



The Lethal Loophole in America's Poison Laws

How online rodent-killer sales are killing America's wildlife

by Ted Williams

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Wildlife Clinic in North Grafton, Massachusetts, was trying and failing to maintain a clinical countenance. She was clicking through X-rays from necropsies she'd autopsied, and the images were depressing both of us.

rodents because they prevent blood from clotting by inhibiting the function of Vitamin K, thereby causing fatal bleeding. SGARs are also lethal to all manner of r s — even when deployed by professional exterminators inside a seemingly sealed building — they inevitably exit and stagger around in the open for up to five d y.

lary poisoning include, but are not limited to, rats, mice, possums, black bears, skunks, badgers, fish

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late in nontarget wildlife. Victims don't have enough red blood cells to deliver oxygen to their tissues, so they're lethargic. They stumble. Their heads d At t wild is a death sentence. At worst, they bleed from their eyes, ears, noses, mouths and internal organs. Ruptured blood vessels frequently cause eyeb awai xp

colleagues, both a scientist and an advocate — **reported** in the journal *Environmental Toxicology and Chemistry* that 100% of red-tailed hawks admitted to the clinic mostly brodifacoum and bromadiolone.

It seemed sadder than the last. There was a great horned owl with a hematoma running the length of its left wing; a red-tailed hawk's entire body cavity glistened with a hematoma that had ballooned its left eye to 10 times normal size. Dozens of raptors had pools of blood under their skin. Maybe the saddest image was that of the red-tailed hawk whose oviducts had ruptured, and she'd slowly bled to death from the inside.

SGAR poisoning is doubly debilitating because they've already **ingested toxic fragments** of lead bullets left in gut piles or unretrieved game. A study published in the February half of all bald and golden eagles sampled "had chronic, toxic levels of lead" that appeared "high enough to suppress population growth in both species."

"Adult birds eat [SGAR-poisoned] mice and bring them to their babies," said Marge Gibson, the founder and director of Antigo, a Wisconsin-based **Raptor Education Group**. "People find them [adults and nestlings] when they die and fall from the nests. We see this often. It is so disheartening. It's excellent marketing, which is misleading at best."

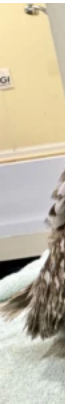
"The eye trauma where the raptors' eyes burst from internal bleeding. The pooled blood attracts maggots, which subsequently travel into the birds' brains and cause a left eye that bursts," Gibson said. "We're seeing more of that this year. Maggots get in through the ears, too. We had a great-horned owl that had blood leaking from its ear."



This young barred owl, found unresponsive in a barn, was barely able to stand on admission to the Raptor Education Group's clinic. He was given Vitamin K but died within a few hours. The necropsy showed free blood in the peritoneum.



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"First-generation" anticoagulant rodenticides were developed in the late 1940s and 1950s. Warfarin, for example, proved more effective as a human blood thinner, and is still prescribed. But because it sometimes caused only sickness, rodents often learned to avoid a second dose that would have killed them.

Most of the World Health Organization, Imperial Chemical Industries of London developed "single dose" SGARs. Today, SGARs used in the United States are brodifacoum and bromadiolone.

SGAR delivery system or place of application that is safe for wildlife. Still, the EPA allows farmers and exterminators to buy and apply SGARs. It has banned public use in grocery stores, hardware stores, club stores, and similar retail outlets." Apparently, the EPA hasn't heard of the internet. When I Googled "second-generation anticoagulant rodenticides," I found a list of purchase opportunities.

With SGARs, there's scant understanding of how these biocides endanger nontarget wildlife, pets, and young children — and maybe little concern, given the public's indifference to the loss of our native wildlife. They contaminate our food. They spread diseases. America's common conviction is that if a little poison kills, a lot kills better.

