should this be written into the list of IPM Coordinator responsibilities? (IV.F)
- V.2.d. (p15) If there are foreseeable areas of potential exposure outside of the application area (eg, due to wind or water transport), the Application Supervisor should provide notification to property owners, residents, and tenants in the potential exposure areas
- V.4. (p17) Pesticide use data from the PUA software should be made publicly available in a standard machine-readable format (eg, CSV files)

Gurr, G.M., S.D. Wratten, & J.M. Luna (2003) Multi-function agricultural biodiversity: pest management and other benefits. *Basic & Applied Ecology* 4:107–116. <https://doi.org/10.1078/1439-1791-00122>

Redlich, S., E.A. Martin, I. Steffan-Dewenter (2018) Landscape-level crop diversity benefits biological pest control. *Journal of Applied Ecology* 55:2419–2428. <https://doi.org/10.1111/1365-2664.13126>

Tooker, J.F., & S.D. Frank (2012) Genotypically diverse cultivar mixtures for insect pest management and increased crop yields. *Journal of Applied Ecology* 49:974-985. <https://doi.org/10.1111/j.1365-2664.2012.02173.x>



CHAIR, ACADEMIC SENATE
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December 13, 2021

Robert Horwitz, Chair, Academic Council
1111 Franklin Street, 12th Floor
Oakland, CA 94607-5200

RE: [Systemwide Review] Proposed Policy: Proposed Presidential Policy on Integrated Pest Management (IPM)

Dear Robert,

The Riverside Executive Council discussed the Proposed Presidential Policy on Integrated Pest Management during our December 13, 2021 meeting and members discussed pleased anticipation of the policy and its application locally and systemwide.

Sincerely yours,

/s/Jason

Jason Stajich
Professor of Bioinformatics and Chair of the Riverside Division

CC: Hilary Baxter, Executive Director of the Academic Senate
Cherysa Cortez, Executive Director of UCR Academic Senate Office



OFFICE OF THE ACADEMIC SENATE

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December 7, 2021

Professor Robert Horwitz
Chair, Academic Senate
University of California
VIA EMAIL

Re: Divisional Review of Presidential Policy on Integrated Pest Management

Dear Professor Horwitz,

The proposed Presidential Policy on Integrated Pest Management was distributed to San Diego Divisional Senate standing committees and discussed at the December 6, 2021 Divisional Senate Council meeting. Senate Council endorsed the proposal, and provided the following comments for consideration.

It was suggested that the policy could more clearly specify the role assigned to herbicides, in order to be clear that herbicides are considered pesticides. Council noted that it would have been helpful to know if the implementation of the proposed policy will have a significant effect on current practices or if the proposed changes are already aligned with actions done at campuses.

The response from the Divisional Committee on Campus and Committee Environment is attached.

Sincerely,

A handwritten signature in black ink, appearing to read "Tara Javidi", with a long horizontal flourish extending to the right.

Tara Javidi
Chair
San Diego Divisional Academic Senate

Attachment

cc: Nancy Postero, Vice Chair, San Diego Divisional Academic Senate
Lori Hullings, Executive Director, San Diego Divisional Academic Senate
Hilary Baxter, Executive Director, UC Systemwide Academic Senate

November 22, 2021

TARA JAVIDI, CHAIR
Academic Senate, San Diego Division

SUBJECT: Presidential Policy on Integrated Pest Management Proposed Revisions

The Committee on Campus & Community Environment (CCCE) discussed the Presidential Policy on Integrated Pest Management proposed revisions. The committee evaluated positively the goal of establishing uniform requirements and oversight across the whole UC system. The policy is carefully crafted and provides a clear timeline of sensible measures that each UC campus must implement. The following points were raised during the discussion of the policy:

- The policy could more clearly specify the role assigned to herbicides to avoid the common pitfall of thinking that herbicides are not pesticides.
- The committee was curious to know whether the implementation of the proposed policy will have a significant effect on current practices on campus. In other words, is the way we currently use pesticides on campus already aligned with what is laid out in the policy, or will this represent a major shift?

