

DPR Anticoagulant Rodenticide Informal Public Workshop

September 24, 2025



Overview

- Overview of Anticoagulant Rodenticides (ARs)
- High level proposed mitigation
- Current AR restrictions based on legislative action
- Details of draft proposal
- Comment Period
- Next Steps

Anticoagulant Rodenticides

Anticoagulant rodenticides prevent blood from clotting, leading to uncontrolled hemorrhaging and toxicosis.

- Second-generation anticoagulant rodenticides (SGARs)
 - **Brodifacoum**
 - **Bromadiolone**
 - **Difenacoum**
 - **Difethialone**
- First-generation anticoagulant rodenticides (FGARs)
 - Chlorophacinone
 - **Diphacinone**
 - Warfarin

***Bolded pesticides are under formal DPR reevaluation**

The proposed mitigations would mitigate all FGARs and SGARs as a holistic approach.

Mitigation: Reduce impacts to wildlife and maintain necessary uses of ARs

Reduce repeat exposure of non-target wildlife for all ARs

- Reduce overall amount in the environment
- Reduce how long they are available in the environment

Educate users on sustainable rodent management

- Education
- Sustainable Rodent Management Plan



How are we proposing to do this?

Propose regulations that:

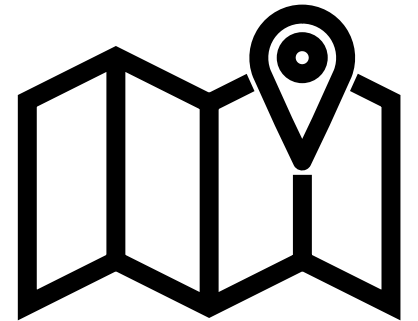
- Classify all ARs **restricted materials**.
- Limit **where** ARs can be used to those that protect public health, agriculture, and water.
- Limit applications to a maximum of **35 consecutive days** at most sites with a maximum of 105 days annually per site for any AR.
- Require **training** on sustainable rodent management that includes rodent biology and choosing the right tool for managing rodents.
- Require developing and maintaining a **sustainable rodent management plan** that addresses how the businesses or operators will approach rodent management decision making.

What is a Site?

Existing product labels specify the sites where a product can be used

Proposed regulations would further restrict sites where ARs could be used

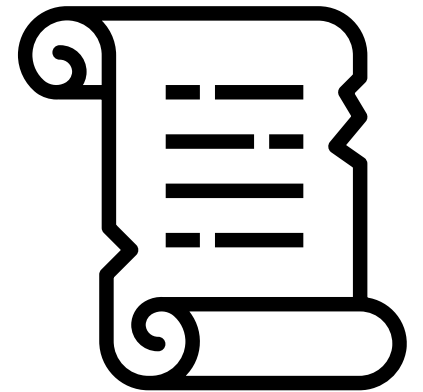
- Restricts use in and around man-made structures to within 50 ft of listed structures
- Specifies when use would be exempted from regulations and, in some cases, the sites where they would be exempt.



Legislation

Section 12978.7 of the California Food and Agricultural Code (FAC) contain use restrictions, considerations for reevaluation and concurrence requirements with the California Department of Fish and Wildlife (CDFW).

- 2020: **AB1788** - Prohibits use of SGARs except at certain sites
- 2023: **AB1322** - Prohibits use of diphacinone (FGAR) except at certain sites
- 2024: **AB 2552** - Prohibits use of remaining FGARs (chlorophacinone and warfarin) except at certain sites



Current vs Proposed Restrictions

Current restrictions (FAC § 12978.7):

- Applications are only allowed by exempted users or at exempted use sites

Proposed restrictions:

- Specifies manmade structures where ARs can be used, via site definitions in statute
- Limits duration of use
- Requires applicator training and development of a Sustainable Rodent Management plan

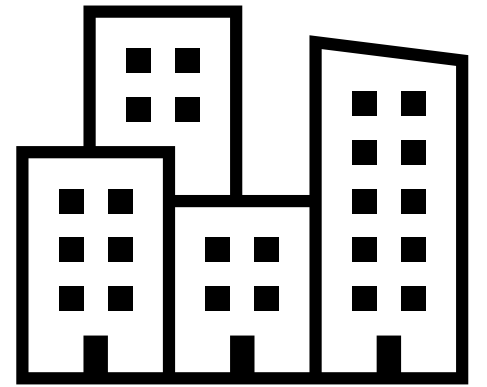
Allowed Use at Manmade Structures

Use at man-made sites is only allowed in listed sites

- Sites picked to protect public health
- Subject to the use duration restriction