Scientists studied common buzzards and 190 common kestrels across the Iberian Peninsula and its archipelagos turned up SGARs (mostly brodifacoum and bromadiolone) in the livers of the kestrels.

Brodifacoum, difenithalione, difenacoum and flocoumafen — are still registered for public use in Australia. Potentially **fatal concentrations of SGARs** were found in the livers of 20 percent of endangered eastern quolls, 20 percent of edge-tailed eagles, endangered Tasmanian marsupials, and 100 percent of endangered koalas.

Brodifacoum and bromadiolone were found in the livers of 83 percent of 96 bald eagles and 77 percent of 13 golden eagles.

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as studied contained rodenticides (mostly SGARs), including 82 percent of the Cooper's hawks, 72 percent of the red-tailed hawks, and 59 percent of the barn owl. In California, 82 percent of the coyotes and 69 percent of the endangered San Joaquin kit foxes. Sublethal SGAR retention was linked to severe, sometimes fatal, immune system suppression in bobcats. (In 2021, California became the first state to ban sale and use of SGARs, save for rat infestations that threaten public health.)

Each year, about 10,000 kids, almost all under age three, swallow SGAR pellets. Children of impoverished minority families are disproportionately affected. A New study found that 72 percent of children who had consumed SGARs were Black, 26 percent Latino.

Like many opera singers, the 45-year-old soprano has gained world recognition for her Wagner and Strauss roles. Her portrayal of Brünnhilde in the Grammy-winning recording of "The Ring Cycle" is a testament to her talent and dedication.

On her property in Ojai, California, is surrounded by orange and avocado farms, she had a major rat infestation. So she hired a professional exterminator company. "There were far fewer rats for the first two years, but one winter we had a horrible infestation. Every night I'd see at least five rats crawling on the chicken coops. Then my beautiful 5-year old golden retriever, Franz, was acting strange. His gums were snow white. Back then, I didn't know what that meant. He weighed 100 pounds, and he died on the way to the vet's. Franz was a wonderful dog. I had a necropsy done. They found brodifacoum."

She herself, then continued, her voice cracking. "The pest-control people told me the bait wasn't dangerous, that there was no secondary poisoning. I used to throw away my food. The local vets see lots of poisoned dogs because the farmers indiscriminately put the stuff out in their orchards. One woman didn't have the money to pay for a new washer and dryer. The vet had to tell her, 'Keep your machines; I can't save your dog.'"

Red owls, affectionately known as the "rockstars of the neighborhood," nested in Chicago's Lincoln Park — this to the delight of visitors who didn't need binoculars to watch the hatching of an owlet in late winter.

In early April "Papa Owl," as he was called, expired. The owlet died in March. Finally, in May, the carcass of Papa Owl's mate, "Mama Owl," was found on a sidewalk. The owlet had been fatally poisoned by multiple SGARs.

A hawk in the world," according to New York City media, was 22-year-old "Pale Male." For years, he and successive mates nested on the decorative window pediment overlooking the pond. He was a viewing spot for birders who gathered every spring with binoculars and scopes at the Model Boat Pond.

His mate, Lima, turned up dead shortly before she would have laid eggs. The inside of her mouth was pallid, as were her heart, lungs, liver, spleen, kidneys, and brain. All organs were found in her liver.

His mate — "Zena." The pair fledged three chicks, one of which is believed to have been fatally poisoned by SGARs and two of which were gravely sickened by SGARs. Zena died, presumably from SGARs found in his liver. The fates of Zena and the two released chicks are unknown.

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If wildlife advocates are to succeed in reducing SGAR pollution, they need to choose battles they can win — certainly local, state, or national regulations that prohibit online sales to the general public and perhaps even limiting use by exterminators outside rat-infested communities.

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ance director, Glenn Phillips, was directing the New York City Audubon Society, birders scolded him and his organization for advocating only a ban on public use of SGARs. It didn't pass.

this: "Our city has a huge rat problem. We can't ban all use of rodenticides. It's never going to happen. If we were to advocate that, we couldn't get the support of you can try. If you want to actually make things better for birds, you have to do what you can to reduce rodenticides, even if you can't eliminate them."

