



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF THE DIRECTOR
235 Promenade Street, Room 425
Providence, Rhode Island 02908

March 11, 2025

The Honorable Stephen M. Casey
Chairman
House Committee on Municipal Government and Housing
82 Smith Street
Providence, Rhode Island 02903

RE: H 5704 An Act Relating to Health and Safety – Pesticide Control

Dear Chairman Casey,

Thank you for providing the Department of Environmental Management (DEM) the opportunity to comment on H 5704, which would restrict the sale and use of certain rodenticides and establish a voluntary integrated pest management pilot program and associated restricted receipt account.

H 5704 would prohibit the sale of first-generation anticoagulant rodenticides in consumer stores such as drug stores, grocery stores, hardware stores, and online retail stores effective on March 1, 2026. It would also prohibit the sale of second-generation anticoagulant rodenticides at the same establishments effective on January 1, 2027. H 5704 would also prohibit the use of first-generation and second-generation anticoagulant rodenticides, with exceptions, effective on January 1, 2026. Uses excepted from the prohibition include public health activities, protection of drinking water supplies, eradication of non-native invasive species of rodents, and agricultural activities.

H 5704 also establishes a “Rodent Integrated Pest Management Pilot Program” intended to assess methods of controlling rodent populations other than the use of rodenticides. Municipalities choosing to participate in the pilot program would be eligible to receive financial assistance through the restricted receipt account the legislation also establishes. DEM would be directed to administer the fund and to seek grant and philanthropic funding to support the program.

Anticoagulant rodenticides (“anticoagulants”) are a class of pesticides used to control the population of rodents such as rats and mice by interfering with blood clotting. Although they typically kill rodents with a single feeding, second-generation anticoagulant rodenticides (SGARs) remain in animal tissue for longer which means they pose greater risks to nontarget species that may consume them. Due to this concern, the U.S. Environmental Protection Agency (EPA) has instituted restrictions on the sale and use of SGARs intended to discourage

homeowner use. For example, they are not allowed to be sold in consumer stores including drug stores, grocery stores, hardware stores, club stores and similar retail outlets. There are also requirements relating to the minimum size of containers that may be sold and the use of tamper-resistant bait stations in certain circumstances such as if children, pets or nontarget wildlife may have access.

DEM recognizes that anticoagulants, especially SGARs, pose a threat to nontarget species such as birds of prey. We support efforts to test the effectiveness of other methods of controlling rodent populations such as using integrated pest management. However, we note that the bill proposes to restrict the sale and use of anticoagulants before the results of the pilot program will be known. It may be more appropriate to establish the pilot program and assess results of alternative methods before instituting sales and/or use bans on anticoagulants. We also note that the legislation does not provide state funding to support the pilot program created by this bill.

We appreciate the opportunity to offer comments on this legislation and would be pleased to make ourselves available as needed. Please feel free to contact Ryan Mulcahey, DEM Director of Legislative Affairs, at ryan.mulcahey@dem.ri.gov should you have any additional questions or wish to discuss this matter further.

Sincerely,

A handwritten signature in cursive script that reads "Terrence Gray".

Terrence Gray, P.E.
Director

cc: Members of the House Committee on Municipal Government and Housing
The Honorable Rebecca Kislak
Nicole McCarty, Esq., Chief Legal Counsel to the Speaker of the House
Lynne Urbani, House Policy Director