



Transmitted Electronically

April 3, 2025

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

Re: SUPPORT-- H.326, Rodenticides (Rep. Satcowitz)

Dear Chair Durfee, and Members of the House Committee on Agriculture, Food Resiliency, and Forestry:

On behalf of the Center for Biological Diversity and our thousands of members and supporters in Vermont we urge you to pass H.326 (regulation of rodenticides), sponsored by Rep. Lawrence Satcowitz. H. 326 is narrowly targeted at anticoagulant rodenticides, which poison wildlife, children, and pets and unnecessary high rates, and includes important exemptions to allow anticoagulant rodenticide use if no other rodent control method is effective. Fortunately, there are hundreds of safer, cost-effective alternatives available today to address rodent infestations. Restrictions on anticoagulant rodenticides in other states, such as California, have safely reduced dangerous rodenticides without adverse increases in rodent infestations.

The science is well established that anticoagulant rodenticides pose an unreasonable adverse effect on the environment and human health. For example, bald eagles, and other hawks, owls, and raptors, are frequently poisoned and killed by rodenticides. Anticoagulant rodenticides have been found in 83% of bald eagles tested.ⁱ Anticoagulant rodenticides have been found in high percentages of wildlife in Vermont, such as fishers and bobcats.ⁱⁱ

A November 28, 2024, biological evaluation by the Environmental Protection Agency found that rodenticides are harming more than 130 endangered species and pushing at least 73 toward extinction because inadequate protections are in place, with the greatest impacts resulting from anticoagulant rodenticides.ⁱⁱⁱ Many of the same regulatory inadequacies that jeopardize endangered species also cause unreasonable adverse effects on a range of non-target species.

Existing requirements restricting use to bait stations, near structures, and to certified professionals does not limit secondary exposure to wildlife that feed on rodents. The highest rates of anticoagulant rodenticides are found in wildlife that consume poisoned rodents. Poisoned rats and mice become easy prey and anticoagulant rodenticides bioaccumulate up the food chain to higher level predators, such as hawks, owls, eagles, foxes, and bobcats.

Rodenticides also pose a serious risk to people. More than 8,500 cases of human poisonings were reported in 2021 by the American Association of Poison Control Centers, including more than 8,000 involving children.^{iv} The most effective way to avoid unreasonable adverse effects to human health is to eliminate anticoagulant rodenticide use.

There are a wide range of cost-effective alternatives available today and restrictions by other states demonstrate the feasibility of restricting anticoagulant rodenticides. Less-toxic rodenticides and a variety of effective traps are available to control rodent infestations. According to Vermont Agency of Agriculture, Food & Markets over one hundred different non-anticoagulant rodenticides would still be available for use and not be affected by H.326 including products containing zinc phosphide (19); cholecalciferol (11); and bromethalin (80).^v To learn more about safer alternatives to anticoagulant rodenticides, visit [SafeRodentControl.org](https://www.safedorodentcontrol.org).

California has enacted restrictions on all anticoagulant rodenticides—with limited exceptions to protect public health, agriculture, and infrastructure—and alternatives have proven effective in minimizing the risks posed by rodent infestations.^{vi} We urge Vermont to take strong steps to stop needless poisonings of wildlife, children, and pets.

Thank you for your consideration of these comments,



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ⁱ Niedringhaus KD, et al. (2021) Anticoagulant rodenticide exposure and toxicosis in bald eagles (*Haliaeetus leucocephalus*) and golden eagles (*Aquila chrysaetos*) in the United States. PLoS ONE 16(4): e0246134. <https://doi.org/10.1371/journal.pone.0246134>.

ⁱⁱ Vermont Agency of Agriculture, Food & Markets, Rodenticide Stewardship in Vermont: Presentation to the House Committee on Agriculture, Food Resiliency, and Forestry (April 1, 2025) <https://legislature.vermont.gov/Documents/2026/Workgroups/House%20Agriculture/Bills/H.326/Witness%20Documents/H.326~Steve%20Dwinell~Rodenticide%20Stewardship~4-1-2025.pdf>

ⁱⁱⁱ EPA (2024) Rodenticides. Draft Biological Evaluation, Effects Determinations, and Mitigation Strategy for Federally Listed and Proposed Endangered and Threatened Species and Designated and Proposed Critical Habitats, <https://www.regulations.gov/document/EPA-HQ-OPP-2023-0567-0004>.

^{iv} Gummin DD, et al. (2022) 2021 Annual Report of the National Poison Data System (NPDS) from America's Poison Centers: 39th Annual Report, Clinical Toxicology, 60:12, 1381-1643, <https://doi.org/10.1080/15563650.2022.2132768>

^v Vermont Agency of Agriculture, Food & Markets, Rodenticide Stewardship in Vermont.

^{vi} Seidman L, Los Angeles Times (Oct. 1, 2024) California enacts unprecedented restrictions on rat poisons in bid to protect wildlife, <https://www.latimes.com/environment/story/2024-10-01/california-enacts-unprecedented-ban-on-rat-poisons>; Cal. Food & Agric. Code § 12978.7.