

## March 11, 2025

Rhode Island State Assembly Committee on Municipal Government & Housing 82 Smith Street Providence, RI 02903

Representative Stephen Casey, Chair Representative Kathleen Fogarty, First Vice Chair Representative June Speakman, Second Vice Chair

## RE: HB 5704 - AN ACT RELATING TO HEALTH AND SAFETY – PESTICIDE CONTROL

Dear Chair Casey, Vice Chairs Fogarty and Speakman, and Members of the House Committee on Municipal Government and Housing:

The New England Pest Management Association (NEPMA) represents the professional pest management industry in Maine, Massachusetts, New Hampshire, Rhode Island, and Vermont. Our members in Rhode Island are committed to providing high-quality pest management services that protect public health, food and property. We appreciate this opportunity to share our thoughts on **HB 5704 and respectfully ask that you oppose this legislation.** 

HB 5704, as written, would establish local rodent integrated pest management (IPM) pilot programs, while simultaneously removing registered pesticide products proven to be effective while used by pest management professionals to control rodent populations in Rhode Island's homes, rental properties, schools, hospitals, senior centers, food processing facilities, grocery stores, and hotels.

We rely on the Rhode Island Department of Environmental Management (DEM) to regulate pesticides for use within our state alongside the U.S. Environmental Protection Agency (EPA). DEM staff's scientific expertise and access to necessary resources is why they are best suited for making science-based, non-political decisions on pesticides. In addition to registration decisions, DEM ensures all commercial pesticide applicators are licensed and remain up to date in the latest training and education. DEM investigates the misuse of pesticides in the state and will issue heavy fines or revoke applicator's license if the state finds sufficient evidence. **HB 5704 undercuts DEM's authority, revoking the use of DEM-registered pesticides across the state by 2026.** 

As part of their pesticide review cycle, the U.S. EPA is currently reevaluating rodenticides. As part of that process, regulators are considering whether additional mitigation measures are required to ensure the products cause no adverse effects to off-target species. Once finalized, DEM will be able to address or place further restrictions for use within Rhode Island.

## HB 5704's Aggressive Implementation Timeline Would Leave Pest Management Professionals without Effective Products to Utilize in Rodent Control

HB 5704 seeks to ban the use of the most effective and affordable means of preventing rat infestations. By removing these tools from pest management professionals, we could see an increase in persistent rodent infestations, as alternative control methods and pesticide products may not be as effective. As rodents are known to transmit more than thirty-five diseases<sup>1</sup>, restricting our control methods may increase the risk of rodent-transmitted diseases in Rhode Island.

While the bill would allow second-generation anticoagulant rodenticides (SGARs) to be applied at medical waste and agriculture facilities, or used by government employees in public health emergencies, it fails to recognize the enhanced pressures all settings will face with this prohibition. Additionally, the "public health issue," as defined in Section 23-25-42 of the bill is vague, and could lead to confusion on when it is permissible to use SGAR rodenticides to control the infestation.

## HB 5704's Rodent Integrated Pest Management (IPM) Pilot Program is Redundant, as Pest Management Professionals Are Employing Comprehensive IPM Measures

Pest management professionals (PMPs) employ a comprehensive integrated pest management (IPM) strategy to control rodents, carefully considering the environmental factors and risks associated with the location of the pest infestation. Our treatments start with thoroughly inspecting the property and creating a treatment plan using cultural control methods to change both human and rodent behaviors, suggesting pest-proofing measures, and will include mechanical control methods like traps and/or chemical methods such as rodenticides.

As professionals on the frontlines, we are deeply invested in protecting public health from the diseases and destructive impacts caused by commensal rodents. Many of you have likely heard from constituents who are struggling with rodent infestations in their homes, businesses, and neighborhoods — in North Providence, Johnston, Cranston, and throughout our urban centers. The challenges posed by these infestations are significant and growing.

NEPMA interprets the intent of HB 5704 to reduce off-target pesticide exposures in our environment. These alternatives pest control methods—such as organic or non-chemical approaches—may not be as effective or efficient in managing ongoing pest issues. It is also important to acknowledge that some alternative pest control methods can carry their own health risks. Any improper application of natural or organic methods could expose residents to harmful substances, undermining the municipality's intent behind the applications.

The consequences of HB 5704 will fall disproportionally on our state's urban settings, where higher population densities result in more accessible food sources, encouraging rodent populations. As the bill removes the most effective and affordable rodent control products, we anticipate the costs of pest control services to increase—and given the rise of inflation, we expect

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<sup>&</sup>lt;sup>1</sup> CDC. (2024). How to control wild rodent infestations. Centers for Disease Control and Prevention.

some customers will be unable to protect their family, property, and businesses from rodent infestations.

HB 5704 will create more challenges than benefits to protecting Rhode Island's people, places, and environment from harmful rodent infestations. It is for the reasons shared above we respectfully ask the Committee for an unfavorable vote on HB 5704.

Sincerely,

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