

**Maine Board of Pesticide Control**

20 February, 2026

Dear Members of the Board,

American Bird Conservancy and our 800+ members in Maine respectfully submit this **comment in strong support of the Chapter 40 amendment to restrict the use of second-generation anticoagulant rodenticides (SGARs).**

The amendment would prevent unnecessary poisoning of non-target wildlife including Hawks, Eagles, Owls, Vultures, and other species of migratory and resident birds.

- Wildlife that ingests rodents poisoned by SGARs may suffer internal bleeding, ataxia, suppressed immune systems, organ failure, and susceptibility to other human-made threats
- 91% of Red-tailed Hawks admitted to a wildlife clinic in Massachusetts had exposure to at least two different SGARs<sup>1</sup>
- A 2021 study on Bald and Golden Eagles found that 83% and 77% respectively had elevated levels of rodenticide and may have been fatal in 12 of the birds<sup>2</sup>
- SGARs comprise the majority of bird and mammal poisoning events reported by the Environmental Protection Agency in their Pesticide Incident Database
- The Environmental Protection Agency cites ongoing poisoning of children and pets from SGARs as a driver of the need to restrict their availability<sup>3</sup>

The amendment would not only allow the responsible continued use of SGARs, it would greatly reduce the threats posed by these chemicals to wildlife, people, and ecosystems. We thank you for your work and the opportunity to **comment in strong support of the Chapter 40 amendment.**

Sincerely,



E. Hardy Kern III  
Director of Government Relations  
American Bird Conservancy  
202-750-1412  
[ehardykern@abcbirds.org](mailto:ehardykern@abcbirds.org)

<sup>1</sup> <https://setac.onlinelibrary.wiley.com/doi/abs/10.1002/etc.4853>

<sup>2</sup> <https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0246134>

<sup>3</sup> <https://www.epa.gov/pesticides/epa-proposes-new-mitigation-measures-rodenticides-including-pilot-protecting-endangered>

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**Contact**

**abcbirds.org**  
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**Address**

regular, registered, or certified mail:  
**P.O. Box 249, The Plains, VA 20198**  
physical address for deliveries:  
**8255 E. Main Street, Suites D & E,  
Marshall, VA 20115**

## Boyd, Karla

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**From:** Pesticides  
**Sent:** Wednesday, February 25, 2026 12:59 PM  
**To:** Peacock, Alexander R  
**Subject:** FW: Public Comment for the BPC Proposed Restrictions on SGAR's

-----Original Message-----

From: Janis Albright <jalbright@maine.rr.com>  
Sent: Wednesday, February 25, 2026 12:39 PM  
To: Pesticides <Pesticides@maine.gov>  
Subject: Public Comment for the BPC Proposed Restrictions on SGAR's

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2/25/2026

Dear Director Peacock and Members of the Board:

My name is Janis Albright and I am a resident of South Portland. Thank you for the chance to submit comments in support of the BPC proposed restriction on SGAR's.

The three main reasons that I support this restriction are:

First, SGAR's move up the food chain, from rodents to predators and scavengers, also causing death to those animals, as well as our pets.

Second, SGAR's persist in the environment for long time. One application of SGARs can poison multiple species in an ecosystem.

Third, poisons in our environment have been scientifically linked to human cancer and other diseases. I, like many that you may know, share personal experiences with how fatal cancers can be. We all have a public health responsibility to protect humans from adverse effects of these poisons.

As you probably know, we can follow the lead of other states such as CT, and VT, in introducing restrictions.

And finally, there are alternatives, as spelled out by the Center for Biological Diversity, that protect our ecosystems.

In summary, I strongly support the Board's proposed Chapter 40 amendment to restrict the use of SGAR's.

Sincerely,  
Janis Albright

## Boyd, Karla

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**From:** Pesticides  
**Sent:** Monday, March 2, 2026 8:08 AM  
**To:** Peacock, Alexander R  
**Subject:** FW: Public Comment for the Board of Pesticides Control's Chapter 40 Second-Generation Anticoagulant Rodenticides Restriction Rulemaking Proposal

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**From:** Andrea Aufdencamp  
**Sent:** Saturday, February 28, 2026 8:18 PM  
**To:** Pesticides  
**Subject:** Public Comment for the Board of Pesticides Control's Chapter 40 Second-Generation Anticoagulant Rodenticides Restriction Rulemaking Proposal

**EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.**

Dear Director Peacock and Members of the Board:

Thank you opportunity to submit comments in support of the Board of Pesticides Control's (BPC) proposed restriction on second-generation anticoagulant rodenticides (SGARs).

Commercial and Residential development is at the top of the list of threats to wildlife and ecosystems, with impacts tied to the resulting habitat loss, fragmentation, roads, domestic animals, and the use of toxins such as rodenticides and pesticides that come with that development. Studies show second-generation anticoagulant rodenticides are highly toxic and environmentally persistent rodenticides that kill rodents by accumulating in fatty tissues and causing massive hemorrhaging. Unfortunately, those rodents are often consumed by birds of prey and scavengers. When birds of prey consume these rodents, the toxins cause tremors, organ failure and uncontrolled bleeding to inhibiting Vitamin K. At lower exposure, the impacts of ingesting SGARs include chronic, sublethal effects such as reduced hunting ability, anemia, and weakness, which in the wild means death.

A single great horned owl hatchling can consume 6-8 rodents in a day. A great horned owl family can consume 2,000-4,000 rodents annually! Thus, when a great horned owl (and other raptors on the landscape) is removed from an ecosystem (which includes our parks, neighborhoods, schools) due to SGARs, there is a loss of the predation of that many rodents per owl family annually.

Raptors invisibly, yet critically, prevent the spread of zoonotic rodent disease such as Hantavirus and Salmonellosis through their consumption of rodents. Conserving and protecting wildlife such as raptors by prohibiting the use of second-generation anticoagulant rodenticides offers pest control to our parks, neighborhoods, schools and ecosystem in general. Raptors and scavengers balancing rodent populations on the landscape does not come with the same toxicity risks to pets and humans as SGARs do. Of particular concern to humans are the studies that show SGARs leaching into groundwater or surface water and contaminating supplies that feed into our drinking water systems.

Beyond the very real human health concerns and devastating impacts to the wildlife food chain, we also feel it is important to note that Maine's Outdoor Recreation (\$3.4B) and Nature Based Tourism (\$8B) sectors are among the highest contributors to state GDP in the country. Wildlife viewing, birding, and photography are all critical drivers of that income. For the health of our wildlife and citizens in Maine, I strongly support the Board's proposed Chapter 40 amendment to restrict the use of second-generation anticoagulants.

It is my hope that Maine can do more to conserve and protect wildlife, both flora and fauna, through re-wilding and coexistence strategies and dispense with chemical controls that wreak havoc on the food web, ecosystems and ultimately human health. People and planet over profit.

Sincerely,

Andrea Aufdencamp

South Portland, ME

## Boyd, Karla

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**From:** Pesticides  
**Sent:** Tuesday, February 24, 2026 9:42 AM  
**To:** Peacock, Alexander R  
**Subject:** FW: Pesticides Public Hearing

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**From:** tom aversa  
**Sent:** Saturday, February 21, 2026 11:45 AM  
**To:** Pesticides  
**Subject:** Pesticides Public Hearing

**EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.**

Hello Board members,

I am writing because I heard that you recently initiated rulemaking to restrict the sale and use of Second-Generation Anticoagulant Rodenticides (SGARs). I am overjoyed to hear this. I will be unable to attend the public hearing that's been scheduled for February 27 in Augusta so I wanted to submit public comments (see below).

I worked with birds of prey for a good part of my career in ornithology. The position where I was most directly involved was at Woodland Park Zoo in Seattle, Washington where I cared for, trained, educated with, and rehabilitated raptors. These spectacular birds are some of the primary victims of irresponsible use of SGAR's. In that position and over my long career working primarily with birds, I saw many unintended casualties.

Obviously we need to control mouse and rat populations. There are other ways. The use of rodenticides to control rodents has impacts far beyond these intended targets. Owls and hawks head the list but mammals such as foxes, fisher, bobcat and pet cats and dogs also die. Other birds like ravens have also died of internal bleeding associated with these substances. Maine wildlife deals with enough risks that are caused by people. I see the black plastic boxes of SGAR's left at the edge of wetlands and behind buildings where the targeted rodents undoubtedly wander off in highly comprised condition. This weakened state is exactly what raptors have evolved to detect. Birds of prey control prey populations by killing and eating sick, young and old individuals. The hawk or owls thinks "Oh boy, an easy meal!". Sadly it is a meal that could be one of their last. These SGARs pose a grave risk to our native wildlife and critical ecosystems. It is long overdue that we further restrict their use in our state. It is a problem that I was well aware of when I began my work with Seattle raptors in 1996. Thirty years is too long to wait!

Please further restrict the use and sale of SGARs by adding brodifacoum, bromadiolone, difenacoum, and difethialone to the restricted-use pesticides list and prevent unlicensed sale and use of products containing these ingredients or other compounds that cause internal bleeding in their targets.

Thanks for listening.  
Sincerely,  
Tom Aversa  
115 Fisher Rd  
Unity, ME 04988

## Boyd, Karla

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**From:** Pesticides  
**Sent:** Monday, March 9, 2026 8:31 AM  
**To:** Peacock, Alexander R  
**Subject:** FW: Public comment on Proposed Rule Amendments to Chapter 40: Maine Restricted and Limited-Use Pesticides

-----Original Message-----

From: Karen Bennett <karen@rickbennett.org>

Sent: Sunday, March 8, 2026 7:23 PM

To: Pesticides <Pesticides@maine.gov>

Subject: Public comment on Proposed Rule Amendments to Chapter 40: Maine Restricted and Limited-Use Pesticides

EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Director Peacock,

I submit this as written testimony in support of the Board of Pesticide Control's proposed restriction of second generation anticoagulant rodenticides.

I have been working as a volunteer with Saco River Wildlife Center in Limington, Maine, for a little over 4 years and just recently acquired my license from the State of Maine as a wildlife rehabilitator. I have seen firsthand the suffering our wildlife endures as a result of rodenticide poisoning. For example, I have seen red foxes who are brought to our center with sarcoptic mange so severe that they are unable to open their eyes. Over the past 5 years we have witnessed an increase in these types of cases which is not only heartbreaking but is suggestive of a growing environmental danger. There is a strong, well-documented correlation between SGARs and the increased prevalence and severity of mange in red foxes. Ironically, harming these carnivores and other species will cause the populations of rodents to increase. Foxes, other carnivorous mammals, and birds of prey are extremely effective at managing rodent populations.

As you discuss in your draft report, integrated pest management (IPM) strategies should be considered as alternatives to the use of rodenticides. Please consider my own personal journey with IPM. About 10 years ago we engaged the services of a pest control company. Our elderly cat was no longer able to manage the mice problem in our home. We were reluctant to use the pest service but felt that it was not healthy to cohabitate with rodents. When I specifically asked the service provider about secondary poisoning of our animals and or wildlife, the answer I received was vague and misleading. Wanting to rid our home of rodents, we continued with the service for several years. We decided to discontinue the service due to the persistence of mice in our home and the addition of a new, young cat to our family.

I began doing research on my own and learned about using IPM strategies. Had this been an option when we engaged the pest management company, we certainly would have chosen that option. I truly believe that, given the facts about rodenticides and the options for non-toxic pest control, most homeowners would choose the latter. We have been doing our best to block entry points, employing live trapping, using a product called Evolve (rodent birth control), and installing owl boxes around our home. We have found that these have been more effective than using the rodenticides.

I strongly support the Board's proposed Chapter 40 amendment to restrict the use of SGARs in Maine. I also strongly support education for homeowners and businesses regarding the facts of using rodenticides and the benefits of using IPM strategies in order to better protect our wildlife and our environment.

Sincerely yours,

Karen L. Bennett  
Oxford, Maine

# **Albert Boardman**

**5 Steele Way  
Brooksville MAINE 04617  
United States**

**barndog9@gmail.com**

February 20, 2026

**RE: Public comment for the Board of Pesticides Control  
SPECIFICALLY : Chapter 40 Second- Generation Anticoagulant Rodenticides  
Restriction Rulemaking Proposal**

Dear Mr. Peacock and members of the Board:

My Name is Albert Boardman and I am a full time resident of Brooksville, Maine. I thank you for the opportunity to submit comments in support of the Board of Pesticides proposed restriction on second generation anticoagulant rodenticides.

Second-generation anticoagulant rodenticides are highly toxic and environmentally persistent rodenticides that kill rodents by accumulating in fatty tissues and causing massive hemorrhaging. Unfortunately, predators and scavengers such as owls, hawks, eagles, fishers, and bobcats are exposed to SGARs when they consume poisoned prey, leading to preventable wildlife deaths. In addition to the secondary exposure to wildlife, SGARs can also poison family pets—leading to expensive and lengthy treatment if identified in time. What makes SGARs particularly concerning is their ability to persist in the environment for extended periods of time. Because of this, these poisons have ripple effects throughout entire ecosystems. For example, when a raccoon consumes a poisoned mouse, it can also become poisoned. If the raccoon later dies, it may be scavenged by a bird of prey, which then will be exposed to the same toxins. One application of a product containing SGARs can lead to the poisoning of multiple species within an ecosystem.

Just last year I lost a beloved male Labrador retriever to liver failure caused by (SGARs). The emergency veterinarian bill was in the thousands.

**. I strongly support the Board's proposed Chapter 40 amendment to restrict the use of second-generation anticoagulant rodenticides in Maine.**

Sincerely, *Albert Boardman*

**Boyd, Karla**

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**From:** Pesticides  
**Sent:** Monday, March 9, 2026 8:31 AM  
**To:** Peacock, Alexander R  
**Subject:** FW: Written Testimony SGAR's

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**From:** Corrie Ann Borges  
**Sent:** Sunday, March 8, 2026 8:59 PM  
**To:** Pesticides  
**Subject:** Written Testimony SGAR's

**EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.**

**Written Testimony – SGAR Rulemaking  
Maine Board of Pesticides Control**

Director Alex Peacock  
Board of Pesticides Control

My name is Corrie Ann Borges and I reside in Brooks, Maine.

Although my professional background is in steam engineering and industrial water treatment, I have spent decades as a nature and wildlife photographer documenting the remarkable species that share our landscapes. My work has grown into a broader effort in wildlife education and conservation, including founding a wildlife conservation nonprofit organization in Maine, as well as a small publishing company focused on inspiring conservation through education. Additionally I'm a licensed Falconer working currently with a Red-tailed Hawk.

My concern about rodenticides began while working as a facilities director at a community organization that included a daycare program. One day, while walking outside the building near a fenced playground, I heard a faint, distressed squeaking sound. I looked down and saw a mouse wandering slowly along the ground. It was clearly disoriented and bleeding from its mouth. At that moment there were no children on the playground, but I could not help wondering what might have happened if there had been. I gently removed the mouse and soon made the connection to the black bait boxes placed around the building. When I followed up with those responsible for pest control, I was told that the poison causes rodents to die quickly and that it does not harm other wildlife which is not the case at all.

Anyone who spends time observing wildlife quickly realizes that poisoned rodents do not simply disappear. They move silently through the food chain and sometimes into the soil and waterways that sustain life itself. Rodents that consume anticoagulant rodenticides often wander for hours or even days before dying. During that time they become easy prey for owls, hawks, foxes, raccoons, and many other species, including our pets. I have witnessed other distressed mice near bait stations and once observed

a raccoon behaving abnormally not far from one of these boxes which was partially damaged. The entrances to many bait boxes are large enough that animals such as squirrels or raccoons can reach inside and pull out the bait directly. These poisons are specifically designed to attract animals.

How often have we seen a sickly fox or coyote wandering through a neighborhood? Secondary poisoning in larger mammals can lead to prolonged suffering. Anticoagulant rodenticides cause internal bleeding and immune suppression, leaving animals weakened and vulnerable to diseases such as mange.

There are also broader environmental questions that deserve attention. Bait stations placed outdoors can be flooded during heavy rain or snowmelt, allowing toxic compounds to enter soil and runoff. Studies have detected rodenticides in waterways and even in fish and river otters, demonstrating how these chemicals can move beyond their intended target.

Fortunately we have the ability to make meaningful decisions here in Maine. This state is known for its wild landscapes, forests, wetlands, and the incredible wildlife that lives here, from owls and hawks to fishers, foxes, bobcats, and eagles. These species are not only part of Maine's natural heritage, they are also some of the most effective rodent managers we have. These are also the species that are suffering from rodenticide poisoning. A single owl can consume well over a thousand rodents in a year. When predators are weakened or killed by rodenticides, we undermine one of nature's most effective systems of balance. There are safer approaches available such as Integrated Pest Management strategies, focusing on prevention, exclusion, sanitation, and targeted trapping. Snap traps are an affordable, simple, and effective IPM strategy.

Restricting Second-Generation Anticoagulant Rodenticides will not solve every issue, but it represents a thoughtful and responsible step toward protecting wildlife, pets, and ecosystems in Maine.

The nature and wildlife of this state are among our greatest treasures. These species have existed here for millennia, each playing an ecological role that cannot easily be replaced. Their value cannot be measured in dollars.

We have a responsibility to protect them.

I respectfully encourage the Board to move forward with the proposed restrictions.

Thank you for your time and consideration.

Sincerely,  
Corrie Ann Borges  
Brooks, Maine

## Boyd, Karla

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**From:** Pesticides  
**Sent:** Friday, February 27, 2026 3:27 PM  
**To:** Peacock, Alexander R  
**Subject:** FW: Comments on the BPC proposed restrictions n second-generation anticoagulant rodenticides

-----Original Message-----

From: Beth Brown <isa5550@yahoo.com>  
Sent: Friday, February 27, 2026 3:02 PM  
To: Pesticides <Pesticides@maine.gov>  
Subject: Comments on the BPC proposed restrictions n second-generation anticoagulant rodenticides

EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Director Peacock and Members of the Board:

My name is Bethany Brown; I am a resident of Limington and the director of Saco River Wildlife Center. I am writing to you regarding the open comments on the proposed restrictions on second-generation anticoagulant rodenticides (SGARs). I am in full support of restrictions on the use of these poisons, as I have witnessed their detrimental effects on our native wildlife over the past 15 years. Throughout my career as a wildlife rehabber, I have cared for many animals suffering from symptoms such as bleeding, bruising, and ultimately death, all linked to SGAR exposure. Additionally, we observe a significant incidence of mange among wildlife, particularly foxes and coyotes, often as a secondary effect of poisoning. I am aware of other wildlife rehab centers focused on avian care that have also documented similar impacts on our wild predator populations.

With over a decade of experience as a wildlife rehabber, seven years volunteering with wildlife, and nearly eight years assisting as a field biologist, I have seen firsthand the toll these toxins take. We receive numerous calls for help from injured or sick wildlife impacted by SGARs, but unfortunately, we have only been able to save one patient that was admitted. Therefore, I strongly recommend the adoption of rodent birth control methods as a safe alternative to lethal poisons, as they do not harm non-target species and present a more sustainable solution. Thank you for considering these crucial measures to protect our local ecosystems. I've witnessed firsthand the devastating effects of rodenticides on our wildlife, and it's clear we need a sustainable, wildlife-friendly solution. Traditional poisons don't just target rats and mice—they also harm other animals that feed on them, creating a ripple effect in the ecosystem. Rats and mice are incredibly smart; they quickly learn to avoid poison bait after seeing others become ill. In contrast, rodent birth control methods don't trigger this avoidance behavior, making them more effective in the long run. Many volunteers have successfully implemented these methods on their own properties, and their high success rates demonstrate that we can control rodent populations without jeopardizing our local wildlife. It's time to prioritize solutions that are humane, effective, and environmentally responsible.

Thank you for this opportunity,

Bethany Brown

Date, 2026



**RE: Public Comment for the Board of Pesticides Control's Chapter 40 Second-Generation Anticoagulant Rodenticides Restriction Rulemaking Proposal**

Dear Director Peacock and Members of the Board:

Our names are Shelley Spanswick and Kristen Lamb from the Center for Wildlife in Cape Neddick ME. I thank you for the opportunity to submit comments in support of the Board of Pesticides Control's (BPC) proposed restriction on second-generation anticoagulant rodenticides (SGARs).

Center for Wildlife is a wildlife medical clinic/ rehabilitation and ecology-based education center that has existed since 1986. Each year, residents of ME, NH, and MA bring us approximately 2,500 injured and orphaned wild animals from a 100-mile radius of Cape Neddick, ME. Since inception, we have admitted approximately 45,000 wild animals from Maine alone, and in the past 25 years, we have admitted 2,520 raptors. These species range from the endangered peregrine falcons, to the familiar backyard red tailed hawks, and the often photographed snowy owls.

Each animal brought to Center for Wildlife tells a story of the health of their ecosystems, and ultimately offers a barometer of the health and wellbeing of humans who rely on the environment for our own drinking water, food, recreation, and economy. As part of the permits we maintain to perform this work in partnership with several state and federal agencies, we have recorded the reason for admission for all of the 90,000 wild animals we have admitted, along with their age, location, body condition, etc.

99% of the animals brought to us, by members of the public, Animal Control Officers, Game Wardens or Conflict Agents, have suffered an injury or illness that can be tied to human activities or choices in consumption/energy. Our data shows Commercial and Residential development is at the top of the list of threats to wildlife and ecosystems, with impacts tied to the resulting habitat loss, fragmentation, roads, domestic animals, and the use of toxins such as rodenticides and pesticides that come with that development.

Studies show us that second-generation anticoagulant rodenticides are highly toxic and environmentally persistent rodenticides that kill rodents by accumulating in fatty tissues and causing massive hemorrhaging. Unfortunately, those rodents are often not retrieved on the landscape, and are consumed by birds of prey and scavengers. When birds of prey consume these rodents, the toxins cause tremors, organ failure and uncontrolled bleeding to inhibiting Vitamin K. At lower exposure, the impacts of ingesting SGARs include chronic, sublethal effects such as reduced hunting ability, anemia, and weakness, which in the wild also means death.

In the clinic, our young great horned owl patients can consume 6-8 rodents in a day. This tracks with studies that show a great horned owl family can consume 2,000-4,000 rodents annually.



Thus, when a great horned owl (and other raptors on the landscape) is removed from an ecosystem due to SGARs (which includes our parks, neighborhoods, schools), there is a loss of the predation of that many rodents annually. Raptors invisibly, yet critically, prevent the spread of zoonotic rodent disease such as *Hantavirus* and *Salmonellosis* through their consumption of rodents.

Conserving and protecting wildlife such as raptors by prohibiting the use of second-generation anticoagulant rodenticides offers pest control to our parks, neighborhoods, schools and ecosystems. Raptors and scavengers balancing rodent populations on the landscape does not come with the same toxicity risks to pets and humans as SGARs do. Of particular concern are the studies that show SGARs leaching into groundwater or surface water, contaminating supplies that feed into our drinking water systems.

Beyond the health concerns, we also feel it is important to note that Maine's Outdoor Recreation (\$3.4B) and Nature Based Tourism (\$8B) sectors are among the highest contributors to state GDP in the country. Wildlife viewing, birding, and photography are all critical drivers of that income. **For the health of our wildlife and citizens in Maine, I strongly support the Board's proposed Chapter 40 amendment to restrict the use of second-generation anticoagulants.**

Sincerely,

*Kristen Lamb*

Kristen Lamb  
Executive Director, Center for Wildlife

*Shelley Spanswick*

Shelley Spanswick  
Medical Clinic Director, Center for Wildlife  
Resident of Maine



Formerly called the Humane  
Society of the United States and  
Humane Society International

P.O. Box 10231  
Portland, ME 04104  
207-999-2323  
humaneworld.org

**Comments in Support of Proposed Rulemaking  
Chapter 40: Restricted and Limited Use Pesticides  
Board of Pesticides Control  
March 9, 2026**

Humane World for Animals submits these comments in support of the proposed changes to Chapter 40: Restricted and Limited Use Pesticides seeking to restrict the use of the second-generation anticoagulant rodenticides. The addition of these active ingredients to the list of restricted use pesticides will protect Maine communities, companion animals, and wildlife from the well-documented harms that stem from the use of toxic rodenticides.

Rodenticides pose serious risks beyond their intended targets, endangering wildlife, pets, and public health. Rodenticides are commonly formulated as brightly colored, palatable baits designed to attract rodents—features that also increase the risk of accidental ingestion by young children.<sup>1</sup> In 2022 alone, more than 8,000 rodenticide ingestions were reported in the U.S., with over half involving children under the age of six.<sup>2</sup> Household pets suffer a common fate. Rodenticides are among the leading causes of pet poisoning nationwide, resulting in symptoms such as vomiting, internal bleeding, and neurological disturbances.<sup>3</sup> Such poisoning can result in prolonged suffering and costly medical interventions, placing significant emotional and financial burdens on families and caregivers.

