



DEPARTMENT OF REGULATORY AFFAIRS
3699 KINSMAN BLVD
MADISON, WI 53704 USA
608.241.0202
FAX: 608.244.1056
www.belllabs.com

Bell Laboratories, Inc.

Comments on DPR Proposed Rule Changes – Anticoagulant Rodenticides

November 7, 2025

To: California Department of Pesticide Regulation (DPR)

From: Bell Laboratories, Inc.

Subject: Support for current rule proposals regarding agricultural and structural exemptions; Opposition to 35-day/105-day duration restriction on anticoagulant use in agricultural production facilities and structural applications

Introduction & Overview

Bell Laboratories, Inc. appreciates the opportunity to comment on the Department of Pesticide Regulation's (DPR) proposed rule changes regarding anticoagulant rodenticides. As a manufacturer of consumer, agricultural, and structural professional-use rodent control products, we are particularly focused on how these proposed regulations would apply to anticoagulant rodenticide-use within California's agricultural sector, and within the structural pest control industry.

We recognize DPR's intent to balance rodent control, public health protection, and environmental stewardship. However, we respectfully oppose the proposed 35-day/105-day duration limitation for professional AR applications, which would apply to both structural and agricultural-related facilities. This limitation is inconsistent with the continuous and dynamic rodent pressures present in agricultural production, storage, and processing environments

Key Arguments

I. Rodents pose serious hazards to public health, property, food/agribusiness, and infrastructure

- According to the United States Environmental Protection Agency (EPA), each year rodents cause serious damage to property, infrastructure, crops, and food supplies across the U.S., in addition to spreading diseases. ^[1]
- In food- and beverage-processing and storage facilities, rodents are recognized as “public enemy No. 1” due to contamination risk, pathogen spread, and the potential for facility shutdowns. ^[2]
- Rodent infestations also pose economic risks, including contamination and destruction of stored commodities. ^[3]

These facts underscore why robust rodent-control tools matter. Any diminution of those tools increases the risk of rodent-driven harm to health, food and property. Anticoagulant rodenticides remain an essential component of integrated rodent management. Restricting them further would reduce available tools to control rodent infestations.

Anticoagulant rodenticides (ARs) have long been a mainstay of professional rodent control because of their broad efficacy, delayed action (which helps avoid bait-shyness), and proven track record of success. For example, first-generation anticoagulants (FGAR) and second-generation anticoagulants (SGAR) were developed in large part because of the need for effective control of commensal rodent pests. [4][5]

Professional pest-control operations and integrated pest management plans include chemical control, physical exclusion, sanitation, monitoring, trapping, and habitat modification. Over-restricting chemical options would force heavier reliance on less effective or slower methods, which may not suffice in high-infestation or high-risk settings, such as agribusiness, food processing or urban infrastructure.

The proposed DPR rule appropriately retains the availability of anticoagulant rodenticides under professional supervision. That approach ensures efficacy while maintaining responsibility and safeguards.

Rodenticide resistance is a real and growing concern. Fewer available chemical options accelerate the threat of uncontrollable infestations

A compelling and well-documented issue is the emergence of genetic resistance in rodent populations to anticoagulant rodenticides. For example, studies document mutations in the gene *Vkorc1* in commensal rodents that confer resistance. [6][7]

One review finds that resistance is widespread across Europe and other regions, posing a serious threat to the efficacy of control programs. [8][9]

If regulatory policy further restricts available chemical active ingredients or formulations, the remaining tools will face increased selection pressure and higher likelihood of failure due to resistance. Maintaining a broader array of chemically based options, in addition non-chemical options, is a critical strategy to delay and manage resistance development.

Unintended consequences of further restrictions on anticoagulant rodenticides are significant

Fewer chemical options mean longer infestation durations, greater rodent reproduction, increased structural damage (gnawing wires, insulation, pipes), greater destruction of crops, contamination of food and feed, and increased disease-transmission risk. Rodents can quickly contaminate or destroy significant portions of food supplies. [3][2]

From a public-health perspective, rodent-borne diseases such as leptospirosis, hantavirus, rat-bite fever, and others are very real. [1]

If professional rodent control becomes less effective or more costly because fewer chemical tools are available, or only non-chemical options remain, then the burden of infestations will disproportionately fall on municipalities, food processors, warehouses, farms and other critical-infrastructure sectors. This will lead to higher containment costs, longer remedial periods, potential shutdowns, and increased public-health risk.

In states or locales where chemical controls have been restricted, anecdotal reports suggest increased rodent sightings, increased damage claims, increased property loss and increased costs for pest-control service providers. While data is still evolving, the risk is credible and documented.