Going forward, the committee noted that, for the evaluation of proposed policies, it will be useful to have additional background/context on what motivated the policy to begin with, e.g., what problem the policy is trying to address. This will help the committee establish a baseline for the evaluation of proposed policy revisions in the future.

Sincerely,

Jorge Cortes, Chair
Committee on Campus Community and Environment

cc: N. Postero

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Steven W. Cheung, MD, Chair

Steve Hetts, MD, Vice Chair

Pamela Ling, MD, Secretary

Kathy Yang, PharmD, Parliamentarian

December 6, 2021

Robert Horwitz

Chair, Academic Council

Systemwide Academic Senate

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Re: UCSF Comments on the Proposed Presidential Policy on Integrated Pest Management

Dear Robert:

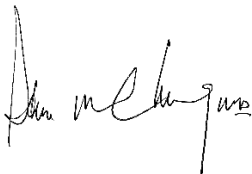
The San Francisco Division of the Academic Senate recently reviewed the proposed Presidential Policy on Integrated Pest Management. Overall, the San Francisco Senate is supportive of the existing recommendations, but stress that it is incumbent upon the University to avoid any unnecessary further harm to our ecosystem. As such, we believe that the use of glyphosate and other pesticides should be further minimized, even given the listed exceptions, and would even be in support of the strongest possible restrictions on the use of such pesticides, with serious consideration of a full prohibition.

With that in mind, our standing Committee on Sustainability made the following additional comments:

1. We would like to ask whether provisions for more stringent restrictions on pesticide use had been considered for locations, such as hospitals, childcare centers, and schools, that serve children or other vulnerable individuals? UCSF would be supportive of such provisions being incorporated into the policy.
2. Additionally, the policy states that "postings for Pesticides applications will be made before the application begins, but not more than 24 hours in advance and must be removed within 72 hours after Pesticide application or after any applicable restricted entry interval has ended if such interval is longer than 72 hours." Given the importance of informing the public, particularly vulnerable individuals, about the use of potentially harmful pesticides, UCSF would like to ask why the policy sets a maximum rather than a minimum time frame for communications about the application of pesticides.

Please see the enclosed letter from our standing Committee on Sustainability for our full comments. Thank you for the opportunity to opine on this important Presidential Policy. If you have any questions, please let me know.

Sincerely,



Steven W. Cheung, MD, 2021-23 Chair
UCSF Academic Senate

Enclosures (1)

Cc: Chelsea Landolin, Chair, UCSF Sustainability Committee

Communication from the Committee on Sustainability

Chelsea Landolin, RN, MS, NP, Chair

November 29, 2021

TO: Steven Cheung, Chair of the UCSF Division of the Academic Senate

FROM: Chelsea Landolin, Chair, UCSF Committee on Sustainability

CC: Todd Giedt, Executive Director of the UCSF Academic Senate Office

RE: Systemwide Review of the Proposed Presidential Policy on Integrated Pest Management

Dear Chair Cheung:

The Committee on Sustainability writes to comment on the Systemwide Review of the Proposed Presidential Policy on Integrated Pest Management. The Committee has reviewed the proposed policy and the UC Herbicide Task Force's final report and recommendations upon which the proposed policy is based. The Committee on Sustainability is supportive of the adoption of a Presidential Policy on Integrated Pest Management requiring all UC locations to utilize an Integrated Pest Management approach.

While supporting the existing recommendations, the Committee on Sustainability would like to emphasize the importance of applying a precautionary principle surrounding the use of pesticides on UC campuses. At a time when the health of humans and our environment (including pollinators vital to our food system) is under duress from the climate crisis, it is incumbent upon the university to avoid any unnecessary further harm to our ecosystem. As such, the Committee believes that the use of glyphosate and other pesticides should be further minimized, even given the listed exceptions. The Committee would be in support of the strongest possible restrictions on the use of such pesticides, with serious consideration of full prohibition.

As a health science campus, with hospitals serving vulnerable individuals, such as children, pregnant people, and people with cancer, we must weigh seriously the potential risk of harm to our patients with the relatively frivolous use of pesticides to kill weeds in decorative gardens and lawns. The Committee would therefore like to ask whether provisions for more stringent restrictions on pesticide use had been considered for locations, such as hospitals, childcare centers, and schools, that serve children or other vulnerable individuals. The Committee would be supportive of such provisions being incorporated into the policy.

