

CONTROL-A-BIRD PTY LTD

A.B.N. 60 004 478 951

APVMA Approval Number: 42202

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Manager Fenthion Review
Australian Pesticides & Veterinary Medicines Authority
PO Box 6182
Kingston ACT 2604

11 July 2014

Submission to Fenthion - Preliminary Review Findings.

Dear Sir/Madam,

Thank you for offering us the opportunity to comment on the subject review.

Control-A-Bird Pty Ltd has been offering a service for the eradication of feral/pest birds for 30 years and have approximately 30 clients. We have been providing our service to some of them for more than 20 years.

We understand that the recommendation of the Preliminary Review is to cancel the registration of our product, **Control-A-Bird Agent**, based on 'Unacceptable OHS risks'.

We understand that the 'Unacceptable OHS risks' are based on additional data relating to 'Dermal Absorption'.

We assume that this additional data is based on tests of 100% Fenthion and not the 'diluted' **Control-A-Bird Agent**.

We also assume that the 'Dermal Absorption' of **Control-A-Bird agent** would be much less than that of 100% Fenthion.

Regarding the OHS assessment (section 3.2), we offer the following comments:

1. Potential exposure during handling or use of the product by professional and/or domestic users.

Control-A-Bird Agent is handled and applied by our licensed Pest Control Technicians using appropriate safety procedures.

We do not sell our product and therefore it is not used by other professional and/or domestic users.

In our 30-years of business we have not had any adverse results from handling the product.

2. Potential post-application exposure, such as during re-entry to treated crops or areas or re-handling treated produce such as seeds, grain or treated timber products.

With reference to Table 1.1: Currently registered and suspended fenthion products, **Control-A-Bird Agent** is a paste (not a paint) which ensures that there is no dripping of our product.

Control-A-Bird Agent is applied to areas (e.g. ledges and roof beams) where the possibility of post-application exposure is negligible.

We also have signs/labels that advise of the presence of our product.

3. Potential exposure of bystanders from the use of the product.

Control-A-Bird Agent is applied to internal areas of industrial and commercial premises only.

Because of the application areas, as per 2 above, risk to staff is negligible.

Also we do not offer our service to premises that are frequented by the general public so exposure to bystanders is also negligible.

4. We estimate that our stock of **Control-A-Bird Agent** will be exhausted within 5-years; we then intend to close the business.

Therefore we request that our registration continue until the business is closed.

Thank you for the opportunity to offer our comments and request that you do not hesitate to contact us if you require more information.

Yours Faithfully

David Rooney - Manager