Eliminating anticoagulants and other chemical rodenticide products is not realistic

We recognize and respect the concerns of wildlife advocates and environmental groups regarding non-target exposures and secondary-exposure risks from anticoagulant rodenticides. However, their objective of eliminating chemical-based rodenticides entirely or reducing them to near-zero is unrealistic from a practical viewpoint. Rodents reproduce quickly, adapt to habitat changes, exploit human-altered environments, penetrate excluded spaces, and when unchecked, can reach densities at which non-chemical measures alone cannot reasonably control. A policy that mandates only non-chemical rodent-control strategies (e.g., traps, exclusion, habitat modification) without preserving chemical options will inevitably lead to recurrent or chronic infestations, higher baseline rodent populations, increased disease vector risk, higher contamination events, and higher costs borne by government, business and the public. These outcomes are exactly the unintended consequences we must avoid.

Accordingly, the best approach is not elimination of chemical rodenticides, but rather responsible, targeted use of them as part of an integrated pest-management (IPM) framework — something the proposed DPR regulations support.

Things to Consider

DPR's proposed rules recognize the importance of maintaining essential agricultural and structural uses of anticoagulant rodenticides, and we support the proposed allowed use patterns as a balanced approach for the California agricultural community. However, we strongly oppose the proposed duration restrictions, which would unduly limit effective rodent control in food processing, storage, and other agricultural-related facilities. DPR should retain the proposed allowed use provisions without adopting the 35-day/105-day duration limitations.

We respectfully request DPR to consider the following:

- Adopt proposed DPR language; emphasize IPM, monitoring, stewardship, resistance-management and preservation of chemical-based rodenticide options.
- Require or encourage applicators and professional users to adopt resistance-management protocols, e.g., rotating among active ingredients when practical, monitoring rodent-population responses, documenting efficacy, and switching modes of action when necessary. This will enhance longevity of chemical-based rodenticides.
- Emphasize the importance of integrated pest-management (IPM) in rodent control programs (including sanitation, exclusion, engineering controls, bait-stations, monitoring, trained applicators), affirming that anticoagulant rodenticides are one component rather than the sole solution.
- Most pest control professionals rely on ARs for rodent control. An arbitrary duration restriction, with increased liability imposed, may create a de facto, unintended prohibition on ARs, hindering safe, effective rodent control.
- When non-chemical alternatives are proposed or required, ensure that they are demonstrated to have equivalent efficacy under real-world conditions before phasing down chemical tools. A premature elimination of chemical options before adequate non-chemical substitutes are scalable is unwise.
- Encourage continued education of pest-management professionals, structural engineers, food-process facility operators and municipalities about the risks of rodent infestations (disease, infrastructure damage, food loss) and the importance of preserving an effective spectrum of rodent-control options.

II. Opposition to duration restriction on AR applications in agricultural production and processing facilities

Rodent activity in agricultural production and processing facilities is not seasonal nor limited to short timeframes. Facilities such as nut, grain, fruit, seed processors, and animal production facilities experience year-round rodent pressure due to consistent food availability, storage environments, and external harborage.

Under DPR's current proposal, AR use within 50 feet of man-made structures at processing facilities (or 100 feet if harborage is present) would remain permissible but the proposed duration limits (no more than 35 consecutive days and 105 total days per year) would severely constrain effective rodent management.

In practical terms, these duration restrictions would:

- Prevent timely follow-up treatments when rodent activity resurges mid-season.
- Leave stored commodities, machinery, and facility infrastructure vulnerable between allowed intervals.
- Compromise compliance with federal and state food-safety standards requiring proactive pest control.

Unlike urban or structural settings, agricultural operations often involve open storage, variable harvest cycles, and continuous inflow of raw commodities, all of which attract rodents. Arbitrary duration restrictions are incompatible with these realities.

III. Bell Laboratories, Inc. opposes the proposed 35-Day / 105-day professional-use limitation on structural pest control applications

We respect DPR's intent to minimize non-target exposure; however, we respectfully oppose the proposed limitation restricting professional-use anticoagulant rodenticide (AR) applications to no more than 35 consecutive days and 105 total days per calendar year, per site.

For structural pest control professionals, this fixed interval is incompatible with the realities of year-round rodent pressures in California's urban and industrial environments. Rodent populations fluctuate based on sanitation, weather, and construction cycles—not calendar intervals. In commercial food handling, healthcare, and public infrastructure sites, a hard limit on baiting days could jeopardize public health and sanitation compliance by preventing timely intervention when activity resurges mid-year. *[10]*

Moreover, DPR's proposed 35-day timeframe is based on limited registrant efficacy studies under controlled conditions, which do not reflect the dynamic, infestation-prone conditions faced in urban pest management. *[11]* The structural pest control context requires continuous monitoring and adaptive response, rather than arbitrary time restrictions.

Recommended alternative: A “Data-Driven AR Usage” compliance option

Bell Laboratories strongly recommends DPR consider a Data-Driven AR Usage model as an alternative compliance pathway to the 35-day limitation for structural and professional users. Under this model, AR deployment would be guided strictly by verified rodent activity, documented through new sensor-based monitoring systems, visual inspections, and non-toxic rodent monitoring products.

