NORTHWEST CONSERVATION DISTRICT
www.nwcd.org

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August 25, 2026

To Whom It May Concern:

The Northwest Conservation District (NWCD), an agency advocating for the wise use of natural resources within thirty-four municipalities in northwestern Connecticut, supports a ban on the use of second-generation anti-coagulant rodenticides (SGARs) products on municipal properties, schools, and daycares.

Scientific information on SGAR and reports from Connecticut licensed wildlife rehabilitators have shown that these products pose a health risk to wildlife, children, and pets.

The attached fact sheet from New Hampshire Audubon provides detail about SGAR and alternative ways of controlling rodents.

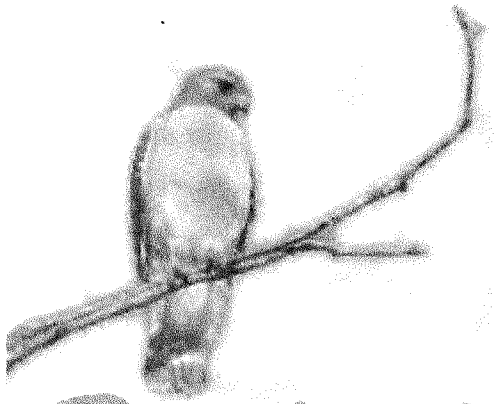
Sincerely,

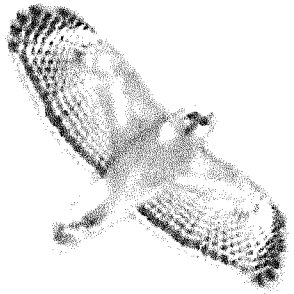
Lawrence M. Rousseau

Lawrence Rousseau

Chairman, NWCD Board

The Northwest Conservation District (NWCD) is a non-regulatory, non-profit agency serving thirty-four municipalities in northwest Connecticut. Our mission is to encourage wise use of natural resources through education and technical assistance focusing on soil, water, energy, agriculture, technical assistance and forests, wetlands and ecosystem health. NWCD supports science-based initiatives and sensible public policy furthering environmental stewardship by the towns in our region.





Protecting animals together

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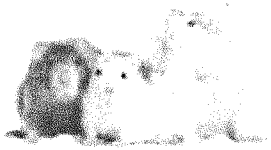
CT Votes For Animals

KILLERS
FRIENDS
of ANIMALS

CT VOTES
ANIMALS



CT VOTES FOR ANIMALS

Speak Up For Animals!

Updated: April, 2026

Watch CFA's Webinar
Think Outside The Bait Box 2.0

Paying for Poison: The Fiscal Case for Banning SGARs

Second-Generation Anticoagulant Rodenticides (SGARs) are slow-acting poisons that regularly cause accidental poisoning of pets, children, and wildlife. SGARs undermine rodent control because they kill the animals that naturally regulate rodent populations. **Banning SGARs would lower long-term costs by shifting to prevention-based services and reducing public health risks.**[1,2]

BREAKING THE BAIT BOX CYCLE

No one benefits more from SGAR use than pest management companies. Rather than addressing the issue, these companies create *the bait box cycle*:[3] A self-perpetuating cycle of rodent poisoning, secondary predator poisoning, rodent population rebound, and an ever-increasing reliance on continued poison use.

This cycle can be broken. Pest industry profits are driven largely by services, not poisons.[4] Industry leaders already rely on inspection, exclusion, and prevention–proving that these companies can remain profitable without making poison their core product.[5,6]

FROM POISON TO PREVENTION

Banning SGARs does not increase costs; it simply shifts resources toward prevention-based strategies like *Integrated Pest Management* (IPM) that reduce long-term spending.

IPM is a comprehensive approach to rodent control that prioritizes prevention, monitoring, and targeted intervention.[2] Two proven intervention methods are *exclusion* and *sanitation*.

EXCLUSION[7]

- Use rodent-proof material like metal mesh to seal cracks and holes that lead to outdoors.
- Repair aging infrastructure to eliminate entry points.
- Trim foliage away from buildings.