Ecologically, rodenticides are equally indiscriminate in their impacts. Anticoagulant rodenticides can persist in animal tissues after exposure, causing secondary poisoning in wildlife who consume affected rodents. Raptors, foxes, and other carnivores that play essential ecological roles in our shared ecosystems are unnecessarily exposed to potentially lethal harm.<sup>4</sup> Such predators are also no longer able to provide natural rodent control, destabilizing the very ecosystems that help regulate rodent populations.

While the federal government has taken steps to reduce the dangers posed from the use of rodenticides, the public can still readily access these toxicants and deploy them without training, oversight, or accountability. States play a critical role in establishing the necessary regulatory frameworks to protect public health and wildlife while guiding communities towards safer, more effective rodent management practices.

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<sup>1</sup> *Rodenticides (rat and mouse poisons)*. Children's Hospital of Philadelphia. <https://www.chop.edu/centers-programs/poison-control-center/rodenticides-rat-and-mouse-poisons>

<sup>2</sup> Isackson, B., Irizarry, L. (Updated 2024, June 22). *Rodenticide toxicity*. National Library of Medicine. <https://www.ncbi.nlm.nih.gov/books/NBK554428/>

<sup>3</sup> *Vermont bill targets toxic chemicals to protect kids, pets, and wildlife*. (2026, January 26). Project Coyote. <https://projectcoyote.org/media-release-vermont-bill-targets-toxic-chemicals-to-protect-kids-pets-and-wildlife/>

<sup>4</sup> Eastern Research Group. (2025, October). *Anticoagulant rodenticide scientific review - final report*. Massachusetts.gov. <https://www.mass.gov/doc/anticoagulant-rodenticides-scientific-review-final-report/download>



P.O. Box 10231  
Portland, ME 04104  
207-999-2323  
humaneworld.org

Formerly called the Humane  
Society of the United States and  
Humane Society International

The proposed consumer restrictions can substantially reduce unnecessary suffering among children, companion animals, and wildlife. By prioritizing public health and humane, science-based wildlife management over toxic rodent control, this rule affirms Maine's commitment to protecting its residents, animals, and shared environment.

We respectfully urge the Board to adopt the proposed amendments to Chapter 40 to address both the overuse and misuse of rodenticides that result in toxicant exposures.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink that reads "Katie Hansberry".

Katie Hansberry  
Maine State Director  
[khansberry@humaneworld.org](mailto:khansberry@humaneworld.org)

**Boyd, Karla**

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**From:** Pesticides  
**Sent:** Monday, March 9, 2026 8:31 AM  
**To:** Peacock, Alexander R  
**Subject:** FW: Public Comment for the Board of Pesticides Control's Chapter 40 Second-Generation Anticoagulant Rodenticides Restriction Rulemaking Proposal

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**From:** Sarah Clark  
**Sent:** Sunday, March 8, 2026 9:22 PM  
**To:** Pesticides  
**Subject:** RE: Public Comment for the Board of Pesticides Control's Chapter 40 Second-Generation Anticoagulant Rodenticides Restriction Rulemaking Proposal

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Director Alex Peacock  
Board of Pesticides Control  
28 State House Station  
Augusta, ME 04333  
March 8, 2026

Hello,

I am a resident of Bangor, and I am writing in support of the Board's proposed Chapter 40 amendment to restrict the use of second-generation anticoagulant rodenticides in Maine. Second-generation anticoagulant rodenticides, given their environmentally persistent nature and ability to transfer up the food chain by accumulating in fatty tissues, are prone to expose non-target species and disrupt ecosystem food webs. Therefore, I support the restriction of these products per the proposed amendment.

Thank you for taking action on this issue and for the opportunity to comment in support.

Thank you,  
Sarah Clark



# HOUSE OF REPRESENTATIVES

2 STATE HOUSE STATION  
AUGUSTA, MAINE 04333-0002  
(207) 287-1440  
TTY: (207) 287-4469

## **Mark C. Cooper**

81 Chute Rd  
Windham, ME 04062  
Residence: (207) 232-5842  
Mark.Cooper@legislature.maine.gov

March 9, 2026

Mr. Alexander Peacock, Director  
Board of Pesticides Control  
Dept. of Agriculture, Conservation and Forestry  
28 State House Station  
Augusta, ME 04333-0028

Dear Mr. Peacock,

I am submitting testimony in opposition to the proposed changes that include the ban on Second Generation Anticoagulant Rodenticides (SGARs).

Last year in the 132nd Legislature, LD 356 addressed some of the concerns and placed additional restrictions. The bill did not take effect until September 2025. We have yet to see or evaluate any of the changes from the legislation.

While there may be some valid opposition to this category of rodenticides, they are in use because they are effective at low dosage and act quickly. The effectiveness and speed reduce the amount of rodenticide used and the length of time treatment is used and placed.

A point that needs to be considered is under current statute rodenticides are not legal to use for control of chipmunks and squirrels. The 132<sup>nd</sup> Legislature did pass a bill to significantly increase penalties for intentional violations of pesticide use laws.

The need to control rodents within the state of Maine is very relevant and required by several licensing agencies.

The Maine Department of Agriculture, Forestry and Conservation, Division of Quality Assurance requires food processing, storage and retail establishments to have rodent control measures in place.

Maine DHHS has rodent control requirements for all establishments falling under licensing and inspection. These may include restaurants, retail stores, food processors, medical facilities, medical providers, medical equipment and product manufacturers.

The Maine CDC can provide information on health issues from rodent populations and problems that can escalate from lack of control.

I would like to ask going forward what effective alternatives are available to replace these 4 (SGARs)?

I realize that some collateral damage that may occur from 2<sup>nd</sup> hand consumption, but I feel the benefits outweigh the unproven claims to date.

Sincerely,

A handwritten signature in cursive script, appearing to read "Mark Cooper".

Mark Cooper  
State Representative



# HOUSE OF REPRESENTATIVES

2 STATE HOUSE STATION  
AUGUSTA, MAINE 04333-0002  
(207) 287-1440  
TTY: (207) 287-4469

## **Mark C. Cooper**

81 Chute Rd  
Windham, ME 04062  
Residence: (207) 232-5842  
Mark.Cooper@legislature.maine.gov

Sincerely,

A handwritten signature in black ink that reads "Mark C. Cooper".

Mark C. Cooper  
State Representative

Proudly Serving House District 107  
Windham (part)

## Boyd, Karla

---

**From:** Pesticides  
**Sent:** Friday, February 20, 2026 7:58 AM  
**To:** Peacock, Alexander R  
**Subject:** FW: Public Comment for the Board of Pesticides Control's Chapter 40 Second-Generation Anticoagulant Rodenticides Restriction Rulemaking Proposal

---

**From:** Jane D  
**Sent:** Thursday, February 19, 2026 8:58 PM  
**To:** Pesticides  
**Subject:** RE: Public Comment for the Board of Pesticides Control's Chapter 40 Second-Generation Anticoagulant Rodenticides Restriction Rulemaking Proposal

**EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.**

To Director Peacock and Members of the Board:

My name is Jane Davidian-Yurko and I am a resident of Freeport. Thank you for the opportunity to submit comments in support of the Board of Pesticides Control's (BPC) proposed restriction on second-generation anticoagulant rodenticides (SGARs).

SGARs poison more than rodents. Many pets are at risk of being poisoned by eating dead or dying rodents. Predators and scavengers—including owls, hawks, eagles, foxes, and bobcats—are exposed to SGARs when they eat poisoned prey. This poisoning can lead to death or further exposure in the food chain. Poisoned non-target species can often become weakened and disoriented leading to other causes of death for the animal. One application of a product containing SGARs can lead to the poisoning of multiple species within an ecosystem.

SGARs are not the most effective pest management strategy. Birds of prey and carnivores are extremely effective at managing rodent populations. The use of SGARs can be counterproductive by negatively impacting these important prey species.

There are effective rodent control alternatives to SGARs. The Integrated Pest Management (IPM) strategy focuses on prevention, exclusion, sanitation, and target trapping. Research has shown that long-term pest management results are generally best if a variety of methods are used.

States of California, Connecticut, Vermont, and Washington have all introduced SGAR restrictions. And many other states have pending legislation.

Restricting the use of SGARs in Maine better protects wildlife, supports healthier ecosystems, reduces risks to pets, and encourages safer integrated pest management strategies.

Please restrict these SGARs in Maine for our environment's sake and our future generations' enjoyment of the natural beauty of our diverse fauna in Maine.

Sincerely,  
Jane Davidian-Yurko

**Boyd, Karla**

---

**From:** Pesticides  
**Sent:** Wednesday, February 25, 2026 10:43 AM  
**To:** Peacock, Alexander R  
**Subject:** FW: LD 356

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**From:** Elizabeth Davidson  
**Sent:** Wednesday, February 25, 2026 10:36 AM  
**To:** Pesticides  
**Subject:** LD 356

**EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.**

Hello,

I am writing to urge strong enforcement of LD 356, prohibiting the use of rodenticides in outdoor residential settings. Rodenticides are responsible for the needless suffering of thousands of animals in Maine every year, many of them scavengers and carnivores like our beloved bald eagles and many owl and raptor species.

The Center for Wildlife in York has admitted over 90,000 wild animals since its inception, and they report that 99% of injuries and illness they see are related to commercial and residential development or human choices in consumption. Rodenticides are a large portion of the "human choices in consumption" category and must be strictly managed and limited. Limiting these toxic chemicals protects our precious wildlife, our domesticated animals, and us as humans.

I urge you to pursue the strictest limits and strictest enforcement possible to ensure our collective well-being for generations to come.

Thank you,  
Elizabeth Davidson  
126 Summit Street  
Portland, ME 04103  
781 254 6064  
[davidson.elizabeth.a@gmail.com](mailto:davidson.elizabeth.a@gmail.com)

**Boyd, Karla**

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**From:** Pesticides  
**Sent:** Wednesday, March 4, 2026 7:47 AM  
**To:** Peacock, Alexander R  
**Subject:** FW: SGAR Comments Maine Public Hearing

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**From:** Jess Feldman  
**Sent:** Tuesday, March 3, 2026 5:12 PM  
**To:** Pesticides  
**Subject:** SGAR Comments Maine Public Hearing

**EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.**

March 3rd, 2026

Re: Public comment for the Board of Pesticides Control's Chapter 40 Second Generation Anticoagulant Rodenticides Restriction Rulemaking Proposal

Dear Director Peacock and Members of the Board:

My name is Jessica Feldman and I live in Eliot. I am lucky to live in such beautiful, abundant forest and marshland, which is home to so much wildlife. The use of toxins and pesticides are incredibly damaging to the environment (including the groundwater that humans, animals, and plants depend on) and the health of wild animals and domestic animals.

According to a 16 year study done by the Norwegian Poison Information Center, SGARs were found in 68% of human exposures and 79% of animal exposures. Their study found that dogs were the animal most frequently exposed to the toxins (you'll notice it's not the rodents, which it's supposed to only target), and domestic cats were the second-most exposed animal. Another scary fact from that study is that 50% of humans who were exposed to SGARs were young children between 0-4 years old.

Maine is known as "vacationland" for its gorgeous, wild landscapes and for being a safe place for people to come and adventure. SGARs put all of those Maine things we hold dear in jeopardy. This is why there needs to be a ban on the sale and use of highly toxic & dangerous SGARs in Maine.

Sincerely,

Jessica Feldman  
Eliot, ME

## Boyd, Karla

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**From:** Pesticides  
**Sent:** Friday, February 20, 2026 7:58 AM  
**To:** Peacock, Alexander R  
**Subject:** FW: Comments Concerning Sale & Use of Second-Generation Anticoagulant Rodenticides

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**From:** Mark Follansbee  
**Sent:** Thursday, February 19, 2026 6:52 PM  
**To:** Pesticides  
**Subject:** Comments Concerning Sale & Use of Second-Generation Anticoagulant Rodenticides

**EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.**

Honorable members of the Maine Board of Pesticides Control,

First, thank you for your efforts to ensure a healthy environment in our state. I value your work and the cost-benefit considerations you weigh in making your decisions. I live in Scarborough.

As a toxicologist, I understand the potential for adverse unwanted effects of using rodenticide products containing Second-Generation Anticoagulant Rodenticides (including brodifacoum, bromadiolone, difenacoum, and difethialone). These SGAR agents are very effective poisons; however, because of their potency and long half-life in animals, these agents can adversely impact non-target wildlife.

This means that poisoned, dying, or dead rats and mice, may be eaten by other animals, including including owls, hawks, eagles, foxes, and bobcats. This poisoning can lead to death of these nontarget wildlife (or further exposure in the food chain as these may be eaten by other non-target species). In addition to this clear hazard to wildlife, our pets are also at risk of being poisoned by eating dead or dying rodents or non-target species impacted unintentionally.

Other effective pest management strategies available as alternatives to SGARs for controlling rodent populations. Integrated Pest Management (IPM) which focuses on prevention, exclusion, sanitation, and target trapping. In addition, birds of prey and carnivores are extremely effective at managing rodent populations. The use of SGARs can be counterproductive by negatively impacting these important prey species that maintain a balance in prey populations. Research has shown that long-term pest management results are generally best if a variety of methods are used.

Other states, including California, Connecticut, Vermont, and Washington have introduced SGAR restrictions and other states have pending legislation or rulemakings addressing SGARs.

I strongly support the Board's proposed Chapter 40 amendment to restrict the use of second-generation anticoagulant rodenticides in Maine.

Thank you for your consideration,

Mark

Mark Follansbee, Ph.D.  
33 Arbor View Lane  
Scarborough, ME 04074

**Boyd, Karla**

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**From:** Pesticides  
**Sent:** Tuesday, March 10, 2026 8:47 AM  
**To:** Peacock, Alexander R  
**Subject:** FW: Public Comment for the Board of Pesticides Control's Chapter 40 Second-Generation Anticoagulant Rodenticides Restriction Rulemaking Proposal

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**From:** mac@maineanimalcoalition.org  
**Sent:** Monday, March 9, 2026 5:12 PM  
**To:** Pesticides  
**Subject:** Re: Public Comment for the Board of Pesticides Control's Chapter 40 Second-Generation Anticoagulant Rodenticides Restriction Rulemaking Proposal

**EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.**

Dear Director Peacock and Members of the Board:

My name is Beth Gallie and I am President of Maine Animal Coalition. Maine Animal Coalition is a statewide nonprofit dedicated to the elimination of animal abuse and exploitation through education, advocacy, and example.

I support the Board of Pesticides Control's proposed restriction on second-generation anticoagulant rodenticides (SGARs). I believe that SGARs kill not only rodents but also Maine wildlife and even companion animals when they encounter poisoned rodents. There are better ways to control rodents.

Thank you for the opportunity to submit comments.

Sincerely,

Beth Gallie

Maine Animal Coalition

P.O. Box 6683

Portland, Maine 04101

207 773-2215

## Boyd, Karla

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**From:** Pesticides  
**Sent:** Tuesday, February 24, 2026 9:47 AM  
**To:** Peacock, Alexander R  
**Subject:** FW: Public Comment for the Board of Pesticides Control's Chapter 40 Second-Generation, Anticoagulant Rodenticides Restriction Rulemaking Proposal

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**From:** Angela Garcia  
**Sent:** Monday, February 23, 2026 12:37 PM  
**To:** Pesticides  
**Subject:** RE: Public Comment for the Board of Pesticides Control's Chapter 40 Second-Generation, Anticoagulant Rodenticides Restriction Rulemaking Proposal

**EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.**

Dear Director Peacock and Members of the Board:

Thank you for the opportunity to provide comments on the proposed updates to Maine's rodenticide regulations. I strongly support efforts to limit the use of second-generation anticoagulant rodenticides (SGARs) and to strengthen oversight of pest control companies operating in Maine.

I want to share a personal experience that illustrates why stronger rules and clearer accountability are needed. For several years, I was a customer of a pest control company that marketed itself as "eco-friendly" and "green." They assured me their services and bait stations were safe for pets and wildlife, but I later learned that their products contained the same highly toxic rodenticides that threaten raptors, owls, and other non-target species. This includes companion animals; once, my neighbor's puppy came into my driveway and grabbed a dead (likely poisoned) mouse from my flower bed. I dread to think of what could have happened if he ate that mouse and was secondarily poisoned.

When I eventually decided to cancel my service after the dangers of these products came to light, the company told me to simply throw the bait stations in the trash if I didn't want them—demonstrating a complete disregard for safe disposal or environmental responsibility. It seemed that once I stopped paying them, they just wiped their hands of it. That response raised serious concerns for me about how casually these hazardous materials are handled and how easily they could end up contaminating our waste stream or harming wildlife.

After ending that contract, I took a different approach: I walked the perimeter of my house and diligently sealed holes and gaps where the animals could be getting in. I have had no further rodent issues and regretted not stopping the service earlier. I would have saved thousands of dollars and, more importantly, countless little lives.

This experience showed me that prevention and exclusion are far more effective and sustainable than persistent baiting with dangerous chemicals. It also made clear that Maine residents deserve transparency about what products are being used around their homes and communities.

I urge the Board to move forward with strong rules that restrict the use of SGARs, require responsible disposal, and stop companies from misleading consumers with “green” branding that hides the real risks to pets and wildlife. Maine has an opportunity to join other states with science-based, humane pest management solutions that protect both people and our ecosystems.

Thank you for considering my testimony and for your work protecting Maine’s environment. It's our most treasured resource.

Sincerely,  
Angela Garcia  
Biddeford, Maine

March 2nd, 2026

**RE: Public Comment for the Board of Pesticides Control's Chapter 40 Second-Generation Anticoagulant Rodenticides Restriction Rulemaking Proposal**

Dear Director Peacock and Members of the Board:

My name is Gina Garey, and I am a resident of Portland, and the State Director for Animal Wellness Action, and the Center for A Humane Economy.

Thank you for the opportunity to submit comments in support of the Board of Pesticides Control's (BPC) proposed restriction on second-generation anticoagulant rodenticides (SGARs). Second-generation anticoagulant rodenticides are highly toxic and environmentally persistent rodenticides that kill rodents by accumulating in fatty tissues and causing massive hemorrhaging.

Unfortunately, a wide range of Maine wildlife- including predators and scavengers such as owls, hawks, eagles, fishers and bobcats- are directly exposed to SGARs when they consume poisoned prey, leading to preventable wildlife deaths. In addition to the secondary exposure to wildlife, SGARs can also poison family pets—leading to costly, lengthy treatment if identified in time, or worse, the death of a beloved companion animal.

We know that the use of SGARs is of particular concern, due to their ability to persist in the environment for extended periods of time- up to a full year. As a result, these poisons have tremendous and long- lasting effects throughout entire ecosystems in Maine. As an example, when any local wildlife species, such as a fox or raccoon, consumes a poisoned mouse, it can also become poisoned. If that animal later dies, it may be scavenged by a bird of prey such as a bald eagle or forest owl, which then will be exposed to the same toxins. Just a single application of a product containing SGARs can lead to the poisoning of multiple species within our ecosystem.

To better protect the wildlife of Maine, the use of rodenticides must be addressed and a

restriction on the use of second-generation anticoagulant rodenticides is an excellent place to start. Maine would be joining several other states with similar restrictions, once again demonstrating that Maine leads the way in protecting the environment.

**Our organization strongly supports the Board’s proposed Chapter 40 amendment to restrict the use of second-generation anticoagulant rodenticides in Maine.**

Sincerely,

Gina E. Garey, MS

Maine State Director

The Center for a Humane Economy

Animal Wellness Action

Portland, Maine

**Boyd, Karla**

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**From:** Pesticides  
**Sent:** Tuesday, February 24, 2026 9:47 AM  
**To:** Peacock, Alexander R  
**Subject:** FW: Public comment for the board of pesticide controls chapter 40 proposal

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**From:** Sarah Griffiths  
**Sent:** Monday, February 23, 2026 12:11 PM  
**To:** Pesticides  
**Subject:** Public comment for the board of pesticide controls chapter 40 proposal

**EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.**

Dear Director Peacock and Members of the Board:

My name is Sarah Griffiths and I am a resident of Westbrook, Maine. I thank you for the opportunity to submit comments in support of the Board of Pesticides Control's proposed restriction on second-generation anticoagulant rodenticides (SGARs).

SGARs are highly toxic rodenticides that kill rodents by accumulating in fatty tissues and causing major hemorrhaging. Predators are exposed to SGARs when they consume poisoned prey, leading to wildlife deaths that are preventable. For example, when an animal consumes a poisoned mouse, it can also become poisoned. If that animal later dies, it may be scavenged by a bird of prey, which then will be exposed to the same toxins. One application of a product containing SGARs can lead to the poisoning of multiple species within an ecosystem.

In order to better protect the wildlife of Maine, the use of rodenticides must be addressed and a restriction on the use of SGARs is the right start. Maine would be joining a handful of other states with similar restrictions, once again showing that Maine leads the way in protecting the environment. I strongly support the Board's proposed Chapter 40 amendment to restrict the use of SGARS in Maine!

Warm regards,  
Sarah Griffiths

**Boyd, Karla**

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**From:** Pesticides  
**Sent:** Monday, March 2, 2026 8:07 AM  
**To:** Peacock, Alexander R  
**Subject:** FW: Eliminating rodenticide in the state of Maine

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**From:** Jean Hall  
**Sent:** Saturday, February 28, 2026 7:12 AM  
**To:** Pesticides  
**Subject:** Eliminating rodenticide in the state of Maine

**EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.**

I lived in SW Florida for 26 years and was very involved in conservation as a volunteer, especially bird conservation. I founded Owl Watch at Audubon of the Western Everglades in 2016 and the number of dead or dying Burrowing Owls that had to be brought into the Conservancy was horrifying. FWC finally started testing these cadavers and almost every one (including car strikes) had rodenticide in them. I also remember 2 pet dogs that got hold of rats and also died from bleeding out internally. All from rodenticide. Many other raptors were brought to rehab suffering from lethargy and/or bleeding from their mouths.

I can provide you with contact info on a Marco Island project that is using Wisdom Good Bites instead of rodenticide in all municipal buildings. It's having great results as a birth control, and since rats only have a lifespan of a year, it's proving that alternatives exist. When I moved to Maine 3 years ago, I had rats under my bird feeders and used Evolve (available on Amazon) which is also a proven birth control for rodents. I haven't had a rat in over a year. Please stop using rodenticide in this wonderful state.

Note from Maine Audubon:

SGARs are drastically more potent than other rodenticides and often only require a single feeding to be fatal to rodents. In addition to being more potent, SGARs have longer half-lives than other rodenticides and therefore persist in animal tissue longer. This means that poisoned rats, dead or dying, that are eaten by other animals are toxic for a longer period of time. In addition to this, SGARs bioaccumulate in the fatty tissue of animals which further increases the risk of secondary exposure to non-target species throughout the food chain.

Predators and scavengers—including owls, hawks, eagles, foxes, and bobcats—are exposed to SGARs when they eat poisoned prey. This poisoning can lead to death or further exposure in the food chain. Poisoned non-target species can often become weakened and disoriented leading to other causes of death for the animal. ● Many pets are at risk of being poisoned by eating dead or dying rodents.

--

**Jean Hall**

**93 Pine St  
Waldoboro, ME 04572**

**email: [halljc2020@gmail.com](mailto:halljc2020@gmail.com)**

TO: Maine Board of Pesticide Control

FROM: Donald E. Hoenig, VMD  
MIM Veterinary Consulting  
Belfast, Maine

SUBJECT: Comments on Proposed Rule Amendments to Chapter 40, Maine Restricted and Limited-Use Pesticides, Section 1, Restricted Use Pesticides

My name is Don Hoenig and I am a veterinarian from Belfast where my wife and I have lived for 43 years. I retired as Maine State Veterinarian in 2012 after 26 years working for the Maine Department of Agriculture. Before my employment with the State of Maine, I was a mixed animal practitioner in Massachusetts and Maine. Since retirement from the State, I have been doing veterinary consulting in farm animal welfare, wildlife rabies, public health and animal emergency response as well as conducting three missions to Africa for the World Organization for Animal Health.

My professional experience with rodenticides dates to my days in private practice in the late 1970s when I treated numerous dogs who had consumed and been poisoned by consumption of poorly placed rodenticides. The anti-coagulant nature of these poisons meant that these dogs usually presented with severe anemia resulting in difficulty breathing, walking and eating. Often their chest cavity was filled with blood. Fortunately, we usually were able to save their lives by treating them with vitamin K, an antidote to the poison. At that time, we were dealing with first generation anticoagulant rodenticides.

I support the Board's proposal to add the four second-generation anticoagulant rodenticide (SGAR) active ingredients: brodifacoum, bromadiolone, difenacoum, and difethialone to the restricted list. I do not believe, however, that this change alone meets the intent of the Resolve passed by the Maine Legislature last year. LD 356 directed the Board to prohibit the use of rodenticides in outdoor residential settings. Adding four SGARs to the restricted list in just a bare minimum. As the Board heard in public testimony on Feb. 27, many currently EPA-banned rodenticides are still available at retail stores in Maine. Department of Agriculture staff may not be aware of this.

