

# National Environmental Coalition on Invasive Species

Center for Invasive Species Prevention ♦ National Wildlife Federation ♦ The Wildlife Society ♦  
American Bird Conservancy  
[www.necis.net](http://www.necis.net)

2 June 2017

Administrator Scott Pruitt  
USEPA William Jefferson Clinton Building  
1200 Pennsylvania Avenue N.W.  
Washington, DC 20004

Dear Administrator Pruitt,

The above-listed member organizations of the National Environmental Coalition on Invasive Species (NECIS) are writing to you today to urge the EPA to **immediately suspend or cancel the registration of Kaput® Feral Hog Bait**.

As NECIS member organizations, we are focused on promoting scientifically sound policies that prevent the introduction and spread of invasive species in the United States. Our organizations recognize that feral hogs are a nuisance invasive species throughout much of the US and require collaborative and aggressive approaches to management. However, the fast-tracked registration of Kaput® Feral Hog Bait by the previous Administration has resulted in continued concern being raised over whether the impacts of this pesticide to non-target wildlife and public health were properly evaluated.

As stated in a May 5 [letter](#) sent to the EPA by the Association of Fish and Wildlife Agencies, native wildlife can be exposed to Kaput® via multiple pathways and can result in lethal or sub-lethal impacts. The required use of 8-10 pound feeder lids as stated on EPA-approved label instructions will likely not deter non-target carnivores such as black bears from directly consuming bait. The label instructions also require spilled bait around feeders be removed from the area only every one to four days, placing a broad array of wildlife populations at risk for exposure.

Label instructions additionally state that all effectively targeted feral hogs need to be properly disposed of after death. However, it can take up to two weeks for death to occur in feral hogs after bait consumption, allowing for a wide dispersal of deceased poisoned hogs. Scavenging wildlife could then consume lethal or sub-lethal doses of Kaput® from carcasses that are not detected or properly disposed of by Kaput® users.

This wildlife issue can quickly transform into a human health concern if game species that consume sub-lethal doses are then harvested by hunters. It can also be a problem in feral hog populations that are utilized as a human meat source. According to the Kaput® Products website, the dye within the bait that turns feral hog fatty tissue blue does not take effect until 24 hours after consumption. This provides a window in which a hunter may harvest a poisoned hog prior to the hog's tissues being stained.

The potential wildlife and human health impacts of Kaput® Feral Hog Bait stress the need to gather more information in order to properly reevaluate this pesticide. We echo the request of the Association of Fish and Wildlife Agencies to “suspend or cancel the registration of this product until such a time that formal consultation can be completed with the United States Fish and Wildlife Service, the United States Department of Agriculture, and the Food and Drug Administration.”

Thank you for your consideration of the above request. The undersigned NECIS member organizations stand ready to work with you to address the critical challenges associated with invasive species management.

Sincerely,

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CC: Rick Keigwin, Jr., Acting Director, EPA Office of Pesticide Programs  
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Kevin Shea, Administrator, USDA-Animal and Plant Health Inspection Service  
Stephen Ostroff, M.D., Deputy Commissioner for Foods and Veterinary Medicine, Food and  
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