SANITATION[8]

- Secure trash in containers with tight-fitting lids.
- Increase waste collection frequency in densely populated areas.
- Enforce proper food storage practices for restaurants and residential buildings.

PREVENTABLE RISKS, AVIODABLE COSTS

With SGAR use comes preventable public health risks. Because of their prolific use around schools, parks, playgrounds, and other high-traffic areas, these poisons pose a heightened risk of accidental exposure to children[9] and pets.[10] Any exposure requires an emergency response; whether that's calls to poison control centers, trips to urgent care facilities, or emergency room visits, the end result is the same: **Unnecessary emergency costs and potential liability for municipalities.**

Importantly, these risks are entirely avoidable. Unlike structural hazards that may result in significant cost to fix, SGAR exposure is a direct result of policy choice. Eliminating their use reduces the chances of accidental exposure, ultimately lowering emergency response demands and limiting potential legal liability.

If it kills the solution and not the problem, it's not a cost-effective policy. Banning SGARs marks a critical shift away from reliance on poisons and toward smarter, safer, and more cost-effective solutions.

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3 Raptors Are the Solution. (n.d.). The Bait Box Cycle. https://raptorsarethesolution.org/wp-content/uploads/2012/06/Bait-box-scam-diagram.pdf
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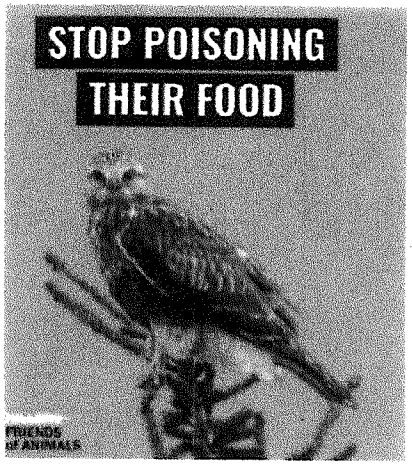
10 Pet Poison Helpline. (n.d.). 2025 Report Card. https://petpoisonhelp.wpenginepowered.com/wp-content/uploads/2026/01/Pet-Poison-Helpline-2025-Report-Card-2.pdf



SAFE PREVENTION STRATEGIES

Did you know rodents can enter a home or building through an opening the size of a dime?

Monitor rodent activity to learn entrance routes, and use non-toxic repellents like peppermint oil spray or cayenne pepper bags.

EXCLUSION

- Seal any gaps where rodents might enter like openings for pipes and cable wires, with steel wool, copper mesh, or hardware cloth; or fill with caulk or plaster and cover with sheet metal. Pay attention to the foundation and holes between house and garage.
- Bury galvanized steel mesh and or hardware cloth around foundations and porches to block tunneling
- Cap chimneys and cover vents/floor drains with hardware cloth
- Seal external doors with rodent-proof door sweeps
- Trim vegetation and ivy away from buildings to minimize shelter (harborage)
- Elevate animal enclosures and/or compost (18 inches) to avoid burrowing
- Install layer of concrete, rat slab, to block tunneling, if appropriate

SANITATION

- Store grains, cereals, nuts and pet foods in sealed plastic, metal, or glass containers. Use rodent resistant trash barrels, bins and dumpsters, and keep them securely covered
- Implement a community education program to ensure good trash management
- If you have bird feeders limit ground litter, using a catch tray under feeder to limit drops. Bring feeders in at night.
- Discard unused clutter that may be providing a home for rodents. Pick up fallen fruit/rotting vegetables from gardens.
- Dont leave food on counters or dirty dishes in sink overnight. Keep stovetops and kitchen floor clean especially under stove and fridge.