Additionally, the policy states that "postings for Pesticides applications will be made before the application begins but not more than 24 hours in advance and must be removed within 72 hours after Pesticide application or after any applicable restricted entry interval has ended if such interval is longer than 72 hours." Given the importance of informing the public, particularly vulnerable individuals, about the use of potentially harmful pesticides, the Committee would like to ask why the policy sets a maximum rather than a minimum time frame for communications about the application of pesticides.

Thank you for the opportunity to comment on this important issue. If you have any questions on the Committee on Sustainability's comments, please contact me or Academic Senate Analyst Liz Greenwood (liz.greenwood@ucsf.edu).



December 2, 2021

To: Robert Horwitz, Chair
Academic Senate

From: Susannah Scott, Chair
Santa Barbara Division 

Re: Systemwide Review of Proposed Presidential Policy on Integrated Pest Management

The Santa Barbara Division distributed the proposed policy for comment to the Council on Faculty Welfare, Academic Freedom, and Awards (CFW) and the Committee on Research Policy and Procedures (CRPP). CRPP opted not to opine. The proposed policy was also distributed to a number of other groups for their information, and responses were received from the Graduate Council, and the Faculty Executive Committees (FECs) of the College of Engineering (COE) and the College of Letters and Science (L&S FEC). The individual responses are attached for your review.

CFW and COE indicated their support for the policy, with CFW emphasizing the importance of the policy to the health and safety of all members of the UC community. Several members of CFW also expressed interest in more information about which chemicals would be included in the red tier and why, and examples of why the university would permit continued use of red tier chemicals.


GC did not formulate an opinion as a council, but forwarded comments from two members. One member inquired as to how the changes might affect spaces like graduate student housing and research offices that are already infested with pests or at higher risk of infestation due to food and other waste that attracts pests. They also suggested that there should be a stated commitment in the policy about preparing campuses for sustainable waste practices. Another member recommended that in addition to human health, other animals, such as dogs and racoons, should be included in the policy.

We thank you for the opportunity to comment.

**Academic Senate
Santa Barbara Division**

November 17, 2021

To: Susannah Scott, Divisional Chair
Academic Senate

From: Lisa Parks, Chair 
Council on Faculty Welfare, Academic Freedom, and Awards

Re: Proposed Presidential Policy on Integrated Pest Management

The Council on Faculty Welfare, Academic Freedom, and Awards met on November 3, 2021 to discuss the proposed Presidential Policy on Integrated Pest Management.

Members are generally supportive of an integrated policy to manage pesticide use on UC campuses and feel that this policy is important to the health and safety of all members of the UC community.

Some members were interested in more information about which chemicals would be included in the red tier and why, and examples of why the university would permit continued use of red tier materials.

CC: Shasta Delp, Executive Director, Academic Senate

October 25, 2021

TO: Susannah Scott
Divisional Chair, Academic Senate

FROM: Tobias Hollerer, Chair
College of Engineering, Faculty Executive Committee

RE: Systemwide Review of the Proposed Presidential Policy on Integrated Pest Management

DocuSigned by:
Tobias Hollerer
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The College of Engineering FEC met on Monday, October 18th and reviewed and approved the policy as written. 7 yes, 0 abstained, 0 no (out of 7 eligible faculty members).

**Academic Senate
Santa Barbara Division**

November 19, 2021

To: Susannah Scott, Chair
Academic Senate

From: Adam Sabra, Chair
Graduate Council



Re: Systemwide Review of the Proposed Presidential Policy on Integrated Pest Management

At its meeting of November 1, 2021, Graduate Council (GC) reviewed the Proposed Presidential Policy on Integrated Pest Management as an informational item. While the Council as a whole did not have an opinion on the policy, two members provided comments:

- How will these changes affect spaces like graduate student housing and research offices that are already infested with pests or at higher risk of infestation due to food and other waste that attracts pests? There should also be a stated commitment in the policy about preparing campuses for sustainable waste practices.
- In addition to human health, other animals, such as dogs and racoons, should be included in the policy.

