

Congress of the United States

Washington, DC 20515

April 19, 2023

The Honorable Michael Regan
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.,
Washington, DC 20460

Dear Administrator Regan:

We are writing on behalf of growers, pest control operators and consumers in our states who are concerned about the ability to protect the food supply, the public health and their property from destructive rodents if the Environmental Protection Agency moves forward with its November 29, 2022 proposed mitigation measures for the eleven 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, or infrastructure. Any new measures should be based on sound science and must recognize the significant benefits that the products provide.

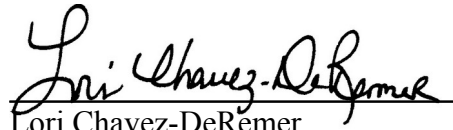
According to the U.S. Department of Agriculture, rodents are responsible for millions of dollars in damages to field crops, stored grain and farm equipment annually. They can also spread over 60 diseases to humans, companion animals, and livestock.¹ The proposed mitigation measures would place severe restrictions on the use of rodenticides. This would hamper the ability of growers, consumers, pest control operators, restaurants and other food handling establishments, such as schools, health care facilities, and businesses, to control rats, mice, and other rodents and comply with food safety regulations that require rodent control. Rather than protecting the public health and the environment, limiting access to vital rodenticides would harm America's food supply and infrastructure. The proposed measures would also affect 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 along with the applicator consulting with Bulletins Live Two, prior to rodenticide application, which could include additional limitations on product use based on location.


We urge the EPA to work with rodenticide registrants and product users to ensure that any new mitigation measures are practical, science-based and allow the continued access to these vital 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.


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>.

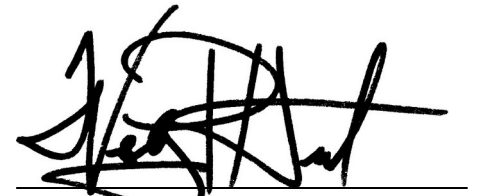
Sincerely,



Lori Chavez-DeRemer
Member of Congress

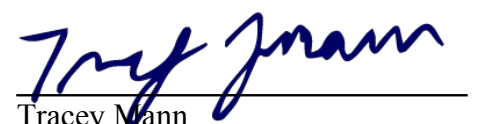

Dusty Johnson
Member of Congress



Virginia Foxx
Member of Congress

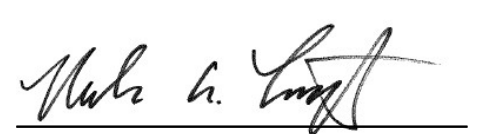

Randy Feenstra
Member of Congress

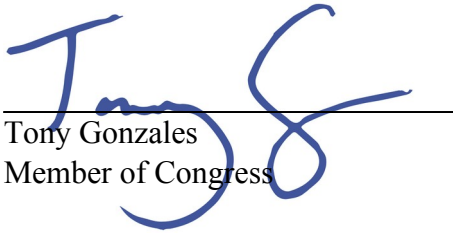

Wesley Hunt
Member of Congress


Mike Bost
Member of Congress

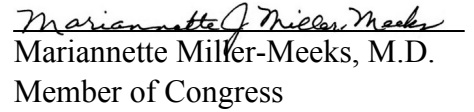

Tracey Mann
Member of Congress


Ronny L. Jackson
Member of Congress

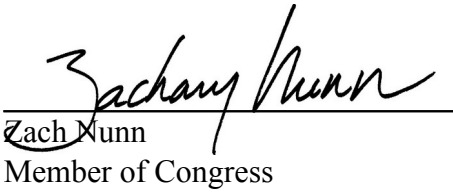

Nicholas A. Langworthy
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Tony Gonzales
Member of Congress



Mariannette Miller-Meeks, M.D.
Member of Congress



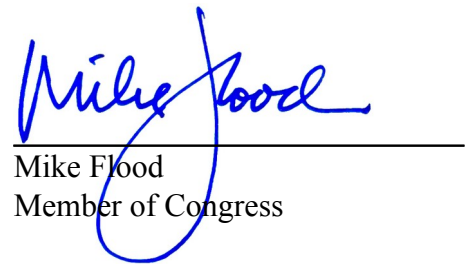
Zach Nunn
Member of Congress



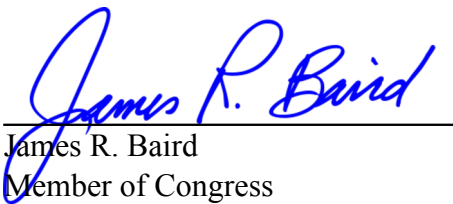
Ashley Hinson
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Pete Sessions
Member of Congress



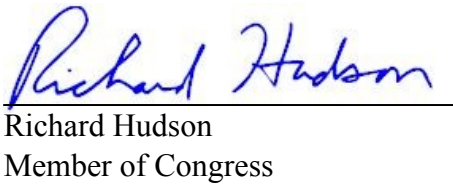
Mike Flood
Member of Congress



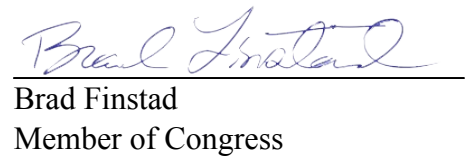
James R. Baird
Member of Congress




Mark Alford
Member of Congress



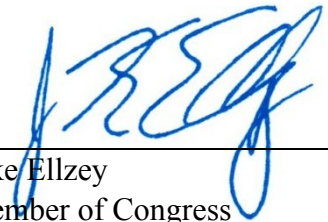
Richard Hudson
Member of Congress




Brad Finstad
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Trent Kelly
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Jake Ellzey
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Frank D. Lucas
Member of Congress



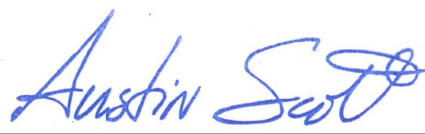
Eric A. "Rick" Crawford
Member of Congress




Mike Ezell
Member of Congress



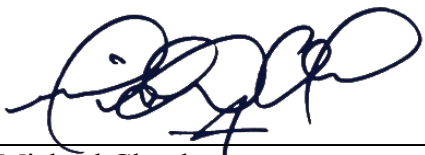
Keith Self
Member of Congress



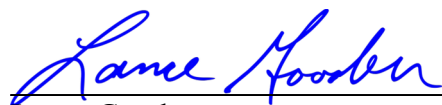
Austin Scott
Member of Congress



David Rouzer
Member of Congress



Michael Cloud
Member of Congress



Lance Gooden
Member of Congress



Max L. Miller
Member of Congress

Cc: **Dr. Michal Freedhoff, Assistant Administrator, Office of Chemical Safety and Pollution Prevention**
Mr. Rod Snyder, Senior Advisor for Agriculture
Julie M. Broadway, CAE, President of the American Horse Council
J.D. Darr, Director of Legislative & Regulatory Affairs, National Pest Management Association