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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.

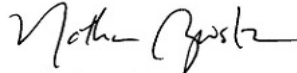
Systemwide Review

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
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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

Integrated Pest Management (IPM)

Responsible Officer:	Chief Financial Officer
Responsible Office:	RK – Risk / EH&S
Issuance Date:	
Effective Date:	
Last Review Date:	
Scope:	All Pest management activities at all University-owned or -operated locations, including arrangements in which the University is either the lessor or lessee, with the exception of privately-owned residences on University property.

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I. POLICY SUMMARY

This Policy establishes the University of California’s (UC) requirements for the implementation of an Integrated Pest Management (IPM) Program, as well as oversight and minimum requirements for the use of Pesticides. 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.

II. DEFINITIONS

Adaptive Management: An intentional approach to making decisions and adjustments in response to new information and changes in context.¹

Antimicrobial: A Pesticide is intended to disinfect, sanitize, reduce, or mitigate growth or development of microbiological organisms or protect inanimate objects, industrial processes or systems, surfaces, water, or other chemical substances from contamination, fouling, or deterioration caused by bacteria, viruses, fungi, protozoa, algae, or slime.

Application Supervisor: A UC employee who exercises primary direction and control over the activities of a Pesticide Applicator and is responsible for the execution of any Pest control procedure, including compliance with applicable local, state, and federal laws and regulations, and this Policy. Pursuant to this Policy, all Application Supervisors must be certified through an examination administered by the state Pesticide lead agency (e.g., California Department of Pesticide Regulation) to use or supervise the use of Pesticides. This designation of “supervisor” will not be used as a basis for exclusion from a bargaining unit.

Certified Applicator: Any individual (whether UC employee or contractor) who has been certified through an examination administered by the state Pesticide lead agency (e.g., California Department of Pesticide Regulation) to use or supervise the use of Pesticides.

Contract: A binding written agreement to acquire the services of an outside provider for activities such as grounds maintenance or any Pest control-related services or services that may include Pest control activities.

Contracted Pest Management Companies (Contractors): A person, firm, corporation, or other entity, including a governmental entity, that enters into a Contract with a UC Location to provide Pest management services.

Emergency: A situation where immediate Pesticide treatment is necessary to prevent harm from a Pest to public health, the environment, or University assets.

Integrated Pest Management (IPM): According to the University of California’s Statewide IPM Program, IPM is “an ecosystem-based strategy that focuses on long-term prevention of Pests or their damage through a combination of techniques such as biological control, habitat manipulation, modification of cultural practices, and use of resistant varieties. Pesticides are used only after monitoring indicates they are needed

¹ USAID defines Adaptive Management in more detail here: <https://usaidlearninglab.org/lab-notes/what-adaptive-management-0>

according to established guidelines, and treatments are made with the goal of removing only the target organism. Pest control materials are selected and applied in a manner that minimizes risks to human health, beneficial and non-target organisms, and the environment.”²

Integrated Pest Management Committee (IPMC): The committee at each UC Location that is to provide IPM oversight and guidance for that location.

Integrated Pest Management Coordinator (IPM Coordinator): A designated employee at each UC Location that serves as the primary point of contact between the local IPMC and the UC SPOC and that will manage the IPM program for their location.

Integrated Pest Management Plan (IPM Plan): The plan developed at each UC Location that details processes for Pest prevention and mitigation, including Pesticide use and reporting (outlined below in the Procedures section).

Integrated Pest Management Program (IPM Program): The collection of activities at a UC Location used to manage Pests. The IPM program includes the IPMC, IPM Coordinator, and the IPM Plan.

Pest: Any animal, plant, fungi, bacteria, or virus that interfere with site-specific purposes, operations, or management objectives or that jeopardize human health or safety with the exception of viruses, fungi, bacteria, or other microorganisms on or in living man or other living animals.

Pesticide: Any substance or mixture of substances intended to be used for preventing, destroying, repelling, or mitigating any Pest (such as fungi, bacteria, virus, plant, or animal); defoliating plants; and regulating plant growth; and any spray adjuvant, as detailed in California Food and Agriculture Code Section 12753. In California, this term includes acaricide, algicide, bactericide, insecticide, fungicide, rodenticide, herbicide, plant growth regulator, defoliant, desiccant, and adjuvant.

