

## Summary

The California Department of Food and Agriculture (CDFA), in collaboration with the California Environmental Protection Agency (CalEPA) and the State Water Resources Control Board (Water Boards), contracted with Crowe LLP (Crowe) to conduct the Regulatory Alignment Study (Study). Crowe is evaluating ag-related food safety and water quality regulatory reporting requirements with the goal of streamlining administrative processes and optimizing information collected by the state.






In May 2024, Crowe released a [Regulatory Alignment Concept Paper](#) (Concept Paper) outlining preliminary regulatory pathways within the areas of food safety and water quality for consideration by CDFA, CalEPA, Water Boards, interested parties, and public commenters. Throughout Summer 2024, Crowe conducted workshops with members of the agricultural community, industry, interested parties, and regulators to review and further develop regulatory pathways outlined within the Concept Paper. Input from the workshops was shared in the [October Study Update](#). This March, the Study Update provides details on the following Study milestones:

- **Identify Process Improvements & Implementation Steps (Fall 2024 – Winter 2025)** – Crowe is reviewing outcomes from previous Study milestones to identify recommended process improvement opportunities and detailed steps for implementation.
- **Evaluate & Recommend Technological Enhancements (Spring – Summer 2025)** – Crowe will identify, evaluate, and recommend technological enhancements aligned with recommended process improvements.
- **Present Solutions & Recommend Implementation Plans (Fall 2025)** – Crowe will present a final report outlining the results of the Study. The report will include detailed implementation plans, such as timelines, mechanisms, strategies, and actions to implement the recommended process improvements and technological solutions.

## Regulatory Alignment Study Objectives

**Exhibit 1** provides the Study's objectives. Crowe, in collaboration with CDFA, CalEPA, and Water Boards, completed the first three objectives (as shown by the green check marks) and is working on the final two objectives.

### Exhibit 1 Regulatory Alignment Study Objectives

	Evaluate state regulatory requirements within the areas of food safety and water quality for the agricultural community and identify environmental and public health protections.	✓
	Conduct listening sessions to gather input from the agricultural community relating to their experiences with the reporting requirements and processes in these areas.	✓
	Convene with the agricultural community and regulators to review and map existing regulatory pathways for food safety and water quality to identify opportunities to improve efficiency and information sharing.	✓
	Identify and prepare implementation plans for recommended process improvements to streamline reporting requirements.	
	Provide recommendations to CDFA, CalEPA, and the Water Boards for technological enhancements to streamline regulatory administrative and reporting processes for the agricultural community.	

## Addressing Key Barriers and Opportunities

Since the Study's inception, Crowe identified several barriers and opportunities, summarized in **Exhibit 2**, that will guide the development of proposed process improvements and technological solutions. While not an exhaustive list, these key barriers highlight opportunities for improvement that can help streamline compliance, enhance the state's data collection efforts, and strengthen protections for human health and the environment.