Non-toxic alternatives

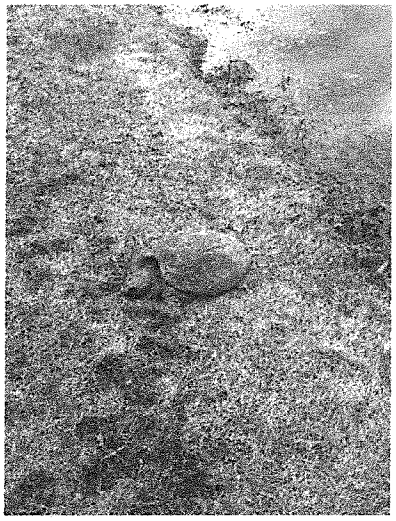
Rodent contraceptives such as **Evolve** & **Contraceptol** can limit rodent fertility

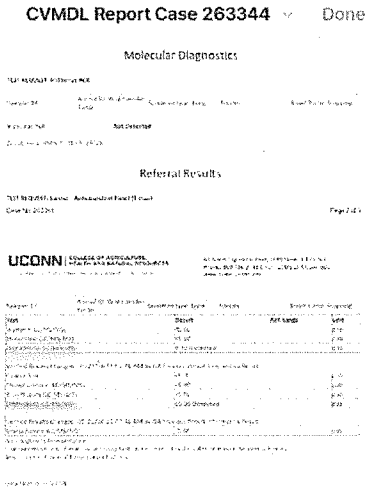
Encourage natural predators with owl nesting boxes, hawk perches

Snap Traps, Zap Traps, CO2 Traps, Live Traps, Noise Repellents, UltrasonicDeterrents like MouseBlocker, SMART TECHNOLOGY, Rat x, Mouse x, Dry Ice, Carbon Monoxide sprayer in burrows, rodent smoke bomb, strobe lights

Turtle Haven – A non-profit organization located in Northford who takes in injured and sick wild turtles to be healed and returned to the wild in CT.

June 16, 2026





CVMDL Report Case 263344 ~ Done

Molecular Diagnostics

Not Detected

Referral Results

UCONN

This is who those bait boxes are killing. This old man, a ~20-pound snapping turtle, died needlessly with rodenticide poison and a handful of other opportunistic infections taking hold in a weakened animal. He died slowly, painfully, and coughing up blood in the arms of one of our rehabbers. He didn't have a single injury, nothing visible to explain his symptoms of lethargy, dehydration, and bleeding from the mouth. He'd been motionless for days before a rehabber was called, and by then it was too late. There's no telling if we would have actually been able to save him if we had gotten to him sooner, but he'd have had a better chance. Still, Jolene, our snapping turtle queen over here at Turtle Haven, did her best to provide care and comfort to a dying animal, and when he passed, we decided he needed to be tested to confirm our suspicions. Two different anti-coagulant rodenticides were detected in this snapping turtle. While not the definitive cause of death with so many other infections raging, it stands to reason that the poison started it all. Snapping turtles are incredibly hardy, and very rarely have they come into our rehab with infections compared to other species.

So how does this happen? How does a bottom-feeding aquatic reptile die from poison meant for a land-dwelling mammal? We can only theorize, but our best guess goes like this:

Venderick's Healing Paw – A nonprofit wildlife rescue located in Killingly who specializes in squirrels and small mammals. They help injured and orphaned Connecticut wildlife get a second chance at a life in the wild

June 4, 2026

Last night, we received a heartbreaking call about a lethargic, very ill chipmunk. While we initially considered a few possibilities for his condition, the true cause became devastatingly clear when the finder went to contain him. Seeking safety, he retreated straight into a commercial bait box; the very source of his suffering. He chose that dark space for protection, completely unaware it was the origin of his slow, fatal illness.

When mice or rats become a problem, many homeowners and businesses turn to the familiar black plastic bait boxes seen outside buildings. They are often marketed as a safe, contained solution. But as wildlife rehabilitators, we see the devastating reality behind these boxes every single day.

If you use these boxes, or are considering them, please know the facts about what they actually do to our local ecosystems.

A common misconception is that bait boxes trap rodents inside. While a few can be outfitted with mechanical snap traps, the vast majority of them do not contain them. Snap traps require frequent checking and manual resetting; poison blocks, however, can be left unattended for long stretches of time before needing a refill. The target animals enter, consume the slow-acting poison, or carry it back to their nests to share with their families, before walking right back out into your yard, neighborhood, and local woods.

