



ASSOCIATION of
FISH & WILDLIFE
AGENCIES

The voice of fish and wildlife agencies

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May 5, 2017

Mr. Scott Pruitt, Administrator
U.S. EPA Headquarters
William Jefferson Clinton Building
1200 Pennsylvania Ave., N.W.
Washington, D.C. 20460

Subject: Notice of Pesticide Registration ([EPA Reg. No. 72500-26](#)) for Kaput® Feral Hog Bait

Dear Mr. Pruitt:

Founded in 1902, the Association of Fish & Wildlife Agencies (Association) represents North America's fish and wildlife agencies and serves to advance science-based management and conservation of species and their habitats for the public's long-term benefit and use. The Association has recently become aware of the registration of Kaput® Feral Hog Bait, and it has been brought to our attention that several states have expressed concerns about the environmental and public safety of this pesticide product.

We understand this regulatory decision was made under the previous Administration. However, given the above concerns, the Association requests the Environmental Protection Agency suspend or cancel the registration until such time that formal consultation can be completed with the United States Fish and Wildlife Service (USFWS), the United States Department of Agriculture (USDA), and the Food and Drug Administration. Also it would be helpful, as we work with you on this issue further, to review information that was utilized by EPA to evaluate Kaput® Feral Hog Bait relative to efficacy, non target impacts, and potential impacts to human health. In this regard, please provide a copy of any study or report or other information and associated evaluation conclusions used during the registration process.

The damage and disease impacts from feral hogs are well known and their control is a priority for many state fish and wildlife agencies. However, there are serious concerns regarding the environmental effects from the use of Kaput® Feral Hog Bait on the landscape as a means of eliminating feral hogs. The potential impacts include short- and long-term effects on non-target wildlife species either through consumption of the bait, or through consumption of carcasses that have been poisoned by the bait. These risks include the primary intoxication of small mammals and non-target game animals as well as secondary intoxication of raptors, including bald eagles and other species. In addition to direct mortality, questions remain about the impacts on fetal development in non-target species that receive sub-lethal doses.

Of specific concern are potential detrimental impacts to black bears, including the Louisiana black bear, which was removed from the Federal list of Endangered Species in the spring of 2016. Kaput® Feral Hog Bait, used according to label instructions to kill hogs, is likely to result in death or sub-lethal impacts to non-target black bear. Use of this product has the potential to create a new and increasing threat that could undermine the recovery of the Louisiana black bear and the management of other species, causing significant concern to state fish and wildlife agencies. We also have concerns that there could be impacts to some of the species identified in State Wildlife Action Plans as Species in Greatest Need of Conservation.

As mentioned above, there are concerns about the use of Kaput® Feral Hog Bait and the potential adverse impacts to wildlife resources. The registration of this product raises questions about the process used by the previous Administration, to approve the use of Kaput®. We are hopeful this issue could provide opportunity to review and improve this process. For example, it isn't clear if the registration process included sufficient consultation with the USFWS for potential impacts of the bait to federal trust wildlife species or if there was sufficient consultation with the USDA Animal Plant Health Inspection Service-Wildlife Services. In fact, USDA is currently working with the states on developing potential toxicants for feral hogs that are both efficient and have minimal impacts to non-target wildlife. Finally, we believe there needs to be further consideration regarding potential effects on human health associated with using this product for feral hogs. There are concerns that the pesticide may have health impacts to people, as it is labeled for use for animals that enter the food chain when harvested and consumed.

We appreciate your consideration of these concerns and respectfully request the opportunity to work with you and your team to reconsider registration of this product. I would be glad to discuss this issue further with you or your staff, so please don't hesitate to contact me at (850) 251-2162 if you have questions. We look forward your response on this important matter. Thank you.

Sincerely,



Nick Wiley, President
Association of Fish and Wildlife Agencies

Cc: Venus Eagle, Acting Chief, USEPA, Invertebrate-Vertebrate Branch 3, Registration
Division of Office of Pesticide Programs
Jim Kurth, Acting Director, USFWS
Kevin Shea, Administrator, USDA-Animal and Plant Health Inspection Services
Stephen Ostroff, M.D., Deputy Commissioner for Foods and Veterinary Medicine, Food
and Drug Administration