New York State Raptors Act of 2025 which bans online and retail-store sale of SGARs and "prohibits the use of either a first-generation anticoagulant rodenticide within five hundred feet of a wildlife habitat area."

every projects for island wildlife are hampered by brodifacoum's vile reputation acquired by gross public abuse on mainlands throughout the world. They report that brodifacoum, the only known way to eradicate invasive rodents from islands to restore native wildlife. And they warn that any ban on brodifacoum must have a specific purpose. "Bring us something else that will work; we will be the first to adopt it," says Island Conservation's Gregg Howald.

mical contraceptive designed for rats called ContraPest doesn't cause permanent sterility. L

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generation rodenticides may eventually provide some relief. They are being designed to reduce secondary poisonings of nontarget wildlife and minimize bioaccumulation. They're not yet named or commercially available. Some are being tested in pilot programs. At this writing, their safety and effectiveness are undetermined.

being used as a hoped-for alternative to SGARs. In Australia, for example, a project in Northern Rivers, New South Wales shows some potential for reducing rat infestation. The initiative has been installing barn-owl roosts and nest boxes in macadamia orchards.

“Feed and they hunt, and each breeding event takes about a thousand rats out of the system,” Alastair Duncan, founder of Owls Eat Rats, told ABC Rural News. “We let content is from] rats and the rest [from] house mice, which are a really significant pest in the agriculture industry.” In June 2025, Owls Eat Rats was granted \$50,000 in funding.

Apple growers are putting up nest boxes to attract barn owls for vole and gopher control. Funded by the Agricultural Research Institute, scientists from the University of California have been assessing results.

“In the past, the team found that the average barn owl family consumes between 3,000 and 4,000 rodents per year, mostly gophers, voles and mice. Team data show that gopher control is more effective with nest boxes.

“They scare them, too,” report team members Drs. [Matthew Johnson and Daniel Karp](#). “Recent work in Napa Valley shows that on vineyards heavily hunted by owls, there is a 50% reduction in their movements, eating fewer seeds in experimentally deployed seed trays and appearing less frequently on remote cameras.”

“The problem, don’t make it worse by poisoning rodent-eating raptors and mammals. But predators alone can’t solve your problem because these rodents are vastly more numerous than the predators.

“I found mouse feeders, so clean up seeds spilled by birds. Inspect the outside perimeter of your house for rodent entrances. Our 250-year-old cellar was a rat haven underground. I filled the tunnel with an entire wheelbarrow-load of cement, ending our infestation.

“I keep them tightly sealed. If you compost garbage, keep the composter far from your house. If you have a vegetable garden, compost all unharvested produce. Use snap traps or battery-powered electrocuting traps. Peanut butter is a far more effective bait than cheese. Do not use glue traps. They’re inhumane. What’s more, rats can chew through their fur. Don’t set traps outside your house because you’ll kill small nontarget mammals and birds.

SGARs have been introduced in Connecticut, New York, Massachusetts, Oregon and Washington. For the most part, they mirror California’s model, focusing on reducing the ecological risk. If you live in one of these states, lobby your state legislators to support these bills. If you don’t live in one of these states, lobby your local, state and U.S. Congress to ban online sale and mainland use of SGARs.

Submit your comments to the Administrator U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue, NW Washington, DC 20460. Include your name, organization if applicable, and contact information. Comment on online sale and mainland use of SGARs” If you have expertise, mention it. Reiterate your main points. Thank the EPA for the opportunity to comment. Include a photo if you have one.

Matthew Johnson is a conservation officer for the Massachusetts Division of Fisheries and Wildlife, serves on the Circle of Chiefs of the Outdoor Writers Association of America. He writes exclusively about wildlife and conservation.



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