Most commercial baits use Second-Generation Anticoagulant Rodenticides (SGARs). These chemicals stop the blood's ability to clot.

It takes 3 to 5 days for the animal to show symptoms.

During this time, they bleed to death internally.

The visible signs are extreme lethargy, weakness, loss of balance, and severe breathing difficulties.

The entry holes on these boxes don't discriminate. They are the perfect size for non-target small mammals. Chipmunks, grey squirrels, red squirrels, flying squirrels, and baby cottontails, routinely enter out of curiosity or to forage, suffering the exact same horrific fate.

Because these poisons take days to work, the dying rodents become disoriented, sluggish, and incredibly easy to catch by predators. They become walking time bombs of potent toxins for wild predators.

When a predator eats a poisoned rodent, they are poisoned too:

Birds of Prey: Upwards of 70% to 90% of dead hawks and owls submitted to wildlife clinics test positive for rodenticides. Owls are especially vulnerable.

Mammal Predators: Foxes, coyotes, bobcats, and fishers are heavily impacted. Even if they don't die immediately, low-level exposure completely decimates their immune system, making them highly susceptible to fatal diseases like mange.

Pets: Outdoor cats and curious dogs are frequently admitted to emergency clinics after consuming bait or a poisoned rodent.

By using bait boxes, we are inadvertently wiping out the very natural predators the hawks, owls, and foxes that provide free, highly effective rodent control. One breeding pair of screech owls can catch dozens of rodents a week. When we poison their food source, we destroy nature's balance.

Humane Solutions

- Seal up entry points in foundations, walls, and roofs with steel wool or hardware cloth.
- Keep trash sealed, clean up spilled birdseed, and secure pet food.
- If elimination is necessary, use traditional snap traps or electronic traps that kill instantly, preventing days of suffering and eliminating the risk of secondary poisoning to wild predators.
- Talk to your neighbors and local business owners about the dangers of SGARs.

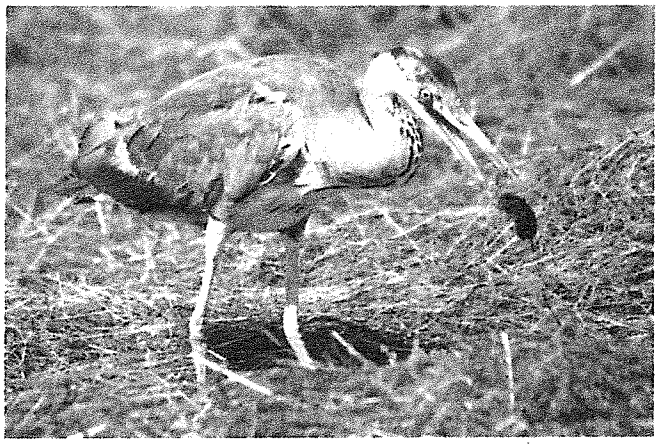
Let's protect our native wildlife and choose solutions that don't cause unintended suffering in our own backyards.

