



March 19, 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 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 appreciate the opportunity to share our thoughts on **H. 326 and respectfully ask that you oppose this legislation.**

H. 326 seeks to ban the use of the most effective and affordable means of preventing rat infestations in homes, businesses, schools and other public buildings. The impact this prohibition will fall heavily on urban and suburban neighborhoods, where higher population densities promote food sources and conditions suitable for rodents. Effective rodent management is vital in protecting our public health because of the bacteria, viruses, and other disease-causing pathogens rodents can transmit to humans. According to the U.S. Centers for Disease Control and Prevention (CDC), rodents transmit over 35 diseases such as hantavirus, rat bite fever, trichinosis, plague, infectious jaundice, Weil's disease, and leptospirosis.¹

NEPMA members are committed to providing quality pest management at an affordable price to protect our public health, food and property. Our industry is highly regulated, both in the products we use and the training and licensure testing required to be certified applicators. The Vermont Agency of Agriculture, Food and Markets (VAAF) works with the U.S. Environmental Protection Agency (EPA) through cooperative agreements to co-regulate our industry under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA). H. 326 is unnecessary, as second-generation anticoagulant rodenticides (SGARs) were reclassified as Class A pesticides in 2024, meaning only certified, licensed applicators can apply these products within Vermont.

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

Pest management professionals (PMPs) employ a comprehensive integrated pest management (IPM) strategy to control rodents. This includes thoroughly inspecting the property and creating a treatment plan using cultural control methods to change both human and rodent behaviors, mechanical control methods like traps, suggesting exclusionary or pest-proofing measures, and chemical methods such as rodenticides. Through continuing education credits, approved by the VAAFAM, our industry continues to learn new techniques and embrace emerging technologies to ensure we continue to provide the best possible services for our customers and our environment.

When an infestation needs to be addressed promptly, our industry's licensed and trained applicators use first-and-second generation anticoagulant rodenticides in and around structures to protect the public's health and property from rodents. These products are only applied in self-contained rodent bait stations, and placed in areas inaccessible to children and non-target animals from accessing the products.

H. 326 would leave us with no comparable tools to treat and prevent future rodent infestations. Without access to these effective products, our pest management professionals would be left with only less effective control methods, which are only capable of trapping one rodent at a time, increasing the time and cost of pest management services in Vermont. This will disproportionately impact our low-income residents' ability to protect their families and their homes from rodents.

Finally, the EPA is currently reevaluating first-and-second generation rodenticides, as part of their registration review cycle. In this process, they are considering additional mitigations to ensure that these products pose no adverse effect to our public health and environment. We believe that the Committee should not take on the role of the regulatory agencies, and allow the EPA, and the VAAFAM to do their jobs, as they have the expertise, resources and career staff to do so.

NEPMA respectfully asks for the Committee to vote unfavorably on H. 326, as it would make a premature decision to prohibit these critical pest management products, and increase the cost of pest management services in Vermont. 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,

Jim O'Neil
Vermont State Policy Affairs Representative (SPAR)
New England Pest Management Association
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