

July 28, 2026

Mr. Ajay Kumar, Environmental Scientist
Department of Pesticide Regulation
Pesticide Registration Branch
Sacramento, CA 95812

Dear Mr. Kumar,

I write on behalf of the Animal Health Institute (AHI) to comment on the California Department of Pesticide Regulation's (DPR) June 29 notice of Decision to Begin Reevaluation of specified total release fogger (TRF) products for indoor consumer use containing certain active ingredients.

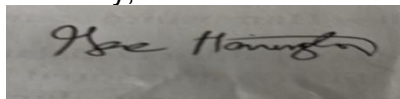
AHI is the U.S. trade association for research-based manufacturers of animal health products – the medicines, vaccines, diagnostics, and parasiticides that keep pets, service and zoo animals, and livestock healthy. Animal health companies work to provide veterinarians, food producers, and pet owners with high-quality, effective, and innovative products. Parasiticides include companion animal flea and tick collars, spot-on topicals, and total release foggers, which have all been reviewed and approved by the U.S. Environmental Protection Agency (EPA). Some of the 45 TRF products listed in Table 1 are AHI member company products or other pet care/veterinary health products.

Veterinary parasiticides – including TRFs – have proven to be highly effective in protecting pets from parasites that can cause vector diseases. The EPA review process is thorough in its examination of safety for animals, humans and the environment, and approved products are continually monitored following regulatory approval and marketing. Moreover, at a time when affordability is arguably the single biggest issue facing Californians, TRFs are an economical means of pest control and pet care.

According to the data in the April 24, 2026 document entitled "Pesticide Investigation into Reported Illnesses Related to Total Release Foggers", almost two-thirds of the cited incidents are cases of label noncompliance. Some of the cases were blatant misuse while others were a misunderstanding of the label, miscommunication, or premature reentry into treated spaces. As such, AHI recommends using the reevaluation process to focus on working with the registrants and U.S. EPA to closely examine the language on TRF product labels, and fine tune and clarify said verbiage where necessary. We do not believe the data highlighted in either the notice of investigation or reevaluation merits classifying TRF products used for pet/veterinary care as restricted materials or canceling their registrations.

We appreciate DPR's consideration of AHI's comments and look forward to working with DPR staff on this matter moving forward. Should have any questions, please feel free to contact me at (202) 549-5934 or gharrington@ahi.org.

Sincerely,

A rectangular box containing a handwritten signature in dark ink. The signature appears to read "Gene Harrington" in a cursive, slightly stylized script.

Gene Harrington
Senior Director, State Affairs
Animal Health Institute