Pesticide Applicator: For the purposes of this policy, a UC employee that applies Pesticides at UC Locations with equipment that includes but is not limited to: backpack sprayers, hand pump sprayers, spray bottles, ground application equipment, airblast sprayers, Unmanned Aircraft Systems (UAS, also known as “drones”), and aircraft. Pursuant to this Policy, all Pesticide Applicators must be certified through an examination administered by the state Pesticide lead agency (e.g., California Department of Pesticide Regulation) to use or supervise the use of Pesticides.

Pesticide Handler: For the purposes of this policy, a UC employee that mixes, loads, measures, applies Pesticides; is present in an area where a Pesticide application is being conducted to assist with the application; cleans Pesticide application equipment; enters Pesticide storage areas; transports Pesticide containers that have already been opened. Pursuant to this Policy, all Pesticide Handlers must be certified through an

² UC ANR’s IPM definition is available online: <https://www2.ipm.ucanr.edu/What-is-IPM/>

examination administered by the state Pesticide lead agency (e.g., California Department of Pesticide Regulation) to use or supervise the use of Pesticides.

Pesticide Hazard Tier List: A list of all Pesticides in use at UC that have been evaluated through the Pesticide Hazard Tiering System. The list will be maintained by the Systemwide Pesticide Oversight Committee.

Pesticide Hazard Tiering System: A process for assessing the hazards of each Pesticide used at UC based on its toxicological and environmental attributes in order to classify them into three distinct tiers: red (high-risk), yellow (medium-risk), and green (low-risk) Pesticides. The system will be developed and maintained by the Systemwide Pesticide Oversight Committee.

Pesticide Use Authorization (PUA): Formal authorization provided by a local IPMC to apply a Pesticide at a UC Location. The authorization may be:

- **Automatic:** to authorize the use of green- or yellow-tier Pesticides for purposes that the IPMC has predetermined do not require additional review and approval.
- **Generic:** to authorize the use of any Pesticide within predefined general parameters for no longer than 1 year without additional review and approval by the IPMC.
- **Specific:** to authorize the use of any Pesticide within explicit parameters as required to address only the particular Pest situation identified in the original request.
- **Emergency:** to authorize the use of any Pesticide after review and approval by the IPM Coordinator only when immediate Pesticide treatment is necessary to prevent harm to public health or significant damage to the environment or University assets.

Pesticide Use Authorization Software (PUA Software): Software developed for systemwide use where Pesticide Applicators or Application Supervisors must request and receive approval for proposed Pesticide use and must report Pesticide use after completion of an application. This software integrates the Pesticide Hazard Tiering System.

Registration Number: A unique identifier that is required by the United States (U.S.) Environmental Protection Agency (EPA) to be located on the front panel of a Pesticide label. This number identifies the individual product and the company that is the primary registrant of that product with the U.S. EPA.

Research Use: Pesticide used as an evaluated treatment in a study or as part of the research design, which is exempt from this Policy.

Systemwide Pesticide Oversight Committee (SPOC): The systemwide committee that provides overall coordination and oversight of UC's Pest management practices and is responsible for maintaining this IPM Policy.

University of California Location (UC Location): All University of California campuses, health locations, Lawrence Berkeley National Laboratory (LBNL), Agriculture and Natural Resources (ANR), Natural Reserve System (NRS), and any other UC-owned or -operated facilities, including arrangements in which UC is either the lessor or lessee, with the exception of privately-owned residences on UC property, as referred to above in the Scope.

III. POLICY TEXT

- A. Each UC Location must implement within 18 months of the enactment of this Policy an IPM Program that facilitates long-term management of University lands and landscapes to create an environment that supports human and ecological health and maintains places where students, staff, faculty, and communities can thrive. 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.
- B. The IPM Program must be designed in conformance with the specific elements outlined in the procedural section of this Policy, which include the following:
 - a. Integration of the systemwide PUA Software;
 - b. Establishment of an IPM Committee;
 - c. Designation of an IPM Coordinator; and
 - d. Creation of an IPM Plan.
- C. UC Locations must incorporate this Policy into procurement activities, Contracts, leases, and agreements to ensure compliance by employees, outside parties, and contractors conducting activities, such as construction, habitat management, concessions management, landscape and building maintenance, management of rights-of-way, public health, and animal and vegetation management at UC Locations.
- D. Policy Exemptions:

This Policy does not apply to:

 - a. The Research Use of Pesticides, although researchers are encouraged to report their Pesticide use through the PUA Software; and

- b. The use of Antimicrobials for hygienic purposes (e.g., disinfecting sprays or wipes, pool treatments, and drinking water treatments) or chemicals for the purpose of sterilizing medical products or equipment.³

The aforementioned exclusions do not exempt users from following otherwise applicable laws and regulations regarding Pesticide use, notification, and reporting.

