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Chemical Review
Australian Pesticides and Veterinary Medicines Authority
GPO Box 3262, Sydney NSW 2001

Via email: chemicalreview@apvma.gov.au

To Whom It May Concern

Reconsideration of anticoagulant rodenticide approvals and registrations

The RSPCA welcomes the decision for the APVMA to reconsider anticoagulant rodenticides and appreciates the opportunity to contribute to the public consultation. The RSPCA is primarily concerned with the significant animal welfare impacts of these chemicals but also acknowledges important conservation, ecological and biodiversity considerations.

As you are aware, the RSPCA provided a submission to the 2020 APVMA Review of the Use Patterns for Anticoagulant Rodenticide Products which included a strong emphasis on the need to consider the humaneness of these chemicals. Since that Review, the Independent Review of the Pesticides and Veterinary Medicines Regulatory Systems in Australia Chemical Review [Report](#) released in July 2021 also supported the need to consider humaneness through a recommendation to include a relevant label statement to help inform chemical users.

Humane and ethical principles promote the use of the most humane methods for controlling vertebrate pests. The RSPCA is disappointed that humaneness is not included in the scope for this further important work regarding these chemicals.

Should you require further information please don't hesitate to contact me via email devans@rspca.org.au .

Kind regards



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Submission by RSPCA Australia

1. Introduction

The RSPCA has multiple concerns regarding the use of both first and second generation anticoagulant rodenticides. It is timely to also consider the welfare risks of these products, which impact equally on target and non-target species. We question the justification of the continued use of these chemicals due to the significant suffering caused to both target and non-target species, the negative impact on wildlife due to fatal secondary poisoning and availability of more humane alternatives.

2. Specific matters and concerns

2.1 Animal welfare impacts

Poisoning with anticoagulants do not result in a humane death (Paparella 2006). Mason & Littin (2003), who have reviewed the humaneness of several rodent control methods, reported that animals poisoned with anticoagulants experience distress, disability and/or pain, and take several days to die. Bleeding per se is not considered to be painful but the accumulation of blood in confined areas in the body, particularly the joints and muscles, can cause pain and dysfunction.

The RSPCA has strongly advocated that animal welfare be included as a primary consideration for all applications and for reviews of currently registered products. There is an increasing community expectation that the welfare of 'pest' target species is considered to help ensure that the most humane methods are available and are used.

Due to the significant and prolonged pain and suffering caused by anticoagulant rodenticides continued approval for the use of these products should be reconsidered. New research should be supported to develop more humane and targeted poisons as has occurred with other vertebrate species, e.g., sodium nitrite is an effective and humane alternative to 1080 for feral pigs delivered using specific feeders to avoid non-target poisoning.

The RSPCA also acknowledges Recommendation 17 from the Independent Review of the Pesticides and Veterinary Medicines Regulatory Systems in Australia Chemical Review [Report](#) (Matthews et al 2021) which refers to a requirement to include a humaneness statement on product labels. As part of the reconsideration of anticoagulant rodenticides, the RSPCA urges that humaneness is included with the view to effectively address this issue. The RSPCA understands that some preliminary work on relative humaneness of rodent control methods has already been undertaken by the NSW Department of Primary Industry.

2.2 Environmental safety, including off target and secondary poisoning

Several studies have been reported both in Australia and overseas of the impact of anticoagulant rodenticides on wildlife (Hughes et al 2013; Masuda et al 2014; Murray 2017; Lohr 2018; Lohr & Davis 2018; Cooke et al 2022). Several studies raising issues to anticoagulant rodenticides with about 50% having potentially dangerous levels Further work has identified native reptiles also

being at risk of secondary poisoning with the authors calling for greater regulatory oversight of the use of these chemicals (Lohr & Davis 2018).

Similarly, there have been several published reports of primary accidental poisoning of companion animals overseas and in Australia (Caloni et al 2016; Merola 2002; Robertson et al 1992). Furthermore, in Australia, there have been several reports of anticoagulant rodenticides being used to maliciously poison domestic pets, with the RSPCA publicly stating that these baits are commonly used for this purpose (Merrilees 2017).

2.3 Regulatory changes in overseas jurisdictions

Overseas jurisdictions have recognised the high risks particularly posed by second generation anticoagulant rodenticides (SGARs) and in response have introduced tighter regulations on their use. For example, in California, increased safeguards under the California Ecosystems Protection Act ([A.B. 1788](#)) to protect native wildlife and domestic animals began on January 1, 2021. Although, consumer sales of SGARs were banned in 2014, these new regulations are aimed at addressing the continued risk posed by increased use by commercial operators.

Similarly, British Columbia also introduced tighter regulations under the Integrated Pest Management Act Ministerial Order No. M305 on use of SGARs to essentially restrict access and use to landholders and licensed pest control operators, i.e., no access for use in a domestic setting.

3. Comment on Scoping and Work Plan

The following comments relate to Attachment B: Work Plan for the Reconsideration of Anticoagulant Rodenticides.

Step 3 Scoping and Work Plan

- the scope includes the following; chemistry, toxicology, worker and public exposure, environment, residues, trade and adequacy of label instructions (2021). For the reasons outlined above, the RSPCA urges inclusion of humaneness, and regulatory changes in other countries in the scope.

Step 5 Assessment

- the component assessment reports to be completed include the following; chemistry, toxicology, worker and public exposure, environment, residues and trade. For the reasons outlined above, the RSPCA urges inclusion of humaneness in the component assessment reports especially as a statement regarding relative humaneness was recommended in the Independent Review of the Pesticides and Veterinary Medicines Regulatory Systems in Australia Chemical Review.

The timeline outlined in the Work Plan covers an extensive period and the RSPCA urges that this reconsideration review is undertaken as quickly as possible but on the basis that it is undertaken thoroughly.

References

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