FRIENDS OF GIPPSLAND LAKES

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SUBMISSION TO THE APVMA

Reconsideration of Anticoagulant Rodenticides

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Responding to the RCP Certification of 12 March 2026:

Making Professional-Only Access Work — Enforcement, Monitoring, and the Lessons of UK Failure

16 March 2026

1. Executive Summary

Friends of Gippsland Lakes (FOGL) welcomes the APVMA's certification on 12 March 2026 that second-generation anticoagulant rodenticides (SGARs) should be declared restricted chemical products (RCPs), and the concurrent one-year suspension of all SGAR registrations commencing 24 March 2026 (APVMA, 2026). These decisions represent a significant regulatory advance and vindicate the sustained advocacy of conservation organisations, scientists, and the more than 280 experts who signed the 2025 open letter (BirdLife Australia, 2025).

However, the RCP certification is a gateway, not a destination. Removing SGARs from retail shelves is an excellent first step, but does not by itself take the poison out of the food web. The critical question is now whether removing consumer access will be enough to reduce wildlife contamination, or whether professional deployment, even at reduced volumes, will continue to sustain the secondary poisoning pathway that drives the contamination documented in Australian wildlife.

This revised submission, lodged on the final day of public consultation, responds directly to the RCP certification and identifies seven structural gaps in the professional-use framework. International experience (particularly the United Kingdom's stewardship regime, discussed in Section 4) demonstrates that professional-only access, without enforceable conditions on use and mandatory monitoring, does not by itself reduce wildlife contamination. Australia's RCP decision goes further than the UK on consumer access, but the question of what happens after the retail ban is exactly the question the UK's seven-year record answers: training and certification improved professional practice but did not reduce barn owl contamination, which fluctuated between 79.5% and 90% with no statistically significant decline from the 81% baseline (Ozaki et al., 2022; Shore et al., 2016).

> *FOGL's position: The RCP decision is the right first step: it takes the poison off the shelf. But it does not, by itself, take the poison out of the food web. Without enforceable conditions on professional use, mandatory wildlife monitoring with escalation triggers, and a genuine IPM-first framework, Australia risks spending the next decade discovering what the UK already knows: that changing who holds the poison does not change what the poison does.*

This submission makes twelve specific requests across monitoring and accountability, professional use conditions, environmental protection, and structural reform. It draws on the published scientific literature on SGAR contamination of Australian wildlife, the APVMA's own Technical Report and Special Gazette (16 December 2025), the UK's documented stewardship record, and British Columbia's essential-services model. FOGL acknowledges BirdLife Australia's national advocacy campaign.

2. The RCP Decision: What It Does and Does Not Do

2.1 What the RCP certification achieves

The combined effect of the suspension and RCP certification, if accepted by DAFF, will remove SGARs from general retail sale. This eliminates the single largest driver of uncontrolled, unsupervised SGAR deployment: millions of residential applications by untrained consumers with no environmental awareness obligations, no monitoring capacity, and no accountability for non-target outcomes. FOGL has advocated for this outcome consistently and acknowledges its significance.

2.2 What the RCP certification does not address

The RCP framework establishes who may purchase SGARs. It does not establish how those persons must use them, what environmental conditions must be satisfied, what monitoring must occur, or what consequences follow from non-compliance. These are matters for state and territory control-of-use authorities, the APVMA's conditions on re-registered product labels, and any future DAFF regulatory instruments.

FOGL acknowledges the constitutional division between Commonwealth product registration and state/territory control of use. Several of the requests below are addressed to the APVMA in its capacity as the body that provides advice to DAFF on the content of RCP declarations (as described

on the APVMA's own RCP guidance page), and as the body that approves labels and sets label conditions under ss 5D and 14 of the Agvet Code. Others are directed to DAFF as recommendations for inclusion in the RCP implementation architecture. Where a request falls outside the APVMA's direct statutory remit, we identify this explicitly and frame the request as a recommendation.

3. Seven Enforcement and Monitoring Gaps

3.1 Gap 1: No national wildlife monitoring programme

The RCP certification provides no mechanism to measure whether professional-only access actually reduces wildlife contamination. Without a mandatory, funded, nationally coordinated wildlife residue monitoring programme, Australia will have no way to determine whether the regulatory intervention has succeeded or failed.

