Chemical Review
Australian Pesticides and Veterinary Medicines Authority
GPO BOX 574
Canberra ACT 2480

Friday, 23 January 2026

To Whom It May Concern

Re: Review of APVMA anticoagulant rodenticides proposed regulatory decisions

We provide this submission in response to the APVMA Special Gazette, 16 December 2025, Notice under section 34AB of the Agricultural and Veterinary Chemicals Code scheduled to the Agricultural and Veterinary Chemicals Code Act 1994: anticoagulant rodenticides reconsideration - proposed decision to vary and affirm active constituent approvals.

This submission is raised on behalf of the Australian Environmental Pest Managers Association Limited (AEPMA), representing Australia's professional pest management industry. AEPMA's mission is to establish and maintain industry standards that ensure best practice in pest management while aligning with community expectations and environmental stewardship. We represent professional pest managers committed to these standards, communicate industry best practice to government and consumers, and advocate for our 450 member companies employing approximately 8,000 pest management technicians nationwide.

AEPMA believes that rodent management should be based on the best available science, weighing the overall costs and benefits to the wider community while recognizing Australia's unique environmental context. Australia's pest rodent challenges differ substantially from those in other jurisdictions—our climate, native ecosystems, agricultural systems, and urban infrastructure create distinct rodent pressure points that demand tailored management approaches rather than wholesale adoption of overseas regulatory models. The environmental, food safety, and public health costs of failing to adequately control pest rodent activity and infestations are significant, and regulatory decisions must account for the practical realities of achieving effective control in Australian conditions.

Professional pest managers operate as government licensed guardians of public health, responding to serious rodent infestations in sensitive and high-risk environments such as food processing facilities, commercial warehouses, schools, hospitals, food service facilities, and public gardens and parks. In such situations effective control is critical to protecting public health and safety and preventing disease transmission, food contamination, export trade issues, and regulatory non-compliance. These professional contexts often involve persistent rodent populations and complex structural and environmental challenges.

Professional pest managers receive mandatory training in proper rodenticide selection, application methods, and non-target species protection, ensuring these specialist tools are used with appropriate precision and environmental responsibility.

Concerns Arising from the APVMA's proposed decisions to vary and affirm active constituent approvals

General

Rodent Species

We note the report extensively relies on date from the United Kingdom and Europe. The data from these regions is widely referenced when it should be treated with caution. Data from the UK and Europe is generally specific to the brown rat, *Rattus norvegicus*, which is their predominant rat species. The British Wildlife Centre specifically notes that this species is a "widespread pest" and "If you live in a town, you are probably never more than 15 metres from a (brown) rat." In Australia this species is less commonly encountered and is generally confined to coastal cities and ports.

The most ubiquitous and commonly encountered pest rat species in Australia is the black rat (*Rattus rattus*), which stands in marked contrast to the situation in the United Kingdom, where this species is now extremely rare. The British Wildlife Centre notes, "Black Rats are now scarce in Britain", advising the population is, "Estimated to be 1,300".

This distinction is of critical importance, as the behavioural ecology, habitat preferences, and movement patterns of *Rattus rattus* differ substantially from those of the brown rat (*Rattus norvegicus*), which dominates pest populations in the UK and Europe. Black rats are more arboreal, exhibit greater climbing ability, and frequently inhabit roof spaces, wall cavities, and upper levels of structures, whereas brown rats are predominantly ground-dwelling and burrowing.

As a result, rodent management strategies developed and routinely applied in the UK and Europe are largely tailored to brown rat behaviour and ecology and are not directly transferable or effective in the Australian context. In Australia, professional rodent management must account for the prevalence of black rats, requiring different surveillance methods, bait placement strategies, exclusion techniques, and risk assessments. Failure to recognise these species-specific differences can lead to ineffective control measures, increased biosecurity risks, and unintended impacts on non-target species. Accordingly, accurate understanding of species distribution and behaviour is essential for the development of effective, evidence-based rodent management policies and practices in Australia.

Implications of Restricted Rodent Control Options

The Review also fails to consider the potential consequences of restricting the use of anticoagulant rodenticides to a degree that results in increased rodent population densities. In professional pest management contexts, these compounds remain the most effective and reliable control tools currently available, particularly in complex urban, industrial, agricultural, and biosecurity-sensitive environments where alternative measures alone are insufficient.

