***[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](mailto: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 **[licensed pesticide dealer/broker/retailer]**, I take seriously my duty to responsibly provide rodenticides, including diphacinone products, to protect people, property, and food from rodents in California. **[Explain your business 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 sell **[such as X, Y, Z, LIST THEM]** are important public health tools, and their continued availability to my customers in order to control rodent infestations is necessary, especially since other tools have been restricted due to previous reevaluations and 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 sell and provide products 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 that are registered and available to sell in other states. This puts our California businesses, retailers, and customers at a disadvantage. Future restrictions added as a result of reevaluation will make it more difficult to provide rodent control solutions, and add costs to applications. We strive to provide pest control solutions regardless of socioeconomic status. Often consumers in lower income brackets cannot afford professional pest control services and therefore are most reliant on having access to diphacinone (non-restricted) products that they can apply themselves. The consequences of reevaluation will mean that consumers and businesses, especially those that are economically challenged, will not be able to control rodents as effectively as they were able to previously. This will then result in an increase in the rodent population, especially in the Californian cities that are already burdened by rodents. These areas will suffer an increase in disease and property damage.

Rodent control options for the consumer are already limited, and further reducing available products unfairly makes the consumer bear the brunt of these restrictions without providing evidence that consumer misuse is common and widespread and is impacting wildlife. Removing diphacinone will leave some consumers with no rodent control options that work for them. Setting traps and disposing of live or dead rodents does not appeal to many people and may not be feasible for some.

**[Add anything else about the importance of diphacinone product availability here]**

For some retailers 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 families and businesses to 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. Restricting diphacinone uses through reevaluation would make it nearly impossible for my customers to effectively control rodents in their homes, businesses, and other properties, thus putting their families, employees, and customers at risk from the disease and damage that rodents cause.  I urge you to strongly consider the negative impacts that these changes will have on my retail business and 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>