The UK established barn owl sentinel monitoring through the Centre for Ecology and Hydrology under its stewardship regime. The key finding is that this monitoring demonstrated that barn owl contamination showed no statistically significant decline across six years of post-implementation data, despite documented improvements in professional practice (see Section 4 for a detailed assessment of the UK comparison, including the important distinction that the UK never removed consumer access). Without equivalent Australian monitoring, failure will be invisible and unaccountable.

Australia currently has no national programme to monitor SGAR residues in wildlife. The National Residue Survey is export-focused (Gabriela et al., 2022). States and territories monitor chemical residues inconsistently: only Queensland, Victoria, and Western Australia perform routine monitoring of any kind, and none monitors SGAR residues in non-target wildlife systematically (Gabriela et al., 2022). University-led research (Cooke et al., 2022; Scammell et al., 2024; Lohr et al., 2025) has provided critical baseline data, but this work is grant-dependent, episodic, and not designed to serve as a regulatory monitoring instrument.

> *FOGL Request 1: The APVMA should recommend to DAFF, as part of its RCP certification advice, that a national SGAR wildlife residue monitoring programme be established as a condition of the RCP declaration, with annual public reporting, sentinel species monitoring (Powerful Owl, barn owl, plus a minimum of five additional indicator species across raptors, marsupials, and reptiles), funded by industry levy and administered independently of the pest control sector. In parallel, the APVMA should include, as a condition of any re-registration of SGAR products following the suspension period, a requirement that registrants contribute to an industry-funded monitoring programme.*

3.2 Gap 2: No automatic escalation triggers

Even if monitoring is established, it will be ineffective without pre-committed escalation triggers. The UK experience illustrates this: the Government Oversight Group found the stewardship regime 'fit for purpose' at each annual assessment despite persistent contamination data (CRRU UK, 2021). A formal review was initiated in 2021, approximately five years after the regime commenced, but no published review outcome has been released (Barn Owl Trust, 2024). The eventual escalation, the prohibition of open-area SGAR use from July 2024, came approximately eight years after

stewardship began, implemented through CRRU voluntary action and HSE label changes rather than through any pre-committed trigger mechanism.

FOGL notes that the APVMA retains power to vary, suspend, or cancel registrations under Division 4 of Part 2 of the Agvet Code (ss 34–34AA) if it forms the view that safety criteria are no longer met. FOGL does not seek to fetter this statutory discretion. Rather, FOGL requests that the APVMA publish a policy framework setting out the monitoring benchmarks and timeframes that will guide the exercise of its discretion, analogous to regulatory guidance documents in other domains that provide transparency and predictability without constraining statutory decision-making.

> *FOGL Request 2: The APVMA should publish a regulatory guidance document specifying that if sentinel species contamination rates do not decline by a statistically significant margin within three years of full RCP implementation (measured against baseline data from Cooke et al. 2022, Scammell et al. 2024, and Lohr et al. 2025), additional restrictions will be considered, including mandatory site-specific environmental risk assessments and deployment restrictions near threatened species habitat and Ramsar-listed wetlands. This framework should guide, not fetter, the APVMA's exercise of its powers under ss 34–34AA.*

3.3 Gap 3: Fragmented state and territory implementation

The RCP framework delegates implementation to eight state and territory control-of-use authorities, each operating under different legislation with different licensing structures, training requirements, and enforcement capacities. The APVMA has acknowledged that it will work with state and territory authorities to 'consider how training and licensing requirements could be implemented'; this confirms these requirements do not yet exist for SGARs.

Victoria requires an Agricultural Chemical Users Permit (ACUP) for restricted chemicals via AQF3 accredited training. New South Wales requires a ground applicator licence for fee-for-service pesticide work. Queensland, South Australia, the Northern Territory, Western Australia, and Tasmania each operate distinct frameworks. No jurisdiction currently operates a SGAR-specific training, licensing, or compliance regime.

The APVMA's own RCP guidance indicates that state and territory authorities determine who is an 'authorised person,' based on advice from the APVMA following a risk assessment. FOGL's request is that the APVMA provide substantive content in this advice, not merely a bare certification that RCP status is warranted.

