



August 06, 2014

Director, Chemical Review and AERP  
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**FENTHION – PRELIMINARY REVIEW FINDINGS MAY 2014**  
**AVIGEL PEST BIRD CONTROL AGENT # 52075/1208**

Reference: A. Your Ref: G-00108 dated 23 May 2014.

We have read through the Preliminary Review Findings Report for the Reconsideration of Fenthion and in particular your argument for cancelling our product AVIGEL Pest Bird Control Agent product # 52075 due to OH&S concerns for dermal absorption. We submit that there is NIL absorption of Fenthion to our licensed trained staff through the application and removal (after seven days) of AVIGEL Pest Bird Control Agent due to the stringent protocols (APVMA safety guide lines and as per the MSDS data sheet) enforced for the application of this proven Avicide. The Avicide is applied to duct tape which has been secured to the identified feral bird locations and removed (quite easily) after seven days. The situations where the Avicide is applied is always where human access is quite difficult without the use of access equipment and it never occurs where the AVIGEL Pest Bird Control Agent has been applied due to the signage and constant monitoring every day before the removal of the Avicide. The used product is secured in heavy duty garbage bags and disposed of in State Land Fill facilities.

We therefore reject that AVIGEL Pest Bird Control Agent as causing damage to the environment and to human health (via dietary and occupational exposure).

Yours Sincerely

A handwritten signature in black ink, appearing to read 'Greg Cowan', is written over a horizontal line.

Greg Cowan for  
ANC Bird Control

**ANC Bird Control**

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