



November 08, 2025

Submitted via CDPR Smart Comment Website

Division of Regulatory and Enforcement Review
California Department of Pesticide Regulation
1001 I Street, P.O. Box 4015
Sacramento, CA 95812-4015

Re: DPR Draft Proposed Regulation for Anticoagulant Rodenticides

Dear DPR Staff,

RISE (Responsible Industry for a Sound Environment)® appreciates the opportunity to provide comments on the draft proposed regulation released by the California Department of Pesticide Regulation (DPR) following the September 24, 2025 informal workshop. We support the shared objectives of advancing Integrated Pest Management (IPM) principles, and ensuring safe, effective rodent control. RISE has identified several areas in the proposed regulation where there are opportunities for clarification, modification, or additional flexibility. We respectfully request that DPR consider the following points.

With respect to the proposed thirty-five-day application limit and cumulative one-hundred-fifty-day annual cap, RISE requests that DPR provide the complete underlying data and analysis supporting these specific durations. At the public workshop, DPR referenced efficacy data suggesting that thirty-five days is an appropriate timeframe for rodent control, but those data have not been made available for public review. RISE emphasizes that regulatory decisions of this scope should not rely on a single study or dataset; instead, DPR should employ a transparent weight-of-evidence approach that draws upon multiple independent data sources and includes peer review of the supporting studies and methodologies.

In many large or complex facilities—particularly food-processing plants, warehouses, and utility installations—rodent pressure is continuous and may require extended treatment cycles. Strict time limits for use, without allowance for professional judgment to expand those limits, risk interrupting effective control and could inadvertently increase resistance or drive users toward less effective alternatives. RISE therefore recommends that DPR allow for extended baiting when justified through a flexible renewal mechanism, such as allowing for additional thirty-five-day cycles following documented retrieval and inspection, RISE further encourages the Department to delay implementation of these duration-based restrictions until the supporting data have been made publicly available and subjected to transparent scientific and peer review. This approach would maintain the Department's intent to

minimize unconsumed bait while preserving essential control capacity supported by sound, peer-reviewed science.

RISE is also concerned that the proposed fifty-foot placement limit and the restriction of use to a defined list of man-made structures may prove overly rigid. Rodent behavior, harborage, and movement patterns vary significantly across facilities, and baiting slightly beyond fifty feet may be required to intercept infestations before they enter structures. We recommend that DPR clarify that the fifty-foot limit may be exceeded when justified based on site inspection evidence of harborage or rodent activity beyond that range. Similarly, the list of approved structure types appears too narrow and may exclude legitimate sites with comparable pest pressures, such as distribution warehouses or mixed-use commercial facilities. A provision allowing other structurally based sites to qualify under a Sustainable Rodent Management (SRM) plan documentation would maintain DPR's environmental objectives while avoiding arbitrary restrictions that could undermine effective control.

RISE supports DPR's emphasis on education and planning through the new SRM training and plan requirements. However, we recommend that DPR extend the SRM training frequency to once per license renewal cycle rather than annually. This would more directly align SRM training with the established recertification and continuing education cycles already recognized under California's credential renewal period for certified applicators. Incorporating SRM content into that same renewal cycle would eliminate redundancy, reduce administrative burden, and promote higher-quality, outcome-focused learning. Rodent management practices and stewardship principles do not change substantially from year to year. Capturing this training within the credential cycle would therefore preserve DPR's educational objectives while ensuring proportionality, efficiency, and greater participation across the regulated community.

We also urge DPR to provide clear implementation guidance, including model SRM plan templates, standardized training curricula, and approval criteria for industry-developed courses. Developing and maintaining an SRM Plan will present a significant administrative undertaking, particularly for small businesses and independent pest control operators that may lack dedicated compliance staff. Each plan must be written, updated, and stored in accordance with new regulatory requirements, adding documentation, recordkeeping, and inspection obligations beyond those already in place under existing pesticide use regulations. A delayed implementation window following the regulation's effective date remains appropriate, but additional flexibility may be necessary to give businesses time to adapt their systems, train personnel, and integrate SRM documentation into routine operations. Allowing a transitional period of eighteen months during which businesses may demonstrate conditional compliance by maintaining draft SRM plans and provisional training documentation while full programs are developed would ensure meaningful participation and high-quality training.

We appreciate that DPR has maintained exemptions for public-health vector control, endangered-species protection by the California Department of Fish and Wildlife, invasive-species eradication on offshore islands, and protection of water and hydroelectric infrastructure. We recommend that DPR also include an emergency-use provision that would allow extended duration or expanded placement when a verified public health or critical infrastructure threat arises. Rodent infestations associated with disease outbreaks or infrastructure vulnerabilities often demand rapid, sustained responses, and this flexibility would preserve necessary control while maintaining accountability.

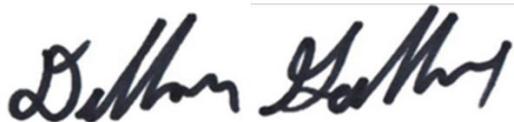
Finally, RISE emphasizes the importance of a phased implementation schedule that reflects the practical realities of training development, and contract updates. We recommend that SRM training and planning

requirements take effect eighteen months after adoption, and that full enforcement of the thirty-five-day and fifty-foot provisions be delayed twenty-four months following the public release of the supporting data and completion of an appropriate peer-review process, to ensure that regulatory decisions are implemented only after the underlying science has been transparently evaluated and validated. This sequencing would allow manufacturers, distributors, and applicators adequate time to develop compliant materials, educate users, and transition without disrupting essential rodent-control services.

Rodent control is a public-health and infrastructure imperative in California, and anticoagulant rodenticides remain a critical tool within integrated pest management programs when used responsibly and in accordance with science-based stewardship principles and in accordance with the label. RISE and its members are committed to supporting DPR's objectives through stewardship programs, and collaborative development of SRM resources. We respectfully request that DPR consider the modifications and clarifications described above to ensure that the final regulation is science-based, and protective of public health and the environment.

We appreciate your consideration of these comments and welcome the opportunity to engage further with DPR staff to refine the regulation, assist in development of training content, and support implementation across the regulated community.

Sincerely,

A handwritten signature in black ink, appearing to read "Dillon Gabbert".

Dillon Gabbert
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RISE (Responsible Industry for a Sound Environment)® is the national trade association representing manufacturers, formulators, distributors, and other industry leaders engaged with specialty pesticides and fertilizers used by professionals and consumers. Learn more at www.pestfacts.org.