***[Agricultural Template Letter- Paste on Company Letterhead & Fill in Bold Sections, Edit Other Sections as Necessary]***

July [**XX**], 2023

Tulio Macedo, Chief
Brenna McNabb, Senior Environmental Scientist
Pesticide Registration Branch
Department of Pesticide Regulation
Pesticide Registration Branch
1001 I Street, P.O. Box 4015
Sacramento, CA 95812-4015

Submitted via email to Rodenticide.Comments@cdpr.ca.gov

Re: California Notice 2023-06 Notice of Proposed Decision to Begin Reevaluation of Diphacinone an Public Report

Dear Mr. Macedo and Ms. McNabb,

Thank you for the opportunity to submit these comments on the proposed decision to begin reevaluation of diphacinone. As an **[agricultural professional/ farmer/ rancher/ operator]**, I take seriously my duty to responsibly protect my **[agriculture operation/ farm/ ranch/ livestock operation/ grain storage facility/ food storage** **facility / property]** from rodents in California. **[Explain your Agri-business/ operation here, and its benefit to California].**

I do not think reevaluation is supported by the information that the Agency has provided, and the process of reevaluation would result in harmful effects to human health and agricultural production. Therefore, I respectfully request that the Department not proceed with the proposed decision to begin reevaluation of diphacinone.

The diphacinone products I currently use **[such as X, Y, Z LIST THEM]** are important tools in my toolbox, and their role in controlling rodent infestations in my operation is necessary. **[Describe the damage that rodents cause to your property here]**

Although the Department is not proposing any restrictions at this time, I would like to state that restricting diphacinone through reevaluation would significantly increase costs and make it very difficult to manage rodents, put all Californians at risk for disease, cause property damage, and contaminate food resources. The continued availability of diphacinone, and other rodenticides, in the state is a key component of integrated pest management in my operation. Diphacinone is often the active ingredient of choice to control pests like rats, mice, moles, voles, pocket gophers, and ground squirrels in agriculture. While products are in reevaluation, and potentially subject to new restrictive legislation, it could limit my ability to properly control these species, which are known to cause significant property and crop damage, harbor disease-spreading parasites such as fleas and ticks, and their burrowing poses a safety hazard for livestock. For example, ground squirrels were implicated as the host to plague-infected fleas (either directly or indirectly) in all the reported cases of human plague in California (CDPH 2021, Page 2). Ground squirrels are often controlled with diphacinone over large areas in crops, rangeland, fallow land, buffer areas, and along ditch banks. Without these applications over large acreages, ground squirrel damage would decimate production.

During reevaluation, I will not have access to all the products and uses of diphacinone that are registered and available in other states. This puts our California agriculture businesses at a disadvantage. Future restrictions added as a result of reevaluation will make it more difficult to control rodents and add costs to my entire operation. These costs will burden me and others in agriculture with extremely limited budgets and already operating on a very small margin. Increases in rodent populations have a direct impact on yield and therefore on an operation’s profitability. For some harvested products, even the slightest damage visible from rodent gnawing cannot be sold and is considered a full loss. Farm equipment is vulnerable to damage from rodent gnawing and nesting when not in use, and from running into burrows and mounds in the field. This damage can render equipment unusable during critical periods of farm operations and be extremely expensive to repair. My livestock and poultry also need protection from the disease and damage caused by rodents. Additionally, contamination from rodent urine and droppings poses a safety hazard to both stored crops, animal feed, and personnel working within buildings. Another issue is the damage to fixed assets in a grower’s production. Voles, rats, mice, and ground squirrels cause damage to irrigation systems, equipment wiring, seed stock, and storage areas, creating further losses for the operation.

**[Add anything else about the importance of diphacinone as a tool in your toolbox here]**

The consequences of reevaluating diphacinone will add significantly to my production costs and decrease my ability to control rodent damage. Collectively, these additional costs will inevitably be passed on to the consumer. Any proposed restrictions to diphacinone during or after reevaluation would negatively impact food production as rodent damage and contamination would increase. Effective and economical rodent management through judicious use of diphacinone is critical to agricultural operations in California. I urge the Department to strongly consider the negative impacts any future changes to diphacinone availability will have on my ability to sustain a viable agricultural business.

Thank you for considering my comments.

Sincerely,

References:

California Notice 2023-06. Notice of Proposed Decision to Begin Reevaluation of Diphacinone and Public Report. Department of Pesticide Regulation. May 19, 2023. <https://www.cdpr.ca.gov/docs/registration/canot/2023/ca2023-06.pdf>

California Department of Public Health (CDPH). California Compendium of Plague Control Vector-Borne Disease Section – Infectious Diseases Branch. Updated September 2021. <https://www.cdph.ca.gov/Programs/CID/DCDC/CDPH%20Document%20Library/CAPlagueCompendium.pdf>