

Sponsor:
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RESOLUTION 2026-05

**CONCERNING ANTICOAGULANT RODENTICIDES AND ADHESIVE-BASED
ANIMAL TRAPS AND THEIR IMPACT ON THE BIODIVERSITY CRISIS**

- WHEREAS, the global biodiversity crisis is devastating non-human life across the planet, with wild animal populations facing an average decline of 73% in size since 1970¹ and the extinction rate skyrocketing to 1,000 to 10,000 times² higher than the normal background rate of species extinction, which is at least 70 times higher than that caused by the Chicxulub asteroid impact that wiped out the non-avian dinosaurs and 76% of all species on Earth³; and
- WHEREAS, Bloomington's location, surrounded by some of the last remaining areas of largely intact ecosystem in the state of Indiana, make our city's stewardship of wildlife and promotion of biophilic policies especially important; and
- WHEREAS, anticoagulant rodenticides, both first-generation and second-generation, kill through uncontrolled internal hemorrhaging over a period of days to weeks, constituting a prolonged and painful death for any animal that ingests them; and
- WHEREAS, anticoagulant rodenticides pose a grave and well-documented threat to non-target wildlife through secondary poisoning, in which a predator or scavenger consumes a poisoned rodent, and tertiary poisoning, in which a predator consumes an animal that was itself secondarily poisoned, allowing anticoagulant compounds to move through multiple levels of the food chain; rodents that have consumed bait remain active and mobile for days before death, and the toxin persists in their tissues after death, making them easy prey for raccoons, opossums, foxes, and other wildlife, which in turn may be consumed by larger predators such as bald eagles, great horned owls, coyotes, or bobcats; and
- WHEREAS, anticoagulant contamination is not limited to predator-prey pathways: a 2025 study detected second-generation compounds in approximately 80% of reptiles and 40% of insectivorous birds tested, species that do not consume rodents but are likely exposed through contaminated invertebrates, demonstrating that these compounds are infiltrating the base of the food web⁴; and
- WHEREAS, second-generation anticoagulant rodenticides are particularly hazardous because they persist in animal tissues for approximately four weeks or longer, dramatically

¹ <https://wwflpr.awsassets.panda.org/downloads/2024-living-planet-report-a-system-in-peril.pdf>

² [Estimating the normal background rate of species extinction](#)

³ [Vertebrate biodiversity losses point to a sixth mass extinction](#)

⁴ Martín Cruz et al., 2025, <https://www.mdpi.com/2305-6304/13/6/505>

increasing the risk of bioaccumulation, and the U.S. Environmental Protection Agency has acknowledged these elevated risks by restricting second-generation compounds from consumer-market products since 2008⁵; and

WHEREAS, scientific research has documented very high rates of exposure in non-rodent wildlife: a Cornell University study found anticoagulant chemical residues in 68% of red-tailed hawks tested⁶, a 2024 study in the Journal of Wildlife Management found that 98% of urban and suburban coyotes in Southern California were exposed to at least one anticoagulant compound⁷, and the New York Department of Environmental Conservation documented poisoning across species including raptors, gray squirrels, raccoons, white-tailed deer, red foxes, skunks, and opossums⁸; a national study of bald and golden eagles found anticoagulant residues in 82% of individuals tested⁹; a 30-year analysis of Canadian raptors found at least one second-generation compound in 74% of individuals, reaching 96% in barred owls¹⁰; and a 2024 global review documented anticoagulant exposure across eight families of mammalian carnivores in 19 countries, with exposure-related mortality claimed in roughly one-third of species studied¹¹; and

WHEREAS, Monroe County supports resident or transient populations of red-tailed hawks, red-shouldered hawks, Cooper's hawks, barred owls, screech owls, short-eared owls, barn owls, long-eared owls, great horned owls, turkey vultures, black vultures, broad-winged hawks, bald eagles, skunks, bobcats, gray and red foxes, coyotes, raccoons, and other predators and scavengers, all of which are vulnerable to secondary poisoning from anticoagulant rodenticides; and

WHEREAS, several of the species listed in the preceding paragraph are either listed as species of greatest conservation need (SGCN) by the state of Indiana in its State Wildlife Action Plan (SWAP), listed as state threatened or endangered, listed as regionally threatened or endangered by the Midwest Landscape Initiative, or are listed in more than one of these categories; and

WHEREAS, anticoagulant rodenticides have been shown to cause not only individual mortality but population-level declines in predators: on Kiawah Island, South Carolina, a 16-year study of GPS-collared bobcats documented annual survival dropping from 94% to 39% following the initial detection of anticoagulant rodenticides in the population, with the bobcat population declining from over 30 to fewer than 10 individuals in two years¹²; and a 2024 California statewide survey detected second-generation anticoagulant compounds in 95% of mountain lions tested, despite existing regulatory efforts¹³; and

