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February 11, 2026

The Honorable Judy Aron
House Environment and Agriculture Committee
Granite Place Room 153
Concord, NH 03301

Re: Support for HB 1676 limiting consumer access to certain high-risk rodenticides.

Dear Chair Aron and Members of the Committee:

Thank you for this opportunity to provide testimony in strong support of HB 1676 on behalf of NH Audubon. We are a statewide conservation organization dedicated to protecting New Hampshire's environment for wildlife and for people.

HB 1676 prohibits the sale of certain rodenticides to persons not licensed or registered with the department of agriculture, markets, and food. The rodenticides addressed in this bill include three first generation anticoagulant rodenticides (warfarin, chlorophacinone, and diphacinone), four second generation anticoagulant rodenticides (brodifacoum, bromadiolone, difethialone, and difenacoum), a neurotoxin (bromethalin), a kidney toxin (chlocalciferol), and a cardiac, respiratory, and metabolic toxin (zinc phosphide).

The U.S. Environmental Protection Agency (EPA) has banned sale of second-generation anticoagulants to general consumers, but these products are available from multiple on-line vendors, typically in large quantities to at least theoretically discourage purchase by homeowners. Bromethalin products are widely available in hardware and farm supply stores.

The majority of general consumers apply rodenticides without reading, much less following the instructions for safe use provided on product labels. Inappropriate applications result in higher risks for wildlife, not to mention pets and children.

Second generation anticoagulant rodenticides (SGARs) pose the greatest risks to New Hampshire wildlife, as poisoned rodents don't die immediately and become vulnerable to predation. SGARs break down slowly and bioaccumulate in the food chain, leading to secondary poisoning of non-target mammals and birds of prey.

Pets are also vulnerable to rodenticide poisoning, either from direct consumption of bait or from eating poisoned rodents. During calendar year 2025 Concord's Capital Area Veterinary Emergency Services (CAVES) treated 265 dogs and 12 cats for rodenticide poisoning, and local animal hospitals report roughly half a dozen cases per year. Of 39 cases of poisonings treated between April 2024 and September 2025, 30% were attributed to SGARs, 18% to FGARs, 7% to bromethelin, and 44% to unknown rodenticides.

Exclusion and sanitation are critical first steps in addressing rodent problems and are steps homeowners can take themselves. Repellents, traps, and birth control products provide alternatives to poisons that the general public can safely use.

Obtaining and maintaining a license as a certified pest control applicator requires ongoing training in safe use of pesticides. Restricting use of anticoagulants to this identifiable group enables targeted education on specific risk-avoidance strategies and enforcement actions. By requiring a license and annual reporting for both merchants and purchasers of anticoagulants, HB1676 will enable the Division of Pesticide Control to track purchasing patterns to individual stores and applicators. That data can be linked to geographic areas with high rates of secondary poisoning documented by annual reports that wildlife rehabilitators submit to the NH Fish and Game Department. HB1676 provides a pathway for tracing parties that are contributing to specific problem areas, which is utterly impossible if these rodenticides are available to general consumers.

Restricting the use of rodenticides to trained and licensed professionals will reduce the incidence of unintended poisonings of wildlife and pets. We urge the Committee to vote HB1676 **Ought to Pass**.

Sincerely,

A handwritten signature in black ink that reads "Carol R. Foss". The signature is written in a cursive, flowing style.

Carol R. Foss, Ph.D.
Senior Advisor for Science and Policy