



July 22<sup>nd</sup>, 2025

Toronto City Council  
100 Queen Street West, 2<sup>nd</sup> Floor  
Toronto, ON  
M5H 2N2

**Attention: Toronto City Council**

**Re: *Support for the Rat Response Plan and Concerns with the Rodenticide Ban Campaign***

Dear: Toronto City Council

The Structural Pest Management Association of Ontario (SPMAO) is the most experienced and largest professional association for the structural pest management industry in Canada, a non-profit organization with a board of directors comprised of representatives from our members. SPMAO assists its member companies and licensed pesticide applicators through workshops and training seminars, so they can obtain their professional licenses and stay current with the latest policies, standards, and best practices. SPMAO represents over 170 licensed companies that actively protect the health and safety of all Ontarians from dangerous and deadly pests. SPMAO members use pesticide products to control ants, bed bugs, cockroaches, mosquitoes, rodents, spiders, stinging insects, and other pests in countless commercial, residential, and institutional settings.

This letter is being generated to comment on the serious push by a concerned citizen group in Ontario to ban rodenticides and to state SPMAO's support of the Rat Response Plan.

SPMAO applauds the Council on its commitment to protecting human health and the environment. We encourage the continuation to strive to vigorously pursue scientific rigor in these endeavors. This commitment ensures that the important tools used by pest management professionals to protect public health, food and property can be used without unreasonable risks to human health or the environment. SPMAO also encourages the Council to recognize the essentiality of rodenticides in many situations in addition to risk. Although not exhaustive, we highlight these benefits below.

## **The Vital Importance of Professional Rodent Control**

Rodenticides are necessary because of the vital need to manage rodent infestation due to the bacteria, viruses, and other disease-causing pathogens that they can transmit to humans. According to Health Canada, mice and rats are carriers of disease and can damage property. The deer mouse is the most common carrier of the deadly hantavirus.<sup>1</sup> In Canada, there have been 109 confirmed cases and 27 deaths due to hantavirus infections between 1989 and 2015.<sup>2</sup> Leptospirosis results in an estimated 1.03 million annual cases and 58,900 deaths around the world.<sup>3</sup> While the majority of deaths caused by leptospirosis occur in the developing world, North America is not immune. In the United States, three people in New York City were infected in 2015, resulting in one death.<sup>4</sup> Renowned rodentologist, Dr. Bobby Corrigan emphasizes that, "It's hard to quantify just how much money rats are costing health systems, because most people sickened by rats have flu-like symptoms, and many don't know they've been exposed to a rat."<sup>5</sup> Our pets are also at risk. The British Columbia Center for Disease Control has reported that there may be an increase in leptospirosis in dogs in North America.<sup>6</sup>

Typhus and plague have been reported as on the rise in California since rodenticides restrictions have been implemented by government regulation. Local governments are often rescinding the ban on all rodenticides to assist in managing rodent populations in close proximity to people and structures.<sup>7</sup>

Closer to home, Montreal recently reversed their decision on a city-wide ban one year later due to increases of rodent occurrences.<sup>8</sup>

In the province of British Columbia, there are notable indicators suggesting an escalation in rodent activity after the rodenticide ban put in place by the provincial government. Presently, within the province of British Columbia, there lacks a comprehensive tracking system to monitor the overall rodent population. This absence of tracking was prevalent even before the implementation of the rodenticide ban. Consequently, gaining a comprehensive understanding of the impact of the rodenticide ban on the overall rodent population is considerably challenging. Data from Abell Pest Control reveals a 28% uptick for rodent-related service inquiries, year over year (2022 – 2024) across the province. Furthermore, an analysis of pest activity data from one chain account over the preceding two years illustrates a 60% surge in rodent-related pest activity

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<sup>1</sup> <https://www.canada.ca/en/health-canada/services/pest-control-tips/rats-mice.html>

<sup>2</sup> <https://www.canada.ca/en/public-health/services/diseases/hantaviruses/surveillance-hantavirus-related-diseases.html>