IV. COMPLIANCE / RESPONSIBILITIES

A. The Office of the President, Office of Energy and Sustainability is responsible for:

- a. co-sponsoring the Systemwide Pesticide Oversight Committee (SPOC).

B. The Office of the President, Office of Risk Services is responsible for:

- a. co-sponsoring and providing administrative support to the SPOC; and
- b. providing a web-based software platform (PUA Software) to record all UC PUA requests and to track the amounts of Pesticides applied at UC Locations for reporting and record keeping purposes.

C. The Systemwide Pesticide Oversight Committee (SPOC) is responsible for:

- a. maintaining and updating this Policy;
- b. providing overall coordination and oversight of UC's Pesticide management practices;
- c. establishing and reviewing at least annually a Pesticide Hazard Tiering System and a Pesticide Hazard Tier List that will be integrated with the PUA Software provided by the Office of Risk Services and made available on the SPOC website;
- d. reviewing each UC Location's IPM Plan for consistency with this Policy upon initial submission and then every 3 years thereafter in alignment with local review and revision requirements outlined section IV(E)(b); and
- e. preparing an annual report on Integrated Pest Management Practices that will be submitted to the UC President and made available for public dissemination.

³ The UC Sustainable Procurement Guidelines contain minimum mandatory sustainability requirements for purchased cleaning supplies: <https://www.ucop.edu/procurement-services/for-ucstaff/sustainable-procurement/sustainableprocurementguidelines.pdf>

D. Chancellors, Health System Chief Executive Officers, the Vice President of Agriculture and Natural Resources, the Executive Director of the Natural Reserve System, and the Director of Lawrence Berkeley National Laboratory (LBNL) are responsible for:

- a. overall local implementation of this Policy;
- b. establishing an IPM Program within 18 months of the enactment of this Policy;
- c. forming an IPMC within 6 months of the enactment of this Policy; and
- d. appointing an IPM Coordinator.

E. Integrated Pest Management Committees (IPMCs) are responsible for:

- a. establishing and submitting to the SPOC within 18 months of the enactment of this Policy a written IPM Plan that will be made available on a publicly accessible website;
- b. establishing as part of the IPM Plan a local review and approval process for green- and yellow-tiered Pesticides;
- c. reviewing and approving on an ongoing basis all PUA requests for red-tiered Pesticides prior to use;
- d. reviewing and updating the IPM Plan at least every 3 years and submitting any revisions to the SPOC;
- e. submitting to the SPOC on an annual basis a summary of their IPM efforts and accomplishments; and
- f. providing IPM Program updates at least annually to local Application Supervisors, Pesticide Applicators, and Pesticide Handlers regarding their roles in implementing a successful IPM Program.

F. Integrated Pest Management (IPM) Coordinators are responsible for:

- a. participating actively as a member of the local IPMC;
- b. acting as the primary contact for the local IPM Program;
- c. ensuring that actual Pest management practices are consistent with both this IPM Policy and the local IPM Plan; and
- d. reviewing and approving Pesticide use in Pest Emergency situations following procedures outlined in the local IPM Plan.