The secondary effects of these poisons on wild mammals and birds are well documented and were also delineated at the public hearing. Even with responsible and discriminant use of rodenticides, we end up killing the very species who we should be relying on to reduce rodent numbers i.e. fishers, foxes, coyotes, hawks, owls, and other raptors. The answer to rodent control, which we should have learned during the DDT crisis in the 1960s and 1970s, is not more chemical poisons but integrated pest management (exclusion, sanitation, mechanical control, etc.) and increased education.

I urge the Board to take further measures within its authority and propose rulemaking to transition toward a complete phase-out of anti-coagulant rodenticides for outdoor use in

Maine. The availability of these dangerous and lethal chemicals for indoor use should be restricted to properly trained and licensed individuals.

I'd like to envision a future when I should not be able to go into my local hardware store and purchase poisons, which, even when properly placed, can sicken and kill companion animals and can secondarily kill wild mammals and birds. Maine needs to do this for a better future for our residents, our companion animals and our wildlife.

## Boyd, Karla

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**From:** Pesticides  
**Sent:** Tuesday, February 24, 2026 9:43 AM  
**To:** Peacock, Alexander R  
**Subject:** FW: re. proposed Ch. 40 amendment

---

**From:** Karin Hoppenbrouwers  
**Sent:** Sunday, February 22, 2026 11:58 AM  
**To:** Pesticides  
**Subject:** re. proposed Ch. 40 amendment

**EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.**

Dear Director Peacock and Members of the Board:

My name is Karin Hoppenbrouwers and I am a resident of Brunswick. I thank you for the opportunity to submit comments in support of the Board of Pesticides Control's (BPC) proposed restriction on second-generation anticoagulant rodenticides (SGARs).

Second-generation anticoagulant rodenticides are highly toxic and environmentally persistent rodenticides that kill rodents by accumulating in fatty tissues and causing massive hemorrhaging. Predators and scavengers such as owls, hawks, eagles, fishers, and bobcats are exposed to SGARs when they consume poisoned prey, leading to preventable wildlife deaths. In addition to the secondary exposure to wildlife, SGARs can also poison family pets—leading to expensive and lengthy treatment if identified in time, or death if not.

What makes SGARs particularly concerning is their ability to persist in the environment for extended periods of time. Because of this, these poisons have ripple effects throughout entire ecosystems. For example, when a raccoon consumes a poisoned mouse, it is also poisoned; if the raccoon later dies and is scavenged by a bird of prey, then the bird will be exposed to the same toxins. One application of a product containing SGARs can lead to the poisoning of multiple species within an ecosystem. Since birds of prey and carnivores are extremely effective at managing rodent populations, the use of SGARs can be counterproductive by negatively impacting these important prey species.

To better protect the wildlife of Maine, the use of rodenticides must be addressed and a restriction on the use of SGARs is a great start. Maine would be joining a handful of other states with similar restrictions, once again showing that Maine leads the way in protecting the environment.

In short, restricting the use of SGARs in Maine better protects wildlife, supports healthier ecosystems, reduces risks to pets, and helps encourage integrated pest management strategies. Therefore, **I strongly support the Board's proposed Chapter 40 amendment to restrict the use of second-generation anticoagulant rodenticides in Maine.**

Sincerely,  
Karin Hoppenbrouwers

**Boyd, Karla**

---

**From:** Pesticides  
**Sent:** Tuesday, February 24, 2026 9:47 AM  
**To:** Peacock, Alexander R  
**Subject:** FW: Rodenticides

-----Original Message-----

From: Gmail <helenhurgin@gmail.com>  
Sent: Monday, February 23, 2026 12:19 PM  
To: Pesticides <Pesticides@maine.gov>  
Subject: Rodenticides

EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.

To the board of Pesticides Control,

I am writing in support of LD 356 to prohibit the use of rodenticides. This is a cruel practice that kills wildlife and pets in a barbaric way. Maine is a state that protects wildlife and rodents are part of our wildlife population. There are many more humane ways to keep rodents out of buildings. Please support this humane bill.

Helen Hurgin  
80 Parker Ridge Drive  
Wells, Maine 04090

Sent from my iPhone

**Boyd, Karla**

---

**From:** Pesticides  
**Sent:** Friday, March 6, 2026 11:57 AM  
**To:** Peacock, Alexander R  
**Subject:** FW: Bill LD 356

---

**From:** Dana Isenberg  
**Sent:** Friday, March 6, 2026 11:55 AM  
**To:** Pesticides  
**Subject:** Bill LD 356

**EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.**

Hello,

I am writing to express my strong support for banning the use of second generation anticoagulant rodenticides (SGARs) in the state of Maine. These poisons are decimating our wildlife population which in turn negatively impacts the ecosystem that they as well as we are all a part of. Too many birds, animals and even pets are becoming sick and often dying horrific, slow deaths as a result of ingesting these poisons either directly or indirectly. Contact any rescue in the state or across New England and the country and they will tell you their first hand experience trying to save these poor animals. It's staggering.

In a state known for its wild beauty, we all must do whatever we can to protect it. I hope Maine joins the growing list of states across the country that are taking a stand on this matter.

Thank you.

Dana Isenberg  
78 Sproul Hill Road  
Bristol, ME 04539

**Boyd, Karla**

---

**From:** Pesticides  
**Sent:** Friday, February 20, 2026 7:36 AM  
**To:** Peacock, Alexander R  
**Subject:** FW: URGENT Prohibit Dangerous Rodenticides from Carole G. Jean, Portland, Maine

---

**From:** Carole  
**Sent:** Thursday, February 19, 2026 3:57 PM  
**To:** Pesticides  
**Subject:** URGENT Prohibit Dangerous Rodenticides from Carole G. Jean, Portland, Maine

**EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.**

Hi,

I am a Mainer and a registered voter, and I urge you to please restrict the sale and use of Second-Generation Anticoagulant Rodenticides (SGARs).

I have seen how dangerous these are to local wildlife, please do the right thing and ban them.

Thank you,

Carole

Carole G Jean  
36 Glenridge Dr  
Portland, ME 04102

----- Forwarded Message -----

**From:** Anthony Erwin, Maine Audubon <[advocacy@maineaudubon.org](mailto:advocacy@maineaudubon.org)>  
**To:** Carole Jean <[msleesiamese@yahoo.com](mailto:msleesiamese@yahoo.com)>  
**Sent:** Thursday, February 19, 2026 at 03:15:34 PM EST  
**Subject:** Right Now: Help Us Prohibit Dangerous Rodenticides

**NM**

# ACTION A ACTION A ACTION A









## Boyd, Karla

---

**From:** Pesticides  
**Sent:** Thursday, February 19, 2026 3:39 PM  
**To:** Peacock, Alexander R  
**Subject:** FW: CHAPTER 40 Amendment restricting SGARs

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

---

**From:** Bob Knight  
**Sent:** Thursday, February 19, 2026 3:36 PM  
**To:** Pesticides  
**Subject:** CHAPTER 40 Amendment restricting SGARs

**EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.**

Director Peacock and Members of the Board

I strongly support further restricting the use of second-generation anticoagulant rodenticides (SGARs).

We have lots of mice because we feed birds. But we also have natural predators that depend on them for food. I have game camera shots of a local Barred Owl feeding on our mice at night, It would be seriously compromised by eating poisoned mice.

We have stopped using rodenticides and have found that the new electro-mechanical mouse traps are simple to use, and very effective at reducing mice in our house.

Maine has been a leader for years in making the environment more resilient—please keep up the good work.

Sincerely

Robert W Knight  
59 Drury Lane  
Brooksville, Maine 04617  
[bob@knightarchitect.com](mailto:bob@knightarchitect.com)  
207-326-9345

**Boyd, Karla**

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**From:** Pesticides  
**Sent:** Thursday, February 19, 2026 3:36 PM  
**To:** Peacock, Alexander R  
**Subject:** FW: Support for Chapter 40 Second-Generation Anticoagulant Rodenticides Restriction Rulemaking Proposal

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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**From:** Natalie Krueger  
**Sent:** Thursday, February 19, 2026 3:30 PM  
**To:** Pesticides  
**Subject:** Support for Chapter 40 Second-Generation Anticoagulant Rodenticides Restriction Rulemaking Proposal

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Hi!

I am Natalie Krueger, in Sabattus, Maine, and I strongly support the Board's proposed Chapter 40 amendment to restrict the use of second-generation anticoagulant rodenticides in Maine.

Before I moved to Maine, I had no real relationship to the outdoors. I really credit this state's natural beauty and livable climate for opening up the world of plants and wildlife to my indoor person's eyes. As a result, I've really formed a love for all wildlife, even rodents, and I really want to see them thrive. I consider our neighborhood squirrels, chipmunks, groundhogs, and even mice and rats to be my animal friends, and they deserve the same respect other animals do. What they do not deserve is to be poisoned, killed, and the poison in their bodies transmitted to whatever wildlife eats their bodies, thereby prolonging the cycle of death. We have already taken so much habitat from these creatures. The least we can do is not start a poison chain reaction which can harm even humans and pets.

Please support this legislation. There are other, better ways of excluding rodents than poison, which should only be used as an absolute last resort.

Thanks for your time!  
Natalie Krueger  
565 Sabattus Rd  
Sabattus, ME 04280

**RE: Public Comment for the Board of Pesticides Control's Chapter 40  
Second-Generation Anticoagulant Rodenticides Restriction Rulemaking Proposal**

Dear Director Peacock and Members of the Board,

My name is Jacqueline Gage and I am a biologist and educator residing in Northport, Me. Thank you for the opportunity to submit comments in support of the Board of Pesticides Control's (BPC) proposed restriction on second-generation anticoagulant rodenticides (SGARs).

Last May at a conference, I learned about SGARs and their significant effects on non-targeted species, pathways through ecosystems and food webs, and found it quite alarming. I began reading studies done throughout New England on rodenticides and non-targeted poisonings. I learned about FGARs, non-anticoagulants, and non-chemical but still lethal methods of rodent control.

I read EPA reports and followed the progress of **Maine LD356** and read the two Board of Pesticide Control's reports on rodenticide use in Maine & the LD356 Resolve (10/3/25 & 1/26).

I've discussed rodent control with nearly 150 community members including veterinarians, farmers, retail managers, wildlife rehabbers, homeowners, and organizations to get a better sense of the extent of the rodent problem, what individuals know about rodenticides, and what people use for rodent control. I also inventoried midcoast Hardware Store Pest Management Sections, reading labels of active ingredients, safe handling warnings, and listed rodenticides restricted by the EPA that are still available in Maine stores.

Most low income people I talked to use snap traps - the least expensive rodent control - as they cannot afford the rodenticides. They also can't afford to take their pets to a vet and the word has spread that pets can, and have, been poisoned.

Nearly everyone I discussed this with uses a variety of rodent control methods, and many of those using rodenticides don't read the labels and or follow instructions. Many simply open the packages and spread the "small green blocks" around the garage or behind the stove. Most never heard of non-targeted wildlife species being killed or that rodents take days to die after consuming bait, making them easy toxic prey for wildlife and pets. The secondary effects on non-targeted wildlife and pets is well-documented. However, many of these animals die painful deaths, out-of-site, so the full impacts are not even known.

At least half the people I talked to had a pet poisoning story. A vet told me of a dog he treated that actually ate through a bait box and consumed the bait. In the BPC report under Rodenticide Exposure in Domestic Animals (pg 5), it states that few scientific studies document the prevalence of poisoning in domestic animals and little data is available for Maine. I recommend sending a survey to every Maine veterinarian because every veterinarian I spoke with had multiple stories of treating pets for rodenticide poisonings.

In your report (1/26) you mention the concern of **affordability** of rodenticides to consumers if these products are banned. Please note, rodenticides are already expensive, not as effective as IPM, and have other significant subsequent costs beyond their purchase price. The consumers who use these toxic products are not educated or trained as is a licensed professional. These rodenticides should not be available for consumer use. They are far too dangerous.

According to this **EPA May 2025 Report** the following are banned for residential consumer use: (<https://www.epa.gov/safepestcontrol/mouse-and-rat-poisons-pellet-form-banned>)

- *All rodenticide bait products marketed to residential consumers must be sold as a block or paste bait, packaged with an EPA-approved bait station. Mouse and rat poisons in pellet form are banned.*
- *Products marketed to residential consumers may contain no more than 1 pound of rodenticide bait.*
- *Products marketed to residential consumers will no longer contain the most toxic and persistent pesticide active ingredients: second generation anticoagulants brodifacoum, bromadiolone, difenacoum, and difethialone. Products containing these active ingredients will only be available for commercial use and for residential use by professional pest control operators.*

As noted in my oral testimony, I purchased samples of these restricted products in February 2025 at mid-coast hardware stores. Most concerning, was the 8-pound bag of the banned SGAR - Brodifacoum, in pelleted form from Rob's Hardware store in Orland for \$64.00. On the bag it clearly states: "**Distribution to and sales in "consumer" stores including hardware stores is prohibited.**" I did speak with the BPC compliance officer and look forward to seeing the seven bags of this product currently on their shelves, removed.

Other rodenticides, in pelleted form, intended to be broadcast outside buildings are equally attractive to non-targeted pets and wildlife as rodents including:

1. A 4-pound bag of fish flavored pellets with the active ingredient, the FGAC **Diphacinon** - No safe bait box included.
2. A 2-lb container of **Bromethalin coated oats and millet**, which look like bird food, comes with a warning stating that “This product is extremely toxic to mammals and birds. In addition dogs and other predatory and scavenging mammals and birds might be poisoned if they feed upon animals that have eaten this bait.”

**Don't EPA regulations apply to Maine? We need to do a better job of enforcing the sale of these banned products and regulating those rodenticides that are clearly not solely targeting rodents.**

I recommend that any consumer retail outlet selling rodenticides require managers be trained on the regulations and safe use of these chemicals. Please require store owners to sign a sheet that lists banned substances and certifies that they have completed training and will comply with regulations.

The purchasing manager at Aubuchans in Belfast told me that when he submits orders, his software will not let him purchase items that are banned in Maine. Perhaps all hardware stores need this software and it would be important for the BOP to ensure it is updated with state regulations.

By regulating retail outlets and ensuring that online purchases of banned substances cannot be delivered to Maine zipcodes, it would streamline the enforcement of products reaching consumers. I will continue to inventory Mid-Coast hardware stores for banned rodenticides and send this information to the BPC's enforcement officer.

In closing, I support the restrictions proposed today and going forward I would like to see FGARS and SGARs banned from both stores and to certified professionals as there are plenty of other safer methods of rodent control. I recommend the original content of LD356 be reintroduced in the future, banning rodenticide use in outdoor residential settings, as poisoned dying rodents travel the neighborhood and can be eaten by all of our pets and Maine's wildlife.

I fully support Integrated Pest Management as the best practice for rodent control.

Thank you,  
Jacquie Gage

**Boyd, Karla**

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**From:** Pesticides  
**Sent:** Friday, February 20, 2026 10:27 AM  
**To:** Peacock, Alexander R  
**Subject:** FW: Rodenticides

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**From:** Doris Luther  
**Sent:** Friday, February 20, 2026 10:24 AM  
**To:** Pesticides  
**Subject:** Rodenticides

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The use of rodenticides to control mice and rat populations has impacts far beyond their intended targets. Owls, hawks, foxes, raccoons, eagles, ravens, pet cats and dogs, and many more creatures directly or accidentally ingest poisons. Maine wildlife is at risk, and it's time to take action. Harmful SGARs pose a grave risk to native wildlife, predators, and critical ecosystems, and it's time that we restrict their use in our state.

Maine Audubon supported a 2025 bill that directed the Board of Pesticides Control to prohibit the use of rodenticides in Maine. As a result, BPC has officially entered rulemaking to restrict the use and sale of SGARs. The proposed rule would add brodifacoum, bromadiolone, difenacoum, and difethialone to the restricted-use pesticides list, preventing the unlicensed sale and use of products containing these ingredients.

Restricting the use of SGARs in Maine is an important first step in better protecting the wildlife of Maine from rodenticides.

Doris Luther  
[dsluther1049@gmail.com](mailto:dsluther1049@gmail.com)

Director Alex Peacock  
Board of Pesticides Control  
28 State House Station  
Augusta, ME 04333

March 9, 2026

**RE: Public Comment for the Board of Pesticides Control's Chapter 40 Second-Generation Anticoagulant Rodenticides Restriction Rulemaking Proposal**

Dear Director Peacock and members of the board:

Thank you for the opportunity to submit comments in support of the Board of Pesticides Control's Chapter 40 second-generation anticoagulant rodenticides (SGARs) restriction rulemaking proposal.

Since 1843, Maine Audubon has worked to conserve Maine wildlife and wildlife habitat by engaging people in education, conservation, and advocacy. The oldest and largest Maine-based conservation organization, Maine Audubon has eight public centers and sanctuaries across the state; seven chapters; 30,000 members, volunteers, and supporters; and connects with more than 250,000 people annually.

Due to the impact that rodenticides have on wildlife and pets, legislation in Maine was introduced and passed in order to prohibit the use of these chemicals. LD 356,<sup>1</sup> a Resolve, was enacted into law in 2025 directing the Board of Pesticides Control (BPC, Board) to prohibit the use of rodenticides in outdoor residential settings. In response to this directive, the Board is moving forward with restricting harmful second-generation anticoagulant rodenticides (SGARs). **Maine Audubon supports this restriction as a great first step in protecting Maine wildlife, pets, and communities from the dangers of rodenticides.**

**What are Anticoagulant Rodenticides?**

First developed in the 1940s as first-generation anticoagulant rodenticides (FGARs), anticoagulant rodenticides (ARs) utilize ingredients that accumulate in fatty tissues and halt the blood clotting process of a rodent, leading to fatal internal bleeding.<sup>2</sup> By the 1970s, rodents began developing resistance to FGARs and new poisons called second-generation anticoagulant rodenticides were developed. Unlike FGARs, SGARs were designed to be fatal after one single feeding. In addition to an increase in lethality, SGARs are able to persist in the environment much longer than FGARs. FGARs

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<sup>1</sup> [LD 356](#) from the 132nd Legislature, *Resolve, Directing the Board of Pesticides Control to Prohibit the Use of Rodenticides in Outdoor Residential Settings.*

<sup>2</sup> MSPCA-Angell, [Rodenticides](#). 2026.

can have liver half-lives between 2 and 26 days while SGARs can have liver half-lives between 80 and 350 days.<sup>3</sup>

### **Anticoagulant Rodenticides & Wildlife**

Due to the ability of ARs, especially SGARs, to bioaccumulate in fatty tissue and persist for extended periods of time, exposure to non-target species is common and can have detrimental effects. Primary exposure occurs when nontarget species – including animals such as raccoons and even dogs– directly consume rodenticides. Secondary exposure occurs when a predator consumes poisoned prey. And tertiary exposure occurs when an animal consumes another animal that consumed a poisoned animal. This pathway through an ecosystem is entirely due to the ability of SGARs to bioaccumulate and persist for extended periods of time. Non-target species exposure is exacerbated by the fact that poisoned prey are weakened and disoriented, making them easy targets for predator species.

Alarming, studies show that these dangerous rodenticides are extremely prevalent in wildlife populations. In Massachusetts, 100% of Great Horned owls tested for anticoagulant rodenticides between 2006 and 2016 were positive for at least one type of AR.<sup>4</sup> Another recent study highlighted the extent of mesopredator exposure to anticoagulant rodenticides across the northeastern United States, including Maine. According to this study, 106 fishers were tested and 52.8% were positive for at least one AR, including both FGARs and SGARs.<sup>5</sup> The State of Maine has also conducted limiting sampling for rodenticides and found that 4 out of 4 bears and 4 out of 6 hawks tested positive for rodenticides in 2024.<sup>6</sup> In addition to the prevalence across species, new research focused on bobcat exposure has found evidence that ARs can be transferred from mothers to fetuses during gestation, highlighting the high risk of secondary exposure.<sup>7</sup> Lastly, wildlife rehabilitation centers are incredibly important sources of data for this issue. In Massachusetts, the New England Wildlife Center reported that they see between 100 and 200 cases of secondary poisoning each year.<sup>8</sup> High prevalence of anticoagulant rodenticides in wildlife suggests that exposure is likely widespread across populations, increasing the likelihood of secondary exposure and therefore population-level impacts.

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<sup>3</sup> Stella C. McMillin et. al., [Anticoagulant Rodenticide Residues in Game Animals in California](#), DigitalCommons@University of Nebraska - Lincoln. 2018.

<sup>4</sup> Massachusetts Department of Agricultural Resources, [Anticoagulant Rodenticide Scientific Review Final Report](#). 2025.

<sup>5</sup> Jacqueline L. Friar, et. al., [Investigating the extent, severity, and drivers of meso-carnivore exposure to anticoagulant rodenticides across the northeastern states, with an emphasis on fisher \(\*Pekania pennanti\*\)](#). State University of New York College of Environmental Science and Forestry, and University of New Hampshire. 2023.

<sup>6</sup> Maine Board of Pesticides Control, [Report on the Implementation of LD 356: Resolve. Directing the Board of Pesticides Control to Prohibit the Use of Rodenticides in Outdoor Residential Settings](#). 2026.

<sup>7</sup> L.E.K. Serieys, et. al., [Anticoagulant rodenticides in urban bobcats: exposure, risk factors and potential effects based on a 16-year study](#). Ecotoxicology 24. 2015.

<sup>8</sup> John Basile, [Eagle's death linked to rodent poison](#). Maine Public Radio. 2023.

To understand why high prevalence is concerning, it is important to examine how anticoagulant rodenticides impact wildlife mortality, behavior, and fitness. Exposed animals can experience internal hemorrhaging that can develop over several days, often leading to weakness, anemia, impaired mobility, and death in severe cases. Unfortunately, rodenticide poisoning in wildlife can and does lead to mortalities. In a Massachusetts study, 161 postmortem examinations on four species of birds were conducted. Brodifacoum (SGAR) was present in 99% of the birds and it was determined that mortality from AR exposure was diagnosed in 6% of the birds.<sup>9</sup> Furthermore, the lethal effects of rodenticide poisoning are frequently experienced at wildlife rehabilitation facilities. A recent article highlighted that 86 of 148 birds of prey brought into the Rhode Island based Congress of Birds rehabilitation center, died or were euthanized due to rodenticide poisoning in 2024.<sup>10</sup> Rodenticide poisoning is not always fatal but can severely impact the health and fitness of an animal. For example, in 2023 a Barred owl in York, Maine, was weakened by rodenticide exposure and then collided with a car.<sup>11</sup> This incident highlights how rodenticides might negatively impact the behavior of wildlife. In addition to this, a recent study by the United States Geological Survey found that anticoagulant rodenticides are associated with increased stress and reduced body condition in avian scavengers.<sup>12</sup> Furthermore, according to the Massachusetts Division of Fisheries and Wildlife, rodenticides can compromise carnivore immune systems, making them more vulnerable to diseases.<sup>13</sup> Another recent study demonstrates a strong correlation between AR exposure and increased occurrences of mange.<sup>14</sup>

The evidence presented above demonstrates that anticoagulant rodenticides pose a significant and widespread threat to wildlife. ARs are widely prevalent in ecosystems, persist for extended periods of time, and can move through food webs. The result of this exposure is a range of harmful effects ranging from illness to death. And the species that are most impacted – predators – play important roles in regulating prey species and maintaining ecosystem balance. By removing these species or impacting their ability to regulate ecosystems, ecological functions are disrupted. Because of this, Maine Audubon supports any restriction on rodenticides, and starting with SGARs is a great first step.

### **Non-anticoagulant Rodenticides**

In addition to anticoagulants, there are many non-anticoagulants in use as well. One example is bromethalin. Bromethalin is a neurotoxin found in popular consumer products such as Tomcat and is

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<sup>9</sup> Maureen Murray, [Anticoagulant rodenticide exposure and toxicosis in four species of birds of prey presented to a wildlife clinic in Massachusetts, 2006-2010](#). Journal of Zoo and Wildlife Medicine. 2011.

<sup>10</sup> Rob Smith, [Bills Would Ban Use of Second-Generation Rodenticides](#). ecoRI. 2025.

<sup>11</sup> Ariana St. Pierre, [Barred owl weakened by rodenticide poisoning hit by car in York](#). WGME. 2023.

<sup>12</sup> Forest and Rangeland Ecosystem Science Center, [Anticoagulant Rodenticides are Associated with Increased Stress and Reduced Body Condition of Avian Scavengers in the Pacific Northwest](#). U.S. Geological Survey. 2023.

<sup>13</sup> Massachusetts Division of Fisheries and Wildlife, [Mange in Wildlife](#).

