September 23, 2013

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

Re: Comments Opposing California DPR Regulation No. 13-002

Dear Ms. Irokawa-Otani:

On behalf of the members we represent, the Hispanic Chambers of Commerce of San Francisco is writing to the California Department of Pesticide Regulation to ask that the department reconsider its proposal to ban general consumers from purchasing second generation anti-coagulant rodenticides.

The use of affordable and effective over-the-counter rodenticides is needed for many of our members to maintain the cleanliness and safety of their businesses and to keep their employees safe. We were very concerned to learn that the California DPR is considering banning rodenticides like d-CON. The members we represent rely upon the use of these rodenticides for routine pest control, as opposed to having their only option be expensive professional services. As such, we are opposed to restricting our chamber’s members and consumers in general from purchasing and using affordable second generation anti-coagulant rodenticides.

Banning consumer access to these products would especially target economically disadvantaged areas where rodent control can be a particular problem. Professional pest control services can be a cost completely out of reach for many of these people. Business owners and employees in these areas who do not have access to small size consumer use second generation anticoagulants and who cannot afford frequent visits from expensive pest control services might attempt to use cheap or dangerous pest control options that are less appropriate for eliminating rodent infestations, and which can cause harm to individuals, children and pets.

The issue of rodent control is a serious issue and one that affects our members. The proposed ban does not hurt farmers; agricultural workers and professional pest control services that already use licensed applicators and thus, unfairly puts the burden on general consumers without eliminating any proposed risk. As such, please find our letter as an official opposition to California DPR Regulation No. 13-002.

Sincerely yours,

Carlos Solorzano Cuadra
CEO
Hispanic Chambers of Commerce
Of San Francisco (HCCSF)

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