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February 15, 2026

Dr. Anson Main
California Department of Pesticide Regulation (DPR)
1001 I Street
Sacramento, CA 95812-4015
Submitted on DPR's public comment website:
<https://cdpr.commentinput.com/?id=jQus94a5i>

Subject: DPR Draft Fipronil Aquatic Risk Memorandum comments

Dear Dr. Main:

On behalf of its 7,000 veterinary professional members, the California Veterinary Medical Association (CVMA) appreciates the opportunity to comment on your Fipronil Pet Products: Potential Risks to Aquatic Life memorandum dated December 15, 2025.

While the use of fipronil in veterinary practices has significantly diminished over the course of the last decade, the pesticide still plays an important role in helping California pet owners control external parasites such as fleas, ticks and lice in their dogs and cats. Because the pesticide is available through over-the-counter "big box" stores such as Costco and PetSmart, veterinary practices carry it less frequently and in lower volumes than in previous decades. While many California veterinary practices and animal shelters still administer and dispense topical parasite treatments that contain fipronil, these products have largely been replaced by newer and more effective systemic treatments. Should fipronil become restricted or unavailable, the veterinary profession does not anticipate significant difficulty in providing parasite control alternatives to animal owners.

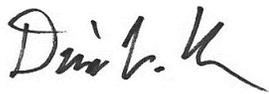
Regardless of fipronil's diminishing prevalence in veterinary practice, topical parasite treatments of its type are historical "game-changers" in fighting the flea-control battle, in turn relieving pet suffering and immeasurably improving quality of life for millions of dogs and cats. With over 7.4 million dogs and approximately 7.2 million cats, California is one of the most pet-dense states in the country. However, reputable studies show that approximately one in four pet-owning households cannot afford basic veterinary care, which includes parasite control. Thus, fipronil is still widely relied upon by California dog and cat owners to control parasites as an alternative to veterinary treatment.

Despite its demonstrable contribution to improving household health by combatting parasites, the CVMA finds the multiple DPR studies about fipronil's effect on the environment and on wildlife species to be compelling. While the profession would face minimal inconvenience if the pesticide were to be eliminated, it also recognizes the benefit of the pesticide to both animal and human health. Both the benefits and the consequences of this pesticide should be carefully considered should an effort to further regulate or ban fipronil be made.

If the DPR opts to convene a stakeholder group to further discuss this important issue, the CVMA respectfully requests that representatives from the veterinary profession be included. Specifically, both the CVMA and the American Veterinary Medical Association (AVMA) would appreciate having seats at that table.

Thank you for your consideration of these comments and we look forward to engaging in further dialogue about this important topic.

Sincerely,

A handwritten signature in black ink, appearing to read "Dan Baxter". The signature is fluid and cursive, with a prominent initial "D" and a stylized "B".

Dan Baxter, Executive Director