USDA
United States Department of Agriculture

Rodenticides causing unintended harm to our wildlife

Problem

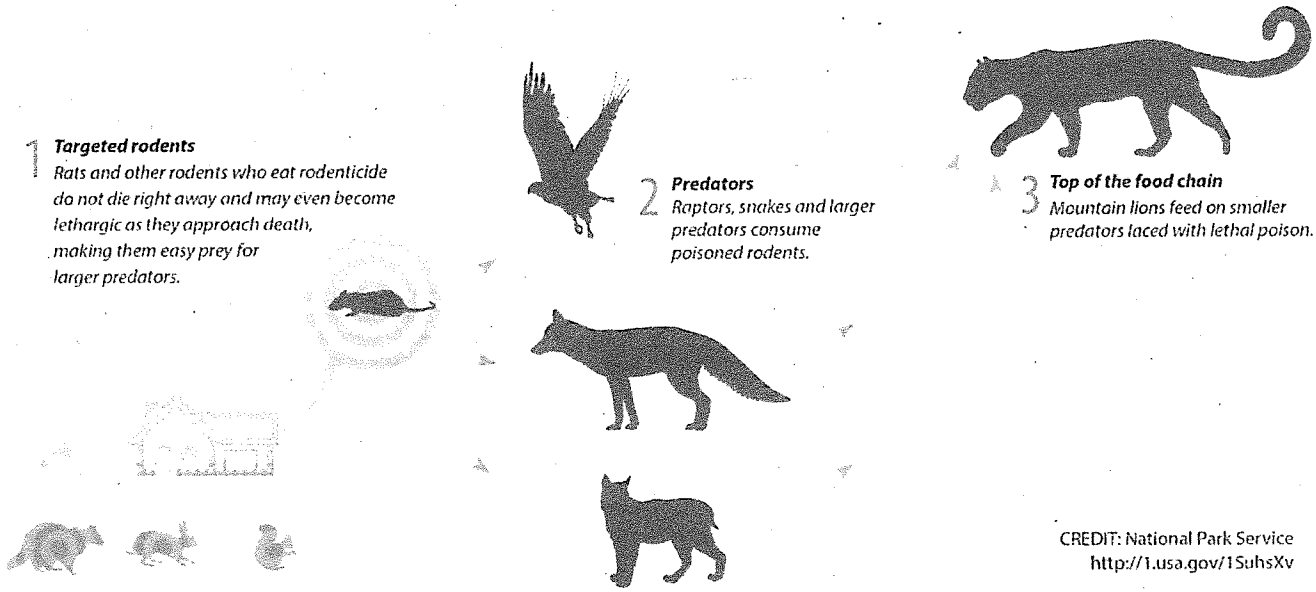
Research shows that rat poisons used to control pest animals are also killing native carnivore species. Anticoagulant rodenticides (ARs), toxicants used for the control of pest populations in agriculture and in homes, have been linked to illness and death of pets and wildlife.[1, 2, 4] Wildlife impacted by ARs include raptors, mountain lions, foxes, and other carnivores as well as household pets. Predatory and scavenging animals that eat dead or dying rodents poisoned by anticoagulant baits are exposed to ARs; this secondary exposure is linked to weakened immune systems and death.



Great blue heron eating rodent. Source: https://cdn.pixabay.com/

Impact to animals: How do rodenticides harm wildlife and pets?

Rodenticide baits are formulated to attract animals in order to be effective; non-target animals including wildlife and pets may be attracted to bait and eat them causing primary poisoning. Anticoagulant rodenticides work by preventing blood clotting, leading to uncontrollable bleeding. In targeted animals this may take several days to be effective. While animals are slowly dying, they may become lethargic, making them easy targets for predators. When a predator eats a poisoned prey animal, it also ingests accumulated ARs in the prey item, causing secondary poisoning or relay toxicosis.[7] Effects to predators include bleeding from the nose and gums, difficulty breathing, vulnerability to illness due to compromised immune system, and death.



CREDIT: National Park Service
http://1.usa.gov/1SuhsXv

Source: National Park Service, Santa Monica Mountains National Recreation Area

Evidence of food web contamination is widespread, and has been studied in sensitive wildlife species in the Pacific Northwest. A review of studies published between 1998 and 2015 that assessed impacts of ARs to non-target wildlife found that in the U.S, 58% of non-target animals analyzed in these studies had AR residues in their livers.[4] One study conducted in Northwestern California documented that 70% of native avian predators studied were exposed to at least one AR.[2] Another study found 79% of tested mammalian carnivores in the Klamath Mountains and Southern Sierra Nevada had been exposed to at least one AR.[1]

Most Common Anticoagulant Rodenticides

Anticoagulant rodenticides are divided into two categories: first generation and second generation anticoagulant rodenticides (SGAR). First generation anticoagulants require animals to consume more than one dose to be effective. Second generation products are much more toxic and typically kill rodents with one dose, though a rodent may eat several doses before death. When a rodent eats several doses of a SGAR, it can accumulate a super-lethal amount of poison that can then be consumed by a predator. This poses higher risk to non-target wildlife species. Second generation ARs registered for use for pest control in the U.S. are bromadiolone, brodifacoum, difenacoum, and difethialone.[5] These products are not available for consumer purchase, but are available for use by professional applicators. Check the label when purchasing pest control products and ask your pest control professional what products they use.

