



COUNTY OF SAN MATEO

Koren J. Widdel

Agricultural Commissioner
Sealer of Weights & Measures
P.O. Box 999 • 728 Heller Street
Redwood City, CA 94064-0999
(650) 363-4700 T
(650) 367-0130 F
www.smcgov.org/agwm

DATE: November 7, 2024

SUBJECT: First Generation Anticoagulant Rodenticides Restricted Use Material Status, Prohibited and Allowed Uses Effective January 1, 2025

First Generation Anti-Coagulant Rodenticides: Restricted Use Material Status

Assembly Bill No. 2552 was passed and signed by the Governor on September 25, 2024, and will go into effect on January 1, 2025. This bill adds first generation anticoagulant rodenticides as restricted materials, specifically products with the active ingredients: diphacinone, chlorophacinone and warfarin to California Food and Agriculture Code (FAC) 12978.7. This code section currently restricts the use of second generation anticoagulant rodenticides with the active ingredients of brodifacoum, bromadiolone, difencoum and difethialone. This update will prohibit most uses, require application by a certified applicator and restrict sales to the end user by a Department of Pesticide Regulation (DPR) licensed pest control dealer. The first generation anticoagulant rodenticides (diphacinone, chlorophacinone, and warfarin) have not been added in the code as California restricted materials and therefore do not require a restricted material permit.

Prohibited Uses

Effective January 1, 2025, it is unlawful to use first and second generation anticoagulant rodenticides in **residential settings**, and most **industrial** and **institutional** settings, such as restaurants, grocery stores, airports, offices, construction sites, ports and terminal buildings, shipyards, timber yards, schools, shopping malls, sewers, and sewage treatment plants. Many **non-production agricultural** uses, such as cemeteries, golf courses, parks, highways, and railroads, are also prohibited.

Additionally, the definition of "wildlife habitat area" has been expanded to include "any park or wildlife refuge managed by a state agency, regional government, quasi-government agency, or by a special district." Use of first and second generation anticoagulant rodenticides in a wildlife habitat area is prohibited unless the use meets one of the exemptions as an allowed use.

Allowed Uses

Effective January 1, 2025, first and second generation anticoagulant rodenticides are restricted materials and **must be applied by or under the supervision of a certified applicator**. A certified applicator is someone who has a license with DPR, the Structural Pest Control Board or a Private Applicator Certificate (PAC).

Allowed uses (exceptions to the prohibited uses) include:

- Government agency employees protecting water supply infrastructure and facilities (e.g., wells, surface-water intakes, dams, reservoirs, storage tanks, drinking-water facilities, pipes, and aqueducts).

- Use by a mosquito or vector control district, including use under a contract with a pest control business licensed by the Department or registered with the Structural Pest Control Board.
- For eradication of nonnative invasive species on offshore islands.
- If the Department of Fish and Wildlife determines the use is required to control or eradicate an invasive rodent population for the protection of threatened or endangered species or their habitats.
- To control an actual or potential infestation associated with an urgent, non-routine public health need declared by the State Public Health Officer or a local public health officer.
- At FDA-registered and inspected facilities involved in commercial manufacture, preparation, compounding, etc., of drugs.
- At medical waste generators as defined in Health and Safety Code section 117705, such as the following examples:
 - Medical, dental, and veterinary offices, clinics, hospitals, surgery centers, etc.;
 - Pet shops;
 - Trauma scene waste management practitioners.
- For research funded by DPR to protect the food system and the environment or reevaluation.
- On agricultural sites producing any horticultural, viticultural, aquacultural, forestry, dairy, livestock, poultry, bee, or farm product.
- At a warehouse used to store foods for human or animal consumption.
- At a food manufacturing or processing plant, such as a slaughterhouse or cannery.
- At a factory, brewery, or winery; including restaurants with an attached winery or brewery.
- On-farm water storage and conveyance facilities to protect on-farm water supply systems, facilities, and related infrastructure and this includes on-farm areas such as waterways, irrigation canals, levies, dams, ponds, reservoirs, wells, water tanks, irrigation pumps and pump houses, and drip tape or other irrigation lines outside of farm fields.
- On-farm storage housing rights-of-way and other transportation infrastructure materials to protect on-farm transportation infrastructure. This includes on-farm areas such as driveways (including driveways to barns and houses), farm or ranch roads (such as along farm fields), and bridge or culvert embankments.

For an allowed use of first and second generation anticoagulant rodenticides, the product labeling and other applicable pesticide laws and regulations must be followed. In the event of a conflict between labeling requirements, other pesticide laws and regulations, and FAC section 12978.7, the strictest requirement must be followed.

A restricted material permit is **not** required for an allowed use of first generation anticoagulant rodenticides (diphacinone, chlorophacinone and warfarin) under FAC 12978.7 (f) and (g). A restricted material permit **is** required for second generation anticoagulant rodenticides (brodifacoum, bromadiolone, difencoum and difethialone). Please contact your district biologist if you need to amend your operator identification number or restricted material permit.

To dispose of existing first and second generation anticoagulant rodenticides products appropriately, please contact your local hazardous waste disposal program.

If you have questions on this amended regulation, please contact our office at (650) 363-4700.