Reductions in effective rodent control capacity may lead to significant changes in rodent population dynamics, including increased abundance, wider dispersal, and greater human–rodent interaction. Such changes carry clear and well-documented risks to public health, through the transmission of zoonotic diseases; to food security, via contamination and loss within agricultural production and food storage and supply chains; and to environmental values, through increased predation pressure and competition with native wildlife.

In the Australian context, these risks are heightened by the predominance of the black rat (*Rattus rattus*), a highly adaptable and invasive species. Black rats are known to displace native rodent species in certain environments and to exploit a wide range of habitats, including urban infrastructure and natural ecosystems. An increase in black rat populations resulting from diminished control options could therefore exacerbate impacts on native fauna, compromise biodiversity outcomes, and undermine existing conservation and biosecurity efforts.

Accordingly, any regulatory changes affecting anticoagulant rodenticides should be accompanied by a thorough assessment of population-level impacts and the availability, efficacy, and scalability of alternative control measures, to avoid unintended consequences that may outweigh the intended benefits of restriction.

Proposed Restraint: DO NOT apply this product directly into burrows

Burrow baiting represents a critical control method for certain professional situations, particularly where brown rats (*Rattus norvegicus*) establish burrow systems in close proximity to commercial buildings. Rodent burrows in and of themselves present a significant risk, as they can undermine buildings, pavements, and other infrastructure, and create trip and fall hazards for occupants and the public. Consequently, the presence of burrowing activity is often regarded as requiring the same level of urgency for remediation as the rodent infestation itself, necessitating rapid identification and removal to mitigate safety and structural risks.

In some scenarios, burrow baiting may be the only effective means of achieving complete elimination. To address environmental concerns while preserving this necessary professional tool, we propose the following improved label restriction:

DO NOT apply this product directly into burrows except as specified below.

Burrow baiting is restricted to licensed professional pest managers for the control of the brown rat (*Rattus norvegicus*) in commercial and industrial sites, and only where burrows are located within 10 metres of a building structure.

This approach maintains professional access to burrow baiting in the controlled, high-risk situations where it is legitimately required, while establishing clear geographical and contextual limitations that restrict environmental exposure.

Attachment A: Anticoagulant rodenticide product registrations and label approvals under reconsideration that the APVMA is proposing to cancel

Our concerns rest specifically with:

- Coumatetralyl 52182 Racumin 8 Rat and Mouse Rodenticide
- Coumatetralyl 86417 Racumin TP Rat and Mouse Rodenticide
- Bromadiolone 47484 Bromakil Super Rat Drink

The complete removal of liquid and powder formulations would eliminate essential rodenticide tools for managing rodents in complex professional settings where ready-to-use baits are ineffective.

Liquid formulations are a niche but irreplaceable tool in water-scarce environments where plentiful food sources abound, such as grain storage facilities, flour mills, and dry goods warehouses. In these settings, rodents often present as a near-permanent risk to the facility and, due to the complexity of the structure throughout which they may infest, can be extremely difficult to isolate, suppress and eliminate. Thus, the ability to select and deploy a liquid bait for moisture-seeking rodents must be preserved as an available option for the professional user.

Additionally, powder formulations represent the only means of creating customized bait matrices when standard formulations fail. Professional pest managers rely on these to mix with site-specific foodstuffs in food processing and storage facilities where extreme bait and trap shyness or neophobia occurs, or where rodents show a strong preference for on-site food sources. Without powder formulations, professionals have no recourse when rodents reject ready-to-use products in these high food competition environments, which represent some of the highest public health risk situations that the industry manages. Powder formulations also needed for burrows, voids and floor crevices.

These formulations are not convenience products but essential problem-solving tools for challenging professional control scenarios. These products must be retained for use only by state and territory licensed professional pest managers. We suggest a labelling requirement of:

RESTRICTED CHEMICAL PRODUCT –

ONLY TO BE SUPPLIED TO, OR USED BY, A LICENSED PROFESSIONAL PEST MANAGER.

Additional controls such as “All sales must be recorded and records maintained for a minimum period of seven (7) years to provide a chain of custody”, could be added.

Proposed Restraint ‘DO NOT bait in areas where wildlife may be collected for human consumption’

AEPMA supports the intent of this restraint to protect Indigenous communities and respect cultural food gathering practices. However, the current wording is overly broad and might prevent legitimate rodent control in urban and commercial environments.

The phrase "areas where wildlife may be collected" lacks geographical boundaries and could theoretically encompass metropolitan areas. This ambiguity creates opportunities for misinterpretation or activist interference with legitimate pest management activities in settings with no connection to Indigenous food gathering.