Training without compliance verification is aspiration, not regulation. The UK's KAP surveys demonstrated that self-reported improvements in professional knowledge and practice did not translate into reduced wildlife contamination (CRRU UK, 2021; Ozaki et al., 2022). A training standard is only as effective as the auditing regime that enforces it. FOGL therefore requests that nationally consistent training standards be accompanied by a comprehensive compliance auditing framework with meaningful penalties, including loss of authorised person status, for repeat or serious breaches.

> *FOGL Request 3: The APVMA must specify, in its advice to DAFF and state/territory authorities, nationally consistent minimum standards for SGAR-authorised person training, including mandatory content on secondary poisoning ecology, threatened species*

> *identification, IPM-first obligations, site-specific environmental risk assessment, and reporting requirements, subject to a comprehensive auditing regime with meaningful penalties (including loss of authorised person status) for repeat or serious breaches. Administrative variation across jurisdictions is acceptable; variation in the substantive environmental protection standard is not.*

3.4 Gap 4: No mandatory reporting of professional SGAR deployments

The RCP certification restricts purchase to authorised persons but imposes no obligation to report what is purchased, where it is deployed, what quantity is used, what non-target impacts are observed, or what bait-take data is recorded. Without deployment reporting, it is impossible to correlate wildlife monitoring data with use patterns, identify geographic hotspots, or verify compliance with label conditions.

The UK's CRRU regime relied on voluntary Knowledge, Attitudes and Practice (KAP) surveys (CRRU UK, 2021). These showed improvements in self-reported awareness, yet barn owl contamination did not decline (Ozaki et al., 2022). Self-reported behaviour change is not a reliable proxy for environmental outcomes.

The APVMA has clear power under ss 5D, 14 and 23 of the Agvet Code to include record-keeping as a label direction for registered products. FOGL recognises that a national register would require DAFF or state/territory instruments; accordingly, FOGL requests that the APVMA include mandatory record-keeping as a label direction, and recommend to DAFF that a centrally accessible register be established.

> *FOGL Request 4: The APVMA should include, as a label direction on all re-registered SGAR products, a requirement that the user record: the active ingredient and quantity deployed; site address and GPS coordinates; proximity to threatened species habitat, waterways, and Ramsar wetlands; deployment duration; bait-take data; and any non-target mortality observed. Records must be retained for five years and be available to state/territory compliance officers on request. FOGL further recommends that DAFF establish a national SGAR deployment register as part of the RCP implementation architecture.*

3.5 Gap 5: No IPM-first obligation

The RCP certification restricts who may use SGARs but does not require that SGARs be used only as a last resort after non-chemical and lower-toxicity alternatives have been tried and documented as inadequate. Without a mandatory IPM-first framework, professional operators will default to SGARs as the cheapest and most familiar tool.

The EU's Biocidal Products Regulation requires SGARs to be authorised only as a 'last resort' within an IPM framework (European Commission, 2012). British Columbia's 2023 restrictions limit remaining use to essential services with documented justification and mandatory site-specific IPM plans (Province of British Columbia, 2023). Australia's RCP framework imposes no equivalent obligation.

This request is squarely within the APVMA's power. The Agvet Code requires the APVMA to be satisfied that use in accordance with label directions does not pose undue risk. A label direction

requiring consideration of alternatives before SGAR use is a standard risk mitigation tool available under the labelling criteria in ss 5D and 14.

> *FOGL Request 5: The APVMA must require, as a condition of re-registration following the suspension period, that all SGAR product labels include a mandatory IPM-first direction: SGARs may only be used where non-chemical methods and first-generation anticoagulant rodenticides have been tried and documented as inadequate for the specific infestation. This direction is enforceable through state and territory control-of-use legislation.*

3.6 Gap 6: Aquatic risk assessment remains incomplete

The APVMA's Technical Report assessed aquatic risks for only two of five SGARs (difethialone and flocoumafen), and only for sewer baiting (APVMA, 2025, paras 24.3–24.6). Non-sewer pathways (stormwater runoff, agricultural drainage, direct riparian contamination) remain entirely unassessed. Four of five SGARs are classified as 'very toxic to aquatic life' (APVMA, 2025, para 24.1).

If the APVMA certifies that products meet the safety criteria under s 5A(1)(c) while the aquatic risk assessment remains incomplete for three of five active ingredients and for non-sewer use patterns, this creates a potential vulnerability in the decision's evidential basis. FOGL raises this constructively: completing the aquatic assessment strengthens the APVMA's decision, not merely FOGL's position.

