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Via email: Jennifer.Teerlink@cdpr.ca.gov

May 13, 2026

RE: Petition for Reevaluation of Indaziflam (Rejuvra)

Dear Deputy Director Teerlink,

Public Employees for Environmental Responsibility (PEER) recently found two per-and polyfluoroalkyl substances (PFAS), perfluorohexanesulfonic acid (PFHxS) and perfluorohexanoic acid (PFHxA), in the pesticide Indaziflam, trade name Rejuvra.¹ Given this new information, and the likelihood that “a significant adverse impact has occurred or is likely to occur,” PEER is requesting the California Department of Pesticide Regulation (DPR) reevaluate Indaziflam for its pesticide risks and impacts on human health and the environment.² This petition requesting the reevaluation of Indaziflam is filed pursuant to Cal. Gov. Code § 11340.6.

Joining PEER in this petition is Andrew Sandoval, Salinas City Councilmember, District 5. He is concerned about the impacts of pesticides and PFAS on his constituency. He is an active proponent of transparency and full disclosure of known harms in pesticides.³

1. Chandra Rosenthal & David Jenkins, *New Testing Detects Toxic PFAS in Herbicide Applied Across Public Lands*, PUB. EMPS. FOR ENV'T RESP. (Mar. 10, 2026), <https://peer.org/new-testing-detects-toxic-pfas-in-herbicide-applied-across-public-lands/>.

2. Cal. Code Regs. tit. 3, § 6220.

3. *California Bill Aims to End Spraying of Crops with Toxic “Forever Chemicals,”* April 10, 2026, Mother Jones Magazine, <https://www.motherjones.com/politics/2026/04/california-bill-ab-1606-pfas-pesticides-food-crops-spraying-toxic-forever-chemicals/>

BACKGROUND

Indaziflam

Indaziflam is a pre-emergent herbicide used to prevent seed germination and control invasive annual grasses such as cheatgrass. The California Department of Pesticide Regulation approved Indaziflam in 2024 for direct soil application.

Indaziflam has significant known ecological risks. Because Indaziflam is non-selective, its application to prevent the spread of invasive plant species can inadvertently kill native plants and forbs. Its application can also disrupt soil and aquatic biota. Therefore, Indaziflam poses significant risks to the environment. In addition, despite being marketed as having low acute toxicity, research suggests that there are genotoxic effects on human cells, raising the possibility that it can damage DNA.

PEER's independent testing has detected significant amounts of PFAS in Indaziflam in the form of PFHxS and PFHxA.⁴ This adds a new risk to using Indaziflam for invasive plant control. PFAS can get in pesticides in four ways: (1) leaching from fluorinated containers; (2) undisclosed inert ingredients in the pesticide's formulation; (3) fluorinated adjuvants; and (4) PFAS used as active ingredients. The presence of PFAS in Indaziflam does not appear to have been taken into account when California assessed it.

Because California considers both publicly disclosed ingredients and inert ingredients in its evaluation for approval, independent testing of Indaziflam should occur to determine whether it contains PFAS.

Risks of PFAS

PFAS are a family of chemicals often referred to as “forever chemicals” because they do not readily break down in the environment and bioaccumulate in our bodies. PFAS are widely manufactured and used because of their unique physical and chemical properties. Nonetheless, human exposure to PFAS is associated with cancer, birth defects, developmental damage to infants, and impaired functioning of the liver, kidneys, thyroid, and immune system. Although the U.S. Environmental Protection Agency focuses most of its attention on two legacy PFAS, perfluorooctanoic acid (PFOA) and perfluorooctane sulfonic acid (PFOS), PFHxS is an equally serious concern because of its toxicity and its longer half-life in the human body.⁵

California already is concerned about PFHxS and PFHxA in drinking water. The California Division of Drinking Water has established non-enforceable advisory levels for PFHxS and PFHxA since 2022.⁶

4. *PFAS Testing Results for Indaziflam, Trade Name Rejuvra*, PUB. EMPS. FOR ENV'T RESP. (Feb. 2026), <https://peer.org/wp-content/uploads/2026/03/Indaziflam-Testing-Chart.pdf>.

