



April 9, 2025

Vermont General Assembly
House Committee on Agriculture, Food Resiliency, and Forestry
115 State Street, Room 49
Montpelier, VT 05633

Representative David Durfee, Chair
Representative Hether Surprenant, Vice-Chair
Representative Leland Morgan, Ranking Member

RE: NEPMA Opposition Testimony H. 326 – An act relating to the regulation of the use of rodenticides.

Dear Chair Durfee, Vice Chair Surprenant, Ranking Member Morgan and Members of the House Committee on Agriculture, Food Resiliency, and Forestry:

The New England Pest Management Association (NEPMA) represents the professional pest management industry in Maine, Massachusetts, New Hampshire, Rhode Island, and Vermont. Our members provide pest management services in numerous settings across Vermont, including homes, rental properties, schools, hospitals, senior centers, food processing facilities, grocery stores, and hotels. We previously submitted testimony in March in opposition, and appreciate the opportunity to reaffirm our opposition to H. 326. **We respectfully request you oppose this bill.**

We appreciate the legislature's continued interest in ensuring these products are not being misused and impacting off-target species. Last year, the legislature passed legislation to ensure second-generation anticoagulant rodenticides, or SGARs, were classified as Class A pesticides, meaning only certified licensed applicators can buy and apply in the state of Vermont. However, as licensed applicators, access to rodenticides is critical in preventing and treating rodent infestations in Vermont homes, businesses, commercial food settings, and public buildings.

Protecting our state's public health starts with effective rodent management. Rodents can transmit more than 35 diseases to humans, such as hantavirus, rat bite fever, trichinosis, plague, Weil's disease, and leptospirosis.¹ H. 326 would remove effective and affordable tools that are reviewed and approved for use by the Vermont Agency of Agriculture, Food and Markets (VAAFM).

VAAFM is recognized as the sole state lead agency with regulatory authority over pesticides. The Agency works with its federal counterpart, the U.S. Environmental Protection Agency (EPA), to review and register pesticide products and ensure applicator competence through the certified applicator training and licensing programs. All registered applicators must earn continuing education credits from courses approved by the VAAFM, to maintain their license. The courses provide an opportunity for our industry to continue to learn new techniques and technologies to provide the best possible pest management services for our customers and our environment.

¹ CDC. (2024). *How to control wild rodent infestations*. [Centers for Disease Control and Prevention](https://www.cdc.gov/rodents/infestations/index.html).

Our industry's use of comprehensive integrated pest management (IPM) is a perfect example of how we continue to develop and use new techniques in our strategy to control rodents. Cultural control methods, meant to change both human and rodent behaviors, are used alongside mechanical controls like snap or adhesive traps and pest-proofing the property, and chemical methods, which include rodenticides. Our pest management professionals conduct a thorough inspection and propose a treatment plan to the customers, prior to any management service taking place. When first-and second generation anticoagulant rodenticides are used, they are applied in self-contained rodent bait stations and placed in areas inaccessible to children and non-target animals.

H. 326 would leave our industry with less effective control methods that can only trap, or treat, one rodent at a time. This will increase the time and cost of pest management services in Vermont, especially in urban and suburban areas where the higher population densities promote rodent-suitable conditions. We anticipate this will disproportionately impact Vermont's low-income residents ability to protect their families and homes through professional pest control.

Finally, the U.S. EPA is currently reevaluating rodenticides, as part of their registration review process. They are considering additional mitigation measures to ensure these products will not negatively impact our public health and environment. This includes measures to move these products to restricted-use pesticides (RUPs), which Vermont has done to second-generation rodenticides as of last year.

We believe this Committee should not take on the role of the regulatory agencies, but rather support additional resources directed to the VAAFM to conduct investigations into rodenticide misuse, compile data on rodenticide usage in Vermont and continue to provide educational trainings to pesticide applicators.

It is for the reasons above that the New England Pest Management Association respectfully requests the Committee vote unfavorably on H. 326, as it would make it difficult for Vermont to treat and prevent future rodent infestations.

We are committed to our role in protecting our public health and our wildlife, and we welcome further discussions with the Committee to address any concerns.

Sincerely,

Adam Carace
State Policy Affairs Representative (SPAR)
New England Pest Management Association