***[Consumer Retail 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 a California consumer, I take seriously my right and responsibility to protect my family, property, home, and pets from rodents.

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. 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, that I purchase from A, B, C]** are important tools, and their role in controlling rodent infestations in and around my property is necessary, especially since other products and active ingredients have already been restricted and taken away from me and other consumers. **[Describe the damage that rodents cause to your home and/or business 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 for me to manage rodents. This decision will also put Californians at risk for disease, cause property damage, and contaminate food resources across the state. The continued availability of diphacinone, and other rodenticides, in California for all consumers is extremely important. Diphacinone is often the active ingredient of choice to control pests like rats, mice, moles, voles, pocket gophers, and ground squirrels. 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 damage, harbor disease-spreading parasites such as fleas and ticks, and their burrowing poses a safety hazard. 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).

During reevaluation, I will not have access to all the products and uses of diphacinone that are registered and available to consumers in other states. This puts Californian consumers at a disadvantage. Future restrictions added as a result of reevaluation will make it more difficult to control rodents and add costs to applications. With limited general use rodent control products available to use I may have to pay a company to control the problem instead of taking care of it myself. Some consumers will not pay for professional services, and may resort to ineffective or unsafe practices, resulting in increases in rodent populations across the state.

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

For some consumers in California like myself, the costs and burdens associated with reevaluation restrictions on products and uses, and subsequent mitigation measures, will result in multiple negative impacts. Some households will abandon efforts to manage rodents. As a result, rodent-borne disease may increase, along with structural damage. Effective and economical rodent management through judicious use of diphacinone is critical to maintain public health and safety for all Californians. I urge you to strongly consider the negative impacts that these changes from reevaluation will have on my household and property.

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>