<sup>3</sup> Costa, Federico et al., "Global Morbidity and Mortality of Leptospirosis: A Systematic Review" PLoS neglected tropical diseases vol. 9,9 e0003898, 17 Sep. 2015, doi:10.1371/journal.pntd.0003898

<sup>4</sup> NBC News Mary Altaffer 2015, [Rat-Borne Leptospirosis Infection Kills One in NYC](#)

<sup>5</sup> Emily Atkin, "America Is on the Verge of Ratpocalypse," The New Republic, August 23, 2017, <https://newrepublic.com/article/144392/america-verge-ratpocalypse>.

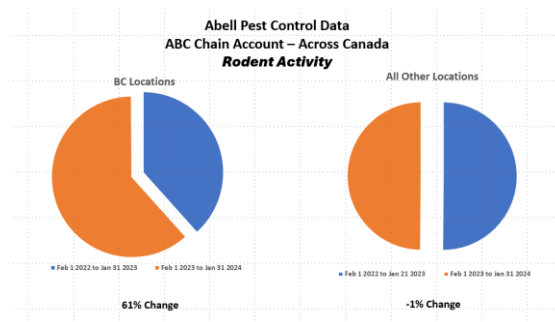
<sup>6</sup> <http://www.bccdc.ca/health-info/diseases-conditions/leptospirosis>

<sup>7</sup> <https://www.sacbee.com/news/environment/article232687952.html>

<https://www.healthline.com/health-news/deadly-typhus-found-in-la-for-first-time-in-30-years>

<sup>8</sup> <https://montreal.ctvnews.ca/montreal-re-allows-use-of-rat-poison-after-home-infestation-complaints-1.6228211>

exclusively within British Columbia, compared to a -1% drop-in rodent activity captures in that same chain in locations throughout the rest of Canada.



Rodents in Ontario can carry parasites (ticks, fleas, lice) which are vectors of disease, and also, Ontario’s rats have been found to carry Hepatitis E.<sup>9</sup>

Detectable levels of mouse allergen exist in 82% of homes.<sup>10</sup> Mouse allergens are known to exacerbate allergies and asthma symptoms, especially in children. In particular, marginalized communities in urban areas are most likely to have exposure to these allergens.<sup>11</sup> These are often the least likely to afford rodent control services.

In addition to the public health threats that rodents pose, the economic impact of rodent infestations is immense. According to a Centre for Economics and Business Research (CEBR) study, in the United States, between 29% and 32% of food businesses reported a mice infestation at some point in the last five years.<sup>12</sup> According to the same CEBR study, a pest infestation incident on average lasted for 2.5 weeks and businesses impacted by the pest infestations lost over \$10.5 Billion in revenue, some of which is attributed to reputational damage.<sup>13</sup>

Globally, rodents destroy or contaminate 20% of the world’s food supply and destroy enough food worldwide to feed 200 million people annually.<sup>14</sup>

Rodent populations can easily get out of control in urban and surrounding settings due to their reproductive capabilities and they carry many diseases that can be transferred to humans. Restricting professional use of one of the main control methods (Second Generation Anticoagulant Rodenticides), places communities in jeopardy of soaring rodent populations and the diseases associated with an infestation.

<sup>9</sup><https://pubmed.ncbi.nlm.nih.gov/37610234/#:~:text=We%20tested%20liver%20samples%20from,tested%20positive%20for%20the%20virus.>

<sup>10</sup> Richard D. Cohn, Samuel J. Arbes, Ming Yin, Renee Jaramillo, Darryl C. Zeldin; National prevalence and exposure risk for mouse allergen in US households; Journal of Allergy and Clinical Immunology; Volume 113, Issue 6; 2004  
<https://doi.org/10.1016/j.jaci.2003.12.592>.