For the Gippsland Lakes, a Ramsar-listed wetland of international importance, professional SGAR deployment in surrounding townships (Bairnsdale, Lakes Entrance, Paynesville, Sale) will continue. Stormwater drains directly into the Lakes system. Rakali, platypus, and fish-eating birds face potential exposure through aquatic food webs that have never been evaluated.

> *FOGL Request 6: The final regulatory decision must require aquatic risk assessment for all five SGAR active ingredients across all registered use patterns, including urban stormwater pathways. Pending completion, a 200-metre exclusion zone should apply to all professional SGAR deployments near permanent and semi-permanent waterways. This distance reflects the upper range of Victorian riparian protection buffers for high-value waterways (Melbourne Water, Waterway Corridors guidelines). For Ramsar-listed wetlands, where contributing catchments may extend far beyond any practicable fixed buffer, the appropriate mechanism is enhanced deployment conditions within contributing catchments rather than exclusion (see Section 6).*

3.7 Gap 7: No spatial framework for environmentally sensitive deployment

The RCP framework establishes who may use SGARs, but provides no mechanism for authorised persons to identify where the environmental risks of deployment are highest. A pest controller attending a callout in suburban Bairnsdale currently has no practical way to determine whether the site falls within Powerful Owl foraging habitat, a Ramsar contributing catchment, or proximity to a riparian corridor supporting rakali or platypus.

Fixed-distance exclusion zones around specific nest sites are not the answer. There is no public, real-time dataset of owl roost or nest locations at the resolution required. The Victorian Biodiversity Atlas has records, but they are patchy, often years old, and sensitive species records

are frequently suppressed to prevent disturbance. Absence of a VBA record does not mean absence of an owl or quoll.

What does exist is habitat suitability modelling. DEECA has Powerful Owl habitat models for Victoria. The Cooke research group's GPS telemetry on 21 urban Powerful Owls in Greater Melbourne produced landscape-scale habitat suitability layers based on tree cover, NDVI, riparian corridor connectivity, and impervious surface thresholds (average home range 397 ha; core range 84 ha; Isaac et al., 2024; cf. Soderquist & Gibbons, 2007 for non-urban home ranges). These models predict where owls are likely to forage based on habitat structure, regardless of whether a specific bird has been recorded at the site. Ramsar wetland boundaries and contributing sub-catchments are mapped by catchment management authorities. Riparian corridors are mapped in state waterway datasets. All the spatial data exists; it has simply not been assembled into a tool that a pest controller can use.

This already has direct analogues in the Victorian planning system. Environmental Significance Overlays, Vegetation Protection Overlays, and Bushfire Management Overlays are all spatially mapped, accessible through VicPlan, and routinely consulted by builders and developers before commencing work. A pest controller could check a SGAR sensitivity layer the same way a builder checks whether a property falls within a Bushfire Management Overlay: enter an address, get a site classification, record the result. That is what professional competence under the RCP framework should look like.

> *FOGL Request 7: The APVMA should recommend to DAFF, as part of the RCP implementation architecture, the development of a national SGAR Environmental Sensitivity mapping tool integrating existing threatened species habitat suitability models (Powerful Owl, Masked Owl, Sooty Owl, quoll habitat), Ramsar wetland boundaries and contributing catchments, and waterway riparian buffers. The tool should be web-accessible and address-searchable, enabling authorised persons to determine site-specific conditions prior to deployment. Within areas classified as high environmental sensitivity, enhanced conditions should apply above the PRD baseline: (a) mandatory pre-deployment site-specific environmental risk assessment; (b) deployment records including GPS coordinates, proximity to sensitive features, and any non-target mortality observed; (c) mandatory post-treatment site inspection and bait removal within 7 days of treatment cessation; (d) a reduced maximum deployment period of 21 days (rather than the PRD's 35-day baseline); and (e) FGARs or non-anticoagulant rodenticides as the required first-line treatment, with SGARs permitted only where the authorised person documents that first-line methods have been tried and are inadequate for the specific infestation. The tool should be operational before any re-registration of SGAR products following the suspension period.*
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> *FOGL Request 8 (interim): Pending development of the sensitivity mapping tool, the APVMA should impose, as interim label directions: (a) a 200-metre exclusion zone around waterways (consistent with the upper range of Victorian riparian protection buffers and rakali foraging ecology); and (b) a requirement that authorised persons consult NatureKit, the VBA, or the relevant state biodiversity atlas before deploying SGARs at any site not previously assessed, and record the result in deployment records.*

