

Joseph Coha

The DPR has requested feedback on specific aspects of the proposed regulations to modify FAC 12978.7 and ENF 24-20.

I oppose the entirety of this proposal that appears to revoke the banning of most uses of first-generation anticoagulant rodenticides (FGARs).

This new proposal appears to be a complicated undoing of the only recently changed Food and Agricultural Code (FAC) section 12978.7, changes that had originally been motivated by Assembly Bill (AB) 2552 (Chapter 571, Statutes of 2024). It became effective only on January 1, 2025, prohibiting most uses of the FGARs, chlorophacinone, warfarin, and their derivatives.

Most people are familiar with the impact of FGARs beyond their intended use for controlling rodent populations. These issues have been carefully considered during the discussion of the Assembly Bill (AB) 2552 that is currently law.

The changes proposed undo the previous legislation to which everyone came to a consensus. The gist of the new proposal is to allow FGARs in a framework bolstered by a new education protocol, but without any responsibility designated for who would implement that education nor ensure that the users of the FGARs would be applied according to the new regulations. The proposal, while well-meaning, seems to allow indiscriminate use of FGARs because there is no immediate oversight. Why are we proposing undoing a ban of FGARs that is easy to enforce with a questionable framework that will be difficult to enforce?

The DFR can make a difference and reject the proposed changes.

For the sake of the environment, I ask you to consider your legacy and the world that we are leaving to our children and the world in which they will live.