G. Application Supervisors are responsible for:

- a. maintaining a certification to use or supervise the use of Pesticides that is administered by the state Pesticide lead agency (e.g., California Department of Pesticide Regulation);
- b. identifying the Pesticide Applicators and Pesticide Handlers under their supervision requiring applicator certification or licensure;
- c. supporting all Pesticide Applicators and Pesticide Handlers under their supervision in obtaining certification by providing training opportunities during paid work time, as well as educational materials to prepare applicators to successfully pass the state certification requirements;
- d. ensuring all Pesticide Applicators and Pesticide Handlers are trained annually on any Pesticides used or planned to be used at the UC Location.
- e. exercising primary direction and control over the activities of Pesticide Applicators and Pesticide Handlers under their supervision;
- f. ensuring the execution of any Pest control procedures under their supervision are completed in compliance with applicable local, state, and federal laws and regulations, this Policy, and the local IPM Plan;
- g. ensuring all Pesticide applications under their supervision, whether completed by a Pesticide Applicator or Contractor, are requested and receive approval through the PUA Software prior to use;
- h. ensuring that affected UC community members are notified ahead of all proposed Pesticide applications under their supervision when potential for exposure to the applied areas exists; and
- i. ensuring the actual Pesticide quantities applied under their supervision, whether completed by a Pesticide Applicator or Contractor, are recorded electronically through the PUA Software.

H. Pesticide Applicators and Handlers are responsible for:

- a. maintaining a certification to use or supervise the use of Pesticides that is administered by the state Pesticide lead agency (e.g., California Department of Pesticide Regulation); and
- b. executing all Pest control procedures in compliance with applicable local, state, and federal laws and regulations, this Policy, and the local IPM Plan.

- I. **Contracted Pest Management Companies (Contractors)** are responsible for:
 - a. adhering to this Policy;
 - b. ensuring they are properly licensed by the State of California as a Pest Control Business;
 - c. reporting directly to the State of California their use of Pesticides. The PUA Software will not perform this function for non-UC applicators.

V. PROCEDURES

1. Pesticide Hazard Tiering System and Pesticide Hazard Tier List

- a. The SPOC will establish and maintain a Pesticide Hazard Tiering System by which the hazards of each Pesticide used at UC will be assessed and classified
 - i. Hazards evaluated in the tiering system will include but will not be limited to acute toxicity, carcinogenicity, reproductive or developmental toxicity, endocrine disruption, bioaccumulation, surface and groundwater contamination potential, toxic air contaminants, toxicity to bees, toxicity to aquatic life, toxicity to birds, and toxicity to terrestrial wildlife.
 - ii. Pesticides will be classified into 3 tiers based on the hazard assessment:
 1. red (high-risk);
 2. yellow (medium-risk); and
 3. green (low-risk) Pesticides.
- b. The SPOC will establish and maintain a Pesticide Hazard Tier List identifying the Pesticides evaluated and their assigned hazard tiers along with key data used to classify the Pesticide's active ingredients.
 - i. The Pesticide Hazard Tier List will be integrated into the Pesticide Use Authorization Software.
- c. The SPOC will publish the following on its public website (refer to section VI for the applicable hyperlink):
 - i. UC Pesticide Hazard Tiering System information
 - ii. UC Pesticide Hazard Tier List
- d. The SPOC will review at least annually the methodology used in the tiering system to confirm it is working as intended, as well as the list of

registered Pesticides in use at UC to ensure they are classified into one of the 3 hazard tiers.

2. Integrated Pest Management (IPM) Program

- a. Each UC Location will be responsible for developing and establishing an IPM Program.
 - i. UC Locations should follow a process of Adaptive Management to continually improve their IPM Programs.
 - ii. UC Locations should consider soliciting stakeholder engagement as part of the IPM Program development and revision process.
 - iii. IPM Programs must include the following elements:
 1. Integrated Pest Management Committee (IPMC):
 - a. IPMCs must include technical and/or faculty experts in, as well as staff responsible for, Pest management and human health and environmental health. The IPMC must include at least one individual who is a Pesticide Applicator. Additional membership might be constituted from departments such as Facilities Management, Environmental Health & Safety, Housing, Occupational Health, and Sustainability. IPMCs should also consider including affected stakeholders, such as faculty, staff, and student representatives.
 2. Integrated Pest Management Plan (IPM Plan):
 - a. The IPM Plan must give full consideration at all times to the safety and protection of UC students, staff, visitors, and community, and to non-target organisms and resources.
 - b. The IPM Plan must incorporate IPM methods into short- and long-term planning to establish methods for implementing low-risk, effective Pest management practices.
 - c. The IPM Plan must be designed to maintain the integrity of structures, developed landscapes, and natural areas to prevent and reduce conditions conducive to Pests.