Best Practices: How can I protect wildlife while controlling pests?

The best methods of rodent control are exclusion and sanitation.[6] Help protect wildlife and pets from unintended poisoning by using prevention methods and non-chemical control options. Homeowners can take preventative steps by removing food, water, and shelter for rodents from their property.[3]

- Keep garbage in sealed containers
- Keep pet food inside
- Reduce standing water around the home
- Remove vegetation from on and around buildings (hedges, ivy)
- Seal openings with ¼" metal mesh or flashing

If preventative methods are not effective, non-chemical methods of removal should be employed next. Snap traps when used correctly are an effective, humane tool to control pest rodent populations in and around the home. If you must use chemical control methods, read the label and use as directed. To prevent accidental poisoning to pets and wildlife, remove and properly dispose of carcasses of rodents.[8]

Citations

1. Gabriel, M.W., Woods, L. W., Poppenga, R., Sweitzer, R.A., Thompson, C., Matthews, S. M., et al. "Anticoagulant Rodenticides on our Public and Community Lands: Spatial Distribution of Exposure and Poisoning of a Rare Forest Carnivore." PLoS ONE. July 13, 2012.
2. Gabriel, M.W., L.V. Diller, J.P. Dumbacher, G.M. Wengert, J.M. Higley, R.H. Poppenga, and S. Mendia, (2018) Exposure to rodenticides in Northern Spotted and Barred Owls on remote forest lands in northwestern California: evidence of food web contamination. Avian Conservation and Ecology 13(1):2.
3. "Identify and Prevent Rodent Infestations." Environmental Protection Agency, 16 Feb. 2018, www.epa.gov/rodenticides/identify-and-prevent-rodent-infestations.
4. Nakayama, Shouta M M, et al. "A Review: Poisoning by Anticoagulant Rodenticides in Non-Target Animals Globally." The Journal of Veterinary Medical Science, The Japanese Society of Veterinary Science, 28 Feb. 2019, www.ncbi.nlm.nih.gov/pmc/articles/PMC6395208/.
5. "Restrictions on Rodenticide Products." Environmental Protection Agency, 7 Apr. 2017, www.epa.gov/rodenticides/restrictions-rodenticide-products
6. "Rodenticides." CDFW Prod, www.wildlife.ca.gov/Living-with-Wildlife/Rodenticides.
7. "Rodenticides." National Pesticide Information Center, Oregon State University, Mar 2016. Retrieved Aug 13, 2019 from http://www.npic.orst.edu/factsheets/rodenticides.html.
8. "Safely Use Rodent Bait Products." EPA, Environmental Protection Agency, 13 Dec. 2016, www.epa.gov/rodenticides/safely-use-rodent-bait-products.

APCH funded 101 completed AR Panel/Necropsies UCONN/MSU costing over $23k from 2022-2024.

This collection of actual data demonstrates the far-reaching negative impact these poisons pose while the opposition has no scientific evidence to support their claims of low negative impacts on our wildlife, domesticated pets, and small children.

Results revealed 78 out of 101 tested positive for one or more of the ingredients that make up SGARs. (BRODIFACOUM, BROMADIOLONE, DIFETHIALONE, DIFENACOUM).
3 had both SGARs and First Generation Anticoagulant Rodenticides (FGARS).
23 others were suspected to have been victims to other classifications of rodenticides which include neurotoxins, vitamin d overdose, or strychnine.

These redundant results show that it does not matter who applies these poisons, it is what is being applied that is the problem. Even when applied by licensed applicators. There simply is no such thing as a safe poison. SGARs are lethal at one feeding session and bioaccumulate.

According to the US EPA in 2023 Rodenticides were # 8 on the list of pet toxins Nationally and # 9 in CT. More than 100 pets die annually from ingesting rodenticides direct or indirectly. The American Association of Poison Control Centers claim in 2023 there were 2,857 human poison cases involving anticoagulant rodenticides and 2,025 involved children.