<sup>14</sup> L.E.K. Serieys, et. al., [Anticoagulant rodenticides in urban bobcats: exposure, risk factors and potential effects based on a 16-year study](#). Ecotoxicology 24. 2015.

often advertised to kill anticoagulant resistant rodents. Bromethalin inhibits cells from properly regulating fluid balance which causes the central nervous system to accumulate fluid leading to pressure on the brain and eventually death.<sup>15</sup> Unlike ARs, many nonanticoagulants break down relatively quickly and the risk of secondary exposure is not as high. Because the vast majority of scientific literature is focused on anticoagulant rodenticides, there remains knowledge gaps in the prevalence and impact non-anticoagulant rodenticides have on wildlife.

### **Rodenticide Restrictions in the United States**

Across the United States, a growing number of states have recognized the risks of rodenticides and have begun taking steps to restrict their use. The following list highlights several examples of how states across the country are protecting their wildlife, pets, and communities from rodenticides. **By joining this list, Maine would once again be embracing steps toward protecting its natural heritage.**

#### *California —*

California has the most extensive rodenticide restrictions in the United States. In 2020, AB1788 prohibited the use of SGARs with specific exemptions.<sup>16</sup> In 2023, California prohibited the use of diphacinone (FGAR), and in 2024 prohibited the use of remaining FGARs, chlorphacinone and warfarin.<sup>17 18</sup>

#### *Connecticut —*

Starting January 1, 2026, all second-generation anticoagulants have been classified as restricted-use pesticides.<sup>19</sup>

#### *South Carolina —*

Effective February 1, 2025, South Carolina's pesticide regulatory authority temporarily restricted SGARs. In November 2025, this restriction was extended indefinitely.

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<sup>15</sup> Angela Nelson, [New Study is First to Find Exposure to Neurotoxic Rodenticide Bromethalin in Birds of Prey](#). Tufts Now. 2023.

<sup>16</sup> [Assembly Bill No. 1788](#), An act to amend Section 12978.7 of the Food and Agricultural Code, relating to pesticides.

<sup>17</sup> [Assembly Bill No. 1322](#), An act to amend Section 12978.7 of the Food and Agricultural Code, relating to pesticides.

<sup>18</sup> [Assembly Bill No. 2552](#), An act to amend Section 12978.7 of, and to add Section 12997.8 to, the Food and Agricultural Code, relating to pesticides.

<sup>19</sup> [Public Act No. 25-33](#), An Act Concerning the Environment, Climate and Sustainable Municipal and State Planning, and the Use of Neonicotinoids and Second-Generation Anticoagulant Rodenticides.

*Vermont* —

SGARs are classified as restricted-use pesticides under 6 V.S.A. § 918.<sup>20</sup>

### **Pending Rodenticide Restrictions**

In addition to states that have restrictions in place, there are also pending rodenticide restrictions across the United States.

*Colorado* —

Senate Bill 26-062 would prohibit the use of bromethalin, zinc phosphide, and both FGARs and SGARs.<sup>21</sup>

*Massachusetts* —

Massachusetts has two bills, Bill H.965 and Bill S.2721, which would both limit the use of anticoagulant rodenticides in the state.<sup>22</sup>

*New Hampshire* —

House Bill 1676 recently passed out of committee would limit consumer access to brodifacoum, bromadiolone, difethialone, difenacoum, warfarin, chlorophacinone, diphacinone, bromethalin, cholecalciferol, and zinc phosphide.<sup>23</sup>

### **Why a Restriction on SGARs Matters**

Restricting the use of SGARs in Maine better protects wildlife, supports healthier ecosystems, reduces risks to pets, and helps encourage integrated pest management. SGARs are the most prevalent rodenticides found in wildlife testing, the most toxic, and the most environmentally persistent. By limiting the use of these SGARs, the Board of Pesticides Control will be taking a substantial step in reducing the risk of non-target species exposure. Currently, SGARs are available to be purchased by anyone in Maine through online storefronts. By restricting SGARs, the Board of Pesticides Control would be limiting the amount of SGARs that can be sold and shipped to Maine. In addition to why

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<sup>20</sup> [6 V.S.A. § 918](#).

<sup>21</sup> [Senate Bill 26-062](#), A Bill for an Act Concerning certain rodent control products in the state.

<sup>22</sup> [Bill H.965](#), An Act Restricting the Use of Rodenticides in the Environment and [Bill S.2721](#), An Act Restricting the Use of Rodenticides in the Environment.

<sup>23</sup> [House Bill 1676](#), An Act limiting consumer access to certain high-risk rodenticides.

this restriction will benefit Maine, rodenticide restrictions are widely supported. **Attached to this comment are the names of 2,967 Maine Audubon members that are supportive of restrictions on rodenticides and a letter of support signed by several statewide environmental, conservation, and public health groups.**

### **Suggestions for the Board of Pesticides Control**

Although Maine Audubon is overwhelmingly supportive of this rulemaking to restrict SGARS, we offer a few suggestions to the Board to consider during this rulemaking period, and beyond.

First, LD 356 directed the Board of Pesticides Control to “prohibit the use of rodenticides . . .”, it did not specify which type of rodenticide to restrict. We believe that a logical next step would be to consider a restriction on FGARs. As mentioned earlier in this comment, and the Board of Pesticides Control’s draft report, although not as toxic as SGARS, FGARs are prevalent in wildlife testing results and can persist in the environment for up to a month. And as an anticoagulant, they can be detrimental to the health and fitness of wildlife species. Furthermore, FGARs are widely more available in retail settings than SGARS, making them an easy purchase for consumers who do not know their dangers. **By restricting FGARs, the BPC would better fulfill the charge of LD 356 and better protect the environment of Maine.** Whether the Board decides to consider an FGAR restriction during this rulemaking or another rulemaking at a later date, Maine Audubon is willing and excited to support the Board in data gathering to support such a restriction.

Second, Maine Audubon does not believe that the Rodenticide Stakeholder Survey accurately encompassed all of the interested parties that are impacted by rodenticides. The survey saw 38 respondents, with over 75% being pesticide product registrants or industry representatives.<sup>24</sup> For future surveys it would be effective if a larger pool of individuals were contacted and surveyed.

Lastly, the Board’s draft report leading up to this rulemaking identified multiple tactics to better address the issue of rodenticides. These include educational and outreach campaigns alongside rodenticide restrictions. Maine Audubon enthusiastically supports educational and outreach campaigns in conjunction with rodenticide restrictions. In fact, restrictions are most effective when paired with outreach and education efforts to help the public understand the risks of rodenticides, and the benefits of nontoxic pest management strategies.

### **Conclusion**

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<sup>24</sup> Maine Board of Pesticides Control, [Report on the Implementation of LD 356: Resolve, Directing the Board of Pesticides Control to Prohibit the Use of Rodenticides in Outdoor Residential Settings](#), Page 16. 2026.



Maine has long prided itself on protecting its natural heritage. Restricting rodenticides aligns with that legacy and represents a practical way to reduce unnecessary harm to wildlife, pets, and people. First and foremost, Maine Audubon supports any restriction to protect the natural environment of Maine, and starting with an SGAR restriction is a great step. We respectfully urge the Board to consider our other suggestions during this rulemaking to better fulfill the directive of LD 356. Maine Audubon looks forward to working with the Board as it continues to reduce the harmful impacts of rodenticides in Maine.

Please let me know if you have any questions and thank you for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "Anthony Erwin".

Anthony Erwin

*Policy Advocate*

Board of Pesticides Control  
28 State House Station  
Augusta, ME 04333

March 9, 2026

**RE: Restricting the Use of Rodenticides in Maine**

On behalf of the environmental, conservation, and public health organizations listed below, we want to express our support for the Board of Pesticides Control's (BPC) proposed rulemaking to restrict four second-generation anticoagulant rodenticides (SGARs) in Maine.

Even when used via target baits, rodenticides can lead to primary and secondary poisoning of wildlife, through animals ingesting the poison themselves, or by ingesting animals that have been poisoned. Bioaccumulation of these chemicals can create major downstream effects on ecosystems and wildlife that were not the intended target.

LD 356, a Resolve, was enacted into law in 2025 directing the Board of Pesticides Control to prohibit the use of rodenticides. In response to this directive, the BPC is moving forward with restricting harmful SGARs in Maine. This restriction would prevent unlicensed individuals from purchasing products containing SGARs. SGARS are more potent than other rodenticides and persist in the environment for longer periods of times – increasing the chances of secondary exposure.

In order to better protect the wildlife of Maine from dangerous poisons, **our organizations support this restriction and any further restrictions the Board of Pesticides Control may propose in response to LD 356.**

Sincerely,

Maine Audubon  
Maine Conservation Voters  
Maine Youth for Climate Justice  
Maine Unitarian Universalist State Advocacy Network  
Physicians for Social Responsibility Maine  
Third Act Maine  
Appalachian Mountain Club  
Natural Resources Council of Maine





March 9, 2026

Board of Pesticides Control  
28 State House Station  
Augusta, ME 04333

**RE: Restricting the Use of Rodenticides in Maine**

Wildlife is at risk in Maine. Rodenticides, especially second-generation anticoagulants (SGARs), can have unintended impacts on many non-target species. SGARs have the ability to bioaccumulate in animal tissue and persist in the environment for extended periods of time. Due to these factors, high percentages of non-target species, including owls, hawks, foxes, and more, test positive for SGARs and many of these species are at risk of death due to poisoning.

**We urge all members of the Board of Pesticides to support changes proposed in Chapter 40 to restrict SGARs in Maine.**

Sincerely,

Amy Frechette — Acton, ME	Ginny Van Dyke — North Yarmouth, ME
Lisa Lund — Acton, ME	Jim Briggs — North Yarmouth, ME
Brian Thibeault — Acton, ME	Rebecca Gervais — North Yarmouth, ME
Jada Fitch — Addison, ME	Kathleen Murrane — North Yarmouth, ME
Pamela Geel — Addison, ME	Heather Margerison — North Yarmouth, ME
Jeanne Lawson — Addison, ME	Kristen Stetson — North Yarmouth, ME
James Reddoch — Albany Twp, ME	Lucas Adair — North Yarmouth, ME
Katherine Reddoch — Albany Twp, ME	Susan Inches — North Yarmouth, ME
Grazyna Kirsch — Alexander, ME	Jennifer Tuemmler — North Yarmouth, ME
Berta Khasina — Alfred, ME	Helen Koch — Northeast Harbor, ME
Linda Page — Alfred, ME	Donna Reis — Northeast Harbor, ME
Colleen Mcbreairty — Allagash, ME	Anna Carr — Northeast Harbor, ME
Laura Hiestand — Alna, ME	Meghan Savage — Northeast Harbor, ME
William Cron — Alna, ME	Paul Sheridan — Northport, ME
fred bowers — Alna, ME	Caren Gast — Northport, ME
Lilliana Vitelli — Appleton, ME	Ruth Koger — Northport, ME
Marisol Maddox — Appleton, ME	Jacqueline Gage — Northport, ME
Lynn Pitman — Appleton, ME	Elise Sump — Northport, ME
Linda Arnold — Appleton, ME	Madeline Godine — Northport, ME
Thomas Varney — Argyle Twp, ME	Marie Manzo — Northport, ME
Peter Crockett — Argyle Twp, ME	Heather Moran — Northport, ME
Claire Enterline — Arrowsic, ME	Jeremiah Kahn — Northport, ME
	Joseph Berube — Northport, ME

For more information, please contact Maine Audubon's Policy Advocate  
Anthony Erwin at [aerwin@maineaudubon.org](mailto:aerwin@maineaudubon.org)

Wendy Van Dyke — Arrowsic, ME  
 Ruth Lantigua — Arundel, ME  
 Robert Rynk — Arundel, ME  
 Denise Fuhrmann — Arundel, ME  
 Judy Puddester — Arundel, ME  
 Lelah Sullivan — Arundel, ME  
 Rachael Barter — Arundel, ME  
 Caroline Davison — Auburn, ME  
 Michelle Berube — Auburn, ME  
 Carol Lane — Auburn, ME  
 Cynthia Grimm — Auburn, ME  
 Marlis Whittier — Auburn, ME  
 Megan Perkett — Auburn, ME  
 Kristina Bouchard — Auburn, ME  
 Sarah Strong — Auburn, ME  
 Linda Snyder — Auburn, ME  
 karysa dalphonse — Auburn, ME  
 Elizabeth Hodenberg — Auburn, ME  
 Michael Marchigiani — Auburn, ME  
 Marjorie Schmieks — Auburn, ME  
 Meagan Charest — Auburn, ME  
 Kelly M Dalphonse — Auburn, ME  
 Daniel A Dalphonse — Auburn, ME  
 Jennifer Marchigiani — Auburn, ME  
 Christine Chute — Auburn, ME  
 Janine Valliere — Auburn, ME  
 Debora Downs — Auburn, ME  
 Deb Sandford — Auburn, ME  
 Katie Lisnik — Auburn, ME  
 Sue Hinkley — Augusta, ME  
 Lori Gingras — Augusta, ME  
 Nancy Morse — Augusta, ME  
 Grace Nichols — Augusta, ME  
 Rita Pello — Augusta, ME  
 Emily Churchill Baxter — Augusta, ME  
 James Culley — Augusta, ME  
 Rebecca Prescott — Augusta, ME  
 Eva Campbell — Augusta, ME  
 Carol Godfrey — Augusta, ME  
 Deborah Palman — Aurora, ME  
 Lianne Nikitas — Bailey Island, ME  
 Nicole Chance — Bailey Island, ME  
 Tavia Chance — Bailey Island, ME  
 HEIDI CROSIER-SYPITKOWSKI — Bangor, ME  
 Elizabeth Stevens — Bangor, ME  
 Jennifer Grant — Bangor, ME  
 Paul Robie — Northport, ME  
 Tracey Drinkwater — Northport, ME  
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 Brittany Geishecker — Rangeley, ME  
 Heather Knight — Rangeley, ME  
 Darlene Woodman — Rangeley, ME  
 Lysle Brinker — Rangeley, ME  
 Avard Dow — Raymond, ME  
 Katja Lavalley — Raymond, ME  
 Sylvia Sullivan — Raymond, ME  
 Sarah Moore — Raymond, ME  
 M Therese Duffy — Raymond, ME  
 Janet Berard Doyle — Raymond, ME  
 Laurie Murphy — Raymond, ME  
 Tracy Mastro — Raymond, ME  
 Desiree Campbell Desiree Campbell — raymond,  
 ME  
 Carol Fink — Raymond, ME  
 Carrie Shamos — Raymond, ME  
 Linda Pankewicz — Raymond, ME  
 Pam Rullo — Raymond, ME  
 Veronica Danie — Raymond, ME  
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 Stephanie Donaldson — Readfield, ME  
 Sammy Hartery — Readfield, ME  
 Bonnie Gantz — Readfield, ME

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 Tom Warhol — Brunswick, ME  
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 Laura Brown — Brunswick, ME  
 Kelsie West — Brunswick, ME  
 Nicole Caron — Brunswick, ME  
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 Rani Long — Brunswick, ME  
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 Barbara Manter — Brunswick, ME  
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 Sherri Christianson — Seal Cove, ME  
 Tate Bushell — Seal Cove, ME  
 Sheila Eddison — Seal Cove, ME  
 Dominika DelMastro — Seal Cove, ME  
 Charles O'Brien — Seal Harbor, ME  
 Lisa Maddison — Searsmont, ME  
 Mary Cronin — Searsmont, ME  
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 Andrew Johnson — Searsport, ME  
 Bay Nadeau — Searsport, ME  
 Heather Nadeau — Searsport, ME  
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 Alexa Schweikert — Searsport, ME  
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 Grace Cain — Sebago, ME  
 Mark Sunderland — Sebago, ME  
 Whitley Lehto — Sebago, ME  
 Rebecca Merritt — Sebago, ME  
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 Kerry Glover — Sebec, ME  
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 Ted Piccone — Cushing, ME  
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 Diana Mullins — Damariscotta, ME  
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 Justin Guider — Damariscotta, ME  
 Julie Perron — Damariscotta, ME  
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 Anthony Erwin at [aerwin@maineaudubon.org](mailto:aerwin@maineaudubon.org)

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 Anthony Erwin at [aerwin@maineaudubon.org](mailto:aerwin@maineaudubon.org)

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For more information, please contact Maine Audubon's Policy Advocate  
 Anthony Erwin at [aerwin@maineaudubon.org](mailto:aerwin@maineaudubon.org)



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Maine Board of Pesticides Control  
Department of Agriculture, Conservation and Forestry  
Written Comments for Proposed Rule Changes to  
Chapter 40, ME Restricted and Limited Use Pesticides

3/9/2026

My name is Katie Lisnik and I am the Executive Director for Maine Humane, an organization dedicated to promoting and advancing the humane care of all animals throughout the state of Maine. We offer support, training, resource sharing, advocacy and more to shelters, rescues, animal control, and other animal protection organizations throughout the state.

We join with many animal and environmental protection organizations in calling on the state Board of Pesticides Control to ban the sale and use of Second Generation Anticoagulant Rodenticides in Maine. Banning these anticoagulants would eliminate the most deadly and most persistent rodenticides in use.

The impacts of these rodenticides are felt far beyond their intended targets. Maine wildlife such as foxes, raccoons, owls, hawks and other predators and scavengers may consume rodenticide directly through bait left outside, or may accidentally consume it by eating poisoned prey, or other animals who consumed the poisoned prey.

Not only wildlife is at risk. Our dogs and cats are also vulnerable to the toxic effect of these chemicals, by consuming the bait themselves, or consuming poisoned rodents and other prey. There have been very well publicized incidents where pet dogs have been poisoned by these chemicals, but the real impact is likely much larger. Many Maine cats are allowed outdoor access and it is difficult to gauge how many succumb to poisoning without their owners' knowledge.

To better safeguard Maine's environmental health, and the welfare of our animals, both companion and wild, it is essential that the state restricts these dangerous chemicals. Maine Humane strongly encourages the BPC to ban the sale and use of SGARs in Maine.

Sincerely,

A handwritten signature in black ink that reads 'Katie Lisnik'.

Katie Lisnik,  
Executive Director



PROTECTING WILD CARNIVORES  
FOSTERING THRIVING ECOSYSTEMS

**To:**

Maine Board of Pesticides Control  
Department of Agriculture, Conservation and Forestry  
Submitted via email to: [pesticides@maine.gov](mailto:pesticides@maine.gov)

**Re:** Support for Implementation of L.D. 356 – Restricting Second-Generation Anticoagulant Rodenticides (SGARs)

Dear Members of the Board of Pesticides Control,

On behalf of Project Coyote, a national nonprofit dedicated to protecting North America's wild carnivores and promoting science-based human-wildlife coexistence strategies, I respectfully submit this comment in strong support of the Board's proposed Chapter 40 rulemaking to restrict second-generation anticoagulant rodenticides (SGARs) in outdoor residential settings. The passage of L.D. 356 gives Maine a vital opportunity to protect its wildlife, pets, and communities from these highly toxic chemicals.

**SGARs Pose a Clear Threat to Wildlife and Pets**

Second-generation anticoagulant rodenticides, including brodifacoum, bromadiolone, difenacoum, and difethialone, are far more potent than first-generation products and can kill rodents in a single feeding. SGARs persist in the fatty tissues of poisoned animals and bioaccumulate in the food chain, creating a long-lasting risk of secondary poisoning.

Predators and scavengers in Maine — such as owls, hawks, eagles, foxes, bobcats, and fishers — are exposed when consuming poisoned prey, often resulting in slow, agonizing deaths or increased vulnerability to other hazards. Pets are also at risk if they ingest poisoned rodents or contaminated wildlife, as tragically demonstrated by cases like Starling, a dog from Bridgton that died after exposure to a poisoned squirrel. ([maine.gov, 2025 draft report](#))

Scientific evidence confirms this risk within Maine:

- In preliminary sampling by the Maine Department of Inland Fisheries and Wildlife, **rodenticides were detected in bears, hawks, and fishers**, indicating that non-target wildlife are being exposed even in relatively wild areas.
- A multi-state study of fishers across the Northeast, including Maine, found **53% of sampled Maine fishers contained at least one rodenticide compound**, demonstrating the widespread reach of these poisons.



**PROTECTING WILD CARNIVORES**  
**FOSTERING THRIVING ECOSYSTEMS**

## **Non-chemical Alternatives to SGARs are More Effective**

Wild carnivores and raptors play a critical role in naturally regulating rodent populations. The use of SGARs can be counterproductive by harming these species, which can exacerbate rodent problems over the long run. Safer, non-toxic approaches like Integrated Pest Management (IPM) — focusing on exclusion, sanitation, trapping, and habitat modification — have been shown to be both more effective and more sustainable for long-term rodent control.

## **Maine Must Join Other States Already Restricting These Deadly Poisons**

By restricting the use of SGARs, Maine joins other forward-looking states — including Connecticut, Vermont, Rhode Island, California, and South Carolina — that have already classified SGARs as restricted use by professionals or banned them outright, and other states like Massachusetts, New York, Colorado, and Washington currently considering policies that would heavily restrict or ban consumer use. This rulemaking is an essential first step toward preventing unnecessary wildlife and pet deaths while encouraging adoption of safer rodent management practices statewide.

We urge the Board to adopt strong, enforceable rules that fully implement L.D. 356 and protect Maine's wildlife, pets, and communities from the preventable harms caused by SGARs.

Thank you for your consideration and your leadership on this critical environmental and public health issue.

Respectfully submitted,

**Kiely Smith**

State Advocacy Manager

Project Coyote

Protecting Wild Carnivores, Fostering Thriving Ecosystems

[www.projectcoyote.org](http://www.projectcoyote.org)

## Boyd, Karla

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**From:** Pesticides  
**Sent:** Friday, February 20, 2026 7:58 AM  
**To:** Peacock, Alexander R  
**Subject:** FW: Pesticide use

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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**From:** Heidi Mass  
**Sent:** Thursday, February 19, 2026 5:58 PM  
**To:** Pesticides  
**Subject:** Pesticide use

**EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.**

Dear Board Members. I am writing to ask you to outlaw use of rodenticides. They are a very dangerous product that not only harms the rodent, but many unintended victims. I worked in wildlife rehabilitation for 12 years and saw the effects of pesticides on wildlife. This is a painful death and should be averted at all costs. In addition, cats and dogs will eat dead mice and be harmed.

I have always used snap traps, which are very effective. They are a good alternative for the homeowner. There are other kinds of traps if needed for large buildings that do not let the rodent leave the trap. They may have to be checked more frequently but are a good alternative to pesticides.

Thank you for reading this.

Jacquelyn H Mass  
Boothbay Harbor, Maine

## Boyd, Karla

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**From:** Pesticides  
**Sent:** Tuesday, February 24, 2026 9:42 AM  
**To:** Peacock, Alexander R  
**Subject:** FW: LD356

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**From:** Helena Melone  
**Sent:** Saturday, February 21, 2026 3:03 AM  
**To:** Pesticides  
**Subject:** RE: LD356

**EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.**

I'm writing because I am deeply dismayed about the flagrant use — and abuse — of pesticides in Maine, and most especially in rural areas where people are having companies place boxes full of rodenticides in systems rich in wildlife... notably, the birds of prey and predators who rely on rodents as prey species.

I live on Deer Isle, an area which has, in recent years, become inundated by people who live here seasonally and who want their beautiful homes mouse-free when they come for a couple of months in the summer. So they have companies come and place plastic boxes snuggles up around their houses out in the woods, filled with poisons, so that the abundant wildlife can become... less less abundant, but sick first. All of the weasels, foxes, otters, fishers, mink, as well as great blue herons, owls, coopers hawks, goshawks, eagles, crows, ravens and even blue jays are affected by the use of rodenticides. Some, after one ingestion — like when a barred owl feeds a dying mouse (an easy catch!) to its owlet. It doesn't take much. Or a fox might bring a poisoned mouse back to its kits. It won't take much; it's a small creature. An older, larger animal will "just" get sick and slow-moving and perhaps disoriented, not landing well, crossing the road in front of a car too slowly....

What makes Maine beautiful are all of the non-human elements. And we can't pick and choose which ones we want gone because they're a nuisance, and which we want to leave because they're pretty and don't bother us... because it's a system, a complete system. And when you put put poison into one part of the system, you poison the entire system.

There are many ways to deal with rodent problems — plugging up entries, not leaving food available, and target trapping... and putting up owl nesting boxes. There are even very effective **birth control** pellets by Senestra (like Contrapest and Evolve) which have proven very effective in communities in Chicago, San Francisco, and Seattle, as well as in rural areas like Gouldsboro, ME!

Ban rodenticides and Maine, and keep Maine a place where people see the wildlife which makes Maine a place both to vacation and live, the way life should be.

Thank you.

