

February 10, 2026

Honorable Judy Aron
Honorable Liz Barbour
Standing Committee on Environment and Agriculture
107 North Main Street
Concord, NH 03301



RE: HB 1018 - Prohibits the use of certain second-generation anticoagulant rodenticides
HB 1676 - Limiting consumer access to certain high-risk rodenticides

Dear Chair Aron, Vice Chair Barbour, and Members of the Standing Committee on Environment and Agriculture

On behalf of the Household & Commercial Products Association (HCPA), I respectfully submit the following comments in opposition to HB 1018, which would prohibit the general use of second-generation anticoagulant rodenticides except under narrowly defined circumstances. We also oppose HB 1676, which would limit consumer access to specified rodenticides by restricting sales to licensed or registered applicators and requiring point-of-sale license verification.

HCPA represents manufacturers and distributors of pest management products that are used responsibly to protect public health, food safety, and property. We oppose the measures for the following key reasons:

- The U.S. Environmental Protection Agency (EPA) has initiated a registration review of anticoagulant rodenticides, including the specified rodenticides listed in HB 1676, among which are the non-anticoagulants cholecalciferol, bromethalin, and zinc phosphide. Along with the EPA endangered species programs, these bills make state-level action premature and duplicative;
- EPA's rodenticide review and mitigation efforts have proceeded consistently across multiple federal administrations, reflecting a stable, science-based regulatory framework that should be allowed to run its course;
- Rodents carry serious diseases, and limiting access to effective control tools for the average homeowner could increase public health risks
- Prohibiting anticoagulant and non-anticoagulant rodenticides, including the specified rodenticides listed in HB 1676, will shift use toward a narrower set of remaining tools, increasing selection pressure, accelerating resistance, and ultimately reducing long-term effectiveness of rodent control options; and
- Responsible pest management demands a holistic approach, and this bill fails to acknowledge the role of Integrated Pest Management (IPM), in which anticoagulants and non-anticoagulants, including the specified rodenticides listed in HB 1676, are used as part of broader, risk-managed control programs.

The EPA's registration review process will scientifically evaluate the uses of rodenticides and implement mitigation measures specifically intended to protect non-target organisms. This process includes endangered species programs through which the agency identifies listed species that may require additional protection and proposes targeted mitigation. HCPA strongly believes the New

Hampshire legislature should allow the EPA to complete its ongoing work before considering state-level approaches that may conflict with federal oversight and risk-mitigation efforts.

Pesticide products are already heavily regulated, evaluated, and restricted as appropriate at both the federal and state levels. Federal law requires that, before selling or distributing a pesticide in the United States, a registrant must obtain approval from the EPA. Prior to registration, EPA must determine that a pesticide, when used according to label directions, can be used with a reasonable certainty of no harm to human health and without posing unreasonable risks to the environment. EPA's risk assessments are guided by scientific advisory panels and are regularly revisited through the registration review process to ensure continued appropriateness, including the imposition of mitigation measures where warranted.

Protecting Public Health

Rodents are known vectors for diseases such as hantavirus, leptospirosis, and salmonella. Removing effective rodent-control tools risks increasing rodent populations in urban and business settings, potentially elevating public health risks—particularly in densely populated or underserved communities. Compounding this issue, restricting anticoagulant rodenticides will shift use toward non-anticoagulant products, increasing resistance pressure and diminishing the long-term effectiveness of available rodent control tools.

Our organization supports Integrated Pest Management (IPM) as a foundational element of responsible pest control. Under IPM, pesticide use is an exercise in managing risk—both from pests and from the tools used to control them. Maintaining access to multiple tools is essential to prevent resistance and preserve long-term effectiveness. Anticoagulants and non-anticoagulants, including the specified rodenticides listed in HB 1676, are used as part of IPM programs alongside sanitation, physical prevention, monitoring, and non-chemical controls, not in isolation. Arbitrarily removing these tools undermines the flexibility necessary for effective, site-specific pest management.

For these reasons, HCPA believes HB 1018 and HB 1676, as written, would significantly curtail access to essential rodent control products, eliminating vital tools relied upon to safeguard public health and disrupting the established federal regulatory system governing their safe and effective use. We respectfully urge the committee to oppose HB 1018 and HB 1676.

Thank you for the opportunity to submit comments.

Sincerely,



Michelle Kopa

Senior Director

State Government Relations & Public Policy