<sup>11</sup> Matsui EC. Management of rodent exposure and allergy in the pediatric population. Curr Allergy Asthma Rep. 2013;13(6):681-686. doi:10.1007/s11882-013-0378-4)

<sup>12</sup> The Business and Economic Impacts of Pest Infestation, Centre for Economics and Business Research, March 19, 2015, [rentokil-cebr-report-the-business-and-economic-impact-of-pest-infestation-2015.pdf](#)

<sup>13</sup> The Business and Economic Impacts of Pest Infestation, Centre for Economics and Business Research

<sup>14</sup> [“Commensal” Rodents Eat at Our Tables - Quality Assurance & Food Safety](#)

The pest management industry cares about birds of prey (a number of our technicians are, in fact, licensed falconers) and practice Integrated Pest Management (IPM). When rodenticides are used by professional pest management agents, they are deployed within Health Canada (PMRA) regulations and guidelines. In a study done in 2024, birds of prey are on the rise in Ontario and Canada as a whole.<sup>15</sup> Placing restrictions on professionals in an urban setting such as Toronto does not make good business sense, nor is there any evidence to suggest that this could have any environmental benefit.

Anecdotal information can be damaging to the pest control industry. An example of this is the inaccurate information provided by Autumn Jordan in her letter to council dated July 8<sup>th</sup>, 2025. In this letter Autumn states, “At the start of this year two Snowy Owls were found dead at Tommy Thompson Park due to rodenticide use.” This statement holds no basis and was refuted by the Toronto and Region Conservation Authority. The report found the cause of death was from “a highly pathogenic avian flu”<sup>16</sup> and **not** from any source of rodenticide.

### **Pest Management Regulatory Agency (PMRA) Re-evaluation of Rodenticides in Canada**

The PMRA re-evaluate pesticides registered for the safe use in Canada on a regular basis. All rodenticides are up for further re-evaluation post the 2016 evaluation, in the fall of 2025. Municipal bodies should rely on the science of this institution to provide safe guidance and implementation of policies and bylaws.

### **Limitations on public access to Rodenticides**

The provincial and national Pest Management Associations pride themselves as educators and have implemented an integrated approach to Pest Control in Urban and surrounding settings. The structural pest management industry of Ontario and Canada as a whole, is highly regulated both provincially and federally. Placing additional restrictions on the industry only transfers those costly measures to the public, who are already stressed socially and economically. When affordable services are taken away from the public, the public can respond with creativity. This can be dangerous, such as using other products like antifreeze, alcohol etc.

Limiting the use of rodenticide to pest management professionals is a solid approach to keeping this product out of untrained hands. This ensures products are used safely with health and the environment in mind.

### **Integrated Approach**

The structural pest management industry has long implemented the Integrated Pest Management or IPM approach when managing any given pest population. This concept was developed in the 70's for the agricultural sector and relies on several control tools being utilized on a rotating basis. Inspection, monitoring, and control methods such as rodenticide are pinnacle aspects along with sanitation and structural modification. All these control measures working in tandem create the best solution for urban rodent populations. Janet Hurley, a leading industry expert at Texas

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<sup>15</sup> [The State of Canada's Birds Report](#)

<sup>16</sup> [2 snowy owls found dead in Toronto park were infected with avian flu: conservation authority | CBC News](#)

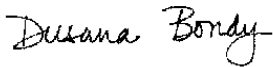
A&M University writes “At the same time, experts really stress types of baits, bait station location and exclusion as the best way to reduce rodent populations.”<sup>17</sup>

**The campaign “*Rodenticide Free Ontario*” is NOT based on facts**, but merely hearsay and colloquial opinions. The Structural Pest Management Association of Ontario fully supports industry standards and government regulatory agencies surrounding the legal use of rodenticides. SPMAO also supports the City of Toronto’s Rat Response Plan.

### **Conclusion**

SPMAO appreciates the opportunity to provide these comments and urges Council to reach out to the association prior to any further municipal action.

Sincerely,



Dusana Bondy  
Past President  
SPMAO Current Director  
1370 Don Mills Rd, Suite 300  
Toronto, ON M3B 3N7  
416-424-6628

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<sup>17</sup> Janet Hurley, Extension Program Specialist Texas A&M 2017