Heléna Melone  
Stonington, ME

February 21, 2026

Director Alex Peacock  
Board of Pesticides Control  
28 State House Station  
Augusta, ME 04333

RE: Public Comment for the Board of Pesticides Control's Chapter 40 Second-Generation Anticoagulant Rodenticides Restriction Rulemaking Proposal

Dear Director Peacock and Members of the Board:

I strongly support the Board's proposed Chapter 40 amendment to restrict the use of second-generation anticoagulant rodenticides in Maine. It is important that states outlaw the use of these chemicals which will force the industry to come up with improved rodent controls. They will not do it otherwise and it is critical that the use of these environmentally persistent poisons ends. I know a dog owner whose dog almost died from what they think was from eating a poisoned rodent of some kind. How many millions of non-target pets, predators, and scavengers die every year across the country and here in Maine. Why are these horrible poisons still on the market?

This amendment is long overdue. Thank you for this effort to end the use of these poisons.

Sincerely,

Lindy Moceus  
Vienna, Maine



**March 9, 2026**

Board of Pesticides Control  
Department of Agriculture, Conservation, and Forestry  
22 State House Station  
18 Elkins Lane  
Augusta, ME 04333

**RE: 01-026 C.M.R. Ch. 40, Maine Restricted and Limited Use Pesticides**

Dear Members of the Board:

The New England Pest Management Association (NEPMA) represents the professional pest management industry in Maine, Massachusetts, New Hampshire, Rhode Island, and Vermont. Our members provide pest management services in numerous settings across Maine. Regulated pesticide products, including rodenticides, play a crucial role in our work to safeguard Maine's public health, food safety, and property. We appreciate the board's deep consideration of this regulation as it could have a significant impact on the industry.

Second-generation anticoagulant rodenticides (SGARs) are a crucial tool for effectively and efficiently addressing rodent infestations. Classifying SGARs products as restricted use ensures continued access for NEPMA members, safeguarding our ability to manage rodent populations. If these products were not available to our licensed operators, it's anticipated that alternative control methods would be less effective and more expensive, leading to an increase in persistent rodent infestations reported in Maine.

As the board continues to work on implementing this regulation and future rulemakings, our members and our industry remain a resource to the members of this board on pest control issues. We appreciate the thoughtful consideration of the board regarding the use of rodenticides for professionals.

Sincerely,

Adam Carace  
State Policy Affairs Representative (SPAR)  
New England Pest Management Association (NEPMA)

# Our Data Project



*Red-Tailed Hawk Found Dead in Cooke's Hollow Arlington, Poisoned. Photo courtesy Beth Melofchik*

From late November 2024 to the end of August 2025, Save Massachusetts Wildlife contributed funds for the liver panel testing of dead animals in the Boston metro area in order to determine if they had been exposed to anticoagulant rodenticides (ARs) and see if that exposure contributed to their deaths. Specifically, Dr. Leef of HEAL veterinary clinic performed necropsies (animal autopsies) on animals brought to her clinic, removed their livers, and sent them to Kansas State University's pathology laboratory. The results offer insight to the extent of the issue of rodenticide poisoning in the Boston MetroWest area.

Over the 9-month period, 44 animals were tested who came from either Arlington or a half-dozen nearby communities (Belmont, Lexington, Somerville, Cambridge, Brookline, and Wayland). Of these, four were omitted from the final data set due to various reasons (other cause of death clearly defined, or non-typical species, etc.). Many of these animals were brought to HEAL's clinic by folks in the community who discovered them in their yards or nearby parks. Other animals were brought in by municipal Animal Control Officers (ACOs) or licensed state and federal rehabbers when an animal in their care perished after suffering from symptoms of AR exposure. Yet other animals were brought into HEAL for treatment but sadly did not make it. HEAL paid KSU for the liver testing and Save Mass Wildlife would reimburse HEAL to defray the costs the clinic incurred. You can view the liver panel results [here](#) and necropsy notes most of the animals [here](#).



*Arlington Barred Owl Found Dead Near Spy Pond Arlington. Poisoned. Photo by Jeanine Barletta.*

Nearly every single animal tested positive for exposure to Anticoagulant Rodenticides (ARs). Almost all of the animals tested at or (often well) above the threshold that begins lethal rate of exposure for birds of prey (100 parts per billion). Most of these animals had AR levels in their livers that began at 300-400 ppb, while many others were 700-900 ppb. Additionally, almost all of the animals had some sort of bleeding issue found during the necropsy (if it wasn't already evident from the outside), often severe internal hemorrhaging. Anticoagulants stop the blood from clotting, so most animals who have lethal range of exposure, tend to die from internal bleeding.



*Eastern Coyote Dead in Belmont. Poisoned. Photo courtesy of Belmont ACO Suzanne Trasavage*

Red-tailed hawks and barred owls were by far the most common casualties in our data set—compromising near-equal shares. Other animals that died of AR poisoning included several Great Horned Owls, an Eastern Screech Owl, several Cooper’s Hawks, a Saw-Whet Owl fledgling, an adult Eastern Coyote, an Eastern Gray Squirrel, and an Eastern Chipmunk. More surprising findings included a Great Blue Heron and a Snapping Turtle—the first lethal cases of either species to be confirmed in the state. During the summer of 2025, a young

coyote pup found on the campus of Brandeis University suffering from severe mange was admitted to HEAL clinic but later perished. A necropsy found widespread internal bleeding and liver testing found the highest exposure rates of any animal tested in this dataset at 1,400+ ppb. Also during the summer, a rare gray fox from Arlington—which has recently been designated a “Species of Greatest Conservation Need” by the State Wildlife Action Plan—died from significant internal bleeding, noted in her necropsy. She had the second highest AR exposure rate (1,168 ppb) in the dataset and fatal levels of the First Generation Anticoagulant Rodenticides (FGAR), chlorophacinone. And while the levels didn’t reach lethal range, a shrew and songbird (grackle) tested positive for more than trace levels of AR exposure—which has implications for how thoroughly ARs are infiltrating the food web.



*Snapping turtle. Photo by Lauren Ulm.*



*Coyote pup. Photo by Return2Wild.*

This project was inspired and builds on the work of Cape Ann Wildlife, which necropsies raptors that die of suspected SGARs poisoning in or en route their care. We have combined our data, which can be viewed [here](#). Cape Ann Wildlife's data can be viewed separately [here](#).



*Cooper's Hawk @ Arlington Whole Foods parking lot. Poisoned. Photo courtesy of Toshia McCabe.*

Designed with [WordPress](#)-Web Hosting by [GreenGeeks](#)

## Boyd, Karla

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**From:** Pesticides  
**Sent:** Monday, March 9, 2026 8:31 AM  
**To:** Peacock, Alexander R  
**Subject:** FW: Proposed amendments to CMR01-026 Chapter 40: Restricted and Limited Use Pesticides (PDF)

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**From:** Me Here In Maine  
**Sent:** Friday, March 6, 2026 5:18 PM  
**To:** Pesticides  
**Subject:** RE: Proposed amendments to CMR01-026 Chapter 40: Restricted and Limited Use Pesticides (PDF)

**EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.**

Dear board,

As a Maine resident appreciative of our beautiful surroundings including its wildlife, I urge you to adopt the strongest protections against the use of rodenticides which could inadvertently harm unintended victims.

It is my understanding that you are currently considering increased controls to prohibit the use of rodenticides in outdoor settings. From children to pets and livestock and on to our scavenging wildlife, we need to protect them from severe injury and untimely death. Additionally, further restrictions should be put in place for ANY use of second-generation anticoagulant rodenticides.

Our wildlife already faces increasing limitations on spaces they can inhabit and frequent that do not overlap with those impacted by us. We continue to develop wild spaces giving them less space to make their living. Many have adapted to live with us, either very much integrated into our spaces or at least on the fringes. This has caused their numbers to decrease due to competition for resources as well as overall health degradation due to numerous stressors. Biodiversity is being lost and brings a new set of issues to address, but I digress.

Possum, racoons and skunks can be attracted to poisons meant for mice and rats. Crows, raptors, vultures, possum, racoons, canids and other wildlife, whose roles as scavengers is crucial to a healthy and pleasant ecosystem, are secondarily poisoned when they consume poisoned animals.

I have lived in rural settings most of my life and found that preventing situations that attract undesired rodents to be the best solution. In the inevitable intrusion of a small number of rodents, other targeted and more humane controls can be employed that do not rely on toxicity. In the case of my mice caught in spring traps, most died nearly instantly and could be thrown out on the compost pile where crows usually picked them up.

Please, lets use some common sense and compassion and have some real foresight.

"We do not inherit the earth from our ancestors, we borrow it from our children." ~ Native American Proverb

Sharon Peralta (she/hers)  
92 Crescent Drive  
No. Waterboro, ME 04061

Occupying unceded Wabanaki territory

(207) 324-4485

[mehereinme@outlook.com](mailto:mehereinme@outlook.com)

**Karen Shine Nelson  
1 Revival Lane  
Scarborough, ME 04074**

Director Alex Peacock  
Board of Pesticides Control  
28 State House Station  
Augusta, ME 04333

February 19, 2026

**RE: Public Comment for the Board of Pesticides Control's Chapter 40 Second-Generation Anticoagulant Rodenticides Restriction Rulemaking Proposal**

Dear Director Peacock and Members of the Board:

I am new to Maine, having moved here in 2025 to enjoy this beautiful state with its abundance of natural resources and outdoor opportunities. I am writing to submit comments in support of the Board of Pesticides Control's (BPC) proposed restriction on second-generation anticoagulant rodenticides (SGARs).

A primary concern is that SGARs are highly toxic and environmentally persistent rodenticides that kill rodents by accumulating in fatty tissues and causing massive hemorrhaging. Unfortunately, predators and scavengers such as owls, hawks, eagles, fishers, and bobcats are exposed to SGARs when they consume poisoned prey, leading to preventable wildlife deaths. Further, SGARs can also poison family pets—leading to expensive and lengthy treatment if identified in time.

A second major concern is SGARs ability to persist in the environment for extended periods of time. Because of this, these poisons have ripple effects throughout entire ecosystems. For example, when a raccoon consumes a poisoned mouse, it can also become poisoned. If the raccoon later dies, it may be scavenged by a bird of prey, which then will be exposed to the same toxins. One application of a product containing SGARs can lead to the **poisoning of multiple species** within an ecosystem.

Maine's Board of Pesticide Control has the power to stop this cycle of unintended death of our wildlife. To better protect the wildlife of Maine, the use of rodenticides must be addressed. A restriction on the use of second-generation anticoagulant rodenticides is a great start. Maine would be joining a handful of other states with similar restrictions, once again showing that Maine leads the way in protecting the environment.

I strongly support the Board's proposed Chapter 40 amendment to restrict the use of second-generation anticoagulant rodenticides in Maine.

Sincerely,

*Karen Shine Nelson*

**Boyd, Karla**

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**From:** Pesticides  
**Sent:** Monday, March 2, 2026 8:05 AM  
**To:** Peacock, Alexander R  
**Subject:** FW: please restrict pesticide use

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**From:** Kara Plank  
**Sent:** Friday, February 27, 2026 3:58 PM  
**To:** Pesticides  
**Subject:** please restrict pesticide use

**EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.**

Dear Director Peacock and Members of the Board,

My name is Kara Plank and I live in South Berwick Maine. We live in a wooded area with much wildlife who enjoy the area year round; from turkeys, deer, birds and owls and coyotes, and more. We also raise chickens and have pets of our own. Living as we do we have had unwanted critters in our home and surroundings- mice and rats to name them. They are pests and we set traps to dispose of them. One method I will never use is second generation anticoagulant rodenticides. (SGAR)I value the natural wildlife we cohabitate with and want them to live beyond my generation in our area. These have been proven to affect the wildlife who consume them and are so very harmful when ingested.

Please vote to restrict or ban these harmful killers.

Thank you  
Kara Plank  
South Berwick Maine

[Sent from Yahoo Mail for iPhone](#)

Richard Podolsky, Ph.D.  
Certified Senior Ecologist, Ecological Society of America  
32A Bay View Street  
Camden, Maine 04843

February 28, 2026

Director Alex Peacock  
Maine Board of Pesticides Control  
28 State House Station  
Augusta, ME 04333

**RE: Post-Hearing Written Testimony on LD 356 and Maine Rodenticide Regulations**

Dear Director Peacock and Members of the Board:

I write to provide formal written testimony following the recent hearing on LD 356 and the Board’s proposed rulemaking on rodenticide use in Maine. Based on the testimony presented, the Board’s own comprehensive report, and decades of ecological research on non-target wildlife impacts, I have concluded that Maine should pursue a more ambitious and scientifically defensible approach: **a complete phase-out of anticoagulant rodenticides for all outdoor uses—professional and residential alike—paired with strong support for Integrated Pest Management (IPM) as Maine’s primary rodent-control framework (Maine BPC 2025; Murray et al. 2017; Rattner et al. 2014).**

**The Fundamental Problem: Environmental Persistence and Food-Web Contamination**

Anticoagulant rodenticides were designed to be effective, but the very properties that make them lethal to rodents also make them exceptionally hazardous ecosystem contaminants. Both first-generation anticoagulant rodenticides (FGARs) and second-generation anticoagulants (SGARs) are lipophilic compounds that can bioaccumulate in fatty tissues—particularly the liver—and resist metabolic degradation (Fisher et al. 2003; Rattner et al. 2014; WHO 1995). FGARs have hepatic half-lives ranging from roughly 2 to 26 days, while SGARs—brodifacoum, bromadiolone, difenacoum, and difethialone—exhibit half-lives from about 113 to more than 300 days in mammalian liver tissue (Fisher et al. 2003; Sage et al. 2020). This extraordinary persistence means that poisoned rodents may remain toxic to predators and scavengers for weeks to months after ingestion, creating a prolonged secondary-poisoning risk that cannot be adequately mitigated through label restrictions, applicator training, or bait-station design alone (Fisher et al. 2003; Murray et al. 2017; Rattner et al. 2014).

The Board’s own report documents pervasive contamination of Maine’s carnivore and raptor communities: 53% of sampled fishers statewide, 93–100% in neighboring states, nearly all red-tailed hawks tested in Massachusetts (96–100%), and 100% of the limited sample of Maine bears and hawks examined by IF&W carried detectable anticoagulant residues (Maine BPC 2025). These are not isolated incidents; they reflect systemic food-web contamination driven by the slow-acting and persistent nature of these compounds (Maine Audubon 2026; Murray et al. 2017; Rattner et al. 2014). Even when individual exposures are sublethal, chronic or repeated exposures are associated with increased disease susceptibility, parasite loads, reduced reproductive success, and elevated mortality risk—outcomes that compromise predator populations at the landscape scale (Maine BPC 2025; Murray et al. 2017; Rattner et al. 2014; Vermont Fish & Wildlife 2023).

These rodenticide impacts also sit within a broader, rapidly strengthening body of evidence: intensive pesticide regimes are increasingly associated with accelerating bird declines at continental scales. A new North American analysis published in *Science* identified “hotspots” where bird losses are speeding up and found that agricultural intensity—defined by cropland extent and pesticide use—was a primary predictor of these accelerations, not climate alone (Leroy et al. 2026; OSU 2026; EurekAlert 2026). Comparable work in Europe shows that agricultural intensification, particularly pesticide and fertilizer use, is a dominant driver of farmland bird declines, exceeding the effects of climate change, forest cover, or urbanization (Rigal et al. 2023; Beyond Pesticides 2023). Together, these studies underscore a central point for Maine: modern pesticide regimes are already pushing bird communities to their limits; adding persistent rodenticides into terrestrial food chains is ecologically inconsistent with any serious commitment to bird conservation (Leroy et al. 2026; Rigal et al. 2023; Maine Audubon 2026).

Ecologically, our current rodenticide paradigm is self-defeating. Raptors, mustelids, canids, and felids are among the most efficient natural controllers of rodent populations. By poisoning the predators that help regulate rodent abundance, we create conditions that favor rodent population rebounds and drive demand for additional poison applications (Maron 2024; News from the States 2026; Rattner et al. 2014). This feedback loop is well documented: landscapes with depleted or contaminated predator communities can experience higher rodent densities and more persistent infestations (Maron 2024; Murray et al. 2017; Rattner et al. 2014). In short, anticoagulant rodenticides undermine the very ecological processes that provide free, sustainable rodent control.

### **The Illusion of Control: Rodenticides Do Not Solve Rodent Problems**

The Board’s report acknowledges what the scientific literature has established for decades: urban rodent populations are driven overwhelmingly by food availability, shelter, and

access to buildings—not by the presence or absence of poison (Maine BPC 2025; Shukla & Wilmers 2024). Studies in California showed that when COVID-19 lockdowns reduced restaurant and food-service waste, invasive rat activity declined sharply without any change in rodenticide use, while native rodent populations remained stable (Maine BPC 2025; Shukla & Wilmers 2024). Research in Brazil demonstrated that rodenticide applications provided only transient reductions in rat abundance; populations rebounded within weeks when structural and sanitation conditions remained unchanged (Maine BPC 2025). A 2025 multi-city analysis in the United States found rat populations increasing despite aggressive rodenticide campaigns, particularly in cities experiencing warming climates and expanding urbanization (Maine BPC 2025; Maron 2024).

These findings highlight a fundamental mismatch between the tool and the problem. Rodenticides kill individual animals but do nothing to change habitat suitability. As long as buildings have entry points, waste is poorly managed, and food remains accessible, rodent populations will recover rapidly—often within one to two reproductive cycles—regardless of how many individuals are poisoned (Maine BPC 2025; Shukla & Wilmers 2024). The result is a chemical treadmill: repeated applications, escalating costs, mounting non-target casualties, and no durable reduction in rodent pressure (Maine BPC 2025; Rattner et al. 2014).

### **Integrated Pest Management: Evidence-Based, Ecosystem-Safe, and Effective**

The alternative is not untested or aspirational; it is well established in both the peer-reviewed literature and operational pest-management practice. Integrated Pest Management (IPM) prioritizes exclusion, sanitation, and mechanical control, using chemical interventions only as a last resort in tightly controlled settings (Maine BPC 2025; MDAR 2025; UC ANR 2025). A landmark randomized controlled trial in urban housing found that a single IPM intervention—focused on sealing entry points, removing food sources, and deploying mechanical traps—reduced cockroach populations by 44–56% compared to conventional pesticide applications, with sustained benefits at six-month follow-up (Williams et al. 2009). A multi-year agricultural IPM study reported 95–97% reductions in insecticide use while maintaining or improving pest control and crop yields (Lu et al. 2021).

For rodents specifically, exclusion is the cornerstone: sealing cracks and gaps in foundations, walls, and rooflines; installing door sweeps and threshold barriers; screening vents and utility penetrations; and eliminating access routes under decks, porches, and sheds (Maine BPC 2025; UC ANR 2025). Sanitation removes the resource base: securing trash in rodent-proof containers, cleaning up food waste around dumpsters and loading docks, eliminating outdoor pet feeding, managing birdseed spillage, and reducing clutter that provides nesting sites (Maine BPC 2025; UC ANR 2025). Mechanical control—snap

traps, multi-catch traps, and increasingly, high-efficiency electric traps—removes animals quickly and humanely without introducing persistent toxins into the environment (Maine BPC 2025; MDAR 2025; UC ANR 2025). Emerging technologies, including fertility-control baits, offer additional non-lethal options for chronic problem areas (Maine BPC 2025).

Critically, IPM does not require homeowners or businesses to tolerate rodent infestations; it requires them to address the conditions that create infestations. The difference is profound: poison can mask the problem temporarily, while IPM can solve it durably. States and municipalities that have invested in IPM education, technical assistance, and regulatory support have shown that effective rodent control is achievable without widespread environmental contamination (Lu et al. 2021; MDAR 2025; Williams et al. 2009).

### **Why a Comprehensive Outdoor Ban Is Necessary**

The Board’s proposed approach—classifying SGARs as restricted-use and prohibiting outdoor residential use by unlicensed applicators—is a meaningful step forward, but it does not go far enough (Maine BPC 2025). A complete outdoor ban is scientifically justified for four reasons:

1. **FGARs are not “safe” substitutes.** While less persistent than many SGARs, FGARs still bioaccumulate, still cause secondary poisoning, and are increasingly compromised by widespread genetic resistance in target rodent populations (Fisher et al. 2003; Maine BPC 2025; WHO 1995). Shifting from SGARs to FGARs does not eliminate food-web contamination; it simply extends it.
2. **Certified applicators cannot prevent secondary poisoning.** No amount of training, bait-station design, or carcass retrieval can eliminate the fundamental pathway: poisoned rodents leave bait stations, move through the environment while dying, and become available to predators and scavengers (Fisher et al. 2003; Murray et al. 2017; Rattner et al. 2014). The slow-acting nature of anticoagulants—intended to avoid bait aversion—ensures that intoxicated animals disperse widely before death, making carcass recovery impractical at scale (Fisher et al. 2003; Sage et al. 2020).
3. **Indoor structural use can remain available as a last resort.** A complete outdoor ban does not eliminate rodenticides; it confines them to indoor structural settings where non-target exposure is minimized, and carcass retrieval is more feasible (Maine BPC 2025). This preserves a tool for situations where exclusion and sanitation are insufficient, while removing the pathway that drives ecosystem contamination (Maine BPC 2025; MDAR 2025).

4. **A bright-line rule is simpler and enforceable.** Attempting to manage outdoor rodenticide use through complex label restrictions, applicator categories, and use-site definitions creates an enforcement and compliance burden the Board cannot realistically shoulder (Maine BPC 2025). A clear rule—no outdoor use—is straightforward to communicate, practical to enforce, and aligns Maine with the most protective jurisdictions nationally and internationally (Maine BPC 2025; Maine Audubon 2026; MDAR 2025; Vermont Fish & Wildlife 2023).

### **Equity and Access Concerns Are Misplaced**

Some stakeholders argue that restricting rodenticides will harm low-income and rural households by removing an “affordable” control option. This framing inverts the actual risk distribution. Lower-income communities often experience higher rodent pressure due to housing quality, waste-management infrastructure, and population density—and they can also bear disproportionate exposure risk, both through accidental ingestions (including in children under five) and through chronic environmental contamination (Caloni et al. 2022; Maine BPC 2025). Allowing ubiquitous outdoor baiting in these neighborhoods does not empower residents; it increases preventable health and environmental hazards while failing to address the structural conditions that drive infestations (Caloni et al. 2022; Maine BPC 2025; Williams et al. 2009).

A policy that shifts resources toward IPM education, technical assistance, municipal “battle books,” and subsidized exclusion services is far more equitable and effective than maintaining broad access to poisons that do not solve infestations and that impose disproportionate risks on the communities they are meant to protect (Lu et al. 2021; Maine BPC 2025; UC ANR 2025; Williams et al. 2009).

### **Recommendations**

I urge the Board to:

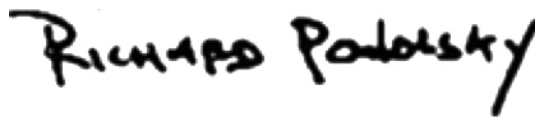
1. **Adopt a complete phase-out of all anticoagulant rodenticides for outdoor use,** including professional applications, with a transition period of 12–24 months to allow applicators and suppliers to adjust.
2. **Retain indoor structural use for certified applicators under tightly defined conditions:** documented evidence of active infestation, documented failure of non-chemical interventions, and mandatory use of tamper-resistant bait stations with regular monitoring and carcass retrieval.
3. **Invest in IPM infrastructure:** develop and widely disseminate best-management-practice guidelines for homeowners, landlords, municipalities, and commercial

applicators; offer training and technical assistance; and create incentive programs for exclusion and sanitation improvements in high-risk neighborhoods.

4. **Monitor and report:** establish a statewide wildlife-monitoring program to track anticoagulant residues in sentinel species (raptors, fishers, foxes) and assess whether contamination levels decline following regulatory changes.
5. **Lead regionally and nationally:** position Maine as a model for science-based rodenticide policy that protects both public health and ecosystem integrity.

We already have the evidence, and it is clear: anticoagulant rodenticides are slow-acting, environmentally persistent, ecosystem-contaminating compounds that do not solve the rodent problems they are intended to address (Fisher et al. 2003; Maine BPC 2025; Rattner et al. 2014; WHO 1995). Maine has an opportunity to move beyond incremental restrictions and adopt a comprehensive, IPM-centered approach that is safer, more effective, and more equitable (Lu et al. 2021; MDAR 2025; Leroy et al. 2026). I respectfully urge you to seize that opportunity.

Sincerely,

A handwritten signature in black ink that reads "Richard Podolsky". The signature is written in a cursive, slightly slanted style.

