

March 11, 2025

Representative Stephen Casey Chair, House Committee on Municipal Government and Housing Rhode Island State House Providence, RI 02908

## Re: Audubon Society of Rhode Island Supports H 5704, Pesticide Control

Dear Chair Casey and members of the House Committee on Municipal Government and Housing,

The Audubon Society of Rhode Island and our 17,000 members and supporters thank Representatives Kislak, Cortvriend, Fogarty, Carson, McGaw, Speakman, Bennett, Spears, Cotter, and Donovan for their leadership on House Bill 5704, a bill to ban the use of anticoagulant rodenticides in Rhode Island.

Anticoagulant rodenticides are a class of rat poisons placed in black boxes around daycares, schools, grocery stores, home, restaurants, and more. They are designed to reduce blood clotting, slowly killing a rodent over the course of 5-10 days. During that time, the rodent becomes easy targets for any predator, including raptors such as owls, hawks, and eagles, to catch and consume. Any predator who eats the rodent also starts accumulating this poison in their system. It builds up over time, causing birds of prey, foxes, cats, opossums, coyotes, snakes and more to suffer the same fate as a rodent.

Anticoagulant rodenticides are also inherited throughout the entire food chain and research suggests that because of its pervasiveness, we could never truly measure the full impact of such dangerous poisons on the ecosystem. Anticoagulant rodenticide research proves beyond the impact to wildlife, the larger environment is at risk, as these rat poisons have been identified in soil and waterways. Studies show that certain fish are also particularly susceptible to the types of rat poisons that are considered to be safer to humans. There is no wildlife-safe anticoagulant rodenticide.

Humans eat deer. Humans eat fish. Humans are exposed directly to rat poisons on a daily basis. In 2024 alone, over 72,000 rodenticide poisoning cases across the United States occurred, with many of the types of rodenticides they could identify as anticoagulants. As the smaller one is, the more the accumulation impacts show symptoms, nearly half of these exposures were in children. According to the Environmental Protection Agency, all but one type of anticoagulant rodenticide can be inhaled to poison humans, and all can be touched or ingested to poison someone. Black boxes may hold rat poison, but they are not containing them. There is no safe way to deploy anticoagulant rodenticides.

Rodents bring diseases and anticoagulant rodenticides may be making them worse. During the 5-10 day time period from ingestion to death, rodents' immune systems are interrupted, contributing to increased infection by such pathogens like Leptospira. A rodent is three times as likely to contract, carry, and spread this rodent to human pathogen.

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Evidence suggests anticoagulant rodenticides become less useful over time, as rodents learn to avoid the boxes that kill them and population immunity over time means more potent poisons will need to be developed for them to remain impactful. The typical current rat poison used by pest control companies are the second generation of anticoagulant rodenticides.

Safe alternatives exist and in locations where these substitutes have been implemented have shown results. In addition to prevention and mitigation, new technology such at rat sterilization bait has been approved by the EPA and deployed throughout communities, including in Rhode Island. This bait has shown to have little to no impact on the safety of wildlife and people and it does not accumulate like poisons do. This sterilization bait impacts both female and male rats and has been shown to be desirable to rodents over time, as there are no deadly consequences. Two rats can have 15,000 decedents in a year. Preventing rats from reproducing those decedents just makes sense. Furthermore, one of the two types of this contraceptives do not require a pesticide license to buy and use. Mouse contraceptive has also been developed and is awaiting approval for use in Rhode Island.

California has had a ban on the second generation anticoagulant rodenticides since 2021, and in 2024, the legislature voted to ban the first generation. Data in California shows there was no correlation between rodent complaints the signing of the bans. The average number of complaints show that they are the lowest they have been in ten years. Public health emergencies from rodents have not materialized in the state. Seven municipalities in Massachusetts also banned the use of second generation anticoagulant rodenticides being used city-wide and most New England states have a bill introduced in their state legislature to ban these poisons, as well.

House Bill 5704 bans the use of both the first and second generation anticoagulant rodenticides in Rhode Island, with exemptions in certain cases for municipal governments and agriculture. While the second generation of these poisons was banned in consumer retail outlets by the EPA about a decade ago, the first generation remains accessible to general consumers. This bill codifies in state law those restrictions from consumer retail outlets for both the first and second generation anticoagulant rodenticides, but allows for the sale in outlets where those who have the exemptions from the ban are able to access them in Rhode Island.

The current iteration of the bill errantly implements the ban date as January  $1^{st}$ , 2026. An amendment will be introduced to move the implementation date to January  $1^{st}$ , 2028.

This bill also provides opportunities for municipalities to voluntarily submit plans for Integrated Pest Management plans to the Rhode Island of Department of Environmental Management that includes pilot programs for rodenticide alternatives. Those municipalities who opt-in and submit plans may be provided additional funding from grants and philanthropic dollars to be determined to help implement these plans and this portion of the bill takes effect upon passage.

Best practices for IPM programs include using chemicals and poisons as a last resort and promotion of predators (such as installation of owl boxes) as more foundational to effective rodent control. This makes sense; an Eastern Screech Owl may be killed after consuming only one to two rodents, but could have eaten hundreds of rodents in a single year. As anticoagulant rodenticides harm predator populations instead of promoting them, IPM programs can only be truly implemented with a ban on these poisons. The intention of the bill is not to prove the alternatives work- we already have this proof. This portion is to support municipal governments to transition to a ban as the current practices are an overreliance on unsafe poisons.

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Save the Bay, Clean Water Action, The Rhode Island Land Trust Council, and The Nature Conservancy have joined Audubon Society of Rhode Island to advocate for passage for a ban on these poisons. The overwhelming evidence suggests Rhode Island's wildlife, children, waterways and more must not wait. Audubon Society of Rhode Island urges the House Committee on Municipal Government and Housing to pass HB 5407 in its entirety.

We appreciate your consideration of our comments.

Sincerely,

In appler

Phoenix Wheeler Director of Advocacy



## California Rodent Complaint Data

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