**Exhibit 2**  
**Summary of Key Barriers and Opportunities by Program**

Program	Barriers	Opportunities
<b>Produce Safety Program (PSP)</b>	<ul style="list-style-type: none"> <li>• <b>Limited Inspectors:</b> PSP has only nine inspectors to cover 20% of verified, covered farms annually, creating a resource strain as more farms come under oversight.</li> <li>• <b>Grower Audit Fatigue:</b> Most covered growers undergo multiple food safety audits from third-party certification programs such as Global G.A.P., PrimusGFS, and others to meet buyer requirements. This redundancy creates audit fatigue.</li> <li>• <b>Data Fragmentation and Availability:</b> PSP requires farm verification information to identify covered farms, but dispersed and unintegrated data systems limit PSP's ability to verify growers, prioritize inspections and focus on high-risk farms.</li> </ul>	<ul style="list-style-type: none"> <li>• Expand digital tools (e.g., PSP Portal, Farmer Questionnaire) to prioritize high-risk farms and support inspectors.</li> <li>• Work toward streamlining audits by recognizing third-party certifications, where appropriate.</li> <li>• Improve data integration between CDFA programs (e.g. State Organics Program) to enhance grower verification and compliance tracking.</li> </ul>
<b>Irrigated Lands Regulatory Program (ILRP)</b>	<ul style="list-style-type: none"> <li>• <b>Fragmented Reporting Systems:</b> Variability in water quality reporting tools and a lack of standardized data make it difficult to perform regional and statewide data analysis.</li> <li>• <b>Complex Nitrogen Reporting Requirements:</b> Small-scale farms face challenges in meeting complex nitrogen reporting requirements due to limited technical expertise, resources, and insufficient scientific data on specialty crops. The absence of standardized crop categories makes it difficult to analyze nitrogen management across different crops.</li> <li>• <b>Enrollment Gaps:</b> Of the 7 million acres estimated to be eligible for enrollment in an ILRP order, approximately 892,800 acres (12%) are yet to enroll.</li> <li>• <b>Regional Inconsistency:</b> Inconsistent regional practices increase inefficiencies in data aggregation and nitrogen management trend analysis.</li> </ul>	<ul style="list-style-type: none"> <li>• Integrate reporting systems to share data and reduce silos.</li> <li>• Provide simplified nitrogen reporting templates tailored for small-scale farmers.</li> <li>• Standardize nitrogen report crop categories across Coalitions and regions.</li> <li>• Coordinate with external partners and other regulatory agencies to expand program outreach.</li> <li>• Standardize the reporting process across regions.</li> </ul>
<b>Confined Animal Facilities (CAF) Program</b>	<ul style="list-style-type: none"> <li>• <b>Manual Reporting Processes:</b> Annual reports submitted as PDFs or paper documents are not consistently integrated into electronic systems such as GeoTracker and CIWQS, limiting data accessibility and analysis.</li> <li>• <b>Nutrient Management Regulatory Challenges:</b> Operators struggle with limited storage, land application availability, and treatment capacity for excess nutrients and manure.</li> <li>• <b>Manure Market Gaps:</b> A lack of a scalable, industry-led manure market further compounds nutrient management challenges.</li> </ul>	<ul style="list-style-type: none"> <li>• Expand digital reporting tools to improve data accessibility and analysis.</li> <li>• Provide additional technical assistance and support for the transition to electronic reporting.</li> <li>• Continue to work closely with industry partners on viable options to manage excess nutrients.</li> </ul>
<b>Winery Order (WO)</b>	<ul style="list-style-type: none"> <li>• <b>Early Implementation Stage:</b> Approximately 2,000 wineries remain unenrolled, and monitoring and reporting data has not been submitted.</li> <li>• <b>Barriers to Adoption:</b> Smaller wineries face challenges using GeoTracker, the designated electronic reporting tool, due to limited familiarity and technological awareness.</li> <li>• <b>Limited Industry Advocacy:</b> Limited industry-led technical assistance and coordination delays compliance and uniform adoption of program requirements.</li> </ul>	<ul style="list-style-type: none"> <li>• Incentivize enrollment under the order through potential fee reductions.</li> <li>• Expand outreach through strategic partnerships with industry groups and counties.</li> <li>• Work with local agencies to provide enrollment assistance and group reporting.</li> </ul>

## Identification of Process Improvements and Actions

Crowe is using the framework in **Exhibit 3** to identify process improvements that align the Study’s goals, focus areas, and regulatory pathways with actionable steps to streamline regulatory processes (e.g., enrollment, monitoring, inspection, reporting, etc.). These process improvements address the key barriers shown in Exhibit 2, and other challenges for each of the programs in scope of the Study.

**Exhibit 3**  
**Identification of Process Improvements and Actions Framework**



### Regulatory Alignment Goals

The Study’s goals provide direction for the process improvements and actions. These goals, validated through extensive feedback from program staff and Study participants, aim to:

- Empower the agricultural community through streamlined requirements.
- Support the state’s data and information collection efforts.
- Strengthen protections for human health and the environment.

The Study’s goals align with CDFA’s Ag Vision strategic priority – Collaborate on Smarter Regulations. This priority emphasizes working with other state agencies, participants, and the administration to explore and support smarter regulations that rethink ways to both meet public obligations and support farmers with regulatory compliance and implementation.

## Regulatory Alignment Focus Areas

The Study's focus areas, listed in **Exhibit 4**, highlight key opportunities to achieve the Study's goals. Each process improvement in the Plan aligns with these focus areas to highlight its value and demonstrate how it supports the Study's goals.