Use for public health, water supply, agriculture, protecting endangered species, and research that meet statutory definitions

- Exempt from duration restriction as specified

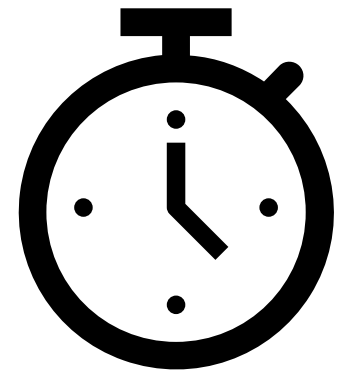


Limitation on Duration of Baiting

- **35 consecutive day** limit of any AR per application
- 2 additional 35-day applications permitted per year, for a cumulative annual total of **105 days** per site.

Basis:

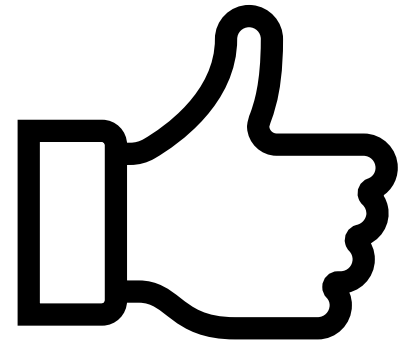
- Registrant submitted data indicate that this timeframe is efficacious
- Studies have shown a 70% reduction in rodent populations in 35 days



Proposed Exemptions

The following uses **would be exempt** from the manmade structures and duration restrictions:

- Public health
 - As declared by State Public Health Officer
 - Use by vector control
- Nonnative invasive species eradication on offshore islands
- CDFW invasive rodent population eradication to protect endangered species/habitats
- To protect water and hydroelectric infrastructure
- FGAR use in agriculture
- Research for continuous evaluation



Holistic rodent management

- Reduced use is critical to protecting non-target wildlife and will help ensure effective pest management critical to addressing rodent management more holistically.
- To support this, the draft mitigation includes a training requirement for AR applicators and development of a Sustainable Rodent Management plan for businesses and private applicators.



Sustainable Rodent Management Training

- **Proposed use requirement:** To use ARs individuals must take annual training to increase awareness and adoption of integrated pest management (IPM) practices, with record retention for two years.
- The course would include **Integrated Pest Management and Sustainable Pest Management principles** (as defined in the FAC sections 11401.7 and 11412).



Training Implementation Options

Outside of rulemaking, DPR is considering whether the training will:

- DPR provided or DPR approved
- Count towards DPR and SPCB licensure (CE credits)

DPR is looking for public feedback on which of these options may be the best fit for implementing this training and proposed topics to include in the required training outline detailed in the regulation.



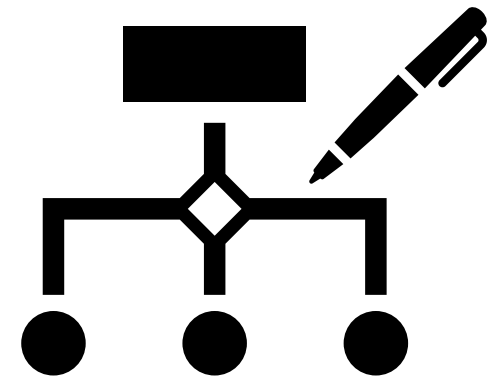
Sustainable Rodent Management Plan

Each business would be required to write, implement and retain records of a Sustainable Rodent Management plan.

- **General and is not required to be site-specific**
- Used as a **decision-making tool**, not a prescribed set of actions for every specific scenario.

Sustainable Rodent Management recordkeeping requirement:

- **Site-specific use records** kept at a central business location that tracks the dates ARs are deployed and collected by site to support compliance with the 35-day limit.



Thank you

California Department of Fish and Wildlife (CDFW)

California Department of Food and Agriculture (CDFA)

Structural Pest Control Board (SPCB)

California Department of Public Health (CDPH)



Where DPR wants feedback specifically

- Does the rulemaking text capture the intent of mitigation?
- Refinements to exempted sites
- Training topics and implementation options
- Site-specific use duration recordkeeping
- 12-month delay between effective date and training requirements



Next steps

- Draft proposed regulatory text are available on our website (www.cdpr.ca.gov).
- 45-day informal comment period
 - Please submit comments to DPR's Public Comment Portal at <https://cdpr.commentinput.com?id=JsSRaG6NA> by November 8, 2025.
 - Please submit clarifying questions to: Rodenticide.Comments@cdpr.ca.gov



SmartComment QR Code



Questions?