We recommend the following revised restraint that maintains the protective intent while providing operational clarity:

DO NOT bait in locations of Indigenous or cultural significance where wildlife collection for human consumption occurs or is likely to occur.

This revision focuses the restriction on actual sites of cultural food gathering activity rather than theoretically expansive areas, ensuring protection where it matters, while ensuring professional pest managers' ability to conduct rodent control in commercial, industrial, and urban environments.

Search for and dispose of dead rodents and slugs/snails in the infested area at each visit to prevent secondary poisoning. In case slugs/snails are present, move bait station to another location within the rodent infested site, away from slugs/snails. Dispose of slugs/snails in a way non-target animals are not exposed.

This requirement is impractical and unsupported by evidence demonstrating a meaningful connection between slug/snail consumption of SGAR rodent baits and a risk to wildlife. While slugs and snails may occasionally contact rodent baits, there is no data establishing this as a significant secondary poisoning pathway, particularly in urban environments where slug/snail populations and native wildlife predation patterns differ substantially from natural ecosystems.

The mandatory relocation of active bait stations is fundamentally incompatible with effective rodent control in professional settings and fails to consider more practical methods to either reduce the presence of slugs and snails or employ modifiers to bait placements, such as plastic wraps to minimise consumption and damage to the baits.

Additionally, across many commercial segments, bait station placement is determined by risk to the facility, rodent activity patterns, structural constraints, and regulatory compliance requirements. To relocate stations that are actively being consumed by target rodents will often compromise control efficacy, extend treatment timelines, and increase public health risks, by allowing infestations to persist longer in critical environments.

We propose the following revised wording that addresses environmental concerns without undermining rodent control effectiveness:

Search for and safely dispose of dead rodents in the infested area at each visit to prevent secondary poisoning. Where dead slugs or snails are observed, dispose of them in a manner that prevents non-target animal exposure. Where slug or snail activity is prevalent, consider application of a registered molluscicide product to reduce non-target bait contact.

This approach maintains carcass removal protocols while providing practical guidance that does not require counterproductive relocation of functioning rodent control measures.

Proposed instruction 'Inspect bait sites at intervals no more than 7 days apart.' is required to be added to the instructions for use for all commercial anticoagulant rodenticide chemical products listed in Attachment A …

This proposed mandatory 7-day inspection interval is operationally impractical, economically unjustifiable, and lacks scientific rationale supporting its necessity for effective rodent control or environmental protection.

Professional rodent management programs are designed around site-specific risk assessment, infestation severity, rodent activity patterns, and client operational requirements. Many commercial and industrial accounts operate on economically-based 14-day, 21-day, or monthly service intervals that have proven effective for maintaining rodent suppression whilst managing costs proportionate to actual site risk. Mandating universal 7-day inspections would arbitrarily double or triple service frequencies regardless of whether rodent activity or environmental risk warrants such intensity.

The economic impact of the proposed change would be extreme and systemic. Increased mandatory service frequency would translate directly into higher labour costs, travel time, vehicle utilisation, compliance overheads, and service fees across the professional pest management sector. These costs would be borne by a very large proportion of Australia's commercial and industrial businesses operating on recurring pest management programs.

The commercial pest management market is characterised predominantly by monthly service intervals. In practical terms, increasing service frequency across these monthly programs alone would result in many millions of dollars in additional annual costs—costs that will ultimately flow through to consumer food prices, healthcare costs, and essential services.

The impact would be disproportionately severe in regional and remote areas, where labour availability, travel distance, and service density already constrain delivery. In these locations, the proposed requirements risk making professional rodent management economically unviable, potentially reducing compliance and increasing biosecurity and food safety risks.

Taken collectively, the proposal represents not a marginal regulatory adjustment, but a structural increase in operating costs across critical supply chains, with no evidence of commensurate public health benefit, compared to current risk-based inspection schedules. Professional pest managers already conduct inspections at frequencies appropriate to the specific circumstances—daily or weekly in high-risk acute infestations, fortnightly or monthly in programs where rodent pressure is lower.

We propose retaining the current approach where inspection intervals are determined by professional judgment based on label requirements for carcass removal, infestation severity, bait consumption rates, and site-specific environmental considerations. This ensures appropriate stewardship without imposing blanket requirements that ignore operational reality.

Flooding (Gazette Section 65.2)

The proposed instruction to "place bait stations in areas not liable to flooding" is not feasible in the Australian context, given the extensive and well-documented history of flash flooding across both urban and regional areas. Many locations that are suitable and

necessary for rodent control during normal conditions may nonetheless be subject to intermittent or unpredictable flooding events.