APCH Anticoagulant Positive Results by species and town; **78/101**
*(We are only one facility; this represents only a small percentage of the actual damage caused to wildlife across CT. Imagine if all Wildlife Rehabilitators and CT DEEP were submitting for testing.) **1 Red Fox Kit** New Milford
1 Opossum New London
1 Weasel Dayville
1 Barn Owl New Haven
3 Ravens New Britain, Durham, Durham
5 American Bald Eagles Bloomfield, Bloomfield, New Hartford, Canton, Westport **3 Barred Owls** East Hampton, North Branford, Killingworth
7 Great Horned Owls Cheshire, Harwinton, Killingworth, Guilford, Clinton, Madison, Guilford **6 Coopers Hawks** Cheshire, New Britain, Ansonia, New Haven, Hamden, Cheshire **14 Red Shouldered Hawks** Columbia, Middletown, Bantam, Waterbury, Torrington, Oxford, Madison, Avon, Manchester, Guilford, Cheshire, Cheshire, Waterbury, Danbury,
36 Red Tailed Hawks Southington, Southington, North Haven, East Haven, North Haven, Southington, West Hartford, Milford, West Hartford, Milford, Hartford, Farmington, Suffield, West Hartford, Watertown, New Haven, Middletown, Bantam, East Berlin, Newington, Hartford, New Haven, East Hartford, East Windsor, Hartford, North Branford, Woodbury, New Haven, Middletown, West Hartford, North Branford, Ellington, Woodbridge, Colchester, Litchfield, New Haven,

FERTILITY CONTROL PRODUCTS 100% HUMANE 100% AFFORDABLE

Natural Ingredients that target fertility. No hormones or toxins involved. No negative effects on non

Dear Honorable Members of the Environmental Commi5ee, 2025 Wri5en Tes<mony

Thank you for raising Bill 6915 to ban the use of Second Genera<on An<coagulant Roden<cides in our progressive State of Connec<cut. Please add an amendment to make SGARS Registered Use Products to close the internet loophole and to make sure that only licensed applicators can apply these potent poisons in the outlined exempted scenarios as intended. (To knockdown infesta<ons to more manageable levels treatable with safe alterna<ves)

The crisis regarding non targeted poisoning from the overuse/reliance upon roden<cides con<nues to accelerate since the US EPA removed SGARS from the public shelves in 2014. In 2015 the Bait Box explosion began as these poisons became the number one tool over relied upon by pest management companies. Despite claims made that these applicators are regulated by DEEP and the US EPA, guidelines are not enforced, and this becomes evident when bait boxes line the perimeter of any structure/building being treated. Most are in place as a preventa<ve measure, not as SGARS are intended. Our domes<cated pets, small children, as well as our wildlife are all at risk.

To date, APCH has submi5ed 101 dead specimens to UCONN/MSU for necropsies and An<coagulant Roden<cide Panels to determine which an<coagulant ingredients are responsible. The biggest offender has been iden<fied as Second Genera<on An<coagulant Roden<cides made up of four toxic ingredients, brodifacoum, bromadiolone, difenacoum and difethialone. The results are not only redundant but revealing at 78 tes<ng posi<ve for one or more of the ingredients of SGARS. 3 tested posi<ve for both SGARS and FGARS. The remaining 23 were suspected to have been exposed to other classifica<ons such as strychnine, vitamin d overdose, or neurotoxins.

This tes<ng has cost our non-profit over $23k to provide this conclusive evidence that poisons cannot be streamlined to affect only the targeted rodents. We feel we have done a phenomenal job collec<ng scien<fic data to demonstrate how devasta<ng these methods are, while the opposi<on has been unable to provide any valid suppor<ng evidence that these methods are safe. Simply sta<ng that there is li5le to no nega<ve impact on our wildlife does not make it true. We'd say 80% of our deceased specimens would agree. We all know at this point, it does not ma5er who applies these poisons, it is what is being applied that is responsible for this far reaching devasta<on. Our tes<ng represents a mere frac<on of what is really taking place statewide since we are only one facility. Imagine all the un-tested vic<ms, yet alone the ones

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