Richard Podolsky, Ph.D.  
Certified Senior Ecologist  
Certified Senior Ecologist, Ecological Society of America  
Camden, Maine

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## Boyd, Karla

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**From:** Pesticides  
**Sent:** Friday, February 20, 2026 7:57 AM  
**To:** Peacock, Alexander R  
**Subject:** FW: Public Comment for the Board of Pesticides Control's Chapter 40 Second-Generation Anticoagulant Rodenticides Restriction Rulemaking Proposal

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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**From:** Gail Presley  
**Sent:** Thursday, February 19, 2026 4:29 PM  
**To:** Pesticides  
**Subject:** Public Comment for the Board of Pesticides Control's Chapter 40 Second-Generation Anticoagulant Rodenticides Restriction Rulemaking Proposal

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Dear Director Peacock and Members of the Board:

My name is Gail Presley and I am a resident of Rockland. I thank you for the opportunity to submit comments in support of the Board of Pesticides Control's (BPC) proposed restriction on second-generation anticoagulant rodenticides (SGARs).

Second-generation anticoagulant rodenticides are highly toxic and environmentally persistent rodenticides that kill rodents by accumulating in fatty tissues and causing massive hemorrhaging. Unfortunately, predators and scavengers such as owls, hawks, eagles, fishers, foxes, and bobcats are exposed to SGARs when they consume poisoned prey, leading to preventable wildlife deaths. In addition to the secondary exposure to wildlife, SGARs can also poison family pets—leading to expensive and lengthy treatment if identified in time.

What makes SGARs particularly concerning is their ability to persist in the environment for extended periods of time. Because of this, these poisons have ripple effects throughout entire ecosystems. For example, when a raccoon consumes a poisoned mouse, it can also become poisoned. If the raccoon later dies, it may be scavenged by a bird of prey, which then will be exposed to the same toxins. One application of a product containing SGARs can lead to the poisoning of multiple species within our ecosystem.

In order to better protect the wildlife of Maine, the use of rodenticides must be addressed and a restriction on the use of second-generation anticoagulant rodenticides is a great start. Maine would be joining a handful of other states with similar restrictions, once again showing that Maine leads the way in protecting the environment. **I strongly support the Board's proposed Chapter 40 amendment to restrict the use of second-generation anticoagulant rodenticides in Maine.**

Sincerely,

Gail Presley



**Boyd, Karla**

---

**From:** Pesticides  
**Sent:** Wednesday, March 4, 2026 11:57 AM  
**To:** Peacock, Alexander R  
**Subject:** FW: LD 356

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**From:** Anne Rankin  
**Sent:** Wednesday, March 4, 2026 10:55 AM  
**To:** Pesticides  
**Cc:** advocacy@maineaudubon.org  
**Subject:** RE: LD 356

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Director Alex Peacock  
Board of Pesticides Control  
28 State House Station  
Augusta, ME 04333

March 4, 2026

RE: Public Comment for the Board of Pesticides Control's Chapter 40 Second-Generation Anticoagulant Rodenticides Restriction Rulemaking Proposal

Dear Director Peacock and Members of the Board,  
Thank you for the opportunity to submit comments in support of the Board of Pesticides Control's (BPC) proposed restriction on second-generation anticoagulant rodenticides (SGARs). These SGARs are highly toxic, killing rodents by accumulating in fatty tissues and causing massive hemorrhaging. Unfortunately, predators and scavengers such as owls, hawks, eagles, fishers, and bobcats are exposed to SGARs when they consume poisoned prey, leading to preventable wildlife deaths. In addition, SGARs can also

poison family pets, leading to expensive and lengthy treatment if identified in time--or death.

What makes SGARs particularly concerning is their ability to persist in the environment for extended periods of time. Because of this, these poisons have ripple effects throughout entire ecosystems. For example, when a raccoon consumes a poisoned mouse, it can also become poisoned. If the raccoon later dies, it may be scavenged by a bird of prey, which then will be exposed to the same toxins. One application of a product containing SGARs can lead to the poisoning of multiple species within an ecosystem.

In order to better protect Maine's wildlife, we need to restrict the use of SGARs. Maine would be joining a handful of other states with similar restrictions, once again showing that Maine leads the way in protecting the environment. I strongly support the Board's proposed Chapter 40 amendment to restrict the use of second-generation anticoagulant rodenticides in Maine.

Sincerely,  
Anne Rankin  
38 Columbia Ave.  
Brunswick, ME 04011  
207-295-2082

**KANSAS STATE VETERINARY DIAGNOSTIC LABORATORY**  
**1800 DENISON AVENUE**  
**MANHATTAN, KS 66506-5606**  
Laboratory Client Care Phone #: 866-512-5650 Fax #: 785-532-4835  
Email: ClientCare@vet.k-state.edu



Owner:  
**SAVE MASS WILDLIFE**

Rdvm:  
**DR AMANDA LEEF**

Accession Number: D24-081373  
Case Coordinator: STEVE ENSLEY  
Received: 12/03/2024  
Finalized: 12/06/2024  
Species: OWL  
Specimen: LIVER

Clinic:  
**HEAL VETERINARY CLINIC**  
150 BELMONT STREET  
WATERTOWN, MA 02472

**FINAL REPORT**

*This report supercedes all previous reports for this case*

**Toxicology**

**Anticoagulant Panel**

Animal Id: SGIRI4E - Belmont Great Horned Owl  
Specimen Desc: LIVER

Warfarin	< 5.00	ppb	No Ref Interval
Dicoumarol	< 5.00	ppb	No Ref Interval
Diphacinone	< 5.00	ppb	No Ref Interval
Coumachlor	6.40	ppb	No Ref Interval
Chlorophacinone	17.35	ppb	No Ref Interval
Brodifacoum	442.00	ppb	No Ref Interval
Difethialone	66.83	ppb	No Ref Interval
Bromadiolone	150.40	ppb	No Ref Interval

Date Reported  
December 6, 2024

Reported By  
Dr. Yuntao Zhang, PhD, Chemist

Animal Id: VOJUZZ - Arlington Barred Owl  
Specimen Desc: LIVER

Warfarin	< 5.00	ppb	No Ref Interval
Dicoumarol	< 5.00	ppb	No Ref Interval
Diphacinone	< 5.00	ppb	No Ref Interval
Coumachlor	6.40	ppb	No Ref Interval
Chlorophacinone	8.23	ppb	No Ref Interval
Brodifacoum	666.29	ppb	No Ref Interval
Difethialone	45.92	ppb	No Ref Interval
Bromadiolone	24.68	ppb	No Ref Interval

Date Reported  
December 6, 2024

**KANSAS STATE VETERINARY DIAGNOSTIC LABORATORY**  
**1800 DENISON AVENUE**  
**MANHATTAN, KS 66506-5606**  
Laboratory Client Care Phone #: 866-512-5650 Fax #: 785-532-4835  
Email: ClientCare@vet.k-state.edu



Owner:

**SAVE MASSACHUSETTS WILDLIFE**

Rdvm:

**DR AMANDA LEEF**

Clinic:

**HEAL VETERINARY CLINIC**  
150 BELMONT ST  
WATERTOWN, MA 02472

**Accession Number:** D25-005605

**Reference Number:** VY5GYV9

**Case Coordinator:** STEVE ENSLEY

**Received:** 01/28/2025

**Finalized:** 01/31/2025

**Species:** OWL

**Animal ID:** VY5GYU9

**Specimen:** LIVER

**FINAL REPORT**

*This report supercedes all previous reports for this case*

**Toxicology**

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**Anticoagulant Panel**

Animal Id: VY5GYU9 - Somerville Barred Owl  
Specimen Desc: LIVER

Warfarin	< 5.00	ppb	No Ref Interval
Dicoumarol	< 5.00	ppb	No Ref Interval
Diphacinone	< 5.00	ppb	No Ref Interval
Coumachlor	< 5.00	ppb	No Ref Interval
Chlorophacinone	< 5.00	ppb	No Ref Interval
Brodifacoum	135.32	ppb	No Ref Interval
Difethialone	228.59	ppb	No Ref Interval
Bromadiolone	83.47	ppb	No Ref Interval

Date Reported  
January 30, 2025

Reported By  
Dr. Yuntao Zhang, PhD, Chemist

**TOXICOLOGY INTERPRETATION**

Species: OWL  
Animal Id: VY5GYU9

Tox Comments  
brodifacoum, difethialone and bromadiolone were detected in this owl's liver.

Reported By  
Steve Ensley, DVM PhD  
Veterinary Toxicologist

**KANSAS STATE VETERINARY DIAGNOSTIC LABORATORY**  
**1800 DENISON AVENUE**  
**MANHATTAN, KS 66506-5606**  
Laboratory Client Care Phone #: 866-512-5650 Fax #: 785-532-4835  
Email: ClientCare@vet.k-state.edu



Owner:  
**SAVE MASSACHUSETTS WILDLIFE**

**Accession Number:** D25-001614  
**Case Coordinator:** STEVE ENSLEY  
**Received:** 01/10/2025  
**Finalized:** 01/16/2025  
**Specimen:** LIVER

Rdvm:  
**DR AMANDA LEEF**

Clinic:  
**HEAL VETERINARY CLINIC**  
150 BELMONT ST  
WATERTOWN, MA 02472

**FINAL REPORT**

*This report supercedes all previous reports for this case*

**Toxicology**

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**Anticoagulant Panel**

Animal Id:	11/15/24 RTH		
Specimen Desc:	LIVER		
Warfarin	< 5.00	ppb	No Ref Interval
Dicoumarol	< 5.00	ppb	No Ref Interval
Diphacinone	< 5.00	ppb	No Ref Interval
Coumachlor	< 5.00	ppb	No Ref Interval
Chlorophacinone	< 5.00	ppb	No Ref Interval
Brodifacoum	170.95	ppb	No Ref Interval
Difethialone	18.13	ppb	No Ref Interval
Bromadiolone	< 5.00	ppb	No Ref Interval

Date Reported  
January 16, 2025

Reported By  
Dr. Yuntao Zhang, PhD, Chemist

Animal Id:	12/21/24 BARRED OWL		
Specimen Desc:	LIVER		
Warfarin	< 5.00	ppb	No Ref Interval
Dicoumarol	< 5.00	ppb	No Ref Interval
Diphacinone	< 5.00	ppb	No Ref Interval
Coumachlor	< 5.00	ppb	No Ref Interval
Chlorophacinone	< 5.00	ppb	No Ref Interval
Brodifacoum	256.85	ppb	No Ref Interval
Difethialone	32.51	ppb	No Ref Interval
Bromadiolone	130.19	ppb	No Ref Interval

Date Reported  
January 16, 2025

Reported By  
Dr. Yuntao Zhang, PhD, Chemist

# Toxicology

## Anticoagulant Panel

Animal Id: 1/4/25 COOPERS HAWK  
Specimen Desc: LIVER

Warfarin	< 5.00	ppb	No Ref Interval
Dicoumarol	< 5.00	ppb	No Ref Interval
Diphacinone	5.73	ppb	No Ref Interval
Coumachlor	< 5.00	ppb	No Ref Interval
Chlorophacinone	< 5.00	ppb	No Ref Interval
Brodifacoum	48.26	ppb	No Ref Interval
Difethialone	12.28	ppb	No Ref Interval
Bromadiolone	33.51	ppb	No Ref Interval

Date Reported  
January 16, 2025

Reported By  
Dr. Yuntao Zhang, PhD, Chemist

Animal Id: 12/18/24 BARRED OWL  
Specimen Desc: LIVER

Warfarin	< 5.00	ppb	No Ref Interval
Dicoumarol	< 5.00	ppb	No Ref Interval
Diphacinone	< 5.00	ppb	No Ref Interval
Coumachlor	< 5.00	ppb	No Ref Interval
Chlorophacinone	< 5.00	ppb	No Ref Interval
Brodifacoum	8.99	ppb	No Ref Interval
Difethialone	< 5.00	ppb	No Ref Interval
Bromadiolone	362.45	ppb	No Ref Interval

Date Reported  
January 16, 2025

Reported By  
Dr. Yuntao Zhang, PhD, Chemist

Animal Id: 12/26/24 RTH  
Specimen Desc: LIVER

Warfarin	< 5.00	ppb	No Ref Interval
Dicoumarol	< 5.00	ppb	No Ref Interval
Diphacinone	< 5.00	ppb	No Ref Interval
Coumachlor	< 5.00	ppb	No Ref Interval
Chlorophacinone	< 5.00	ppb	No Ref Interval
Brodifacoum	144.91	ppb	No Ref Interval
Difethialone	289.73	ppb	No Ref Interval
Bromadiolone	< 5.00	ppb	No Ref Interval

Date Reported  
January 16, 2025

Reported By  
Dr. Yuntao Zhang, PhD, Chemist

Animal Id: 12/16/24 RTH  
Specimen Desc: LIVER

Warfarin	< 5.00	ppb	No Ref Interval
Dicoumarol	< 5.00	ppb	No Ref Interval
Diphacinone	< 5.00	ppb	No Ref Interval
Coumachlor	< 5.00	ppb	No Ref Interval

## **Toxicology**

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### **Anticoagulant Panel**

Chlorophacinone	< 5.00	ppb	No Ref Interval
Brodifacoum	67.11	ppb	No Ref Interval
Difethialone	464.20	ppb	No Ref Interval
Bromadiolone	< 5.00	ppb	No Ref Interval

Date Reported  
January 16, 2025

Reported By  
Dr. Yuntao Zhang, PhD, Chemist

### **TOXICOLOGY INTERPRETATION**

Species: AVIAN  
Animal Id: 12/16/24 RTH

Tox Comments  
Brodifacoum, difethialone and/or bromadiolone were detected in 1 or more of these liver samples.

Reported By  
Steve Ensley, DVM PhD  
Veterinary Toxicologist

**KANSAS STATE VETERINARY DIAGNOSTIC LABORATORY**  
**1800 DENISON AVENUE**  
**MANHATTAN, KS 66506-5606**  
Laboratory Client Care Phone #: 866-512-5650 Fax #: 785-532-4835  
Email: ClientCare@vet.k-state.edu



Owner:

**SAVE MASSACHUSETTS WILDLIFE**

**Accession Number:** D25-011108

**Case Coordinator:** STEVE ENSLEY

**Received:** 02/20/2025

**Finalized:** 02/26/2025

**Specimen:** LIVER

Rdvm:

**DR AMANDA LEEF**

Clinic:

**HEAL VETERINARY CLINIC**  
150 BELMONT ST  
WATERTOWN, MA 02472

**FINAL REPORT**

*This report supercedes all previous reports for this case*

**Toxicology**

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**Anticoagulant Panel**

Animal Id:	1/27/25 BARRED OWL		
Specimen Desc:	LIVER		
Warfarin	< 5.00	ppb	No Ref Interval
Dicoumarol	< 5.00	ppb	No Ref Interval
Diphacinone	< 5.00	ppb	No Ref Interval
Coumachlor	< 5.00	ppb	No Ref Interval
Chlorophacinone	5.40	ppb	No Ref Interval
Brodifacoum	27.40	ppb	No Ref Interval
Difethialone	14.90	ppb	No Ref Interval
Bromadiolone	582.10	ppb	No Ref Interval

Date Reported  
February 26, 2025

Reported By  
Dr. Yuntao Zhang, PhD, Chemist

Animal Id:	1/30/25 RTH		
Specimen Desc:	LIVER		
Warfarin	< 5.00	ppb	No Ref Interval
Dicoumarol	< 5.00	ppb	No Ref Interval
Diphacinone	< 5.00	ppb	No Ref Interval
Coumachlor	< 5.00	ppb	No Ref Interval
Chlorophacinone	< 5.00	ppb	No Ref Interval
Brodifacoum	325.40	ppb	No Ref Interval
Difethialone	266.40	ppb	No Ref Interval
Bromadiolone	79.70	ppb	No Ref Interval

Date Reported  
February 26, 2025

Reported By  
Dr. Yuntao Zhang, PhD, Chemist

# Toxicology

## Anticoagulant Panel

Animal Id: 2/11/25 RTH  
Specimen Desc: LIVER

Warfarin	< 5.00	ppb	No Ref Interval
Dicoumarol	< 5.00	ppb	No Ref Interval
Diphacinone	< 5.00	ppb	No Ref Interval
Coumachlor	< 5.00	ppb	No Ref Interval
Chlorophacinone	< 5.00	ppb	No Ref Interval
Brodifacoum	133.80	ppb	No Ref Interval
Difethialone	8.20	ppb	No Ref Interval
Bromadiolone	77.50	ppb	No Ref Interval

Date Reported  
February 26, 2025

Reported By  
Dr. Yuntao Zhang, PhD, Chemist

Animal Id: 2/10/25 RTH  
Specimen Desc: LIVER

Warfarin	< 5.00	ppb	No Ref Interval
Dicoumarol	6.90	ppb	No Ref Interval
Diphacinone	< 5.00	ppb	No Ref Interval
Coumachlor	< 5.00	ppb	No Ref Interval
Chlorophacinone	5.00	ppb	No Ref Interval
Brodifacoum	350.00	ppb	No Ref Interval
Difethialone	< 5.00	ppb	No Ref Interval
Bromadiolone	< 5.00	ppb	No Ref Interval

Date Reported  
February 26, 2025

Reported By  
Dr. Yuntao Zhang, PhD, Chemist

Animal Id: 1/25/25 GH0  
Specimen Desc: LIVER

Warfarin	< 5.00	ppb	No Ref Interval
Dicoumarol	< 5.00	ppb	No Ref Interval
Diphacinone	< 5.00	ppb	No Ref Interval
Coumachlor	< 5.00	ppb	No Ref Interval
Chlorophacinone	5.00	ppb	No Ref Interval
Brodifacoum	172.10	ppb	No Ref Interval
Difethialone	78.60	ppb	No Ref Interval
Bromadiolone	39.00	ppb	No Ref Interval

Date Reported  
February 26, 2025

Reported By  
Dr. Yuntao Zhang, PhD, Chemist

Animal Id: 2/10/25 BARRED OWL  
Specimen Desc: LIVER

Warfarin	< 5.00	ppb	No Ref Interval
Dicoumarol	< 5.00	ppb	No Ref Interval
Diphacinone	47.30	ppb	No Ref Interval
Coumachlor	< 5.00	ppb	No Ref Interval

# Toxicology

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## Anticoagulant Panel

Chlorophacinone	20.50	ppb	No Ref Interval
Brodifacoum	31.80	ppb	No Ref Interval
Difethialone	117.20	ppb	No Ref Interval
Bromadiolone	337.80	ppb	No Ref Interval

Date Reported  
February 26, 2025

Reported By  
Dr. Yuntao Zhang, PhD, Chemist

Animal Id: 2/2/25 COOPER'S HAWK  
Specimen Desc: LIVER

Warfarin	< 5.00	ppb	No Ref Interval
Dicoumarol	< 5.00	ppb	No Ref Interval
Diphacinone	< 5.00	ppb	No Ref Interval
Coumachlor	< 5.00	ppb	No Ref Interval
Chlorophacinone	5.30	ppb	No Ref Interval
Brodifacoum	15.70	ppb	No Ref Interval
Difethialone	12.00	ppb	No Ref Interval
Bromadiolone	120.00	ppb	No Ref Interval

Date Reported  
February 26, 2025

Reported By  
Dr. Yuntao Zhang, PhD, Chemist

## TOXICOLOGY INTERPRETATION

Species: HAWK  
Animal Id: 2/2/25 COOPER'S HAWK

Tox Comments  
all 7 livers submitted tested positive for one or more of the anticoagulants in this pane.

Chlorphacinone, brodifacoum, difethialone, bromadiolone and dicoumarol were found in 1 or more of these livers.

Reported By  
Steve Ensley, DVM PhD  
Veterinary Toxicologist



Owner:

**NOT SPECIFIED**

**Accession Number:** D25-029374

**Case Coordinator:** STEVE ENSLEY

**Received:** 04/23/2025

**Finalized:** 04/29/2025

**Specimen:** LIVER

Rdvm:

**DR AMANDA LEEF**

Clinic:

**HEAL VETERINARY CLINIC**  
150 BELMONT ST  
WATERTOWN, MA 02472

**FINAL REPORT**

*This report supercedes all previous reports for this case*

**Toxicology**

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**Anticoagulant Panel**

Animal Id:	4-10-25 SQUIRREL		
Specimen Desc:	LIVER		
Warfarin	< 5.00	ppb	No Ref Interval
Dicoumarol	< 5.00	ppb	No Ref Interval
Diphacinone	< 5.00	ppb	No Ref Interval
Coumachlor	< 5.00	ppb	No Ref Interval
Chlorophacinone	< 5.00	ppb	No Ref Interval
Brodifacoum	11.18	ppb	No Ref Interval
Difethialone	82.72	ppb	No Ref Interval
Bromadiolone	< 5.00	ppb	No Ref Interval

Date Reported  
April 29, 2025

Reported By  
Dr. Yuntao Zhang, PhD, Chemist

Animal Id:	RED TAILED HAWK 02-21-25		
Specimen Desc:	LIVER		
Warfarin	< 5.00	ppb	No Ref Interval
Dicoumarol	< 5.00	ppb	No Ref Interval
Diphacinone	< 5.00	ppb	No Ref Interval
Coumachlor	< 5.00	ppb	No Ref Interval
Chlorophacinone	< 5.00	ppb	No Ref Interval
Brodifacoum	26.17	ppb	No Ref Interval
Difethialone	275.22	ppb	No Ref Interval
Bromadiolone	45.53	ppb	No Ref Interval

Date Reported  
April 29, 2025

Reported By

# Toxicology

## Anticoagulant Panel

Animal Id: BARRED OWL 3-31-25  
Specimen Desc: LIVER

Warfarin	< 5.00	ppb	No Ref Interval
Dicoumarol	< 5.00	ppb	No Ref Interval
Diphacinone	< 5.00	ppb	No Ref Interval
Coumachlor	< 5.00	ppb	No Ref Interval
Chlorophacinone	< 5.00	ppb	No Ref Interval
Brodifacoum	241.40	ppb	No Ref Interval
Difethialone	< 5.00	ppb	No Ref Interval
Bromadiolone	20.03	ppb	No Ref Interval

Date Reported  
April 29, 2025

Reported By  
Dr. Yuntao Zhang, PhD, Chemist

Animal Id: RED TAILED HAWK 3-31  
Specimen Desc: LIVER

Warfarin	< 5.00	ppb	No Ref Interval
Dicoumarol	< 5.00	ppb	No Ref Interval
Diphacinone	< 5.00	ppb	No Ref Interval
Coumachlor	< 5.00	ppb	No Ref Interval
Chlorophacinone	< 5.00	ppb	No Ref Interval
Brodifacoum	155.84	ppb	No Ref Interval
Difethialone	271.97	ppb	No Ref Interval
Bromadiolone	< 5.00	ppb	No Ref Interval

Date Reported  
April 29, 2025

Reported By  
Dr. Yuntao Zhang, PhD, Chemist

Animal Id: BLUE HERON 4-10-25  
Specimen Desc: LIVER

Warfarin	< 5.00	ppb	No Ref Interval
Dicoumarol	< 5.00	ppb	No Ref Interval
Diphacinone	< 5.00	ppb	No Ref Interval
Coumachlor	< 5.00	ppb	No Ref Interval
Chlorophacinone	< 5.00	ppb	No Ref Interval
Brodifacoum	53.13	ppb	No Ref Interval
Difethialone	121.05	ppb	No Ref Interval
Bromadiolone	< 5.00	ppb	No Ref Interval

Date Reported  
April 29, 2025

Reported By  
Dr. Yuntao Zhang, PhD, Chemist

Animal Id: COOPERS HAWK 3-17-25  
Specimen Desc: LIVER

Warfarin	< 5.00	ppb	No Ref Interval
Dicoumarol	< 5.00	ppb	No Ref Interval
Diphacinone	< 5.00	ppb	No Ref Interval
Coumachlor	< 5.00	ppb	No Ref Interval

## Toxicology

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### Anticoagulant Panel

Chlorophacinone	< 5.00	ppb	No Ref Interval
Brodifacoum	< 5.00	ppb	No Ref Interval
Difethialone	< 5.00	ppb	No Ref Interval
Bromadiolone	106.38	ppb	No Ref Interval

Date Reported  
April 29, 2025

Reported By  
Dr. Yuntao Zhang, PhD, Chemist

Animal Id: COYOTE 4-17-25  
Specimen Desc: LIVER

Warfarin	< 5.00	ppb	No Ref Interval
Dicoumarol	< 5.00	ppb	No Ref Interval
Diphacinone	< 5.00	ppb	No Ref Interval
Coumachlor	< 5.00	ppb	No Ref Interval
Chlorophacinone	< 5.00	ppb	No Ref Interval
Brodifacoum	93.19	ppb	No Ref Interval
Difethialone	55.77	ppb	No Ref Interval
Bromadiolone	526.88	ppb	No Ref Interval

Date Reported  
April 29, 2025

Reported By  
Dr. Yuntao Zhang, PhD, Chemist

### TOXICOLOGY INTERPRETATION

Species: COYOTE  
Animal Id: COYOTE 4-17-25

#### Tox Comments

a long acting anticoagulant was identified in each of these 7 samples.  
some samples contained several long acting anticoagulants.