3.8 Gap 8: No time limits on professional SGAR deployment

The RCP framework does not require time-limited deployment plans. Without defined end dates, professional operators may maintain permanent or rolling baiting programmes that sustain

continuous SGAR presence in the food web indefinitely. The PRD proposed a 35-day deployment limit for all products, but this applies to individual deployment events and does not prevent immediate re-deployment or permanent baiting contracts. British Columbia imposes both a 35-day consecutive limit and a 120-day annual cap per site (Province of British Columbia, 2023). Open-ended baiting is the operational norm in commercial pest control, and without a label direction requiring time-limited deployment plans with defined end dates, the RCP framework will not change this practice.

> *FOGL Request 9: The APVMA should include, as a label direction on all re-registered SGAR products, a requirement that deployment plans specify a defined end date. Open-ended or permanent baiting programmes must not be permitted under the RCP framework. This direction is within the APVMA's power under the labelling criteria in ss 5D and 14 of the Agvet Code.*

3.9 Gap 9: No guarantee of monitoring independence

The UK's stewardship regime was designed, funded, and administered by CRRU UK, a body whose membership comprises rodenticide manufacturers and distributors (CRRU UK, 2021). The Government Oversight Group provided regulatory supervision but did not control training content, certification standards, or the KAP survey methodology. The barn owl monitoring programme was independently administered by UKCEH, but the stewardship regime itself was industry-governed. This structural conflict, in which the regulated industry designs and assesses its own compliance framework, is the most commonly cited criticism of the UK model (Barn Owl Trust, 2024). Australia must not replicate it. Any monitoring, training, or stewardship body established under the RCP framework should be independently funded and governed, with no structural control by rodenticide manufacturers or their industry associations.

> *FOGL Request 10: No monitoring, training, or stewardship body established under the RCP framework should be funded or governed by rodenticide manufacturers or their industry associations. FOGL recommends that the APVMA include this principle in its advice to DAFF on the RCP implementation architecture.*

3.10 Gap 10: No national threat abatement pathway

Victoria has listed poisoning of native wildlife by anticoagulant rodenticides as a threatening process under the Flora and Fauna Guarantee Act 1988 (DEECA, 2023). No equivalent listing exists at the Commonwealth level. Listing SGAR exposure as a Key Threatening Process under the EPBC Act would trigger a national Threat Abatement Plan, providing a coordinated, cross-jurisdictional framework for reducing SGAR impacts on threatened species. This is the appropriate national mechanism for a threat that operates across state boundaries and affects EPBC-listed species including the Northern Quoll and Chuditch.

> *FOGL Request 11: The APVMA should support the nomination of SGAR exposure as a Key Threatening Process under the EPBC Act, consistent with Victoria's existing FFG Act listing and the weight of published scientific evidence on SGAR contamination of EPBC-listed species.*

3.11 Gap 11: No published implementation timeline

The RCP certification provides no published timeline for implementation of the professional-use framework. Eight state and territory jurisdictions must develop or adapt training, licensing, and compliance regimes. The sensitivity mapping tool must be developed. Monitoring must be established and baselined. Without a published timeline specifying milestones and deadlines, there is no mechanism for public accountability if implementation stalls. The UK's stewardship regime took approximately two years from announcement to full implementation (Buckle et al., 2017); British Columbia's restrictions were implemented within twelve months of announcement. FOGL considers that DAFF should publish a binding implementation timeline within 60 days of accepting the RCP certification.

> *FOGL Request 12: The APVMA should recommend that DAFF publish an RCP implementation timeline within 60 days of acceptance, specifying milestones for state/territory training and licensing, sensitivity tool development, monitoring programme establishment, and first annual monitoring report.*

4. International Comparisons: What the Evidence Does and Does Not Show

4.1 The UK is not a direct analogue, and that matters

The UK's Rodenticide Stewardship Regime is frequently cited as evidence that label-based controls fail to reduce wildlife contamination. FOGL agrees with that conclusion. However, with the RCP certification of 12 March 2026, the regulatory question has shifted. The label-control debate is now settled: consumer access is being removed. FOGL considers it important to state clearly what the UK evidence does and does not prove for Australia's new professional-use framework.