- d. The IPMC may consider certain sites and situations as special circumstances and develop separate IPM Plans for those settings.
 - i. Special circumstances may include but are not limited to: archival facilities and rare specimens in botanical gardens.
- e. IPMCs are encouraged to pursue third-party recognition and certification of their plans (e.g., Bee Campus, USDA Organic, Green Shield, ECOwise, GreenPro, etc.).⁴
- f. All IPM Plans must include the following components:
 - i. The IPM Coordinator’s name and contact details;
 - ii. The membership structure of the IPMC;
 - iii. Boundaries and scope;
 - iv. A comprehensive list of potential Pests;
 - v. A list of Generic PUAs approved by the IPMC, if any.
 - vi. The process by which the IPMC will review green-, yellow-, and red-tier Pesticides.
 - vii. A monitoring plan for Pest populations or damage;
 - viii. Pest prevention tactics;
 - ix. Guidelines or thresholds for when action is needed, including information about handling Pest Emergency situations;
 - x. The decision-making process for selecting management tactics and post-action evaluation of the efficacy of management tactics;
 - xi. The mechanism for ensuring electronic reporting of all Pesticide use by Pesticide Applicators or Application Supervisors

⁴ IPM points are available in LEED certification of green buildings if there is Green Shield or ECOwise certification. The University of California’s [Policy on Sustainable Practices](#) requires minimum LEED Silver for all new construction.

(including recording of Pesticide use applied by Contractors) using the systemwide PUA Software;

- xii. Methods for communicating with Pest management contractors; and
- xiii. Methods for communicating with the campus community.

3. Integrated Pest Management Coordinator (IPM Coordinator):

- a. Each UC Location will designate an individual to serve as the IPM Coordinator.

b. Pesticide Use Authorization (PUA) Software application

- i. The Office of Risk Services will provide a web-based software platform to record all UC PUA requests and track the amounts of Pesticides applied at UC Locations for reporting and recording keeping purposes.
- ii. The PUA Software will integrate the Pesticide Hazard Tiering System established by the SPOC.
- iii. UC Locations must record the following in the PUA Software provided by the Office of Risk Services so that UC can maintain a single source of information for reporting and recording keeping purposes:
 - 1. All requests for PUAs (as detailed in section V(1)(c)(iii));
 - 2. Approval or denial status of all PUA requests; and
 - 3. All records of actual Pesticide quantities applied as classified in the Pesticide Hazard Tiering System.

c. Pesticide Use Authorizations (PUAs):

- i. 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.
- ii. All Pesticide applications at UC Locations must be requested through the PUA Software by the Pesticide Applicator or the Application Supervisor and receive approval prior to use.
- iii. In addition to data needed for state and local Pesticide use reporting requirements, information required on the PUA form may include but may not be limited to:
 1. Product name and active ingredient;
 2. EPA Registration Number;
 3. Target Pest;
 4. Date of proposed Pesticide use;
 5. Area to be treated;
 6. The Pesticide application method; and
 7. Any additional information needed to evaluate the overall exposure risk.
 8. Additionally, any Emergency PUA applications must be clearly identified.
- iv. PUA Approval:
 1. Green- and yellow-tier Pesticides:
 - a. Use of green- and yellow-tier Pesticides will be subject to the limitations of review, approval, and use as determined by each UC Location's IPMC and documented in the local IPM Plan.
 - i. The IPMC may document in the IPM Plan pre-approval for the use of green- or yellow-tiered Pesticides as determined by the Pesticide Hazard Tier List without requiring additional review and approval, which will result in an Automatic PUA.
 - ii. The IPMC may restrict the approval for use of green- or yellow-tiered Pesticides to require additional review, which would result in a Generic, Specific, or Emergency PUA (see section V(2)(c)(iv)(2)(b)(i-iii) below for more information about these PUAs).

