



April 4, 2024
Chairman David A. Bennett
Vice Chairman Robert D. Phillips
Vice Chairwoman Lauren H. Carson
State House - Room 101
82 Smith Street, Providence, RI 02903

RE: Testimony in Opposition to HB 7783 – AN ACT PROHIBITING THE USE OF SECOND GENERATION ANTICOAGULANT RODENTICIDES

Dear Chairman Bennett, Vice Chairman Phillips, and Vice Chairwoman Carson,

The New England Pest Management Association (“NEPMA”) is the leading trade association representing structural pest management companies in Rhode Island. NEPMA was founded in 1933, with members across the New England region. Our member companies manage pests ranging from bed bugs to roaches to mosquitoes, and most importantly rodents. We appreciate the opportunity to share our thoughts on HB 7783, as we want to be constructive in the policymaking process. **We applaud the Committee’s efforts to protect wildlife in Rhode Island.**

Members in our industry service numerous settings in the state, including homes, rental properties, hospitals, senior centers, food processing facilities, grocery stores, and hotels. The members of NEPMA are fully committed to providing quality pest management services at an affordable price that protects public health, food, and property. Our licensed and trained applicators use Second-Generation Anticoagulant Rodenticides (“SGARs”) 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, so as not to allow children or non-target animals from being able to enter and retrieve this bait.

Pest management professionals employ a comprehensive integrated management strategy to control rodents. This includes thoroughly inspecting the property, mechanical changes, pest-proofing suggestions, and monitoring. When rodent populations need to be handled promptly, our industry judiciously uses SGARs, ensuring that they are placed in areas inaccessible to consumers and non-target wildlife populations. In the absence of SGARs, our professionals would turn towards using significantly less effective methods that include snap and glue traps. These are capable of ensnaring only one rodent at a time, and once caught, need replacing to capture another, requiring increased visits to the site. However, using SGARs allows pest management professionals to check stations monthly, which helps to keep our costs down so we can continue to make our services affordable to lower-income households that can't afford these alternative methods.

SGARs are essential because they are the most effective rodenticides. Rodent management is vital to the protection of public health because of the bacteria, viruses, and other disease-causing pathogens these pests can transmit to humans. They also exacerbate allergies and asthma attacks due to allergenic proteins in their urine and feces. 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 Leptospirosis results in an estimated 1.03 million annual cases and 58,900 deaths around the world. While many deaths caused by leptospirosis occur in the developing world, the United States is not immune, as three people in New York City were infected in 2017, resulting in one death. In 2018, pest management professionals fought and contained a marine typhus outbreak in L.A. County with the aid of rodenticides.

Furthermore, HB 7783 bans the use of the most effective and affordable means of eliminating rat infestations at a site. The impact of this ban will fall heavily on urban and suburban neighborhoods, with higher population densities where rats can have access to food sources commonly found in unsecured trash bins. Additionally, with inflation running at all-time highs, the cost of using less effective products that require more frequent visits by pest management professionals will likely lead to more expensive rodent control measures for citizens and businesses of our state.

I would also like to point out to the committee that the U.S. Environmental Protection Agency (“EPA”) is currently evaluating all rodenticides as part of their product review cycle. The proposed interim decision published by the EPA aims to classify these products as restricted use, allowing them to be used ***only*** by certified applicators—i.e., specifically-licensed pest management

¹ “Rodents,” Centers for Disease Control and Prevention, Centers for Disease Control and Prevention, www.cdc.gov/rodents/diseases/direct.html.

professionals—due to their testing and training that minimizes any risk to non-target wildlife. We believe any actions taken should be done with full consideration of the formal, years-long evaluation by the EPA, which is the lead federal agency that has the expertise, resources, and career staff in this field. We ask that Rhode Island not get ahead of the science and respectfully request this bill be held until the EPA has released its final decision on all rodenticides.

In conclusion, HB 7783 is a bill that is making a premature decision before the current regulatory process is completed. It has the potential to pick winners and losers in our state by making service costs skyrocket, which will make it difficult for low-income residents to protect their families and their homes from rodents. I ask you to consider this when voting on this bill because it is premature to make a statewide decision to ban second-generation rodenticides. NEPMA is open and willing to engage in a constructive dialogue with state legislators to come up with a plan to safeguard our wildlife while also safeguarding the health of our citizens. **I respectfully ask for your opposition to HB 7783.**

Thank you for your time.

Sincerely,

Kevin Goldman

On behalf of the New England Pest Management Association (NEPMA)