The UK stewardship regime (CRRU, April 2016 onward; Buckle et al., 2017) controlled professional use while leaving consumer access to small packs largely intact. UK consumers could purchase SGARs in quantities under 1.5 kg (later reduced) from retail outlets throughout the stewardship period. The CRRU training, certification, and point-of-sale requirements applied to professional-quantity purchases only. Consumer packs remained on supermarket shelves.

Australia's RCP decision does something the UK has never done: it removes all consumer access entirely. The one-year suspension from 24 March 2026, followed by the RCP declaration if DAFF accepts, takes SGARs off retail shelves completely. That is a more radical intervention than anything the UK has implemented. FOGL acknowledges this distinction rather than glossing over it.

The APVMA may therefore argue that the UK comparison is inapt, arguing that UK barn owl contamination reflects the combined effect of uncontrolled consumer use alongside professional use, and that removing the consumer contribution may be sufficient to change outcomes. FOGL takes this argument seriously, but the evidence does not support it for three reasons.

4.2 What the UK data proves

First, the relative contribution of consumer versus professional deployment is unknown, and that matters. Neither the UK nor Australia has published data disaggregating SGAR use by volume between consumer self-application and professional deployment (CRRU UK, 2021). The UK

stewardship regime focused on professional users without quantifying what proportion of environmental contamination their use generated. Australia's RCP decision removes consumer access without knowing what proportion of contamination it will eliminate. In both cases, the regulatory intervention proceeded without baseline data on relative source contributions. This is why mandatory monitoring (Request 1) is essential: without it, Australia will not be able to attribute any observed change in wildlife contamination, or lack of change, to the consumer ban, the professional conditions, or neither. If professional deployment turns out to be the dominant source, the consumer ban will have addressed the minor contributor while leaving the major contributor managed but undiminished.

Second, training and certification do not change the secondary poisoning mechanism. Across six years of post-implementation monitoring (2017–2022), barn owl SGAR contamination fluctuated between 79.5% and 90%, with no statistically significant decline from the 81% baseline (Shore et al., 2016; Ozaki et al., 2022). Three KAP surveys documented major improvements in professional knowledge and self-reported practices (CRRU UK, 2021). These behavioural improvements did not translate into reduced wildlife contamination. This finding transfers directly to Australia regardless of consumer access, because it is about the inherent biology of the product: a well-trained professional who deploys brodifacoum correctly still produces contaminated rodents that enter the food web.

Third, monitoring without escalation triggers produces regulatory inertia. The UK Government Oversight Group found the stewardship regime 'fit for purpose' at each annual assessment despite persistent contamination data (CRRU UK, 2021). A formal review was initiated in 2021 but no published outcome has been released (Barn Owl Trust, 2024). The eventual escalation (the open-area ban from July 2024) came approximately eight years after stewardship began, through voluntary industry action rather than any pre-committed trigger. Without automatic escalation benchmarks, regulatory inertia is the default even when monitoring data demonstrates that the intervention is not achieving its stated environmental objective. This is a governance finding, not a toxicological one, and it applies identically to any Australian framework that lacks pre-committed escalation benchmarks.

FOGL acknowledges that the relative contribution of consumer versus professional SGAR deployment to wildlife contamination is unknown (Section 4.2, First). This uncertainty does not weaken the case for managing professional use; it strengthens it. The published evidence on SGAR pharmacokinetics and bioaccumulation (Elliott et al., 2024) demonstrates that any sustained deployment of SGARs, regardless of source volume, is capable of maintaining the secondary poisoning pathway. Precautionary regulation requires managing professional use as if it were sufficient alone to sustain contamination, because the biological mechanism confirms that it can be.

4.3 What the UK data does not prove

The UK data does not prove that removing consumer access will fail to reduce contamination. The UK has never tried that, so there is no data either way. British Columbia removed consumer access in 2023, but post-implementation monitoring data is not yet available to assess outcomes. The RCP decision places Australia in uncharted regulatory territory, which is why mandatory monitoring

(Request 1) is non-negotiable. Without it, Australia will have no way to determine whether the consumer ban has produced the environmental outcomes the APVMA expects.