Reported By  
Steve Ensley, DVM PhD  
Veterinary Toxicologist



Owner:  
**NOT SPECIFIED**

**Accession Number:** D25-047828  
**Case Coordinator:** STEVE ENSLEY  
**Received:** 07/01/2025  
**Finalized:** 07/09/2025  
**Specimen:** LIVER

Rdvm:  
**DR AMANDA LEEF**

Clinic:  
**HEAL VETERINARY CLINIC**  
150 BELMONT ST  
WATERTOWN, MA 02472

**FINAL REPORT**

*This report supercedes all previous reports for this case*

**Toxicology**

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**Anticoagulant Panel**

Animal Id: 06/29/2025 SAW WHET FLEDGELY  
Specimen Desc: LIVER

Warfarin	< 5.00	ppb	No Ref Interval
Dicoumarol	< 5.00	ppb	No Ref Interval
Diphacinone	< 5.00	ppb	No Ref Interval
Coumachlor	< 5.00	ppb	No Ref Interval
Chlorophacinone	< 5.00	ppb	No Ref Interval
Brodifacoum	15.24	ppb	No Ref Interval
Difethialone	61.12	ppb	No Ref Interval
Bromadiolone	24.94	ppb	No Ref Interval

Date Reported  
July 9, 2025

Reported By  
Dr. Yuntao Zhang, PhD, Chemist

Animal Id: 05/29/25 BLUE HERON  
Specimen Desc: LIVER

Warfarin	< 5.00	ppb	No Ref Interval
Dicoumarol	< 5.00	ppb	No Ref Interval
Diphacinone	< 5.00	ppb	No Ref Interval
Coumachlor	< 5.00	ppb	No Ref Interval
Chlorophacinone	< 5.00	ppb	No Ref Interval
Brodifacoum	5.94	ppb	No Ref Interval
Difethialone	5.55	ppb	No Ref Interval
Bromadiolone	7.66	ppb	No Ref Interval

Date Reported  
July 9, 2025

Reported By  
Dr. Yuntao Zhang, PhD, Chemist

# Toxicology

## Anticoagulant Panel

Animal Id: 06/06/25 SQUIRREL OTTAWA RD  
Specimen Desc: LIVER

Warfarin	< 5.00	ppb	No Ref Interval
Dicoumarol	5.19	ppb	No Ref Interval
Diphacinone	< 5.00	ppb	No Ref Interval
Coumachlor	< 5.00	ppb	No Ref Interval
Chlorophacinone	< 5.00	ppb	No Ref Interval
Brodifacoum	5.61	ppb	No Ref Interval
Difethialone	5.47	ppb	No Ref Interval
Bromadiolone	13.61	ppb	No Ref Interval

Date Reported  
July 9, 2025

Reported By  
Dr. Yuntao Zhang, PhD, Chemist

Animal Id: 06/08/25 RTH  
Specimen Desc: LIVER

Warfarin	< 5.00	ppb	No Ref Interval
Dicoumarol	18.15	ppb	No Ref Interval
Diphacinone	5.45	ppb	No Ref Interval
Coumachlor	< 5.00	ppb	No Ref Interval
Chlorophacinone	< 5.00	ppb	No Ref Interval
Brodifacoum	7.74	ppb	No Ref Interval
Difethialone	6.51	ppb	No Ref Interval
Bromadiolone	7.39	ppb	No Ref Interval

Date Reported  
July 9, 2025

Reported By  
Dr. Yuntao Zhang, PhD, Chemist

Animal Id: 06/17/25 CHIPMUNK  
Specimen Desc: LIVER

Warfarin	< 5.00	ppb	No Ref Interval
Dicoumarol	< 5.00	ppb	No Ref Interval
Diphacinone	< 5.00	ppb	No Ref Interval
Coumachlor	< 5.00	ppb	No Ref Interval
Chlorophacinone	< 5.00	ppb	No Ref Interval
Brodifacoum	129.37	ppb	No Ref Interval
Difethialone	300.70	ppb	No Ref Interval
Bromadiolone	7.38	ppb	No Ref Interval

Date Reported  
July 9, 2025

Reported By  
Dr. Yuntao Zhang, PhD, Chemist

Animal Id: 06/23/25 FELINE  
Specimen Desc: LIVER

Warfarin	< 5.00	ppb	No Ref Interval
Dicoumarol	5.02	ppb	No Ref Interval
Diphacinone	< 5.00	ppb	No Ref Interval
Coumachlor	< 5.00	ppb	No Ref Interval

# Toxicology

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## Anticoagulant Panel

Chlorophacinone	< 5.00	ppb	No Ref Interval
Brodifacoum	7.34	ppb	No Ref Interval
Difethialone	9.68	ppb	No Ref Interval
Bromadiolone	< 5.00	ppb	No Ref Interval

Date Reported  
July 9, 2025

Reported By  
Dr. Yuntao Zhang, PhD, Chemist

Animal Id:	06/29/25 RED TAIL HAWK		
Specimen Desc:	LIVER		
Warfarin	< 5.00	ppb	No Ref Interval
Dicoumarol	< 5.00	ppb	No Ref Interval
Diphacinone	< 5.00	ppb	No Ref Interval
Coumachlor	< 5.00	ppb	No Ref Interval
Chlorophacinone	< 5.00	ppb	No Ref Interval
Brodifacoum	486.37	ppb	No Ref Interval
Difethialone	6.06	ppb	No Ref Interval
Bromadiolone	7.89	ppb	No Ref Interval

Date Reported  
July 9, 2025

Reported By  
Dr. Yuntao Zhang, PhD, Chemist

Animal Id:	6/18/25 DOV FLEDGE RTH		
Specimen Desc:	LIVER		
Brodifacoum	64.07	ppb	No Ref Interval
Difethialone	7.54	ppb	No Ref Interval
Bromadiolone	8.97	ppb	No Ref Interval

Date Reported  
July 9, 2025

Reported By  
Dr. Yuntao Zhang, PhD, Chemist

## TOXICOLOGY INTERPRETATION

Species:	HAWK
Animal Id:	6/18/25 DOV FLEDGE RTH

Tox Comments  
all of the samples received contained more than one anticoagulant.

contact me with any questions.

Reported By  
Steve Ensley, DVM PhD  
Veterinary Toxicologist

**KANSAS STATE VETERINARY DIAGNOSTIC LABORATORY**  
**1800 DENISON AVENUE**  
**MANHATTAN, KS 66506-5606**  
Laboratory Client Care Phone #: 866-512-5650 Fax #: 785-532-4835  
Email: ClientCare@vet.k-state.edu



Owner:  
**SAVE MASSACHUSETTS WILDLIFE**

Rdvm:  
**DR AMANDA LEEF**

Accession Number: D25-049084  
Case Coordinator: STEVE ENSLEY  
Received: 07/07/2025  
Finalized: 07/09/2025  
Specimen: LIVER

Clinic:  
**HEAL VETERINARY CLINIC**  
150 BELMONT ST  
WATERTOWN, MA 02472

**FINAL REPORT**

*This report supercedes all previous reports for this case*

**Toxicology**

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**Anticoagulant Panel**

Animal Id:	SHREW			
Specimen Desc:	LIVER			
Warfarin	< 5.00	ppb		No Ref Interval
Dicoumarol	< 5.00	ppb		No Ref Interval
Diphacinone	< 5.00	ppb		No Ref Interval
Coumachlor	< 5.00	ppb		No Ref Interval
Chlorophacinone	< 5.00	ppb		No Ref Interval
Brodifacoum	6.13	ppb		No Ref Interval
Difethialone	< 5.00	ppb		No Ref Interval
Bromadiolone	< 5.00	ppb		No Ref Interval

Date Reported  
July 9, 2025

Reported By  
Dr. Yuntao Zhang, PhD, Chemist

Animal Id:	GRACKEL			
Specimen Desc:	LIVER			
Warfarin	< 5.00	ppb		No Ref Interval
Dicoumarol	< 5.00	ppb		No Ref Interval
Diphacinone	< 5.00	ppb		No Ref Interval
Coumachlor	< 5.00	ppb		No Ref Interval
Chlorophacinone	5.95	ppb		No Ref Interval
Brodifacoum	< 5.00	ppb		No Ref Interval
Difethialone	< 5.00	ppb		No Ref Interval
Bromadiolone	< 5.00	ppb		No Ref Interval

Date Reported  
July 9, 2025

Reported By  
Dr. Yuntao Zhang, PhD, Chemist

# Toxicology

## Anticoagulant Panel

Animal Id: BROAD WING HAWK 7/12/25  
Specimen Desc: LIVER

Warfarin	< 5.00	ppb	No Ref Interval
Dicoumarol	< 5.00	ppb	No Ref Interval
Diphacinone	< 5.00	ppb	No Ref Interval
Coumachlor	< 5.00	ppb	No Ref Interval
Chlorophacinone	< 5.00	ppb	No Ref Interval
Brodifacoum	61.37	ppb	No Ref Interval
Difethialone	< 5.00	ppb	No Ref Interval
Bromadiolone	11.28	ppb	No Ref Interval

Date Reported  
August 15, 2025

Reported By  
Dr. Yuntao Zhang, PhD, Chemist

Animal Id: GRAY FOX 7/19/25  
Specimen Desc: LIVER

Warfarin	< 5.00	ppb	No Ref Interval
Dicoumarol	< 5.00	ppb	No Ref Interval
Diphacinone	< 5.00	ppb	No Ref Interval
Coumachlor	< 5.00	ppb	No Ref Interval
Chlorophacinone	681.81	ppb	No Ref Interval
Brodifacoum	47.56	ppb	No Ref Interval
Difethialone	< 5.00	ppb	No Ref Interval
Bromadiolone	438.47	ppb	No Ref Interval

Date Reported  
August 15, 2025

Reported By  
Dr. Yuntao Zhang, PhD, Chemist

Animal Id: SKUNK 7/21/25  
Specimen Desc: LIVER

Warfarin	< 5.00	ppb	No Ref Interval
Dicoumarol	< 5.00	ppb	No Ref Interval
Diphacinone	< 5.00	ppb	No Ref Interval
Coumachlor	< 5.00	ppb	No Ref Interval
Chlorophacinone	< 5.00	ppb	No Ref Interval
Brodifacoum	5.62	ppb	No Ref Interval
Difethialone	< 5.00	ppb	No Ref Interval
Bromadiolone	14.11	ppb	No Ref Interval

Date Reported  
August 15, 2025

Reported By  
Dr. Yuntao Zhang, PhD, Chemist

Animal Id: RED TAIL HAWK 7/24/25  
Specimen Desc: LIVER

Warfarin	< 5.00	ppb	No Ref Interval
Dicoumarol	< 5.00	ppb	No Ref Interval
Diphacinone	22.23	ppb	No Ref Interval
Coumachlor	< 5.00	ppb	No Ref Interval

# Toxicology

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## Anticoagulant Panel

Chlorophacinone	< 5.00	ppb	No Ref Interval
Brodifacoum	< 5.00	ppb	No Ref Interval
Difethialone	< 5.00	ppb	No Ref Interval
Bromadiolone	26.06	ppb	No Ref Interval

Date Reported  
August 15, 2025

Reported By  
Dr. Yuntao Zhang, PhD, Chemist

Animal Id: COYOTE 7/25/25  
Specimen Desc: LIVER

Warfarin	< 5.00	ppb	No Ref Interval
Dicoumarol	< 5.00	ppb	No Ref Interval
Diphacinone	< 5.00	ppb	No Ref Interval
Coumachlor	< 5.00	ppb	No Ref Interval
Chlorophacinone	12.91	ppb	No Ref Interval
Brodifacoum	7.40	ppb	No Ref Interval
Difethialone	< 5.00	ppb	No Ref Interval
Bromadiolone	1432.55	ppb	No Ref Interval

Date Reported  
August 15, 2025

Reported By  
Dr. Yuntao Zhang, PhD, Chemist

Animal Id: SKUNK 7/25/25  
Specimen Desc: LIVER

Warfarin	< 5.00	ppb	No Ref Interval
Dicoumarol	< 5.00	ppb	No Ref Interval
Diphacinone	< 5.00	ppb	No Ref Interval
Coumachlor	< 5.00	ppb	No Ref Interval
Chlorophacinone	< 5.00	ppb	No Ref Interval
Brodifacoum	61.57	ppb	No Ref Interval
Difethialone	< 5.00	ppb	No Ref Interval
Bromadiolone	57.32	ppb	No Ref Interval

Date Reported  
August 15, 2025

Dr. Yuntao Zhang, PhD, Chemist

Animal Id: TURTLE 07/10/25  
Specimen Desc: LIVER

Warfarin	< 5.00	ppb	No Ref Interval
Dicoumarol	< 5.00	ppb	No Ref Interval
Diphacinone	< 5.00	ppb	No Ref Interval
Coumachlor	< 5.00	ppb	No Ref Interval
Chlorophacinone	< 5.00	ppb	No Ref Interval
Brodifacoum	391.32	ppb	No Ref Interval
Difethialone	< 5.00	ppb	No Ref Interval
Bromadiolone	< 5.00	ppb	No Ref Interval

Date Reported  
August 15, 2025

Reported By  
Dr. Yuntao Zhang, PhD, Chemist

**RE: Public Comment for the Board of Pesticides Control's Chapter 40 Second-Generation Anticoagulant Rodenticides Restriction Rulemaking Proposal**

Dear Director Peacock and Members of the Board:

My name is Sandra Scholar and I am a full-time Maine resident and registered voter in Piscataquis County. Thank you for the opportunity to submit comments in support of the Board of Pesticides Control's (BPC) proposed restriction on second-generation anticoagulant rodenticides (SGARs), the highly toxic and environmentally persistent rodenticides that kill rodents by accumulating in fatty tissues and causing massive hemorrhaging.

Unfortunately, predators and scavengers such as bald eagles, owls, hawks, vultures, black bears, foxes, fishers, Canada lynx, and bobcats, among others – which are themselves important for rodent control -- are also poisoned when they consume poisoned prey. These animals themselves may die, and be fed on by other scavengers, who in turn may die. Because SGARs can persist in the environment for an extended period of time, this chain of poisoned animals being eaten and then those predators/scavengers themselves dying and being eaten leads to many preventable wildlife deaths in an ongoing and continuing spiral of death, resulting in ripple effects throughout entire ecosystems. One application of a product containing SGARs can lead to the poisoning of multiple species within an ecosystem, and suppress the populations of the very animals which provide important natural rodent control services.

Many of these same species – bald eagles, owls, hawks, etc. – are popular with bird watchers, both Maine residents and the many tourists who come to our beautiful state to view wildlife, and so this is also, in part, potentially an economic issue for the state. People love to see bald eagles, for example, but they do not love seeing dead bald eagles. Our wildlife should be protected, not only because healthy wildlife populations are necessary for a healthy environment, but also because they bring a substantial economic benefit to the state. Moreover, all migratory birds, including hawks and owls, are protected by regulations under the Migratory Bird Treaty Act, making “incidental killings” illegal for any of these 1,000+ bird species. No permits are currently administered. Unpermitted killing of eagles is also prohibited under the Bald and Golden Eagle Protection Act.

In addition to the danger to wildlife, SGARs can also poison family pets—leading to death, or to expensive and lengthy treatment if identified in time. They may also pose health and safety issues to humans.

In order to better protect the wildlife of Maine, the use of rodenticides must be addressed, and a restriction on the use of SGARs is a great start. Maine would be joining a handful of other states with similar restrictions, once again showing that Maine leads the way in protecting the environment. I strongly support the Board's proposed Chapter 40 amendment to restrict the use of second-generation anticoagulant rodenticides in Maine.

Sincerely,

Sandra Scholar, Esq.

**Boyd, Karla**

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**From:** Pesticides  
**Sent:** Tuesday, March 10, 2026 8:47 AM  
**To:** Peacock, Alexander R  
**Subject:** FW: I support rule-making that restricts rodenticides

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**From:** Robin Hadlock Seeley  
**Sent:** Monday, March 9, 2026 4:21 PM  
**To:** Pesticides  
**Subject:** I support rule-making that restricts rodenticides

**EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.**

Hello Pesticide Board,

I am a member of Maine Audubon and I also conduct grant-supported research on wildlife use of marine habitats in the Shoreland zone.

I support rule-making that restricts the use of products containing brodifacoum, bromadiolone, difenacoum, and difethialone.

These rodenticides kill Maine wildlife, including wildlife protected by other Maine rules, laws, and plans. As a certified ecologist, I am opposed to killing random wildlife as a side effect of killing target rodents. I've seen photos of eagles and owls poisoned by these rodenticides - it's a horrible death.

Thank you for making rules that restricts these rodenticides products - for Maine's incredible wildlife.

Best,  
Robin

**Robin Hadlock Seeley, Ph.D., Marine Scientist**  
Executive Director, Maine Rockweed Coalition (EIN 86-39652243)  
2022 Natural Resources Council of Maine, Conservation Leadership Awardee  
Certified Senior Ecologist, Ecological Society of America

Contact:  
PO Box R, Pembroke, ME 04666 | 207.216.5999 cell

MAR 09 2026

March 5, 2026

Director Alex Peacock  
Board of Pesticides Control  
28 State House Station  
Augusta, ME 04333

**RE: Public Comment for the Board of Pesticides Control's Chapter 40 Second-Generation Anticoagulant Rodenticides Restriction Rulemaking Proposal**

Dear Director Peacock and Members of the Board:

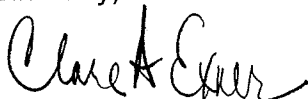
My name is Clare Exner and I am a resident of Mapleton. I thank you for the opportunity to submit comments in support of the Board of Pesticides Control's (BPC) proposed restriction on second-generation anticoagulant rodenticides (SGARs).

Second-generation anticoagulant rodenticides are highly toxic and environmentally persistent rodenticides that kill rodents by accumulating in fatty tissues and causing massive hemorrhaging. Unfortunately, predators and scavengers such as owls, hawks, eagles, fishers, and bobcats are exposed to SGARs when they consume poisoned prey, leading to preventable wildlife deaths. In addition to the secondary exposure to wildlife, SGARs can also poison family pets—leading to expensive and lengthy treatment if identified in time.

What makes SGARs particularly concerning is their ability to persist in the environment for extended periods of time. Because of this, these poisons have ripple effects throughout entire ecosystems. For example, when a raccoon consumes a poisoned mouse, it can also become poisoned. If the raccoon later dies, it may be scavenged by a bird of prey, which then will be exposed to the same toxins. One application of a product containing SGARs can lead to the poisoning of multiple species within an ecosystem.

In order to better protect the wildlife of Maine, the use of rodenticides must be addressed and a restriction on the use of second-generation anticoagulant rodenticides is a great start. Maine would be joining a handful of other states with similar restrictions, once again showing that Maine leads the way in protecting the environment. **I strongly support the Board's proposed Chapter 40 amendment to restrict the use of second-generation anticoagulant rodenticides in Maine.**

Sincerely,



MAR 0 8 2026

Wendy Van Dyke  
56 Crosby Road  
Arrowsic, ME 04530

Director Alex Peacock  
Board of Pesticides Control  
28 State House Station  
Augusta, ME 04333

February 24, 2026

Dear Director Peacock and Members of the Board:

Thank you for the opportunity to submit comments in support of the Board of Pesticides Control's (BPC) proposed restriction on second-generation anticoagulant rodenticides (SGARs).

Recently, I have learned about second-generation anticoagulant rodenticides, which are highly toxic and environmentally persistent chemicals that kill rodents by accumulating in fatty tissues and causing massive hemorrhaging. Because they also persist in the environment for extended periods of time, they can easily harm species other than rodents. For example, when a raccoon consumes a poisoned mouse, it can also become poisoned. If the raccoon later dies, it may be scavenged by a bird of prey, which then will be poisoned as well. One application of a product containing SGARs can lead to the poisoning of multiple species within an ecosystem, including such predators and scavengers as owls, hawks, eagles, fishers and bobcats. In addition to the secondary exposure to wildlife, SGARs can also poison family pets—leading to expensive and lengthy treatment or even death. Upon learning all of this, I cancelled my “bait box” anti-rodent pest service a few months ago. But these SGARs are too harmful and should simply not be so widely available.

In order to better protect the wildlife of Maine, the use of rodenticides must be addressed and a restriction on the use of second-generation anticoagulant rodenticides is a great start. Maine would be joining a handful of other states with similar restrictions, once again showing that Maine leads the way in protecting the environment. I strongly support the Board's proposed Chapter 40 amendment to restrict the use of second-generation anticoagulant rodenticides in Maine.

Sincerely,

A handwritten signature in cursive script that reads "Wendy Van Dyke". The signature is written in black ink and is positioned above the printed name.

Wendy Van Dyke

3 March, 2026

**RE: Public Comment for the Board of Pesticides Control's Chapter 40  
Second-Generation Anticoagulant Rodenticides Restriction  
Rulemaking Proposal**

Dear Director Peacock and Members of the Board:

My name is Jennifer Jones and I live in Saco, ME. I thank you for the opportunity to submit comments in support of the Board of Pesticides Control's (BPC) proposed restriction on second-generation anticoagulant rodenticides (SGARs).

The number one threat to wildlife and our own environment is human activity on the landscape. Studies show that Commercial and Residential development is at the top of the list of threats to wildlife and ecosystems, with impacts tied to the resulting habitat loss, fragmentation, roads, domestic animals, and the use of toxins such as rodenticides and pesticides that come with that development.

Studies show SGARs are highly toxic and environmentally persistent rodenticides that kill rodents by accumulating in fatty tissues and causing massive hemorrhaging. Unfortunately, those rodents are often not retrieved from the landscape, and are consumed by birds of prey and scavengers. When birds of prey consume these rodents, the toxins cause tremors, organ failure and uncontrolled bleeding to inhibiting Vitamin K. Even at lower exposure, the impacts of ingesting SGARs include chronic, sublethal effects such as reduced hunting ability, anemia, and weakness, which in the wild also means death.

One young Great Horned Owl hatchling can consume 6-8 rodents in a day. This tracks with studies that show a Great Horned Owl family can consume 2,00-4,000 rodents annually. Thus, when a Great Horned Owl (and other raptors on the landscape) is removed from an ecosystem due to SGARs (which includes our parks, neighborhoods, schools), there is a loss of the predation of thousands of rodents annually. Raptors invisibly, yet critically, prevent the spread of zoonotic rodent disease such as Hantavirus and Salmonellosis through their consumption of rodents.

Conserving and protecting wildlife such as raptors by prohibiting the use of SGARs offers natural, effective pest control to our parks,

neighborhoods, schools, and ecosystems. Raptors and scavengers balancing rodent populations on the landscape does not come with the toxicity risks to pets and humans that we get with SGARs. Of particular concern are the studies that show SGARs leaching into ground water or surface water, contaminating supplies that feed into our drinking water systems.

Beyond the health concerns, we also feel it is important to note that Maine's Outdoor Recreation (\$3.4B) and Nature Based Tourism (\$8B) sectors are among the highest contributors to state GDP in the country. Wildlife viewing, birding, and photography are all critical drivers of that income. For the health of our wildlife and citizens in Maine, I strongly support the Board's proposed Chapter 40 amendment to restrict the use of second-generation anticoagulants as a first step.

Sincerely,

Jennifer Jones, Saco, ME



## SGARs Fact Sheet

**What are SGARs?:** Second-generation anticoagulant rodenticides (SGARs) are a class of poisons that prevent blood clotting. When an animal ingests a lethal dose of a SGAR, it dies slowly, making it an easy target for predators. This makes SGARs harmful for predators and pets - when they eat poisoned rodents, they develop painful and often fatal internal bleeding.

While federal law bans the retail sale of SGARs, these poisons remain legal - and widely used - by licensed pest control professionals. SGARs come in black bait boxes & include:

- Brodifacoum (Brand names Mouser, Ratak, Talon)
- Bromadiolone (Maki Mini Blok, Contrac)
- Difenacoum (Di-Kill)
- Difethialone (First Strike, Hombre)



### SGARs Harm Wildlife and Pets:

New England veterinarians treat hundreds of raptors, foxes, and coyotes for critical SGAR poisoning each year. Recent necropsies of red foxes, gray foxes, and fishers by the NH Veterinary Diagnostic Laboratory at UNH found that 34 of 35 animals from throughout the state had been exposed to rodenticides. Several New Hampshire Bald Eagles have been poisoned by SGARs in the past five years. A recent study found that 100% of Red-tailed Hawks tested at a Massachusetts wildlife clinic had SGARs in their bloodstream.



Household pets also can be affected either by directly consuming bait or through secondary poisoning.

### We Can Control Rodents Without

**Poison:** Rodenticides aren't a long-term solution to rodent problems. Rodents will keep coming back as long as they can find food and an entry route.