2. Red-tier Pesticides:

- a. All red-tier Pesticides are prohibited unless permitted for use only after the location's IPMC has directly reviewed and approved its PUA application prior to use.
- b. The IPMC may approve the use of a PUA for a red-tier Pesticide only if the benefits achieved from the use of the Pesticide outweigh the identified potential or known risks (taking into account the availability of feasible, safer alternatives). The PUA may be one of the following types:

i. Generic PUA

1. A Generic PUA may be appropriate for Pesticide uses that pose little to no risk of exposure to the Pesticide or for certain Pest control cases that are common to the UC Location in which non-chemical treatment options have been unsuccessful.
2. A Generic PUA must establish limitations on the use of the Pesticide by setting general parameters as required by the particular use cases it is intended to approve (e.g., target Pest(s), application location(s), application method(s), number of applications, etc.).
3. A Generic PUA may not be granted for longer than 1 year but may be renewed by the IPMC after annual review.

ii. Specific PUA

1. A Specific PUA must establish limitations on the use of the Pesticide by setting explicit parameters as required by the particular case (e.g., type of Pest to be treated, application location, application method, number of applications, defined period of application(s), etc.).
2. A Specific PUA must not be approved to extend beyond the successful resolution

of the particular case identified in the original request.

iii. Emergency PUA

1. An Emergency PUA must apply only to a Pest Emergency situation for which the Pesticide treatment could not be planned more than 3 days in advance.
2. The IPMC may allow the IPM Coordinator to approve Emergency PUAs without prior review by the IPMC.
3. Post-event, the PUA must be updated to include detailed information about the situation and proposed future prevention measures. This information must be submitted to the IPMC for review.

d. Notification of Pesticide Use before Application

- i. Before the application of a Pesticide, the Application Supervisor must ensure affected UC community members are notified ahead of all proposed Pesticide applications where potential exposure to the applied areas exists.
- ii. Notifications to certain persons (for example, K-12 school and daycare facility representatives, parents or guardians of children in K-12 schools and daycare facilities, rental housing occupants, and agricultural workers) are prescribed by existing laws, including the Healthy Schools Act (see, e.g., Cal. Education Code § 17608 *et seq.*; Cal. Food and Agricultural Code § 13180 *et seq.*), California Department of Pesticide Regulation requirements related to agricultural Pesticide use near school sites (see Cal. Code of Regulations, Title 3, § 6690 *et seq.*), statutory requirements for landlords and their authorized agents (see Cal. Civil Code § 1940.8.5), and US Environmental Protection Agency regulations related to agricultural workers (see Code of Federal Regulations, Title 40, § 170.120). Nothing in this Policy exempts users from following otherwise applicable laws and regulations.
- iii. The IPMC may establish notification requirements that exceed the rigor of existing laws.

- iv. Existing laws notwithstanding, all notifications of Pesticide applications by UC employees or contractors will include the following elements:
 - 1. Product name and active ingredient;
 - 2. EPA Registration Number;
 - 3. Target Pest;
 - 4. Date of proposed Pesticide use;
 - 5. Area to be treated;
 - 6. Signal word indicating the toxicity category of the Pesticide;
 - 7. The SPOC hazard tier rating of the Pesticide;
 - 8. UC contact details for more information; and
 - 9. The location of additional information available from the IPMC.

- e. Postings
 - i. Pesticide use postings must be conspicuously posted around any area where Pesticide applications are intended or have been made (e.g., entries to fields or buildings, along walkways, etc.).
 - 1. 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.
 - 2. In the event of an Emergency PUA, postings will be made as soon as reasonable but no later than at the time of the application and must be removed 72 hours after Pesticide application.
 - 3. Postings required by existing laws (e.g., those for schools, daycare facilities, rental housing units, and agricultural workers, as described above) must follow the applicable legal requirements. Additionally, California Department of Pesticide Regulation requirements related to field postings (see Cal. Code of Regulations, Title 3, § 6776.) must be followed. If the property is located out of state, postings should conform to that state's guidelines.

- ii. All posting of Pesticide applications will include the required notification elements prescribed in section V(2)(d)(iv).
- f. Pesticide Use Reporting
- i. All Pesticide applications at UC Locations must be recorded electronically through the PUA Software by the Pesticide Applicator or the Application Supervisor.
 - ii. The PUA Software will perform the appropriate state and county Pesticide usage reports in conformance with state regulations for UC-performed Pesticide applications.
 - iii. The PUA Software will also report out key metrics and data regarding UC's annual Pesticide use.

3. Pesticide Applicators and Handlers:

- a. Pesticide Applicators and Pesticide Handlers will be permitted to attend training during paid work time to maintain their license or certificate. State required registration, certification, or re-certification fees and other associated costs will be the responsibility of the UC Location.
- b. Training documentation will be recorded and reported to the IPMC.

