

February 27, 2026

Honorable Stephen M. Casey
Honorable Kathleen A. Fogarty
House Municipal Government and Housing Committee
82 Smith Street, Providence, RI 02903



RE: H 7222 - RELATING TO HEALTH AND SAFETY -- PESTICIDE CONTROL

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

On behalf of the Household & Commercial Products Association (HCPA),¹ we respectfully submit the following comments regarding the proposed use-restriction of first and second-generation anticoagulant rodenticides, except under narrowly defined circumstances, included in H 7222. We oppose the measures for the following key reasons:

- The U.S. Environmental Protection Agency (EPA) has initiated a registration review of anticoagulant rodenticides, including the specified rodenticides listed in H 7222;
- EPA's rodenticide review and mitigation efforts have proceeded consistently across multiple federal administrations, reflecting a stable, science-based regulatory framework that should be allowed to run its course;
- Along with the EPA endangered species programs, the bill makes state-level action premature and duplicative;
- Rodents carry serious diseases, and limiting access to effective control tools for the average homeowner could increase public health risk;
- Prohibiting anticoagulant and non-anticoagulant rodenticides, including the specified rodenticides listed in H 7222, will shift use toward a narrower set of remaining tools, increasing selection pressure, accelerating resistance, and ultimately reducing long-term effectiveness of rodent control options; and
- Responsible pest management demands a holistic Integrated Pest Management (IPM) approach in which anticoagulants are used as part of broader risk-managed control programs.

The EPA's registration review process will scientifically evaluate the uses of rodenticides and implement mitigation measures specifically intended to protect non-target organisms. This process includes endangered species programs through which the agency identifies listed species that may require additional protection and proposes targeted mitigation. HCPA strongly believes the Rhode Island legislature should allow the EPA to complete its ongoing work before considering state-level approaches that may conflict with federal oversight and risk-mitigation efforts.

Pesticide products are already heavily regulated, evaluated, and restricted as appropriate at both the federal and state levels. Federal law requires that, before selling or distributing a pesticide in the United States, a registrant must obtain approval from the EPA. Prior to registration, EPA must determine that a pesticide, when used according to label directions, can be used with reasonable

¹ The Household & Commercial Products Association (HCPA) is the premier trade association representing companies that manufacture and sell \$180 billion annually of trusted and familiar products used for cleaning, protecting, maintaining, and disinfecting homes and commercial environments. HCPA member companies employ 200,000 people in the U.S. whose work helps consumers and workers to create cleaner, healthier, and more productive lives.

certainty that it will not pose a hazard to human health and without posing unreasonable risks to the environment. EPA's risk assessments are guided by scientific advisory panels and are regularly revisited through the registration review process to ensure continued appropriateness, including the imposition of mitigation measures where warranted.

Protecting Public Health

Rodents are known vectors for diseases such as hantavirus, leptospirosis, and salmonella. Removing effective rodent-control tools risk increasing rodent populations in urban and business settings, potentially elevating public health risks—particularly in densely populated or underserved communities. Compounding this issue, limiting available control options can concentrate selection pressure, accelerating resistance development and diminishing the long-term effectiveness of rodent management efforts.

Our organization supports IPM as a foundational element of responsible pest control. Under IPM, pesticide use is an exercise in managing risk—both from pests and from the tools used to control them. Maintaining access to multiple tools is essential to prevent resistance and preserve long-term effectiveness. Anticoagulants, including the specified rodenticides listed in H 7222, are used as part of IPM programs alongside sanitation, physical prevention, monitoring, and non-chemical controls, not in isolation. Arbitrarily removing these tools undermines the flexibility necessary for effective, site-specific pest management.

For these reasons, HCPA believes H 7222, as written, would significantly curtail access to essential rodent control products, eliminating vital tools relied upon to safeguard public health and disrupting the established federal regulatory system governing their safe and effective use. We respectfully urge the committee to oppose H 7222.

Thank you for the opportunity to submit comments.

Sincerely,



Michelle Kopa
Senior Director
State Government Relations & Public Policy