

United States Senate

WASHINGTON, DC 20510

October 16, 2023

The Honorable Michael S. Regan
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W., Mail Code 1101A
Washington, D.C. 20460

Dear Administrator Regan:

We are writing on behalf of growers, pest control operators, and consumers in our states who are concerned about the consequences if EPA moves forward with its November 29, 2022, proposed mitigation measures for the 11 rodenticides. We encourage you to take the time to work with stakeholders to ensure that any new mitigation measures for these products do not jeopardize the ability of users to protect the food supply, public health, property, and infrastructure. Any new measures should be based on sound science and must recognize the significant benefits that the products provide.

According to the U.S. Department of Agriculture, rodents are responsible for millions of dollars in damages to field crops, stored grain, and farm equipment annually. They can also spread over 60 diseases to humans, companion animals, and livestock.¹ The proposed mitigation measures would place severe restrictions on the use of rodenticides, hampering the ability of growers, consumers, pest control operators, restaurants, other food handling establishments, schools, health care facilities, and businesses to control rats, mice, and other rodents. They would also complicate compliance with food safety regulations that require rodent control. Rather than protecting the environment, limiting access to vital rodenticides would harm the American food supply, public health, animal health and welfare, and infrastructure. The proposed measures would also hamper environmental justice efforts by increasing the cost of rodent control and making food more expensive for those who can least afford it.

These proposed mitigation measures include: classifying most of the products as restricted use pesticides; requiring that users of these products become licensed, state-certified applicators; requiring the use of respirators for many products; prohibiting the surface (non-bait station) application methods currently used to protect many crops; and requiring growers to conduct carcass searches for two weeks after application. Stipulating that the applicator consult with

¹ Keirn, Gail. "Improving Agriculture Production through Rodent Damage Management." *USDA*, 21 Feb. 2017, <https://www.usda.gov/media/blog/2011/03/11/improving-agriculture-production-through-rodent-damage-management>.

Bulletins Live! Two, prior to rodenticide application, could also result in additional limitations on product use based on location.

We strongly encourage the EPA to work with rodenticide registrants and product users to ensure that any new mitigation measures are practical, science-based, and allow continued access to these essential pest control tools. As written, the proposed mitigation measures will result in crop damage and livestock loss, jeopardize the safety of the food supply, weaken public health protections, and make it more difficult for people to protect their homes and property from rodents.

Sincerely,



CINDY HYDE-SMITH
United States Senator



JOHN BOOZMAN
United States Senator



JOHN BARRASSO
United States Senator



PETE RICKETTS
United States Senator



TED BUDD
United States Senator



MIKE CRAPO
United States Senator



BILL HAGERTY
United States Senator



JAMES E. RISCH
United States Senator



CHUCK GRASSLEY
United States Senator



CYNTHIA LUMMIS
United States Senator



THOM TILLIS
United States Senator



KATIE BOYD BRITT
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JAMES LANKFORD
United States Senator



JONI K. ERNST
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JOHN THUNE
United States Senator



ROGER F. WICKER
United States Senator

Cc: Dr. Michal Freedhoff, Assistant Administrator, Office of Chemical Safety and Pollution
Prevention
Mr. Rod Snyder, Senior Advisor for Agriculture