Principles of Data-Driven AR Usage

Verification Before Deployment-

- Bait with active ingredient is deployed only when confirmed rodent activity is detected in a station equipped with non-toxic attractant and electronic monitoring. *[12]*

Targeted and Limited Placement-

- Only those stations with verified activity receive active bait; all others contain non-toxic monitoring blocks.

Dynamic Rotation-

- When follow-up inspections show no further activity, active bait is removed and replaced with non-toxic material.

Continuous Recordkeeping-

- Each account maintains digital records documenting bait placements, activity confirmation, and removal dates to ensure transparency and traceability of use patterns.

A “data-driven” approach is consistent with DPR’s Sustainable Rodent Management framework and provides a science-based alternative that directly limits non-target exposure by eliminating unnecessary bait presence.

Advantages of Data-Driven AR Usage

- Minimizes environmental exposure while preserving the ability to manage verified infestations in real time.
- Encourages licensed professionals to choose the active their expertise suggest would control an infestation best, not based on arbitrary duration restrictions.
- Encourages technology adoption and modern monitoring consistent with DPR’s stated goals for innovation and sustainability. [13]
- Ensures year-round protection for critical infrastructure, food supply chains, and healthcare facilities without overuse of active ingredients.
- Aligns with IPM principles by prioritizing prevention, monitoring, and targeted response.

For analysis of the benefits of electronic monitoring and data-driven rodent professional rodent control, please see the following video: <https://www.youtube.com/watch?v=OlyZdaefHY8>

Our Recommendations

Bell Laboratories, Inc. respectfully requests DPR:

1. Adopt DPR’s proposed agricultural exemptions as drafted with regard to allowable use, ensuring continued AR availability for agricultural production and processing.
2. Remove or revise the 35-day/105-day duration restriction for professional-use anticoagulant applications in both agricultural and structural contexts.
3. Incorporate a Data-Driven AR Usage model as an alternative compliance pathway for licensed professionals.
4. Encourage resistance-management and stewardship programs—including rotation of active ingredients, monitoring for efficacy, and education for professional users.
5. Affirm that ARs remain a critical IPM component in safeguarding public health, the food supply, and infrastructure.

Conclusion

Bell Laboratories supports DPR's balanced approach to maintaining field agricultural exemptions and professional oversight but strongly opposes the proposed duration restrictions for anticoagulant rodenticide applications in agricultural facilities and structural settings. Such restrictions would undermine effective rodent management, increase risks to food safety and infrastructure, and fail to reflect real-world pest pressures in California's agricultural sector.

We strongly urge DPR to consider our recommendations, to maintain flexibility for year-round professional AR use based on verified activity and revise the proposed rules to allow Data-Driven AR Usage as an alternative compliance mechanism for structural pest control professionals. This would be consistent with IPM principles and the DPR's sustainable pest-management goals.

We look forward to working with DPR and stakeholders to promote safe, effective, and sustainable rodent-control programs in California.

Thank you for considering our comments.

Respectfully submitted,



Robert D. Schromm, JD
Director of Regulatory Affairs
Bell Laboratories, Inc.

References

1. United States Environmental Protection Agency. "About Rats and Mice – Why Be Concerned." Available at: EPA. [accessed 2025] – "Each year, rodents cause significant damage to property, crops, and food supplies ... and they may also spread diseases." (US EPA, "About Rats and Mice.")
2. Quality Assurance Magazine. "The Risks of Rodents in Food Facilities." July 12, 2024. "If auditing agencies detect any rodent fecal matter, urine or signs of rodent presence, they can stop production, and that is extremely costly."
3. IFSQN (International Food Safety & Quality Network). "How Rodents are Threatening Your Food Safety Procedures." August 5, 2019. "Twenty percent of the world's food supply is believed to be contaminated by rodents."
4. McGee, C.F., McGilloway, D.A., & Buckle, A.P. (2020). "Anticoagulant Rodenticides and Resistance Development in Rodent Pest Species – A Comprehensive Review." Journal of Stored Products Research.
5. Pest Management Science / PMC. "Anticoagulant rodenticide blood-clotting dose-responses and resistance factors in house mice." (2022)
6. Scientific Reports. "VKORC1-based resistance to anticoagulant rodenticides and emerging target sites in rodent populations." (2023)
7. PMC/NCBI. "Investigation of anticoagulant rodenticide resistance induced by single nucleotide polymorphism (SNPs) in commensal rodents." (2022)
8. Professional Pest Manager. "Rodenticide Resistance – An Overview." (2023).
9. BPCA (British Pest Control Association). "New data suggests that 74% of rats and mice sampled were resistant to anticoagulant rodenticides." News release. (2023)
10. Centers for Disease Control and Prevention (CDC). Rodent Control in Commercial and Residential Settings, 2023.
11. U.S. EPA. Risk Mitigation Decision for Ten Rodenticides, EPA-HQ-OPP-2006-0955, 2008.
12. Bell Laboratories, Inc. iQ™ Rodent Monitoring System: Field Validation Summary, 2024.
13. California Department of Pesticide Regulation (DPR). Anticoagulant Rodenticide Informal Workshop Presentation, September 24, 2025