

From: [Diana Turchin](#)
To: [Economic and Community Development](#)
Subject: [External Sender] My comments for 2025.EC22.5 on July 9 2025 Economic and Community Development Committee
Date: July 7, 2025 7:11:25 PM

To the City Clerk:

Please add my comments to the agenda for the July 9, 2025 Economic and Community Development Committee meeting on item 2025.EC22.5, Rat Response Plan. I understand that my comments and the personal information in this email will form part of the public record and that my name will be listed as a correspondent on agendas and minutes of City Council or its committees. Also, I understand that agendas and minutes are posted online and my name may be indexed by search engines like Google.
Please make my communication accessible to the public.

Thank you for considering these comments. I understand that the City needs to respond to the concerns raised by residents, but the response should not harm residents, their pets, or wildlife. I am concerned about the widespread use of rodenticide throughout our city. Bait boxes surround commercial buildings, and they are in many of my neighbours' backyards. Rodenticide is much too widely used.

The City of Toronto's proposed Rat Reduction Plan refers to integrated pest management; however, key components of integrated pest management are not mentioned in the plan. Integrated pest management advocates for exclusion, prevention, attractant reduction, habitat modification, non-chemical control methods such as snap-traps, and biological controls wherever possible. Exclusion of rodents from waste receptacles and buildings should be the main focus. Rodenticide should be used only temporarily or as a last resort when all other management methods have been exhausted. Please add language throughout the plan to prioritize finding and sealing access points to buildings (which is also cost-saving in terms of energy costs). City of Toronto public and private garbage bins should be made inaccessible to wildlife.

We are in the midst of a global biodiversity crisis. It is unacceptable to poison wildlife based on imaginary threats. As documented in the Plan, rats do not pose significant health risks to Toronto residents. It is unacceptable to poison wildlife because they are not cute. For example, there is a plan to "reduce" rats, but there is no plan to "reduce" chipmunks. However, chipmunks are impacted by the use of rodenticide, as are many other types of wildlife, either directly or secondarily (as is the case for hawks and owls). And it is completely unacceptable to explore ways to kill rats in parks and green spaces unless they pose a real threat. Wildlife belong in natural spaces and should be allowed to live in the wild. Please change the wording under "NEW ACTION: Explore the use of non-rodenticide control methods for rats." to indicate that these measures will be explored in ESAs only if rats have been demonstrated to pose a threat to that ecosystem, not as a routine measure. Please add wording to clarify that sewer baiting will be targeted and limited, and please consider discontinuing it. We do not need pesticides in Toronto's rivers and ponds, or in Lake Ontario.

The wildlife that depend on our City's green spaces and waterways do not deserve to die from secondary rodenticide poisoning just because someone saw a rat and complained about it (simply because they don't want to see rats).

Rodenticide is scented and flavoured to attract wildlife, so using it in construction sites will attract rodents to those areas. The main focus should be to ensure that garbage is not accessible to rats at those sites, rather than attracting them.

Finally, the Rat Response Coordination Team should have an environmental representative and a wildlife representative to ensure that any measures used will not cause harm to the natural environment and wildlife in general.

Thank you.