CALIFORNIA

October 4, 2013

Linda Irokawa-Otani
Regulation Coordinator
Department of Pesticide Regulation
1001 I Street
P.O. Box 4015
Sacramento, CA 95812

Re: Ban on Second Generation Anticoagulant Rodenticides

Dear Ms. Linda Irokawa-Otani,

The National Federation of Independent Business/California is opposed to a ban on the consumer use of second-generation anticoagulant rodenticides. This proposal has recently come to our attention, and we believe that such a ban would have a negative impact on businesses that perform their own pest control operations.

Pest control is of critical importance to a business, and to the health and cleanliness standards that the law, and good business practice, demands. A ban on the currently accessible, highly effective products would result in an increase in the pest population as many “mom and pop” businesses cannot afford to hire outside vendors to do pest control. An outright ban is an entirely unnecessary step to take, particularly in our current economic environment.

As the largest small business association in the United States, we represent the 3.6 million small businesses operating in California, and work hard to ensure that they have the flexibility necessary to operate and grow their businesses in our great state. Our membership includes several thousand manufacturers, thousands of restaurants, and one in ten farmers in the state, among many other businesses. Having the most modern and effective rodenticides available allows for cost-effective measures to control pests and prevent disease or possible health code violations.

As we understand it, the alternatives to these highly-effective rodenticides are more expensive, potentially more dangerous, and that many rodents have actually built up a resistance to them. But when used responsibly, and as directed, current anticoagulant products available in the marketplace pose no real threat to wildlife. Perhaps efforts should be made to enforce current law and the misuse of rodenticides.

The Federal Environmental Protection Agency’s currently action on these products is being challenged in the courts. We firmly believe that 1) DPR should wait until that action is resolved, 2) perform a risk assessment in the interim on the potential impact of alternatives on wildlife,
and 3) conduct an economic assessment of the impact of the potential ban on the State's businesses.

NFIB is firmly opposed to California Department of Pesticide Regulation taking action on second generation anticoagulant rodenticides at this time.

Sincerely,

[Signature]

Ken DeVore
Legislative Director