5. *IRIS Toxicological Review of Perfluorohexanesulfonic Acid (PFHxS, CASRN 335-46-4) and Related Salts*, US Environmental Protection Agency, January 2025, <https://iris.epa.gov/static/pdfs/0705tr.pdf>.

6. *Drinking Water Notification Levels*, STATE WATER RES. CONTROL BD. (Nov. 6, 2025), https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/NotificationLevels.html.

The most recent notification levels for PFHxS and PFHxA⁷ in drinking water are 3 ppt and 1,000 ppt, respectively, and are intended to be health-based precautionary measures. Response levels for PFHxS and PFHxA⁸ in drinking water are 10 ppt and 10,000 ppt, respectively, which are the recommended levels to reduce public exposure.⁹

California also regulates products that are likely to contain PFHxS. PFHxS is extensively used in firefighting foams and textile treatment.¹⁰ California bans the sale and distribution of firefighting foam containing intentionally added PFAS.¹¹ California also bans the manufacture, sale, and distribution of textiles containing regulated PFAS.¹² Along with independent testing, the Department of Pesticide Regulation should perform a risk assessment of Indaziflam to determine the risk to California's drinking water, public health and the environment.

California is one of the front runners in our country with regard to defending the state from PFAS pollution through litigation. In 2022, California Attorney General Rob Bonta filed a lawsuit against PFAS manufacturers for endangering public health and causing irreparable harm to California's water resources.¹³ He has also submitted letters in support of greater PFAS regulation.¹⁴ It follows that California policy would support reconsideration of Indaziflam in light of this new data.

CONCLUSION

DPR is required to continuously evaluate currently registered pesticides for their risks.¹⁵ PEER's independent testing has detected significant amounts of PFHxS and PFHxA in Indaziflam, and California has identified PFAS, including PFHxS, as a risk to public health. Considering the new information that Indaziflam contains PFAS, PEER is requesting the California Department of Pesticide Regulation to reevaluate Indaziflam for its pesticide risks and impacts on human health and the environment.

We respectfully request a meeting with you to discuss this petition. Thank you for your consideration.

7. NOTIFICATION LEVEL ISSUANCE (PFHxA), STATE WATER RES. CONTROL BD. (2025), https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/documents/pfas/PFHxA-nl-issuance-20251028.pdf; NOTIFICATION LEVEL ISSUANCE (PFHxS), STATE WATER RES. CONTROL BD. (2025), https://www.waterboards.ca.gov/drinking_water/programs/documents/PFHxS-issuance.pdf.

8. *Id.*

9. *Id.*

10. *IRIS Toxicological Review of Perfluorohexanesulfonic Acid* (PFHxS, CASRN 335-46-4) and Related Salts, US Environmental Protection Agency, January 2025, <https://iris.epa.gov/static/pdfs/0705tr.pdf>.

11. Cal. Health & Safety Code § 13061(b)(1).

12. Cal. Health & Safety Code § 108971(a)(1).

13. *Attorney General Bonta Sues Manufacturers of Toxic Forever Chemicals*, STATE OF CAL. DEP'T OF JUST. (Nov. 10, 2022), <https://oag.ca.gov/news/press-releases/attorney-general-bonta-sues-manufacturers-toxic-forever-chemicals>.

14. *Attorney General Bonta Leads Bipartisan Coalition in Opposing 3M's Proposed PFAS Settlement*, STATE OF CAL. DEP'T OF JUST. (July 26, 2023), <https://oag.ca.gov/news/press-releases/attorney-general-bonta-leads-bipartisan-coalition-opposing-3m%E2%80%99s-proposed-pfas>.

15. Cal. Food & Agric. Code § 12824.

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Attachments:
Spec Lab Analytical Reports, January 15, 2026, and summary
Indaziflam fact sheet, PEER