As currently framed, this instruction risks being interpreted so conservatively that large areas of Australia would effectively be excluded from baiting, even during extended periods of normal rainfall or prolonged drought.

Further consideration is therefore required to develop a more practical and risk-based precaution that recognises the episodic nature of flooding in Australia while still enabling effective rodent management. Without such refinement, the guidance risks preventing timely and effective rodent control in many essential commercial situations, thereby increasing the likelihood of rodent population growth and the associated public health, infrastructure, and environmental risks that arise from unmanaged infestations. We suggest:

DO NOT place bait stations in locations where flooding is likely to occur.

Use of Scoop and Measure (Gazette Sections 87, 87.1, 87.2)

The proposed instruction requiring the use of "a scoop or measure" for block and soft bait formulations is impractical and imposes an unnecessary operational burden in professional rodent management settings. In commercial environments, professional pest managers service numerous sites, often involving large numbers of bait stations, and the proposed requirement would be unworkable in practice.

In most professional and food-industry contexts, especially Hazard Analysis and Critical Control Point (HACCP)–regulated environments, rodent control is primarily undertaken using block baits or soft baits that are secured to bait rods within locked and tamper-resistant bait stations, which are themselves often anchored or otherwise secured in position.

This approach is central to effective risk management, as it limits the risk of bait removal, minimises spillage, and reduces exposure risks to non-target species and the environment. The use of a scoop or measure is incompatible with this established and essential method of bait deployment. It cannot be practically applied when baits are to be fixed directly to bait rods within enclosed stations.

Further clarification is therefore required regarding the intent and expected application of the "scoop or measure" instruction. From a professional perspective, such a requirement would only be practical or relevant when using pelletised or grain-based baits, where loose product is dispensed. Applying the same requirement to block and soft bait formulations does not align with real-world professional practice.

It is also noted that the majority of rodenticide products used by professional pest managers already include clear, practical, and effective safety instructions, "When using the product wear elbow length chemical resistant gloves. Wash hands after use. After each day's use wash gloves."

These measures are well understood, routinely implemented, and fully endorsed by the Australian Environmental Pest Managers Association (AEPMA). Collectively, they provide a robust and proportionate approach to operator safety and risk management without introducing impractical procedural requirements.

Washing Clothes After Re-Handling Activities (Gazette Section 95)

The requirement to "wash clothes after performing re-handling activities" is impractical and does not align with established professional work practices. In professional pest management operations, clothing is appropriately cleaned as part of standard end-of-day hygiene and decontamination procedure. Requiring clothing to be washed after each re-handling activity during the workday is not operationally feasible and would not provide any safety benefits.

This requirement does not appear to be related to any demonstrated risk to users when products are handled in accordance with existing Safety Directions. The Australian Environmental Pest Managers Association (AEPMA) and its member companies are not aware of any incidents of technician poisoning associated with these products when current label instructions are followed. As noted above, existing directions are practical, well-understood, and effective risk-management measures. "When using the product wear elbow length chemical resistant gloves. Wash hands after use. After each day's use wash gloves."

In this context, the proposed clothing-washing requirement imposes unnecessary operational burdens with no corresponding improvement in user safety.

Disposal of Dead or Moribund Animals and Rodent Faeces (Gazette Section 107.1(C))

The instruction stating that workers "MUST" remove all dead or moribund animals and all rodent faeces from areas accessible to livestock or poultry, places an unrealistic and absolute liability on technicians. In practice, it is not physically possible to identify and remove every affected rodent or every piece of faecal matter.

We recommend a revised instruction that better reflects practical and achievable standards of care, such as:

"Workers must make all reasonable efforts to remove dead or moribund animals and rodent faeces at the time of inspection."

This aligns with current professional best practice. Professional pest managers routinely collect identified dead or moribund animals and clean bait stations to remove faeces during servicing, thereby managing risks to livestock and poultry effectively without imposing impossible requirements on technicians.

Limitations on Preferred Rodent Management Methods

Restricting professional rodent control to anticoagulant rodenticides, which require 4–7 days to be effective against mice (*Mus musculus*), creates significant public health and welfare risks in sensitive environments such as homes, schools, hospitals, and food premises. Approximately 5% of Australians experience musophobia, and the presence of live mice can cause severe stress, anxiety, and disruption to their daily life.