CC: Shasta Delp, Executive Director, Academic Senate

November 22, 2021

To: Susannah Scott
Chair, Divisional Academic Senate

From: Sabine Frühstück
Chair, L&S Faculty Executive Committee



Re: Systemwide Review of the Proposed Presidential Policy on Integrated Pest
Management

At its meeting on November 18, 2021, the Faculty Executive Committee of the College of Letters and Science (FEC) reviewed the proposed Presidential Policy on Integrated Pest Management. This policy would establish guidelines and processes for approval and use of pesticides across the UC system.

Although this subject is outside the expertise of the committee, the FEC wishes to state that it appreciates the thoroughness of the policy and the broad consultation made during the review process.

Thank you for the opportunity to comment.

cc: Pierre Wiltzius, Executive Dean of the College and Dean of Science
Michael Miller, Interim AVC and Interim Dean of Undergraduate Education
Mary Hancock, Acting Dean of Humanities and Fine Arts
Charlie Hale, Dean of Social Sciences



UNIVERSITY COMMITTEE ON PLANNING AND BUDGET (UCPB)
Kathleen McGarry, Chair
mcgarry@econ.ucla.edu

Assembly of the Academic Senate
1111 Franklin Street, 12th Floor
Oakland, CA 94607-5200
Phone: (510) 987-9466
Fax: (510) 763-0309

December 8, 2021

**ROBERT HORWITZ, CHAIR,
ACADEMIC COUNCIL**

RE: PROPOSED PRESIDENTIAL POLICY ON INTEGRATED PEST MANAGEMENT

Dear Robert,

UCPB's Task Force on Agriculture and Natural Resources reviewed the proposed changes to the Presidential Policy on Integrated Pest Management. Their letter is reproduced below. UCPB supports their conclusions.

Sincerely,

A handwritten signature in black ink that reads "Kathleen McGarry".

Kathleen McGarry, Chair
UCPB

cc:UCPB

November 22, 2021

Kathleen McGarry
Chair, University Committee on Planning and Budget

Dear Kathleen,

The University Committee on Planning and Budget's Task Force on Agriculture and Natural Resources (TF-ANR) welcomes the opportunity to comment on the proposed Presidential Policy on Integrated Pest Management currently out for systemwide review. While members appreciated the detail and thoroughness of the proposed policy, they felt that in many instances there might be UC faculty or ANR Specialists with relevant expertise who could be consulted more directly. We suggest that some mention of this be incorporated into the long list of Compliance/Responsibilities in section IV and specifically into the Procedures section regarding "stakeholder engagement" (V2a ii-iii, p. 10). While there is a general list of stakeholders that includes faculty as a possibility, we felt, in the spirit of shared governance, that it might be stipulated more strongly that faculty consultation take place where possible, including consultation with relevant Specialists.

Thank you for giving us the opportunity to comment on this important matter.

Sincerely,

A handwritten signature in cursive script that reads "Eleanor K. Kaufman".

Eleanor Kaufman
Chair, TF-ANR

December 6, 2021

Robert Horowitz
Chair, UC Academic Senate

Re: Systemwide Review of Proposed Presidential Policy on Integrated Pest Management

Dear Chair Horowitz,

The Divisional Executive Board, councils, and committees appreciate the opportunity to review the Proposed Presidential Policy on Integrated Pest Management. The Executive Board reviewed the proposal and divisional council and committee feedback at its meeting on December 2, 2021. Members unanimously endorsed the proposal.

Sincerely,



Jody Kreiman
Chair
UCLA Academic Senate

Cc: Jessica Cattelino, Vice Chair/Chair Elect, UCLA Academic Senate
Shane White, Immediate Past Chair, UCLA Academic Senate
April de Stefano, Executive Director, UCLA Academic Senate



EXECUTIVE VICE PRESIDENT—
CHIEF FINANCIAL OFFICER

OFFICE OF THE PRESIDENT
1111 Franklin Street, 6th Floor
Oakland, California 94607-5200
510/987-9029

September 29, 2021

CHANCELLORS
ACADEMIC COUNCIL CHAIR HORWITZ
LABORATORY DIRECTOR WITHERELL
ANR VICE PRESIDENT HUMISTON

Re: Systemwide Review of Proposed Presidential Policy on Integrated Pest Management

Dear Colleagues:

Enclosed for systemwide review is a draft of the proposed Presidential Policy on Integrated Pest Management (“IPM”).

