California Rice
It's in our Nature

November 7, 2025

Submitted via SmartComment portal:
Informal comments: DPR Anticoagulant Rodenticide Mitigation Informal Public Workshop

Lauren Otani, Regulations Coordinator
Department of Pesticide Regulation
1001 I Street, P.O. Box 4015
Sacramento, California 95812-4015

RE: California Rice Commission Comments on the Department of Pesticide Regulation Anticoagulant Rodenticide Mitigation Informal Public Workshop

Dear Lauren Otani:

Thank you for requesting informal comments on the Department of Pesticide Regulation (DPR) Anticoagulant Rodenticide Informal Public Workshop held September 24, 2025.

The California Rice Commission (CRC) is a statutory organization representing the entirety of the California rice industry consisting of 2,500 rice farmers and marketers. Representation of the California rice industry involves managing regulatory issues for air resources, pesticide regulation, water quality, conservation programs, and public education. California is the second largest rice producing state growing temperate japonica medium grain on an average of 500,000 acres annually. The cropland provides important habitat to millions of migrating waterbirds along the Pacific Flyway during the non-crop production season and offers other environmental benefits year-round.

Previous comments were specific to explaining use of rodenticides in milling facilities and responses to identifying the second generation anticoagulant rodenticides (SGARS) as restricted materials. The following comments focus on the workshop presentation.

Rice marketers consist of the milling facilities, which are members of the CRC while the rice warehouses receive representation from the California Warehouse Association. Essentially, a rice warehouse stores rice in the "paddy" form with the husk still on. A rice mill mechanically processes the paddy rice into a more refined, edible form like brown or white rice. Therefore, the function of the mill is hulling the husk and removing bran (for white rice) whereas the warehouse is a place to receive rice directly from the field and store the

commodity to preserve quality until milling. Both types of facilities maintain stores of rice and face similar challenges with rodent pest control.

We provide this distinction between rice mills and warehouses because there appears to be no identification of milling facilities. The Crosswalk of Anticoagulant Legislation and Proposed Regulations, Agricultural Activities (h)(2) cites "Warehouse storing food for human or animal consumption". We assume inclusion of rice milling facilities under the same section, "Food production sites including slaughterhouse or cannery."

The text of proposed regulations allows use of the anticoagulant rodenticides in and around man-made structures § 6471(a)(9) *Food processing facilities, as defined in HSC § 109947.*[1] The next section also applies to rice mills, § 6471(a) (10*) Locations with the primary purpose of producing, storing, holding, or packing an agricultural commodity, livestock, poultry, or fish.* Therefore, § 6471 (9) and § 6471 (10) could suffice to identify rice mills.

Proposed text under § 6471(d) *Use is allowed, and exempt from the restrictions in (a), (b), and (c)*[2]*:*
(6) *When FGARs are used at a location with the primary purpose of producing, storing, holding, or packing an agricultural commodity, livestock, poultry, or fish.*
Note from the CRC: rice is the agricultural commodity.

Per the cited legislation, AB1788, the exemptions specific to the Second Generation Anticoagulant Rodenticides (SGARs) includes agriculture. In text of the proposed regulation, why is the exemption for agriculture specific to the First Generation Anticoagulant Rodenticides (FGARs) and does not include the SGARs? The mills will use either type of rodenticide based on the preference of the rodent. The duration restriction of 35-consecutive days and no more than 105 days annually will restrict rice mills to using FGARs or a rotation to SGARs resulting in more difficulty keeping track of the specific restrictions.

Duration restrictions should not apply to FGAR and SGAR use at milling facilities housing agricultural commodities. It is important to identify the distinction of rice milling facilities to

[1] California Health and Safety Code. § 109947. "Food processing facility" means any facility operated for the purposes of manufacturing, packing, or holding processed food. Food processing facility does not include a food facility as defined in Section 113785, a cottage food operation that is registered or has a permit pursuant to Section 114365, or any facility exclusively storing, handling, or processing dried beans.
(Amended by Stats. 2012, Ch. 415, Sec. 3. (AB 1616) Effective January 1, 2013.)

[2] (b) (c) Except as provided in (d), it is prohibited to place any above ground bait more than 50 feet from a listed man-made structure, unless there is a feature associated with the site that is harboring or attracting the pests targeted on the label between the 50-foot limit and the placement limit specified on the label.
Except as provided in (d), applications must not exceed 35 consecutive days. All unconsumed bait must be collected at the end of the 35-day period. Double bag and dispose of bait according to the pesticide label directions. The combined application duration of anticoagulant rodenticides at a site must not exceed a total sum of 105 days within a calendar year.

receive the exemptions for bait placement and duration. The mills place baits stations outside the facility and on the perimeter fence. The fencing can be either more or less than 50-feet from the structure. Often a perimeter fence is farther than 50-feet from a milling facility to accommodate a truck and trailer.

