The New Hampshire Wildlife Coalition strongly urges the House Committee on Environment and Agriculture to support House Bill 1018. This legislation would appropriately and responsibly restrict the use of second-generation anticoagulant rodenticides (SGARs), allowing their use only in narrowly defined circumstances where a verified rodent infestation poses a demonstrable risk to public health—such as the protection of drinking water supplies or documented public health emergencies—and only when all reasonable nonchemical and alternative control measures have been shown to be ineffective.

One of the most vulnerable of New Hampshire's wildlife to SGARs is the fisher. As you are aware, New Hampshire's fisher population carries **some of the highest documented SGAR body burdens in the nation** (Silveira et al. 2025). Multiple peer-reviewed studies, including Gabriel et al. (2012), demonstrate that exposure to SGARs through bioaccumulation—particularly to **multiple compounds simultaneously, as is common in New Hampshire fishers—can result in severe sublethal effects, reproductive impairment, and mortality**. There is sufficient toxicological literature documenting the adverse effects of SGARs on small mammals like the fisher to provide cause for concern.

Some argue that management action should be deferred until there is absolute, New Hampshire-specific proof of population-level impacts attributable solely to SGAR exposure. We strongly disagree. **Prudent wildlife management does not require perfect data before acting—it requires weighing the best available evidence and responding accordingly.** Demanding unattainable certainty before taking action represents a classic logical fallacy that effectively guarantees inaction, even in the face of mounting harm.

As any credible scientist would affirm, **the absence of definitive proof is not evidence of the absence of risk**. The collective weight of existing research clearly demonstrates that SGARs pose a grave and ongoing threat to New Hampshire's fisher population. Ignoring this evidence would be inconsistent with sound, precautionary wildlife management.

Moreover, it is entirely reasonable to conclude that rodenticide exposure may help explain the documented decline in fisher Catch Per Unit Effort (CPUE) observed over the past three decades. SGARs were first developed and introduced in the early 1980s, with widespread use expanding throughout the 1980s and 1990s—**a timeline that closely mirrors the onset and persistence of declining fisher harvest and CPUE trends** (Figures 1 and 2). While correlation alone does not prove causation, the temporal alignment is compelling and warrants decisive action rather than delay.

Rodenticide exposure is not the sole pressure on New Hampshire's fisher population, but it is a significant and avoidable one. Fishers are already subject to mortality from trapping

and hunting, as well as increasing habitat fragmentation driven by suburban and exurban development. As forested landscapes are subdivided, fishers are forced into closer proximity with human activity, roads, and developed areas—**conditions that simultaneously increase vehicle mortality risk and dramatically elevate exposure to rodenticides** (Litvaitis 2024).

Taken together, **the cumulative effects of trapping, hunting pressure, habitat loss, and chronic rodenticide exposure place New Hampshire's fisher population at serious risk**. For the past eight years, the New Hampshire Wildlife Coalition has repeatedly urged closure of the fisher season as a precautionary measure, yet those calls have gone unheeded.

Two years ago, New Hampshire Fish and Game declined to support legislation similar to House Bill 1018, citing the expectation that the U.S. Environmental Protection Agency would eventually promulgate stronger federal restrictions on SGARs. **That has not occurred**, and there is little indication that meaningful federal action is imminent.

The opportunity—and responsibility—to act now rests with New Hampshire. House Bill 1018 represents a reasonable, science-based, and targeted response that protects public health while significantly reducing unnecessary harm to wildlife.

We urge The House Committee on Environment and Agriculture to join us in taking decisive action to safeguard one of the state's most iconic forest carnivores.

Please support House Bill 1018.

References

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Figure 1

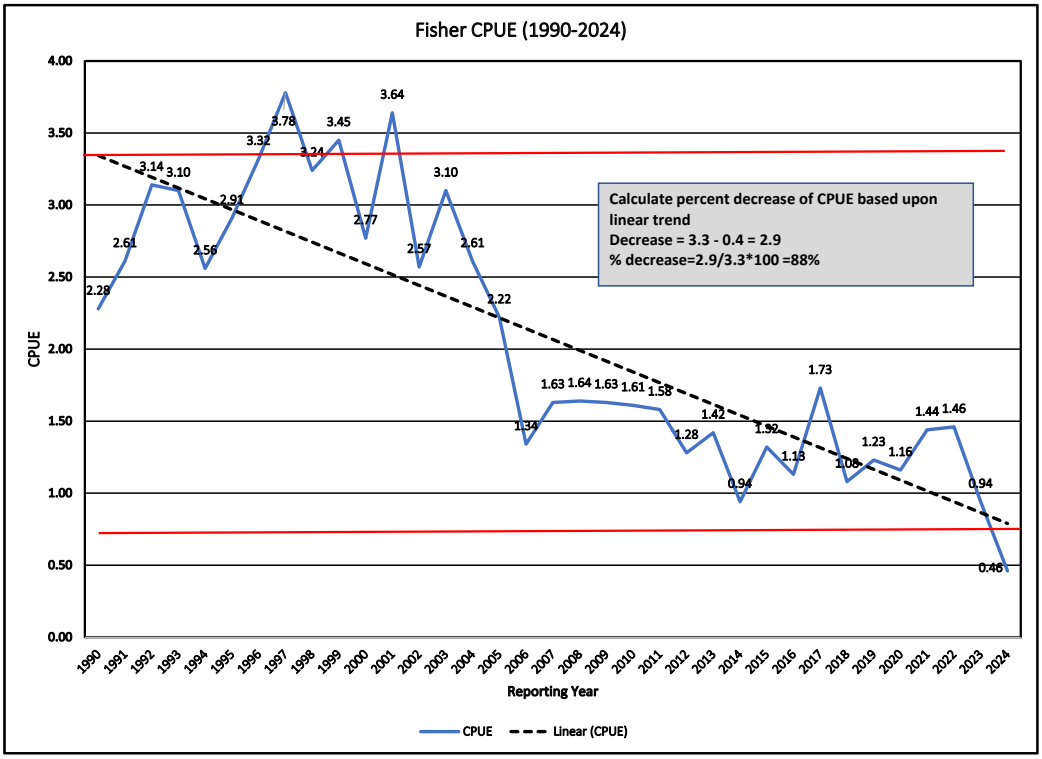

Figure 2