



Committee on Agriculture, Conservation & Forestry
% Legislative Information Office
100 State House Station
Augusta, ME 04333

March 6, 2025

RE: LD 356, Resolve, Directing the Board of Pesticides Control to Amend Rules on Placement of Pesticidal and Rodenticidal Baits and Appropriate Notification of Abutters

Dear Sen. Talbot Ross, Rep. Pluecker, and Members of the ACF Committee:

My name is Francesca “Ches” Gundrum and I am Maine Audubon’s Director of Advocacy. Maine Audubon is a wildlife conservation non-profit – we fulfill our mission to “conserve Maine wildlife and wildlife habitat” by engaging people of all ages in nature through a science-based approach to education, conservation, and advocacy. On behalf of Maine Audubon and our 30,000 members, supporters, and volunteers, thank you for the opportunity to submit testimony in support of the amended version of LD 356, *Resolve, Directing the Board of Pesticides Control to Amend Rules on Placement of Pesticidal and Rodenticidal Baits and Appropriate Notification of Abutters*.

Maine Audubon enthusiastically supports opportunities to address the management of toxics in our environment, such as pesticides and rodenticides. Currently, Maine laws surrounding placement of pesticidal and rodenticidal baits are limited. We support this legislation as an opportunity to proactively review and strengthen existing laws and rules in order to better protect human and wildlife communities.

Even when used via targeted baits, both classes of chemicals can lead to primary and secondary poisoning of wildlife, through animals ingesting the pesticide themselves, or by ingesting animals that have been poisoned. Bioaccumulation of these chemicals can create major downstream effects to ecosystems and wildlife that were not intended to be impacted.

Second-generation anticoagulant rodenticides (SGARs) – a type of rat and rodent poison commonly used by pest control companies – are a prime example. SGARs prevent blood from clotting, causing animals to die slowly and painfully over several days. These poisoned animals become easy prey for predators, who then subsequently die from poisoning. A national study found that 82% of dead eagles found had exposure to rodenticides.¹ This phenomenon has been reported in Maine in necropsied

¹ Niedringhaus, et al. 2021. Anticoagulant rodenticide exposure and toxicosis in bald eagles (*Haliaeetus leucocephalus*) and golden eagles (*Aquila chrysaetos*) in the United States - <https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0246134>

cormorants, and rescued owls.² SGARs are currently under moratorium in California³ and a similar bill is being considered in Massachusetts.⁴

Additionally, Maine Audubon is supportive of the proposal to revisit rules regarding pesticide application notification. It is our understanding that current rules largely require the abbutter to request information on pesticide application, which puts the responsibility on the potentially-affected abbutters. Changes to the notification rules could make the process more transparent, or potentially require more upfront notification to abutters, rather than waiting for an abbutter to take action.

In order to best protect Maine people, wildlife, and ecosystems, we encourage the committee to support this resolve. Thank you for your time and consideration.

Sincerely,



Francesca "Ches" Gundrum
Director of Advocacy

² 13 WGME. 2023. "Barred owl weakened by rodenticide poisoning hit by car in York." <https://wgme.com/news/local/barred-owl-weakened-by-rodenticide-poisoning-hit-by-car-in-york-center-for-wildlife-cape-neddick-maine-rodents-second-generation-anticoagulant-rodenticides>

³ California Legislative Information. 2020. "AB-1788 Pesticides: use of second generation anticoagulant rodenticides." https://leginfo.ca.gov/faces/billTextClient.xhtml?bill_id=201920200AB1788

⁴ Commonwealth of Massachusetts. 2022. "An Act restricting the use of rodenticides in the environment." <https://malegislature.gov/Bills/194/HD1721>