***[Pest Control Professional 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 pest control professional, I take seriously my duty to responsibly protect people, property, and food from rodents in California. **[Explain your business/ professional pest control career here].**

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]** are important public health tools, and their role in controlling rodent infestations is necessary, especially since other tools have been restricted due to AB1788. **[Describe the damage that rodents cause to your customers 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, which will put Californians at increased risk for disease, property damage, and contaminated food resources. The continued availability of diphacinone, and other rodenticides, in the state is a key component of integrated pest management. 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 in other states. This puts our California pest control businesses and customers at a disadvantage. Future restrictions added as a result of reevaluation will make it more difficult to provide rodent control services and add costs to applications. These costs will burden those customers with limited budgets such as small businesses, school districts, public and low-income housing complexes and lower income homeowners. Customers will reduce or eliminate our professional services, resulting in increases in rodent populations.

If diphacinone, and other rodenticides, are severely restricted I may have to resort to traps. The additional costs associated with using traps instead of diphacinone include much more frequent visits to accounts, and more time spent per visit to collect carcasses and reset traps. Currently most accounts may only be visited monthly, every other month, or quarterly. In addition, the frequent return trips will result in increased fuel usage and increased carbon dioxide emissions that are associated with transportation. Furthermore, increased time spent setting traps will mean less time for other components of integrated pest management (IPM), leading to more pest problems and more reactionary remediations since preventative actions will not be a priority. To keep costs down at commercial accounts, my technicians will need to shift their time from inspecting the site for pest activity and conducive conditions to servicing traps. Problems that were once prevented through correcting identified conducive conditions will be missed, resulting in higher insect and rodent populations. This will lead to more food safety issues, disease spread, and structural damage. Reactionary tactics will have to be employed, including more rodenticide use. The increased time and effort needed to bring pest populations under control will result in additional costs.

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

For some pest control applicators in California like myself, the costs and burdens associated with reevaluation restrictions on products and uses, and subsequent mitigation measures, will result in increased costs for my customers. This will cause some businesses and households to abandon rodent management services. 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 business and my customers.

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>