### Exhibit 4 Focus Areas



#### Data and Information Sharing

Opportunities to improve the exchange of selected data and information between state regulatory agencies and programs.



#### Efficiencies

Opportunities to simplify and expedite regulatory administrative, reporting, and compliance processes.



#### Effectiveness

Opportunities to measure regulatory performance objectives and goals.



#### Equity

Opportunities to ensure the inclusion of socially disadvantaged communities, and farmers and ranchers<sup>1</sup> in the development, implementation, and enforcement of regulations.

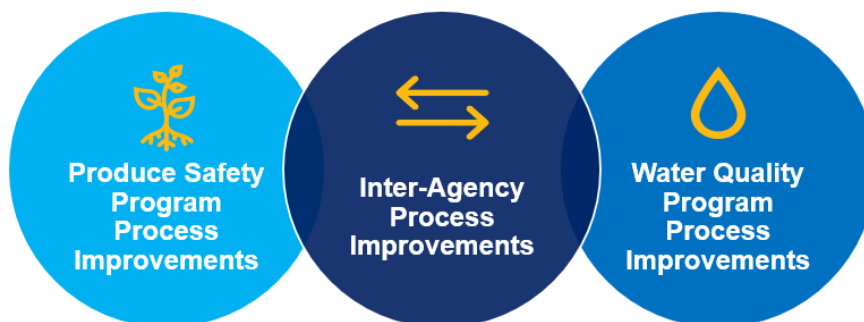
## Regulatory Pathways

The Regulatory Alignment Concept Paper provided nearly 50 proposed regulatory pathways including considerations, options, tools, and recommendations for improving, streamlining, and aligning the regulatory programs and requirements in the scope of the study. Input provided by interested parties on the regulatory pathways served as a foundation for the development of process improvements and actions.

## Process Improvement and Actions

Crowe is identifying process improvements and actions to support regulatory alignment across agencies, the Produce Safety Program and Water Quality Programs (ILRP, CAF Program, and WO). **Exhibit 5** lists the categorization of process improvements to be implemented by CDFA and Water Boards in coordination with key partners. Crowe will summarize key process improvements and actions in the final solutions report.

### Exhibit 5 Process Improvements and Actions



<sup>1</sup> As defined by the Farmer Equity Act of 2017.

## Identification of Technological Enhancements

The next Study milestone is to evaluate and recommend technological enhancements that will support proposed process improvements and other regulatory alignment opportunities. Crowe is working with CDFA, Water Boards, and CalEPA to identify possible upgrades to existing systems, re-configurations of solutions, and alternative solutions. This includes:

- Reviewing the Farm Data Repository (PSP Portal) and existing Water Boards systems and databases (e.g. GeoTracker, California Integrated Water Quality System [CIWQS], California Environmental Data Exchange Network [CEDEN]).
- Identifying essential system and database functionalities needed for program compliance and to support process improvements and other regulatory alignment opportunities, including automation, data integration, and user accessibility.
- Evaluating alternative solutions that may offer increased efficiency or adaptability to changing regulatory needs.
- Gathering insights from industry experts, regulatory agencies, and program participants to verify that proposed solutions align with real-world operational challenges.
- Providing recommendations on technological enhancements in consideration of business analyses and feasibility considerations.

## Next Steps

**Exhibit 6** provides the remaining Study milestones along with additional opportunities to provide input on proposed solutions. Crowe encourages all interested parties to engage as we prepare draft and final recommendations for public comment later this year.

### Exhibit 6 Remaining Study Milestones

Fall 2025	Crowe will publish draft Solutions and Implementation Plans for public comment. ★
Fall 2025	Crowe will facilitate workshops on the Solutions and Implementation Plans. ★
By Winter 2026	Crowe will publish final Solutions and Implementation Plans.

★ Opportunity for Public Engagement

Crowe welcomes your input – email us at [RegulatoryAlignmentStudy@crowe.com](mailto:RegulatoryAlignmentStudy@crowe.com).

## For More Information

Additional information about the Study can be found at the following link: <https://www.cdfa.ca.gov/RegulatoryAlignment>.