Australian Government

Australian Pesticides and Veterinary Medicines Authority

Summary of submissions to the public consultation on use patterns for anticoagulant rodenticide products

September 2020

Comments and enquiries regarding copyright:

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This publication is available from the APVMA website.

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1 CONSULTATION OVERVIEW

From 7 April 2020 to 17 July 2020, the Australian Pesticides and Veterinary Medicines Authority (APVMA) asked for feedback on use patterns for anticoagulant rodenticide products. The consultation was published on the APVMA website and in the Gazette on 7 April 2020. The consultation end date was extended from 3 July to 17 July on request, and one late submission was also considered.

The key issues the consultation sought to address included:

- products considered anticoagulant rodenticides have been prioritised for reconsideration on the basis of concerns for worker exposure, public health and environmental safety
- the use of products in domestic premises, animal production facilities and food production facilities
- international jurisdictions (including the United States Environmental Protection Agency and the European Chemicals Agency) have taken action to limit access to these products by non-professional users, and to restrict the product formulations available and the situations in which these products may be used
- the APVMA is in consultation with the states and territories and relevant holders regarding the registered particulars and conditions of use for anticoagulant rodenticide products.

  NB: This does not include consideration of the intentional misuse of products or failure to act in accordance with label instructions.

Table 1: Active constituents used in registered products considered during the consultation

Active constituent
First-generation anticoagulant rodenticides (FGARs)
Coumatetralyl
Diphacinone
Warfarin
Second-generation anticoagulant rodenticides (SGARs)
Brodifacoum
Bromadiolone
Difenacoum
Difethialone
Flocoumafen

During this consultation, the APVMA invited submissions on matters specifically related to:

- the need for anticoagulant rodenticide products to be used in home garden or domestic settings
- the need for anticoagulant rodenticide products to be used in residential or suburban settings, for example, for public health or public sanitation programs
- the need for anticoagulant rodenticide products to be used in or around buildings, including those used to house livestock, or in or around on-farm buildings (including homesteads)
- the need for anticoagulant rodenticide products to be formulated as powders, gels, liquids, pellets, grains or pastes
- the likelihood of compliance with post-application sanitisation instruction (eg the timely collection of poisoned rodent carcasses, and the appropriate disposal of carcasses)
- the label instructions, particularly the adequacy of instructions to prevent inadvertent exposure to the product
- critical uses for anticoagulant rodenticide products, particularly in primary production
- other relevant matters related to the use of anticoagulant rodenticide products.

2 RESPONSE TO CONSULTATION

A total of 3,391 submissions were received, including:

- 3,327 campaign form emails (a copy of the form letter is at Enclosure 1)
- 53 responses from government agencies, holders, retailers or stakeholders
- 11 submissions from individuals.

2.1 Key themes for consideration

Need for continued industrial use

Twenty-one submissions acknowledged or advocated for the need for the use of first generation anticoagulant rodenticides (FGARs) and second generation anticoagulant rodenticides (SGARs) to protect agricultural and livestock production. A range of submissions outlined the need for the use of FGARs and SGARs in continuous rodent management programs from a public health perspective to maintain hygiene levels in agriculture and industry, and to reduce the risk of contamination of food and feed products by rodent waste or rodent-borne diseases. The use of different product formulations was cited as an important factor in continued efficacy.

Need for continued domestic/peri-urban use

Eleven submissions directly addressed the need for FGARs and SGARs in domestic and peri-urban locations. These submissions referenced the history of safe use of these products, and consider anticoagulant rodenticides as the ‘front line’ of rodent control in domestic situations. Two submissions detailed a lack of alternative pest control measures highlighting the need for the continued use of FGARs and SGARs.

Environmental impact

In addition to the 3,327 form letters, 27 submissions discussed the adverse impact of SGARs on non-target species as a result of primary or secondary consumption of anticoagulant rodenticide products. These submissions referred to the impact on non-target animals, including native animals and domestic pets, while noting the necessity of using anticoagulant products as part of a properly managed rodent control strategy. Fourteen submissions raised animal welfare concerns.

Human health and safety

Although this consultation did not include consideration of the intentional misuse of products (or failure to act in accordance with label instructions), two submissions referenced the impact of accidental consumption on humans. Other submissions outlined the need to use FGARs and SGARs to protect and maintain public health and safety and ensure sanitary conditions, by preventing exposure to rodent waste and rodent-borne diseases.

3 CONCLUSION

3.1 Considerations

A majority of submissions advocated for stricter regulation, including restricted access to certain formulations and updated label instructions. These submissions presented a variety of recommendations, including:

- restricting access to specific product forms (ie liquid, gel, wax block, powder, pellet) based on risk
- restricting use of products to secured, single use bait stations
- updated labelling including consistent, easy to follow instructions for use and requirements to dispose of used baits and carcasses.

Next steps

The APVMA thanks everyone who took the time to make a submission during the consultation period. All submissions have been reviewed, and relevant information will be considered further.

Enquiries in relation to this consultation should be directed to:

Chemical Review
Office of the Chief Regulatory Scientist
Australian Pesticides and Veterinary Medicines Authority
GPO Box 3262
Sydney NSW 2001, Australia

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Enclosures

ENCLOSURE 1—FORM LETTER

Office of the Chief Regulatory Scientist

Australian Pesticides and Veterinary Medicines Authority

via: chemicalreview@apvma.gov.au

Re: Submission to the consultation on use patterns for anticoagulant rodenticide products

Please accept my submission into the consultation on use patterns for anticoagulant rodenticide products. As part of my submission I would like to make the following key points:

First and Second Generation Anticoagulant Rodenticides (FGARs and SGARs) present a higher level of risk to humans and non-target animals (such as predatory birds) than would normally be considered acceptable. While they carry these risks, the use of FGARs and SGARs is sometimes necessary as part of properly managed rodent control strategies. But there must be clearer and tighter controls on their usage.

SGARs must be removed from the shelves for public sale and only made available to licenced professional operators only.

SGARs use should be restricted to indoor (non-domestic) use by these licenced operators, with exemptions only made for specific conservation efforts where there is little demonstrated impact on non-target species and reduced opportunity for SGARs to accumulate in the environment.

Both FGARs and SGARs should only be available in tamper proof bait stations that use solid formulations that are less likely to be moved away from the site.

Yours sincerely

[Via email]