### Here's how to reduce rodent populations without rodenticides:

- **Exclude them:** Rodents can fit through holes as small as a quarter. Keep them out of your space by filling all holes and closing gaps under doors and between windows.
- **Starve them:** Rodents won't stick around if there's nothing to eat! Remove food sources by covering garbage cans, harvesting garden produce quickly, and never leaving pet food out for long periods.
- **Target them:** Without food or access, rodents won't last long. But if you must get rid of remaining rodents quickly, use non-poison methods like snap-traps or electro-traps.

**Scan for more information  
on the rodenticides issue:**



To scan the QR code, open the camera app on your phone and point your phone's camera at the QR code. Your phone should recognize the QR and display a notification or banner, tap the notification to open the Rodenticides webpage on our website.

You may also type this URL to open the page:  
[nhandubon.org/policy/rodenticides](http://nhandubon.org/policy/rodenticides)

## Boyd, Karla

---

**From:** Pesticides  
**Sent:** Tuesday, February 24, 2026 9:47 AM  
**To:** Peacock, Alexander R  
**Subject:** FW: RE: Public Comment for the Board of Pesticides Control's Chapter 40 Second-Generation Anticoagulant Rodenticides Restriction Rulemaking Proposal

-----Original Message-----

From: Paul Sheridan <sheridanpa@earthlink.net>  
Sent: Monday, February 23, 2026 12:11 PM  
To: Pesticides <Pesticides@maine.gov>  
Subject: RE: Public Comment for the Board of Pesticides Control's Chapter 40 Second-Generation Anticoagulant Rodenticides Restriction Rulemaking Proposal

EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Director Alex Peacock  
Board of Pesticides Control  
28 State House Station Augusta, ME 04333

Date, Feb. 23, 2026

RE: Public Comment for the Board of Pesticides Control's Chapter 40 Second-Generation Anticoagulant Rodenticides Restriction Rulemaking Proposal

Dear Director Peacock and Members of the Board:

My name is Paul Sheridan and I am a resident of Northport. I thank you for the opportunity to submit comments in support of the Board of Pesticides Control's (BPC) proposed restriction on second-generation anticoagulant rodenticides (SGARs).

Second-generation anticoagulant rodenticides are highly toxic and environmentally persistent rodenticides that kill rodents by accumulating in fatty tissues and causing massive hemorrhaging. Unfortunately, predators and scavengers such as owls, hawks, eagles, fishers, and bobcats are exposed to SGARs when they consume poisoned prey, leading to preventable wildlife deaths. In addition to the secondary exposure to wildlife, SGARs can also poison family pets—leading to expensive and lengthy treatment if identified in time.

What makes SGARs particularly concerning is their ability to persist in the environment for extended periods of time. Because of this, these poisons have ripple effects throughout entire ecosystems. For example, when a raccoon consumes a poisoned mouse, it can also become poisoned. If the raccoon later dies, it may be scavenged by a bird of prey, which then will be exposed to the same toxins. One application of a product containing SGARs can lead to the poisoning of multiple species within an ecosystem.

In order to better protect the wildlife of Maine, the use of rodenticides must be addressed and a restriction on the use of second-generation anticoagulant rodenticides is a great start. Maine would be joining a handful of other states with similar restrictions, once again showing that Maine leads the way in protecting the environment. I strongly support the Board's proposed Chapter 40 amendment to restrict the use of second-generation anticoagulant rodenticides in Maine.

Thank you for your work. Dirigo...

Paul Sheridan  
88 Hart Rd  
Northport, ME 04849-3419  
207-322-3961 Cell  
207-338-0350 Hm  
sheridanpa@earthlink.net

\*\*\*\*\*

**Boyd, Karla**

---

**From:** Pesticides  
**Sent:** Monday, March 2, 2026 8:10 AM  
**To:** Peacock, Alexander R  
**Subject:** FW: Public comments for Board of Peaticides Control's Chapter 40 Second generation anticoagulant Rodenticides Restrictions Rule making Proposal

-----Original Message-----

From: Susan Sorkin <suburbanvolvo@icloud.com>

Sent: Sunday, March 1, 2026 3:45 PM

To: Pesticides <Pesticides@maine.gov>

Subject: Public comments for Board of Peaticides Control's Chapter 40 Second generation anticoagulant Rodenticides Restrictions Rule making Proposal

EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Director Peacock and Members of the Board,

My name is Susan Sorkin and I live in Saco, Maine. I am in support of the Board of Pesticides proposed restriction for Second generation anticoagulant Rodenticides.

I have personally seen the horrible deaths of our native owls, hawks scavenger animals by eating poisoned mice. It is not a quick and painless death. When they feed these poisoned mice to their chicks it wipes out another generation of the majestic raptors.

We live in Maine which is known for its pristine landscapes and abundant wildlife. I travel a lot internationally and locally and when people hear I am from Maine they tell me that Maine is one of their bucket list of places to go because of the abundance of nature we have in our beautiful state. Please keep in mind that Maines tourism for nature based activities is over a \$10 billion industry that will suffer if we don't do something to preserve nature and its inhabitants.

Susan Sorkin

## Boyd, Karla

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**From:** Pesticides  
**Sent:** Thursday, February 26, 2026 8:04 AM  
**To:** Peacock, Alexander R  
**Subject:** FW: Second Generation Anticoagulant Rodenticide use in Maine

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**From:** Joshua Sparks  
**Sent:** Wednesday, February 25, 2026 3:46 PM  
**To:** Pesticides  
**Subject:** Second Generation Anticoagulant Rodenticide use in Maine

**EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.**

Dear Director Peacock and Members of the Board:

My name is Joshua Sparks and I am a resident of New Gloucester. I thank you for the opportunity to submit comments in support of the Board of Pesticides Control's (BPC) proposed restriction on second-generation anticoagulant rodenticides (SGARs). I strongly support any restrictions on the use of second-generation anticoagulant rodenticides in Maine. I am a current ADC (animal damage control) agent and was a wildlife rehabilitator for close to 30 years so have first hand experience with nuisance wildlife as well as animals injured or sickened due to human causes. Most of the pest control I do is for larger animals and is almost exclusively live trapping and relocating, but I do do some lethal trapping of rodents like mice and rats. I often set baited traps in areas where there are multiple bait boxes of rodenticides that other companies have set yet catch rodents there anyway. While it can be more labor intensive to repeatedly set traps, you must also repeatedly set poison. It briefly kills the initial animals that eat it but when it is gone, new animals move into the vacated space. In the meantime those poisoned animals sometimes die underground but are often eaten by other animals. Important urban predators such as hawks, owls and foxes ingest those poisoned rodents. Many of these animals die of secondary poisoning and then they are no longer on the landscape to prey on the problem animals and the density of those rodents actually goes up. There are also links to secondary poisoning contributing to immune system problems which can lead to secondary infections such as mange. These sick predators then become a public safety issue. Members of the public feel bad for them and leave out food, encouraging those sick animals into closer proximity to humans and elevating the risk of bites or disease transmission to people or pets. Those targeted rodents also sometimes die in the structure of peoples homes. I have heard and seen first hand how terrible it is if a rat or squirrel dies in the wall or ceiling of your house. The smell is terrible and the damage done trying to find the carcass and remove it can be quite extensive and quite costly to repair. I personally do not like any rodenticides, but these Anticoagulants persist in the food chain, not only killing and sickening the wildlife that naturally helps keep these rodents in check, but in my opinion, they also increase the danger to the public through possible negative interactions with sick predators as well as the risk of animals dying inside their homes. I believe blocking access, limiting food sources and encouraging healthy predations with some limited trapping as needed is a solution far better for the environment, the public and our pets.

Thank you for your time

Josh Sparks

## Boyd, Karla

---

**From:** Pesticides  
**Sent:** Tuesday, February 24, 2026 9:48 AM  
**To:** Peacock, Alexander R  
**Subject:** FW: rodenticides

-----Original Message-----

From: Sylvia Sullivan <rssm@maine.rr.com>  
Sent: Monday, February 23, 2026 3:38 PM  
To: Pesticides <Pesticides@maine.gov>  
Subject: rodenticides

EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good afternoon,

My name is Sylvia Sullivan and I am a registered voter in Raymond. I am a pet owner and also live in the woods on Sebago Lake. We enjoy the birds and animals that live in these woods with us. I am asking the committee to vote to restrict second-generation rodenticides, a further protection offered in LD 356. These SGARs are unintentionally poisoning the wildlife that may eat rodents as well as other animals that may ingest the rodent.

Thank you for your attention and compassionate concern.

Sylvia S. Sullivan  
1 Cape Road  
Raymond, Maine

**Boyd, Karla**

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**From:** Pesticides  
**Sent:** Tuesday, February 24, 2026 9:48 AM  
**To:** Peacock, Alexander R  
**Subject:** FW: Second-Generation Anticoagulant Rodenticides Restriction Rule-making Proposal

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**From:** Simon Thompson  
**Sent:** Monday, February 23, 2026 5:14 PM  
**To:** Pesticides  
**Subject:** Second-Generation Anticoagulant Rodenticides Restriction Rule-making Proposal

**EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.**

Director Alex Peacock  
Board of Pesticides Control  
28 State House Station  
Augusta, ME 04333

February 23, 2026

**RE: Public Comment for the Board of Pesticides Control's Chapter 40 Second-Generation Anticoagulant Rodenticides Restriction Rulemaking Proposal**

Dear Director Peacock and Members of the Board:

My name is Simon Thompson and I am a resident of Portland, and the Legislative Chair of Maine Friends of Animals. I am submitting comments in support of the Board of Pesticides Control's (BPC) proposed restriction on second-generation anticoagulant rodenticides (SGARs).

Maine takes pride in its commitment to wildlife and habitat conservation. Restricting the use of second-generation anticoagulant rodenticides will further that legacy by protecting all types of species, as well as family pets, from the persistent toxicity of these products.

As you likely know, SGARs persist in the environment for an extended period of time, resulting in impacts not just to targeted species but to any animals that feed on the dead rodent: vultures, bobcats, eagles, all types of wildlife. The impacts of the toxin ripple through the ecosystem.

Several other states have already banned SGARs and it would be an important and reasonable step for Maine to take. I strongly support the Board's proposed Chapter 40 amendment to restrict the use of second-generation anticoagulant rodenticides in Maine, so that Maine can continue its strong record on animals and their habitats.

Thank you,

Simon Thompson  
Portland, Maine

**Boyd, Karla**

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**From:** Pesticides  
**Sent:** Monday, March 2, 2026 8:10 AM  
**To:** Peacock, Alexander R  
**Subject:** FW: Ban SGARs Public Comment

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**From:** Bert Troughton  
**Sent:** Sunday, March 1, 2026 9:09 AM  
**To:** Pesticides  
**Subject:** Ban SGARs Public Comment

**EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.**

**RE: Public Comment for the Board of Pesticides Control's Chapter 40 Second-Generation Anticoagulant Rodenticides Restriction Rulemaking Proposal**

Director Peacock and Members of the Board:

My name is Bert Troughton. I live in New Gloucester and also own property in Gouldsboro.

Thank you for accepting my comments in **support of the BPC's proposed restriction on second-generation anticoagulant rodenticides** (SGARs).

As you know, second-generation anticoagulant rodenticides are highly toxic and persist in the environment, impacting wildlife and pets well beyond the target species. Indeed, I had a harrowing experience when my dog was impacted. Thankfully she recovered, but she was gravely ill and it wasn't easy to diagnose the situation.

As a homeowner, I do understand the need to control rodents. I have found that the experts on this topic are correct – that the most effective approach is what experts refer to as an 'integrated management strategy.' We have implemented clean-up, exclusion and targeted trapping very successfully so that pets and birds of prey are not subject to inadvertent poisoning. This is better for surrounding water, as well.

I strongly support the Board's proposed Chapter 40 amendment to restrict the use of second-generation anticoagulant rodenticides in Maine.

Thank you.

Bert Troughton  
14 Dougherty Rd  
New Gloucester ME 04260  
[bert@joandempsey.com](mailto:bert@joandempsey.com)



Photos courtesy of Margaret Lewis



# A second bald eagle dies in Massachusetts in a span of 5 months after ingesting prey that had been poisoned

Published: Aug. 13, 2021, 8:16 a.m.





Photo courtesy of MJ Keeler





Photos courtesy of New England Wildlife Center



Photo courtesy of MJ Keeler





Wildlife rehabilitators are treating increasing caseloads of wildlife patients that are requiring more aggressive and prolonged treatment.

Photo courtesy of New England Wildlife Center

## News



ERIN HUTCHINGS, CAPE ANN WILDLIFE

MAY 13, 2024 | ANIMAL LAW & POLICY CLINIC, MEDIA RELEASE

### Rodenticides Are Killing Massachusetts Wildlife; Will Authorities Step Up?

For Immediate Release: May 13, 2024

# State Authorities Vote to Undertake Scientific Review of Rodenticides but Fail to Take Immediate Action to Protect Wildlife and Companion Animals

By Nirva Patel / January 28, 2025



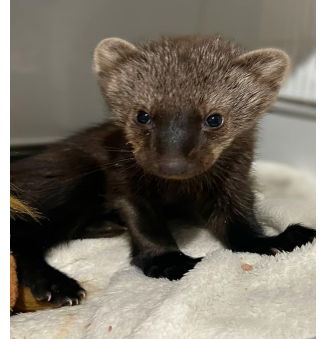


Screech owl photo Patty Sears-Joyce; Barred owl bleeding from mouth Erin Hutchings

# Rodenticides: Not Just Deadly to Raptors



*This young coyote showing signs of poisoning was found on*



Photos of fox and skunk courtesy of Newhouse Wildlife

## News



ERIN HUTCHINGS, CAPE ANN WILDLIFE

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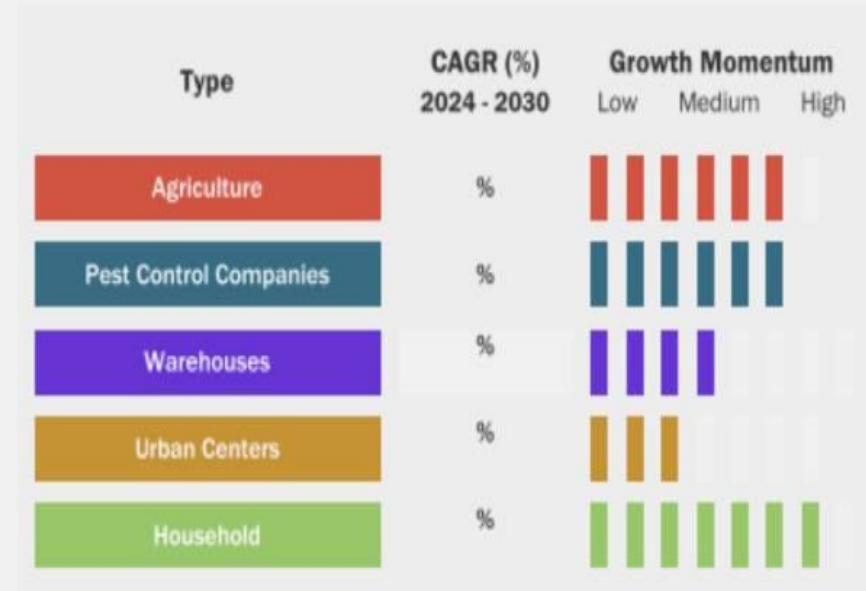
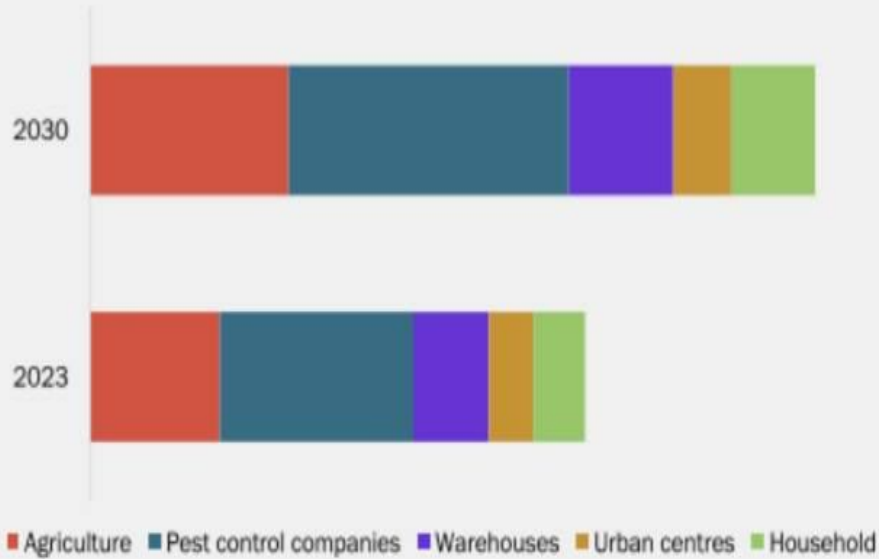


# MSPCA Angell Centers

- Reports dozens of cases of rodenticide poisoning annually.
- Cases peak during spring and fall.
- The cost of veterinary care can often exceed \$5,000 and take weeks of supportive care and medication.

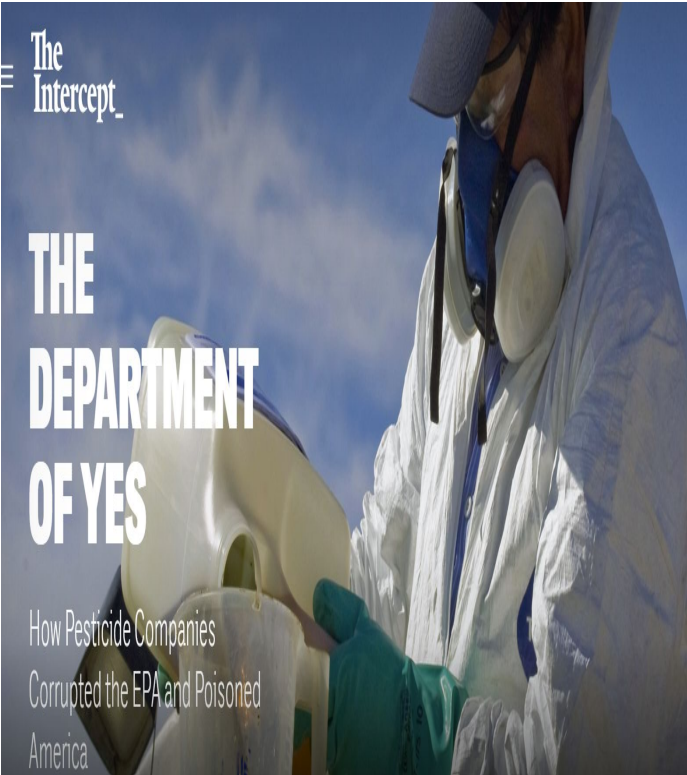


Fig.4 Application Snapshot, 2023



- Globally, pest companies were found to be the largest purchasers/users of rodenticides BY FAR than any other single sector (40% of the market share).
- The agricultural sector comes in second.
- Private households made up the smallest share.

Source: Grand View Research



**Regulation**

## Why the U.S. Is Losing the Fight to Ban Toxic Chemicals

From a powerful chemical industry that helped write the toxic substances law to an underfunded EPA lacking in resolve, the flaws in the American chemical regulatory apparatus run deep.

by Neil Bedi, Sharon Lerner and Kathleen McGrory

Dec. 14, 2022, 7 a.m. EST

The Intercept 

## EPA WHISTLEBLOWERS PROVIDE NEW EVIDENCE OF ONGOING FAILURE TO ASSESS DANGEROUS CHEMICALS

Managers in the EPA's New Chemicals Division have refused to assess the risk of cancer and other harms from chemicals deemed to be "corrosive."

Sharon Lerner

August 1 2022, 10:37 a.m.

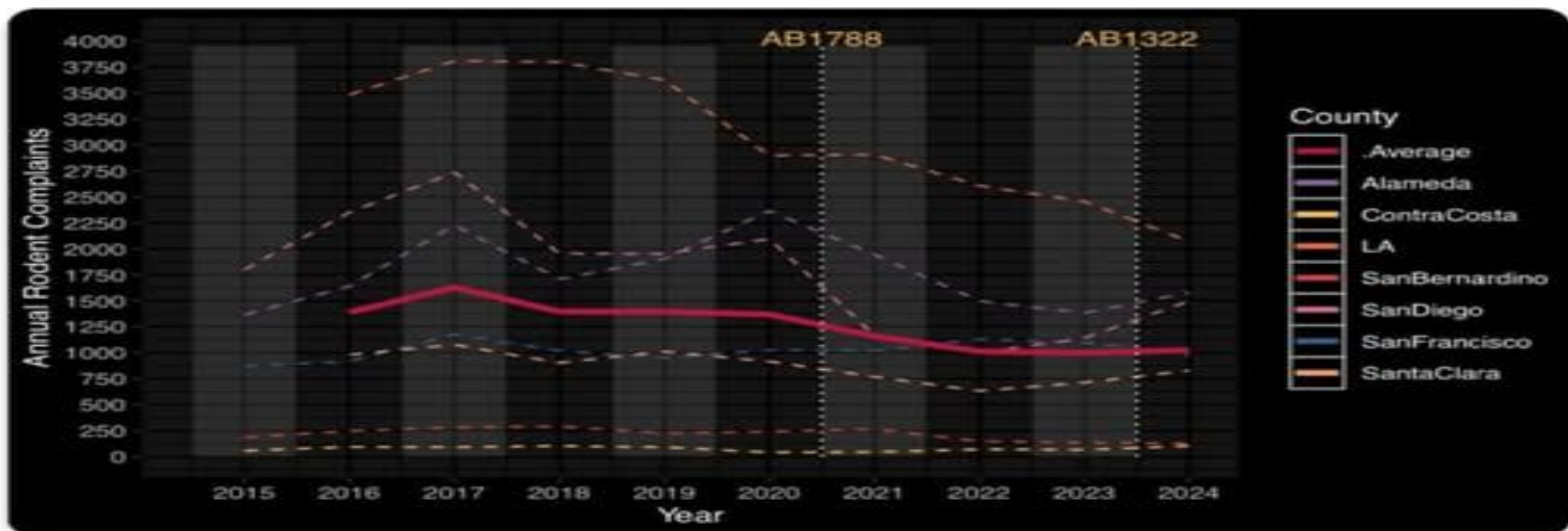
# Tamper-Resistant Does Not = Tamper Proof



Yale University, Photo courtesy of Farm River Wildlife Rescue and Rehabilitation

E. Arlington squirrel tampered w/ & distributed difethialone bait in nearby yards

## Rodent complaints have gone DOWN in California since their anticoagulant rodenticide moratoriums!



Data was obtained through California Public Record Act (PRA) requests issued to each county's Public Health and/or Environmental Health Department. PRAs requested all public rodent complaints received from January 1st 2015 to December 31st 2024. Contra Costa and LA county did not collect/record rodent complaint data in 2015. Average is calculated for years 2016 to 2024, due to missing data. Rodent complaint data is used as a proxy/correlate for rodent population size. Credit: Dr. Rebecca Gooley

**Boyd, Karla**

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**From:** Pesticides  
**Sent:** Tuesday, February 24, 2026 1:18 PM  
**To:** Peacock, Alexander R  
**Subject:** FW: submitting comments on SGAR use- restrict them

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**From:** Peggy York  
**Sent:** Monday, February 23, 2026 9:38 PM  
**To:** Pesticides  
**Subject:** submitting comments on SGAR use- restrict them

**EXTERNAL: This email originated from outside of the State of Maine Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.**

Dear Director Peacock and Members of the Board:

My name is Peggy York and I am a resident of Portland. I thank you for the opportunity to submit comments in support of the Board of Pesticides Control's (BPC) proposed restriction on second-generation anticoagulant rodenticides (SGARs). Second-generation anticoagulant rodenticides are highly toxic and environmentally persistent rodenticides that kill rodents by accumulating in fatty tissues and causing massive hemorrhaging. Unfortunately, predators and scavengers such as owls, hawks, eagles, fishers, and bobcats are exposed to SGARs when they consume poisoned prey, leading to preventable wildlife deaths. In addition to the secondary exposure to wildlife, SGARs can also poison family pets—leading to expensive and lengthy treatment if identified in time. What makes SGARs particularly concerning is their ability to persist in the environment for extended periods of time. Because of this, these poisons have ripple effects throughout entire ecosystems. For example, when a raccoon consumes a poisoned mouse, it can also become poisoned. If the raccoon later dies, it may be scavenged by a bird of prey, which then will be exposed to the same toxins. One application of a product containing SGARs can lead to the poisoning of multiple species within an ecosystem. In order to better protect the wildlife of Maine, the use of rodenticides must be addressed and a restriction on the use of second-generation anticoagulant rodenticides is a great start. Maine would be joining a handful of other states with similar restrictions, once again showing that Maine leads the way in protecting the environment. I strongly support the Board's proposed Chapter 40 amendment to restrict the use of second-generation anticoagulant rodenticides in Maine.