

National Environmental Coalition on Invasive Species

Center for Invasive Species Prevention ♦ National Wildlife Federation ♦ The Wildlife Society ♦
American Bird Conservancy
www.necis.net

8 January 2018

Administrator Scott Pruitt
USEPA William Jefferson Clinton Building
1200 Pennsylvania Ave NW
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 follow up on a June 2017 [letter](#) requesting the **suspension or cancellation of the registration for Kaput® Feral Hog Bait until such a time that formal consultation can be completed with appropriate federal agencies.**

Our organizations reiterate the statement above and **request a response** from USEPA on the matter. In the time since the initial letter was sent, there has been no notable progress made to inform stakeholders and the public on the internal research that resulted in the fast-tracked approval of this product. However, the EPA and Scimetrics Ltd. Corp., the makers of Kaput®, have continued to profess the benefits of this product without providing any peer-reviewed results to substantiate the claims or address concerns. This has most recently been the case in an August 2017 EPA [letter](#) to the Association of Fish and Wildlife Agencies, and an October 2017 Scimetrics presentation during the Southeastern Association of Fish and Wildlife Agencies Annual Conference.

While all relevant parties agree that feral hogs are a nuisance invasive species that require aggressive control mechanisms, the lack of publicly available data on Kaput® leaves us uncertain about consequences this product may have to non-target wildlife. Indeed, during Scimetrics' October presentation, the presenters stated that the feeders used in field trials, which are heavier than the 8-pound minimum required by the EPA registration, are not effective in preventing bear populations from accessing the bait.

Questions also remain about how long it takes the dye in the bait to turn the fatty tissue of feral hogs blue. The EPA and Scimetrics have both stated in publicly available documents that the dye will take effect in "as little as 24 hours", while Scimetrics stated during their October presentation that the dye can take as little as six hours to appear in fatty tissue. This uncertainty provides an unknown window of time in which a hunter can harvest a feral hog without visibly blue fatty tissue being present.

Given the concerns surrounding impacts to non-target wildlife as well as human consumers of feral hogs, we again request that EPA suspend or cancel the registration for this toxicant and work with our organizations going forward on safe and effective feral hog management programs with sufficient dispersal mechanisms. For example, the recent EPA approval of a USDA-APHIS Wildlife Services experimental use permit on sodium nitrite feral hog bait, a compound that has been extensively vetted and utilized for feral hog control in countries such as Australia, offers a potentially promising mechanism for feral hog control going forward.

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

Sincerely,

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