

2/23/26

Dear Chair Casey, First Vice Chair Fogarty, Second Vice Chair Speakman, and Members of the House Municipal Government and Housing Committee,

My name is David Brunetti, and I live in Burrillville, RI.

I fully support House Bill No. 7222 which amends Section 23-25-4 of the General Laws in Chapter 23-25 entitled "Pesticide Control". I have written to request that you advance/vote in favor of House Bill No. 7222, which amends the Pest Control Act, when it comes before you.

This bill addresses the issues associated with first-generation and second-generation anticoagulant rodenticides and bans the sale of first-generation anticoagulant rodenticides in “consumer” stores and online retail stores starting on March 1, 2027, and bans the sale of second-generation anticoagulant rodenticides in “consumer” stores and online retail stores starting on January 1, 2028, with some exceptions. Additionally, starting on January 1, 2028, the use of both first-generation and second-generation rodenticides shall be prohibited, with some exceptions.

It’s important to understand the context and history of pesticide bans when considering anti-coagulant rodenticides.

During the 50s and 60s, DDT was the most effective pesticide in the world for stopping mosquito populations and therefore, malaria. And, it was cheap. Actually, up to 23 times less than other insecticides. **The United States banned it anyway!**

In that regard, just because anticoagulant rodenticides are cheaper than the alternative – a non-anticoagulant-based integrated pest management program - doesn’t mean that they shouldn’t be banned. **The negative impact on non-targeted species is the cost which needs to be considered, not the cost of purchase and application of the respective pesticides.**

Recent research on the effects of DDT shows that the grandchildren of those exposed had increased cancer rates.¹ That research hasn't been done yet on anticoagulant rodenticides.

The rodenticides covered in this bill have been implicated in the deaths of many non-target avian species, particularly raptors such as eagles, hawks, falcons, and owls, as well as

¹ [Consequences of DDT Exposure Could Last Generations | Scientific American](#)

predatory animals, such as foxes and coyotes, as well as children and pets. Tragically, these non-target wildlife species – many of which serve as natural forms of rodent control by eating thousands of rodents a year, are killed by consuming only 1-2 rodents who have consumed this class of rat poisons. Poisoning the entire ecosystem, our water supply, and children is wrong and unnecessary.

As someone who has spent the past year volunteering as a bird rescuer, releaser, and clinic worker at Congress of the Birds, which is Rhode Island's premier avian rescue and rehabilitation facility, I have witnessed first-hand the negative impacts that these rodenticides have had on RI's birds of prey.

Passage of this bill would also create an integrated pest management pilot program, which here is a science-based approach to managing rodents using a variety of methods to prevent and treat rodent concerns, including the use of rodent contraception, rodent mitigation zones, rodent signs, etc. Passage of this bill would also result in the provision of funds for the implementation of the integrated pest management pilot program.

This issue is pervasive and has been documented globally. In addition to birds, these rodenticides have been responsible for poisoning mammals, reptiles, fish, and humans - with a number of human and pet dog mortalities documented. The list of publications documenting the negative impacts to birds and biodiversity has been growing and it is clear that these chemicals represent a very real threat to terrestrial and aquatic ecosystems alike.^{2,3}

Adding to the carnage of raptors and other wildlife is the fact that even though the Environmental Protection Agency deemed second-generation anticoagulant rodenticides so harmful that they pulled them from consumer shelves back in 2014, e-commerce sites like Amazon make it simple to avoid the EPA's ban with the click of a mouse. Of course, Amazon is just one place where these non-target wildlife killing poisons can be purchased.

Notably, there are poison-free pest control companies out there that instead focus on sanitation and exclusion. For example, with residential and commercial building/structures, when companies focus solely on "control" without addressing entry points – siding gaps, garage doors, vents and crawl spaces, roof and eaves, and doors and windows - they're allowing more rodents to enter the structure, replacing the ones that were eliminated. This cycle can result in an exponential increase in rodent activity over

² [The Threat of Anticoagulant Rodenticides to the Ecological Environment - Forward Pathway](#)

³ [First evidence of widespread anticoagulant rodenticide exposure of the Eurasian otter \(*Lutra lutra*\) in Germany - ScienceDirect](#)

time. People shouldn't be allowed to just keep poisoning and trapping rodents – inside and outside of structures - as the control method. It is an irresponsible and immoral practice.

Think about the irony here, the rodenticides presently used are killing our raptors – our hawks, falcons, and owls, as well as other predatory species – which are our natural control system for the targeted species for which these rodenticides are prescribed! These anticoagulants continue to travel up the wildlands food chain, mercilessly poisoning and killing natural predators of rodents!

To prevent the ongoing, inhumane, and unnecessary suffering and death of non-target animals from these poisons, I urge you to advance/vote in favor of House Bill No. 7222.

Notably, **for information on nontoxic rodent control methods, you can read the attached information below from the Center for Biological Diversity or visit SafeRodentControl.org to access the article Safe-Rodent-Control-Solutions, their guide to Safe Rodent Control: Real-Life Solutions⁴.**

Sincerely,

David A. Brunetti
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Safe, Nontoxic Methods for Rodent Control

Prevention is fundamental in practicing safe, nontoxic rodent control. Removing sources of food, water, and shelter to discourage the rodents' presence is highly effective before and after rodent infestation breaks out. The following is helpful guidance on integrated pest management techniques to addressing potential rodent invasions and treating existing ones.

PEST-CONTROL METHODS THAT ARE SAFE BETS FOR WILDLIFE

- Don't leave pet food and water outdoors, especially overnight. Store pet-food supplies indoors in sealed containers.
- Seal gaps around air vents to building sub-areas and attics and any other openings that penetrate exteriors. Use sweep seals under doors. A rat can squeeze through a hole the size of quarter, a mouse through a hole smaller than a dime.
- Don't plant ivy near/up against buildings— it provides shelter and a food source for rodents: snails and slugs. Ivy on walls can form “rat ladders” to windows, attics and other interior spaces.
- Keep compost piles as far away from structures as possible.
- Keep grass cut and trees trimmed as far away from structures as possible.

⁴ [Safe Rodent-Control Solutions](http://SafeRodentControl.org)

- If you have a birdfeeder, use a squirrel guard at the base to keep rodents away. Keep the ground area clean of birdseed.
- Keep outdoor grills and cooking areas clean.
- Keep firewood off the ground and as far away from structures as possible to mitigate shelter opportunities.
- Use city-issued plastic trash bins. If cracked or missing a lid, contact the Department of Sanitation for a free replacement.
- Clean up trash in garden areas to remove shelter for rodents.

If the above methods aren't sufficient, you may be forced to take [secondary-control steps](#)⁵.

Note: Neither I nor The Center for Biological Diversity condone cruelty to rodents or any other living creatures; the techniques mentioned in this [secondary-control steps](#) article are done so in order to best combat the toxic dangers of rodenticides while also preventing or causing minimum harm to rodents themselves.

⁵ [Secondary Control: Traps, Old and New](#)