Former President Napolitano established the UC Herbicide Task Force in May 2019 to conduct a review of the University’s use of glyphosate and to recommend a strategy for evaluating the University’s sustainable use of pesticides in general. The Task Force issued its final report and recommendations in October 2019 (available for download at <https://www.ucop.edu/safety-and-loss-prevention/files/groups/herbicide-task-force-report.pdf>). This document was discussed during a public briefing at The Regents’ January 2020 meeting, and the recommendations were formally accepted by Former President Napolitano in May of 2020. The principal thrust of the Task Force’s recommendations was to develop an IPM Policy that would apply across the entire UC system. To that end, this proposed Policy intends to establish requirements for the implementation of an IPM Program at each UC location, as well as minimum requirements for and oversight of the use of pesticides systemwide.

In addition to the creation of a Presidential IPM Policy, the UC Herbicide Task Force recommended that a Systemwide Pesticide Oversight Committee (“SPOC”) be established to serve as the standing oversight committee with regard to such a Policy. The SPOC is comprised of experts in related subject areas, including integrated pest management practices, environmental and reproductive toxicology, environmental law, energy and sustainability, and environmental health and safety, as well as other important UC stakeholders, including student and union representatives (the current membership list can be viewed at <https://www.ucop.edu/safety-and-loss-prevention/files/groups/spoc-roster.pdf>). The proposed Policy was drafted by the SPOC and approved for systemwide review by all members of the committee.

Management consultation was requested, but the draft policy was not changed based on the limited feedback received. The responses received will be compiled with any comments submitted during the systemwide review and will be addressed as part of that more comprehensive process.

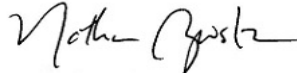
Systemwide Review

Systemwide review is a public review distributed to the Chancellors, the Chair of the Academic Council, the Director of the Lawrence Berkeley National Laboratory, and the Vice President of Agriculture and Natural Resources requesting that they inform the general University community, especially affected employees, about policy proposals. Systemwide review also includes a mandatory, 90-day full Senate review.

Employees should be afforded the opportunity to review and comment on the draft policy. Attached is a Model Communication which may be used to inform non-exclusively represented employees about these proposals. The Labor Relations Office at the Office of the President is responsible for informing the bargaining units representing union membership about policy proposals.

We would appreciate receiving your comments no later than **January 12, 2022**. Please submit your comments to ehs@ucop.edu. If you have any questions, please contact Ken Smith at ehs@ucop.edu.

Sincerely,



Nathan Brostrom

Enclosures:

- 1) Draft Presidential Policy on Integrated Pest Management (clean copy)
- 2) Model Communication

cc: President Drake

Provost and Executive Vice President Brown
Executive Vice Chancellors/Provosts
Executive Vice President and Chief Operating Officer Nava
Senior Vice President Bustamante
Vice President and Vice Provost Gullatt
Vice President Lloyd
Vice President Maldonado
Vice Provost Carlson
Vice Provosts/Vice Chancellors of Academic Affairs/Personnel
Deputy General Counsel Woodall
Associate Vice Provost Lee
Assistant Vice Provosts/Assistant Vice Chancellors/Directors – Academic Personnel
Interim Chief Risk Officer Confetti
Executive Director Baxter
Executive Director and Chief of Staff Henderson
Executive Director Silas
Executive Director Smith
Chief of Staff Kao
Chief of Staff Levintov
Chief of Staff Peterson
Chief Policy Advisor Marisa McAuliffe
Director Grant
Director Roller
Director Sykes
Manager Crosson
Manager Smith
Analyst Durrin
Analyst Nelson
Policy Advisory Committee