

April 15, 2025

Dear House Committee on Agriculture and Forest Products Chair Durfee, and Members of the Committee.

On behalf of the Sierra Club and our nearly 10,000 members and supporters in Vermont, thank you for the opportunity to submit written testimony in SUPPORT of H.326, an act relating to the regulation of the use of rodenticides.

These poisons are the top result and first sponsored product upon searching "most lethal rat poison" on the internet. A single feeding of SGAR bait is lethal to a rodent, but it can take up to five days for the rodent to die. During that time, the toxic chemicals persist in its body and can remain in animal tissue for over 100 days, exposing predators such as hawks, owls, eagles, foxes, bobcats, and coyotes to secondary poisoning as the toxins move up the food chain.

Between 2014 and 2018, a study of 303 deceased eagles found that SGARs were the two most common rodenticides detected in their bodies. In May 2021, Massachusetts wildlife officials confirmed the first documented case of a bald eagle dying from SGAR poisoning. The eagle's liver contained three of the four SGARs registered by the U.S. Environmental Protection Agency(EPA). This issue has also been observed in Connecticut, where a bald eagle died from SGAR exposure this spring. SGARs are not only a danger to wildlife but also pose a significant risk to children and pets—one of the key reasons the EPA has restricted their use. Since many of the other New England states are taking affirmative steps to restrict the use of these poisons, Vermont should join this effort.

Raptors play a vital role in maintaining ecosystem balance by naturally controlling rodent populations, preventing overpopulation that can lead to habitat destruction, crop damage, and disease spread. However, the widespread use of second-generation anticoagulant rodenticides (SGARs) directly undermines this natural pest control system. When rodents consume poisoned bait, they do not die immediately, allowing predators like hawks, owls, and eagles to prey on them and unknowingly ingest toxic chemicals.

Ironically, reliance on rodenticides creates a vicious cycle—by poisoning raptors, we eliminate one of nature's most effective pest control solutions, leading to an increased need for chemical intervention. Protecting raptors from SGAR exposure is not just a wildlife conservation issue; it is essential for maintaining ecological balance and reducing our dependence on harmful pesticides.

We urge the committee to act favorably on adopting legislation to regulate the use of rodenticides. The Sierra Club has others in the region working on this issue, so feel free to reach out for more information.

On behalf of the Vermont Sierra Club

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