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HOUSE COMMITTEE ON ENERGY
& COMMERCE

HOUSE COMMITTEE ON
HOMELAND SECURITY

January 14, 2026

The Honorable Lee Zeldin, Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460

Dr. Michael Watson, Administrator
USDA, Animal and Plant Health Inspection Service
4700 River Road
Riverdale, MD 20737

Administrator Zeldin and Administrator Watson:

I write to express concerns about the growing problem of livestock predation, particularly of sheep and goats. The U.S. Department of Agriculture has identified predation as a significant cause of loss for sheep and goat operations[1], and each successive survey of producers indicates increasing losses. The issue has forced many producers out of business, adversely affected rural economies, and threatens the sustainability of American sheep and goat production. We respectfully request that the Environmental Protection Agency (EPA) work alongside the U.S. Department of Agriculture (USDA) Animal and Plant Health Inspection Service (APHIS) to identify and evaluate predation control methods to increase preparedness and provide sheep and goat producers with additional tools. Specifically, I urge EPA to assess the regulatory status of single-lethal-dose (SLD) baits and explore the feasibility of regulating these products similarly to the M-44 sodium cyanide ejector device.

As you may know, predation by coyotes, foxes, and other predators has reached alarming levels nationwide. In Texas alone, predation of sheep and goats results in approximately $25 million in annual revenue loss. Two decades ago, there were nearly twice as many sheep and goats in Texas as there are today. If Texas ranchers could better control predation, they could generate well over $100 million in additional farm-gate sales.

Currently, there are proven chemical options for SLD baits that could be effective predation management tools for sheep and goat producers. However, these products lack the proper regulatory approval for legal use. Sodium fluoroacetate (Compound 1080) was the subject of EPA Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) Subpart D Hearings in 1982, where the Administrative Judge at that time approved its use in the Livestock Protection Collar

[1] U.S. Department of Agriculture, National Agricultural Statistics Service (NASS), Sheep and Goats Death Loss Reports. Available at: https://www.nass.usda.gov/Surveys/Guide_to_NASS_Surveys/Sheep_and_Goat_Inventory/

and in SLD baits[2]. Additionally, para-aminopropiophenone (PAPP) is currently registered for canine control in Australia and has been the subject of research led by USDA Wildlife Services[3]. If regulated with specific label restrictions to protect the environment and non-target species, both chemicals could provide safe and effective relief to sheep and goat producers. Without appropriate regulatory approval similar to that for the M-44 device, however, producers are left without the legal clarity to deploy these tools, which may prove vital to sustaining American sheep and goat production.

I respectfully urge EPA and APHIS to work together to evaluate whether SLD baits can be regulated as predation control tools similar to the M-44 device, and to coordinate on the feasibility of commercial use of these products. Thank you for your attention to this issue.

Sincerely,

August Pfluger
Member of Congress

[2] U.S. Environmental Protection Agency, Reregistration Eligibility Decision (RED) for Sodium Fluoroacetate, September 1995. EPA notes: "The initial and final decisions (Nissen, 1982; Thomas, 1983) permitted EPA to consider applications for registration of sodium fluoroacetate in toxic collars and single-dose baits." Available at: https://archive.epa.gov/pesticides/reregistration/web/pdf/3073.pdf

[3] PAPP was first assessed at the USDA Denver Wildlife Research Centre in the early 1980s for coyote control. See: Savarie, P.J., et al. (1983). "Comparative acute oral toxicity of para-aminopropiophenone (PAPP) in mammals and birds." Bulletin of Environmental Contamination and Toxicology 30, 122-126. PAPP is currently registered in Australia and New Zealand for canine control.