



November 7, 2025

Department of Pesticide Regulation
Draft Regulations - Anticoagulant Rodenticide Mitigation Informal Public Comment
Office of Laws & Regulations
1001 I Street, P.O. Box 4015 Sacramento, CA 95812

Subject: Proposed Regulations for Anticoagulant Rodenticides Mitigation

The California Restaurant Association (CRA) is the definitive voice of the state's food service industry, representing nearly 22,000 eating establishments. In this letter, we would like to provide restaurant-specific comments regarding the Department of Pesticide Regulation's (DPR) proposed reevaluation and mitigation of First and Second Generation Anticoagulant Rodenticides (FGARs/SGARs/ARs).

First, CRA appreciates DPR's recent regulatory AR mitigation recommendations, which we believe acknowledges the unintended consequences of sweeping rodenticide bans. Eating establishments play a central role in safeguarding the health of their patrons and by extension, the overall public. With such an important responsibility to uphold, it is vital the unique challenges faced by the industry are recognized and accounted for.

This responsibility is reflected in the high health and safety standards that restaurants follow. In fact, California Retail Food Code section 114259 mandates that food facility operators ensure their premises are always free of vermin, rodents and insects. Under the authority of this statute, any evidence of rodent or vermin activity can result in the immediate closure of a facility.

The prohibition on rodenticide usage has removed an effective rodent control tool, while at the same time preexisting laws such as AB 827 (2019) and SB 1383 (2016) have provided additional challenges – such as when surrounding businesses and residents do not follow best practices for storing organic waste or curbing rodent activity, making it more challenging for food facilities' adherence to health standards while utilizing integrated pest management techniques (IPM) aside from rodenticides.

These compounding factors have had a tangible effect. For example, within the first six months of 2025, Santa Clara County had matched the entire 2024 year for rodent-related food facility closures. Similarly, the County of San Diego's Department of Environmental Health reported an alarming 74% increase in rodent-related closures between fiscal year 22/23 and 24/25. This recent data illustrates the necessity for restaurants to have all the necessary tools to ensure these benchmarks are adhered to, the public is protected, and closures are avoided.

While CRA applauds DPR's mitigation recommendations, we believe the industry should be able to utilize AR's, by way of certified or licensed private or commercial applicators for more than the proposed 35 consecutive days for a total of 105 days per year. It is in the best interest of the industry and public health to allow restaurants, a location where food and drinks are stored and prepared, all the tools available to protect the well-being of their patrons and the public.

A handwritten signature in black ink, appearing to read "Matt Sutton". The signature is fluid and cursive, with the first name "Matt" being more prominent than the last name "Sutton".

Matt Sutton
Senior Vice President, Government Affairs & Public Policy
California Restaurant Association