

Lou Mansolillo

From: David Brunetti <davidabrunetti1@gmail.com>
Sent: Wednesday, April 3, 2024 12:35 PM
To: Rep. Bennett, David A.; Rep. Phillips, Robert D.; Rep. Handy, Arthur; Rep. Fogarty, Kathleen A.; Rep. Morgan, Patricia L.; Rep. Kislak, Rebecca M.; Rep. Speakman, June; Rep. Boylan, Jennifer; Rep. Knight, Jason; Rep. Carson, Lauren H.; Rep. Cortvriend, Terri-Denise; Rep. Spears, Tina L.; Rep. Fenton-Fung, Barbara Ann; Rep. McGaw, Michelle E.; Rep. McEntee, Carol Hagan; House Environment and Natural Resources Committee
Subject: House Bill No. 7783

Dear Chair Bennett, First Vice Chair Phillips, Second Vice Chair Carson, and Members of the Environment and Natural Resources Committee,

I have written at this time to provide you with my comments regarding House Bill 7783, which “precludes the use of second generation anticoagulant rodenticide products which contain brodifacoum, bromadiolone, difenacoum, or difethialone, except in certain circumstances”.

Simply stated, I fully support this bill and urge you to vote in favor of it when it comes before you.

My reasons for supporting this bill are as follows:

Rat and mouse poisons, or rodenticides, pose a serious risk to public health and the environment. These are toxic products that cause severe health damage and even death in non-target wildlife, pets, and people. **Because of their toxicity and the weak safety standards for their use and distribution, rodenticides are a serious threat to any living thing that accidentally ingests them.**

While there are several types of rodenticides, the most dangerous on the market are second-generation anticoagulant rodenticides, aka “super-toxic” rodenticides. Super-toxic rodenticides are slow-acting substances that block the synthesis of vitamin K necessary for normal blood clotting, causing their consumers to bleed uncontrollably and die slow and agonizing deaths. There are four types of these silent, super-toxic killers (brodifacoum, bromadiolone, difethialone and difenacoum), all of which have long half-lives that allow rodents to ingest them multiple times before dying. Through a secondary-poisoning process called bioaccumulation, rodenticide residues build up in rodent carcasses to levels many times the minimum lethal doses — exposing rodent-eating predators and scavengers to immense amounts of poison.

Cases of secondary poisoning are thus potentially disastrous for animals like hawks, owls, foxes, and mountain lions, and they've been reported in numerous imperiled species, including various raptors (such as owls, hawks, and eagles), endangered San Joaquin kit foxes and Pacific fishers. While some rodenticide-poisoned wildlife can recover if found and treated in time, many inevitably perish. And even humans — especially children — and household pets can suffer from contact with rodenticides. These toxics obviously pose risks unworthy of the suffering and biodiversity loss they cause.

After 15 years of analyzing the problem and years of pressure from The Center for Biological Diversity, the EPA finally issued a decision back in 2013 to place new limitations on the use of toxic rat poisons in an effort to minimize the risk of their contact with children and pets in the home. Unfortunately, the measure is inadequate to address rodenticides' threats to non-target wildlife, leaving imperiled species' habitat unprotected from the deadly toxins. So second-generation

anticoagulants continue to travel up the wildlands food chain, mercilessly poisoning and killing natural predators of rodents.

For more information on nontoxic rodent control methods, you can read more below or visit SafeRodentControl.org.

Safe, Nontoxic Methods for Rodent Control

Prevention is fundamental in practicing safe, nontoxic rodent control. Removing sources of food, water, and shelter to discourage the rodents' presence is highly effective before and after rodent infestation breaks out. The following is helpful guidance on integrated pest management techniques to address potential rodent invasions and treating existing ones.

PEST-CONTROL METHODS THAT ARE SAFE BETS FOR WILDLIFE

- Don't leave pet food and water outdoors, especially overnight. Store pet-food supplies indoors in sealed containers.
- Seal gaps around air vents to building sub-areas and attics and any other openings that penetrate exteriors. Use sweep seals under doors. A rat can squeeze through a hole the size of quarter, a mouse through a hole smaller than a dime.
- Don't plant ivy — it provides shelter and a food source for rodents: snails and slugs. Ivy on walls can form “rat ladders” to windows, attics and other interior spaces.
- Keep compost piles as far away from structures as possible.
- Keep grass cut and trees trimmed as far away from structures as possible.
- If you have a birdfeeder, use a squirrel guard at the base to keep rodents away. Keep the ground area clean of birdseed.
- Keep outdoor grills and cooking areas clean.
- Keep firewood off the ground and as far away from structures as possible to mitigate shelter opportunities.
- Use city-issue plastic trash bins. If cracked or missing a lid, contact the Department of Sanitation for a free replacement.
- Clean up trash in garden areas to remove shelter for rodents.

If the above methods aren't sufficient, you may be forced to take secondary-control steps. **Note: Neither I nor The Center for Biological Diversity condone cruelty to rodents or any other living creatures; these techniques are mentioned in order to best combat the toxic dangers of rodenticides while also preventing or causing minimum harm to rodents themselves.** Notably, some of this content may be unpleasant to read.

Therefore, to reiterate, I support this bill and urge you to vote in favor of it when it comes before you for a vote.

Sincerely,

David A. Brunetti
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