Access to other previously widely used management tools is increasingly restricted. Glueboards have been banned in states such as Victoria and New South Wales, leaving snap traps—the only other legal option—which are usually ineffective in large or complex infestations.

Mice breed rapidly, and timely control with fast-acting second-generation anticoagulant rodenticides (SGARs) is essential to prevent population explosions. Limiting access to these tools reduces the ability of professionals to respond quickly, prolongs infestations, and increases risks to public health, food safety, and the wellbeing of affected individuals.

Professional pest managers need to retain access to the best performing Second Generation Anticoagulant Rodenticides that provide kill within 3-4 days.

Current label restrictions on bait placement

All professional labels currently advise, "For rats: Place 1 to 3 blocks at intervals of 5 to 9 m in infested areas." Following this, the labels advise, "NOT TO BE USED FOR ANY PURPOSE, OR IN ANY MANNER, CONTRARY TO THIS LABEL UNLESS AUTHORISED UNDER APPROPRIATE LEGISLATION."

In practice, this restriction often prevents effective rodent management. Many professional pest management situations require closer placement of bait stations, particularly in high-density infestations, complex building layouts, or food-industry settings where international third-party audited Hazard Analysis and Critical Control Point (HACCP) guidelines mandate more frequent placement.

As currently written, the label is inconsistent with good pest management practice, and in many circumstances following it strictly would necessitate deliberate non-compliance to achieve effective control.

This represents an opportunity to revise label guidance to better reflect professional requirements while maintaining safety and regulatory compliance. Suggested revised wording could be:

For rats: Place 1 to 3 blocks at intervals of approximately 5–9 m. Placement may be adjusted based on infestation level, building layout, and risk assessment to achieve effective control.

Such wording maintains regulatory oversight and user safety while providing flexibility for professionals to implement rodent control strategies that are consistent with industry best practice, food-safety standards, and site-specific risk assessments.

References to Competency-based Training

We draw your attention to those areas of the review that recommend, "'DO NOT supply this product to any person unless the person has a current statement of attainment from a registered training organisation stating the person has completed the training course CPPUPM3006 - Manage pests by applying pesticides, or an equivalent unit of competency.'" This is not a suitable statement since the above referenced competency-based training package is under review and this code, CPPUPM3006, will change.

The Review ignores the impact of pindone

Of particular concern is the statement at Section 44.4 "However, on the present evidence, I cannot identify any plausible sources of anticoagulant rodenticide exposure apart from currently registered products with labels containing approved instructions by the APVMA."

This overlooks the use of non-rodenticidal use of the anticoagulant chemical pindone, which is widely used in broadscale agricultural applications for rabbit control in a manner that inevitably enters the wildlife food chain. The report's failure to address pindone use represents a significant gap in any comprehensive assessment of anticoagulant exposure pathways affecting Australian wildlife. Pindone is potentially the most widely used anticoagulant in Australia.

Pindone was declared ineligible for registration in the US and has never been registered in the UK. It is not used in the EU.

There are few studies of the toxicity of pindone to Australian native fauna. According to a 2002 survey of the literature by the National Registration Authority for Agricultural and Veterinary Chemicals (NRA – now the APVMA) the available information "indicates that a number of native species (macropods [kangaroos and wallabies], bandicoots, dasyurids, raptors and a range of granivorous birds) are likely to share the high sensitivity of rabbits to pindone.

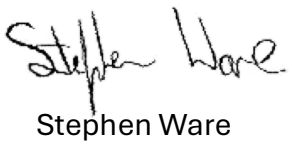
The reason given for the NRA review was that: “Poisoning during baiting operations of non-target animals using either form of pindone in baits were identified in WA and NSW in particular. States and some community groups have expressed concerns about poisonings of non-target animals, including both intentional and unintentional misuse.”

“The proposed regulatory restrictions on SGARs may not achieve the intended environmental benefits if the widespread use of pindone is not also addressed.”

Finally we note, we have had little time in which to fully review these lengthy documents given the Christmas vacation period. In particular it has been challenging since there are limited references provided and errors in detail not addressed herein. E.g.,

- Review Technical Report Page 24 para 1 on coumatetralyl incorrectly states brodifacoum.
- Gazette 3.3.3 Coumatetralyl Bees – highly toxic on contact. The only other source found was the Victorian Government. Could this data actually refer to coumaphos (Asuntol) which was used to control mites in bee hives? This is the only anticoagulant reference to toxicity to invertebrates.

Yours faithfully



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