4. Annual IPM Report

- a. The SPOC will prepare an annual report on Integrated Pest Management Practices that will be submitted to the UC President and made available for public dissemination. The report will summarize the current state of UC's IPM implementation, including but not limited to:
 - i. Pesticide use data collected from the systemwide PUA Software; and
 - ii. Information provided by the local IPMCs, such as narratives describing Pests afflicting UC Locations, successful prevention, non-chemical Pesticide alternatives, and Pest emergencies.

VI. RELATED INFORMATION

- [California Food and Agriculture Code Section 12753:](https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=FA§ionNum=12753)
https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=FA§ionNum=12753
- [Establishing Integrated Pest Management Policies and Programs: A Guide for Public Agencies:](https://anrcatalog.ucanr.edu/pdf/8093.pdf)
<https://anrcatalog.ucanr.edu/pdf/8093.pdf>

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- [University of California Herbicide Task Force Report and Recommendations:](https://regents.universityofcalifornia.edu/regmeet/jan20/c1.pdf)
<https://regents.universityofcalifornia.edu/regmeet/jan20/c1.pdf>
- [University of California Pesticide Hazard Tier List:](https://www.ucop.edu/safety-and-loss-prevention/_files/groups/uc-pesticide-hazard-tier-list.xlsx)
https://www.ucop.edu/safety-and-loss-prevention/_files/groups/uc-pesticide-hazard-tier-list.xlsx
- [University of California Pesticide Hazard Tiering System:](https://www.ucop.edu/safety-and-loss-prevention/_files/groups/uc-pesticide-hazard-tiering-system.pdf)
https://www.ucop.edu/safety-and-loss-prevention/_files/groups/uc-pesticide-hazard-tiering-system.pdf
- [University of California Policy on Sustainable Practices:](https://policy.ucop.edu/doc/3100155/SustainablePractices)
<https://policy.ucop.edu/doc/3100155/SustainablePractices>
- [University of California Statewide Integrated Pest Management Program:](http://ipm.ucanr.edu/)
<http://ipm.ucanr.edu/>
- [University of California Sustainable Procurement Guidelines:](https://www.ucop.edu/procurement-services/for-ucstaff/sustainable-procurement/sustainableprocurementguidelines.pdf)
<https://www.ucop.edu/procurement-services/for-ucstaff/sustainable-procurement/sustainableprocurementguidelines.pdf>
- [University of California Systemwide Pesticide Oversight Committee:](https://www.ucop.edu/safety-and-loss-prevention/environmental/groups/spoc.html)
<https://www.ucop.edu/safety-and-loss-prevention/environmental/groups/spoc.html>

VII. FREQUENTLY ASKED QUESTIONS

Q: Are exemptions around glyphosate use granted by the UC Herbicide Task Force prior to the inception of this Policy still valid?

A: This Policy supersedes any exemption granted under by the UC Herbicide Task Force prior to the inception of this Policy.

VIII. REVISION HISTORY

IX. APPENDIX

MODEL COMMUNICATION

The University of California Office of the President invites comments on a proposed Presidential Policy on Integrated Pest Management (“IPM”). The policy is newly proposed to address the following key issues:

- The issuance of the Integrated Pest Management (“IPM”) Policy intends to establish the University of California’s requirements for the implementation of an IPM Program at every UC location as recommended by the UC Herbicide Task Force formed by former President Napolitano with support from the Regents, including:
 - identification of local and systemwide oversight structures and responsibilities for the IPM Programs;
 - creation and maintenance of a systemwide Pesticide Hazard Tiering System and a systemwide Pesticide Hazard Tier List;
 - integration of a systemwide Pesticide Use Authorization software by every UC location;
 - establishment of certification / licensing requirements for Pesticide Handlers, Applicators, and their supervisors.
- Exemptions to the policy include the use of pesticides in research, the use of antimicrobials for hygienic purposes (e.g., disinfecting sprays or wipes, pool treatments, and drinking water treatments), and the use of chemicals for the purpose of sterilizing medical products or equipment.

If you have any questions or if you wish to comment, please contact _____ at _____, no later than _____, 2021.