

Supporting the EPA's Rodenticide Mitigations

Office of Pesticide Programs
Docket EPA-HQ-OPP-2023-0567-0004
Office of Pesticide Programs
Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460-0001

Re: Comments on the Endangered Species Act Draft Rodenticide Biological Evaluation (EPA-HQ-OPP-2023-0567-0004)

On behalf of undersigned [X#] of organizations, we are writing in support of strong mitigation measures to reduce the environmental and public health threats for the 11 rodenticides currently registered by the Environmental Protection Agency (“EPA”).

Scientific evidence indicates rodenticides pose widespread threats to wildlife, people, and pets and we are grateful for the additional mitigations proposed. But EPA must do more to avoid the well-known poisonings of non-target organisms.

EPA’s draft Biological Evaluation under the Endangered Species Act (“ESA”) puts forward several important proposals to better protect endangered and threatened species from rodenticides and we encourage EPA to take strong steps to reduce unintended poisonings through the following changes to pesticide labels:

- Prohibit all broadcast applications of rodenticides because they cause the most widespread harm to wildlife;
- Implement strong geographic prohibitions on rodenticide use within the range and critical habitat for ESA protected species;
- Require restricted use status for all rodenticides to reduce improper consumer use;

- Require non-refillable bait stations in a setting where children or pets many encounter the product.

EPA recognizes more must be done because rodenticide poisonings potentially jeopardize the continued existence of at least 73 ESA protected species, including Florida panthers, black footed ferrets, northern spotted owls, and California condors.

Rodenticides also pose a serious risk to people. More than 8,400 cases of human poisonings were reported in 2022 alone, including almost 5,500 involving children.

There is still much work to be done in mitigating the dangers of rodenticides to wildlife, people, and pets, and we encourage EPA to take strong steps to reduce the threat of rodenticides to the environment and public health.

Sincerely,
Hillside Federation