⁵ <https://www.epa.gov/rodenticides/restrictions-rodenticide-products>

⁶ <https://news.cornell.edu/stories/2022/07/rodenticide-poisoning-widespread-among-nys-red-tailed-hawks>

⁷ <https://wildlife.onlinelibrary.wiley.com/doi/10.1002/jwmg.22696>

⁸ <https://jwd.kglmeridian.com/downloadpdf/view/journals/jwdi/35/2/article-p187.xml>

⁹ Niedringhaus et al., 2021, <https://pmc.ncbi.nlm.nih.gov/articles/PMC8026043/>

¹⁰ Elliott et al., 2022, <https://pmc.ncbi.nlm.nih.gov/articles/PMC9540899/>

¹¹ Keating et al., 2024, <https://zslpublications.onlinelibrary.wiley.com/doi/10.1111/acv.12947>

¹² Keating et al., 2026, <https://zslpublications.onlinelibrary.wiley.com/doi/10.1111/acv.70061>

¹³ [Center for Biological Diversity](https://www.centerforbiologicaldiversity.org/), 2025

WHEREAS, the poisoning of raptors and predators is counterproductive as a single raptor family, for example, may consume thousands of rodents per year, and their removal causes increase in rodent populations, driving greater reliance on the very poisons that caused the decline in the first place; and

WHEREAS, adhesive-based traps (glue traps) are barbaric and cause extreme and prolonged suffering: trapped animals tear off fur, feathers, and skin, break bones, or chew off limbs attempting to escape, and die over hours to days from blood loss, shock, suffocation, or dehydration; they are inherently indiscriminate, routinely capturing songbirds, chipmunks, lizards, and domestic pets; and

WHEREAS, anticoagulant rodenticides have been banned or restricted in California¹⁴ (all first- and second-generation compounds banned, effective 2025), South Carolina¹⁵ (second-generation restrictions, 2025, extended indefinitely), and Connecticut¹⁶ (second-generation compounds classified as restricted-use, 2026), with legislation pending in Massachusetts¹⁷, New York¹⁸, and Rhode Island¹⁹; and the EPA finalized its Biological Evaluation for eleven rodenticides in November 2024²⁰, with an amended Proposed Interim Decision anticipated in 2026; and

WHEREAS, second-generation anticoagulant rodenticides meet the regulatory criteria for persistent, bioaccumulative, and toxic (PBT) chemicals, which is the same classification that led to the removal of DDT and polychlorinated biphenyls (PCBs) from commerce, and have consistently failed ecological risk assessments, yet remain in use due to demand for rodent control²¹; and

WHEREAS, adhesive-based traps have been banned or restricted in England²², Scotland, Wales²³, Ireland, Norway, the Netherlands, Germany, Iceland, New Zealand, nearly all Indian states and union territories, and the Australian state of Victoria; and voluntarily restricted by hundreds of corporations and U.S. airports²⁴; and

WHEREAS, a systematic welfare assessment rated glue traps among the highest-impact control methods across all categories of suffering²⁵; and the Scottish Animal Welfare Commission concluded that even with optimal use, including frequent checking and effective dispatch, glue traps pose significant and unavoidable animal welfare concerns²⁶; and

¹⁴ <https://responsiblerodenticides.org/california-issues/>

¹⁵ <https://news.clemson.edu/pesticide-regulators-extend-restrictions-on-certain-rodenticides/>

¹⁶ <https://www.jteaton.com/rodenticide-state-restrictions/>

¹⁷ <https://malegislature.gov/Bills/194/S644.Html>

¹⁸ <https://www.nysenate.gov/legislation/bills/2025/S7532/amendment/A>

¹⁹ [Rodenticides kill more than rodents. Providence lawmaker sponsors bill to ban their use.](https://www.providencejournal.com/news/local/providence-lawmaker-sponsors-bill-to-ban-their-use)

²⁰ <https://www.epa.gov/pesticides/epa-releases-rodenticide-strategy-including-final-biological-evaluation-effects-11>

²¹ Elliott et al., 2016, <https://academic.oup.com/bioscience/article/66/5/401/2468643>

²² <https://www.legislation.gov.uk/ukpga/2022/26>

²³ <https://www.bbc.com/news/articles/ckgx9pkq7w0o>

²⁴ <https://www.peta.org/issues/wildlife/wildlife-factsheets/glue-traps/>

²⁵ Meerburg et al., 2024, <https://pmc.ncbi.nlm.nih.gov/articles/PMC10937213/>

²⁶ [Scottish Animal Welfare Commission](https://www.scottishanimalwelfare.com/), 2021

WHEREAS, anticoagulant rodenticides are legally classified as pesticides under both the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) and Indiana law (IC § 15-16-5-25)²⁷; and

WHEREAS, Indiana Code § 15-16-5-71²⁸ explicitly states: “A political subdivision (as defined in IC 36-1-2-13) does not have authority to regulate by ordinance the use or application of pesticides”; and

WHEREAS, Indiana Code § 15-16-5-71(b) provides, however, that a political subdivision may, by resolution, petition the Indiana Pesticide Review Board for a variance because of special circumstances relating to the use or application of a pesticide; and

WHEREAS, adhesive-based traps, as mechanical devices rather than pesticides, may be regulated directly under the City's home rule authority.