Food companies use a three-ring defense system for rodent control as follows:

- First line of defense is perimeter fence line bait usually spaced 50 to 100 feet apart, and located along the property line, which can be man-made (e.g. fencing) or natural (e.g. berms).
- Second line of defense consists or either bait or traps outside the walls, and
- Third line of defense is mechanical trapping indoors.

The bait stations must be tamper-resistant and secured with a tool (e.g., Allen wrench).

Losing the first ring of defense increases the amount of bait a milling facility will use because placement of bait closer to the building draws rodents toward the structure. Wall perimeter baiting reduces the spacing by 50 percent, or 25 to 50 feet apart and doubles the amount of bait necessary for control. It is also quite possible to increase risk at a food plant because more rodents will approach building perimeters seeking bait from the stations next to the wall of the facility.

Restrictions of bait applications not exceeding 35 consecutive days or restricting the use to not exceed a total sum of 105 days within a calendar year is not efficacious. The CRC appreciates the DPR exemptions for agricultural commodities. Mills must undergo third party auditing to maintain certification for continuous operation. The third-party inspections require specific sanitation requirements, which include rodent control. Recommendation in the third-party audits includes maintaining bait stations annually and changing out the bait every 30-days. Per the auditing guidelines, bait can become moldy and less desirable to the rodents if left in the bait station over 30-days.

In addition to third-party audits, the Department of Health Services regulations for sanitation in food plants further identify use of rodenticides in and around rice milling facilities. California Code of Regulations. Title 17. Public Health. Division 1. State Department of Health Services. Article 7. Food Sanitation Regulations. § 12245 to 12280.[3]

---

[3] *Rodenticides are identified under § 12255. Use of Poisonous Insecticides and Rodenticides.*
(a) Every practical precaution shall be taken to keep establishments free from flies, rats, mice and other vermin. If necessary, rodent-proof rooms shall be provided for materials which might become contaminated by these pests.
(b) The use of insecticides, or rodenticides, toxic to humans, in areas where any food products, not adequately protected, is being stored or handled is prohibited.
(c) Poisonous insecticides and rodenticides may be used under buildings, wharves, outbuildings, or similar places, or where adequately protected packaged products are stored; only, if adequate precautions are taken to eliminate the possibility of said poisons being accidentally spilled, or carried, by any means, to areas where these poisons are prohibited. These poisons are to be adequately protected from possible contact by children, or domestic animals, and are to be plainly and distinctly labeled for identification by adults.

Management of rodenticides in and around rice milling facilities is through licensed and trained personnel. The CRC represents all California rice mills (20 total) where approximately half the milling facilities use a commercial pest control company, and the remainder hire trained and licensed staff to manage the in-house pest control.

The third-party auditing process includes a mandatory Food Storage Facility Sanitary Compliance Checklist. One section identifies as Critical the Control of Insects, Birds, Rodents and/or Other Pests. Over half the section assigns points to management of rodent bait stations.

These comments lead us to the specifics DPR requests in the workshop presentation.

Where DPR wants feedback specifically:
• Does the rulemaking text capture the intent of mitigation?
CRC response: Yes, except where the agricultural exemptions in agriculture specifically cite FGAR use. Does this mean the SGAR use would not be exempt from duration restrictions in agriculture? Per AB1788, the SGAR use (in agriculture) should also receive the same exemptions cited for the FGAR use.

• Refinements to exempted sites
CRC response: None if rice mills are captured with definition of “Food production sites including slaughterhouse or cannery”. Including SGARs with FGARs in the agricultural exemptions for consistency with AB1788.

• Training topics and implementation options
CRC response: Cannot emphasize enough proper placement of bait stations and timing to check and maintain. From observations and not an issue with rice facilities.

• Site-specific use duration recordkeeping
CRC response: The third-party audits are already kept at the milling facilities and should suffice for the record keeping requirement. From proposed regulatory text, the mills are exempt from the consecutive 35-day limit for FGARs. Does this mean the mills must comply with the 35-day limit for SGARs?

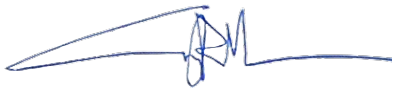
• 12-month delay between effective date and training requirements
CRC response: Seems adequate. Rice mills already implement most requirements, which can be the basis for a management plan. Could take at least one year to implement training requirements if the current practices require rice mills to change reporting requirements into a different format.

For feedback on training and whether it is DPR provided or DPR approved is a good question. The training requirements will either create a cottage industry or add to the DPR

budget and staffing of current programs for training applicators. The training should receive DPR continuing education accreditation because all applicators are licensed.

The CRC appreciates the opportunity to provide feedback to the proposed anticoagulant rodenticide regulatory changes. Please realize not all commodity groups offer the same level of engagement and expertise as the CRC. We request you contact the CRC for anything relative to rice.

Sincerely,



Craig Riddle, PG
Industry Affairs Manager

cc: Roberta Firoved, Consultant, California Rice Commission
Tim Johnson, CRC CEO/President, California Rice Commission