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The California Department of Pesticide Regulation (DPR)'s proposal to allow use of anticoagulant rodenticides for any length of time is an extremely regressive change to what previously has been a very creditable and progressive set of regulations addressing such pesticides: AB 1788, AB 2552, and AB1322. This proposal runs counter to California's commitment to protect wildlife, pets, and children from these harmful chemicals.

No anticoagulant rodenticides should be allowed, except during a declared public health or environmental emergency, as stipulated in current law.

Among the problems with such anticoagulants is that they are both toxic and indiscriminate, accumulating up the food chain, and killing the very wildlife that naturally controls rodents. In California, these poisons have been documented in coyotes, foxes, owls, hawks, and many other raptors and carnivores that naturally control rodent populations, where they cause internal bleeding and long-term illness or death.

The California Department of Pesticide Regulation (DPR) is legally obligated to protect wildlife, not lead to its destruction, which is a demonstrable outcome of the use of anticoagulant rodenticides. Accordingly the DPR must reject the proposed rollback of current laws, and not allow the proposed use of such environmental contaminants for any length of time except as specified in current laws.