NOW THEREFORE, BE IT HEREBY RESOLVED BY THE BLOOMINGTON COMMISSION ON SUSTAINABILITY AND RESILIENCE, THAT:

SECTION 1. The Commission finds that:

- (a) Anticoagulant rodenticides cause severe suffering to target and non-target animals alike, including vulnerable wildlife populations, and pose a direct threat to raptors, other predators, and scavengers in Monroe County through secondary and tertiary poisoning, undermining the natural rodent control these species provide.
- (b) Adhesive-based traps are indiscriminate, inhumane, barbaric, ineffective as pest management, and pose public health risks to humans.
- (c) The use of both anticoagulant rodenticides and adhesive-based traps would be inconsistent with the City's commitments to environmental stewardship and sustainability, and would contribute to the broader biodiversity crisis.
- (d) Proven, humane, and cost-effective alternatives are widely available, including Integrated Pest Management strategies such as habitat modification, exclusion, sanitation, snap traps, and nature-based solutions including barn owl nest box programs.

SECTION 2. Recommendations

- (a) The Commission recommends the Mayor issue a directive prohibiting the purchase or use of anticoagulant rodenticides and adhesive-based traps by all City departments, contractors, and subcontractors on City-owned, City-leased, or City-managed property, and adopt a policy prioritizing non-chemical methods.

²⁷ <https://iga.in.gov/laws/2025/ic/titles/15#15-16-5-25>

²⁸ <https://iga.in.gov/laws/2025/ic/titles/15#15-16-5-71>

- (b) The Commission recommends the Common Council, in conformity with the language of Indiana Code § 15-16-5-71(b) prohibiting political subdivisions from passing an ordinance restricting the *use* or *application* of pesticides, consider passing an ordinance restricting the *sale* of anticoagulant rodenticides within city limits.
- (c) The Commission recommends the Common Council, pursuant to Indiana Code § 15-16-5-71(b), adopt a resolution petitioning the Indiana Pesticide Review Board for a variance to restrict the use and application of anticoagulant rodenticides within the City of Bloomington, citing secondary and tertiary poisoning of non-target wildlife, the availability of effective alternatives, the impact of these products on the ongoing biodiversity crisis, and Bloomington's unique location amid Indiana's last remaining largely intact and sensitive ecosystems as the rationale.
- (d) In conformity with Indiana Code, the Commission recommends the Common Council adopt an ordinance prohibiting the use and sale of adhesive-based traps within the City.
- (e) The Commission recommends the City develop public education materials on the ecological harms of these products, the availability of humane alternatives, and the role of raptors and predators as natural rodent control.
- (f) The Commission recommends the Common Council and/or Mayor work with the Monroe County government to bring the county's policy in line with the city on the use of these products.
- (g) The Commission respectfully requests that the Mayor ask that Indiana University provide information about the use of these products on its campus, and to cease the use of them, if applicable.

SECTION 3. Transmittal

- (a) The Chair shall transmit copies of this Resolution, or shall delegate such task to the Vice Chair or Secretary, within ten (10) business days of the date of passage to the Mayor, to all members of the Common Council, to the Director of Economic and Sustainable Development, to the Director of Public Works, to the Director of Housing and Neighborhood Development, to the Director of Animal Care and Control, to the Facilities Maintenance Director, to the Chair of the Animal Control Commission, to the Chair of the Environmental Commission, to all members of the Monroe County Council, to all members of the Monroe County Board of Commissioners, to all members of the Indiana General Assembly representing Bloomington, to the Chancellor of Indiana University Bloomington, to the President of Indiana University, and to the Board of Trustees of Indiana University.
- (b) Additionally, a courtesy copy is requested to be sent to the Executive Director of WildCare Bloomington.

- (c) The staff liaison is requested to post a copy of the resolution on the Commission website within ten (10) business days of passage.
- (d) The Commission further authorizes the resolution sponsor to speak before the Common Council on behalf of the Commission in order to communicate the recommendations of this resolution as adopted.

PASSED AND ADOPTED by the Bloomington Commission on Sustainability and Resilience upon this 9th day of June, 2026.



Justin Vassel, Chair

Bloomington Commission on Sustainability and Resilience

The views expressed here are solely those of the Bloomington Commission on Sustainability and Resilience, as approved in their public meetings, and do not necessarily reflect the views, policies, or positions of the City of Bloomington. Only the Office of the Mayor has the authority to issue policy statements on behalf of the Executive Branch of the City of Bloomington.