4.4 Four jurisdictions compared

The table below maps four regulatory approaches against the key elements of SGAR control. It situates Australia's RCP decision in relation to the PRD label measures (which remain part of the proposed regulatory decision), the UK stewardship model, and the British Columbia ban.

Element	Australian PRD (label measures)	Australian RCP (12 March 2026)	UK Stewardship (CRRU, 2016–24)	British Columbia (2023)
Consumer retail access	Retained (with pack size limits)	Removed	Retained for small packs	Removed
Professional access	Unrestricted	Authorised persons only (RCP)	Certification required at point of sale	Licensed operators only; essential services sectors
Training standards	None proposed	To be determined by states/territories	CRRU-approved training; farm assurance pathway	Pesticide use licence; IPM plan required
IPM-first obligation	None	None proposed	Code of Best Practice (voluntary)	Mandatory site-specific IPM plan
Time limits on deployment	35-day limit on all products (evaluation for commercial; absolute for domestic)	Not proposed	Code of Best Practice (voluntary)	35 consecutive days max; 120-day annual cap
Deployment reporting	None	None proposed	Voluntary KAP surveys	Mandatory recording of use
Wildlife monitoring	None proposed	None proposed	Annual barn owl sentinel monitoring (UKCEH)	Post-implementation monitoring in progress
Escalation triggers	None	None	None pre-committed (GOG review never completed)	Built into regulatory review framework
Outcome (wildlife contamination)	Not yet assessed	Not yet assessed	No statistically significant decline after 6 years	Too early to assess (implemented 2023)

Sources: APVMA Special Gazette 16 Dec 2025; APVMA RCP certification 12 Mar 2026; CRRU Five Years of Rodenticide Stewardship 2016–2020; UKCEH barn owl monitoring reports; Province of British Columbia, Integrated Pest Management Act Regulation (2023).

The table illustrates three points. First, the RCP decision places Australia ahead of the UK on consumer access but behind British Columbia on every other element: IPM obligations, time limits, deployment reporting, and monitoring. Second, the PRD label measures (which remain part of the proposed regulatory decision alongside the RCP) are the measures most directly analogous to the UK stewardship regime, and the published scientific evidence (Cooke et al. 2022, Scammell et al.

2024, Lohr et al. 2025) demonstrates their inadequacy for addressing secondary poisoning. Third, the gap between the RCP decision and a functional professional-use framework is the gap that FOGL's twelve requests are designed to fill.

4.5 UK barn owl monitoring: Year-by-year data

For completeness, FOGL records the full UK monitoring timeline. The APVMA's own delegate acknowledged at Gazette paragraph 48.1 that international measures have achieved 'limited or no measurable success in reducing wide scale secondary exposure of wildlife' (APVMA, 2025, para 48.1). The delegate noted that Australian conditions differ in some respects, including the absence of registered SGAR use in crops and open areas. FOGL acknowledges that caveat but notes that the published Australian monitoring evidence (83% Powerful Owl contamination, Cooke et al. 2022; 91% brushtail possum contamination, Scammell et al. 2024; documented SGAR exposure in at least 15 FFG-listed species, DEECA 2023) demonstrates pervasive wildlife contamination under Australian conditions notwithstanding these differences.

Year	Barn Owls with ≥1 SGAR (%)	Key Stewardship Measure
2006–12 (baseline)	81% (n=395)	Pre-stewardship; no professional controls
2016	No significant change	Stewardship commenced April 2016
2017	90%	First full year of implementation
2018	~80%	KAP survey: improved awareness
2019	87%	Updated Code of Best Practice
2020	88%	GOG published responses ceased after this year
2022	79.5%	Five-year review initiated 2021; published outcome not released
2024 (July)	—	Open-area SGAR use banned

Sources: UKCEH/PBMS barn owl monitoring reports 2015–2022; CRRU UK; Barn Owl Trust (2024). Note: The Barn Owl Trust characterised the open-area ban as a response to the 'seven-year failure of stewardship.' CRRU characterised it as a strengthening of the regime. FOGL records both interpretations.

4.6 What this means for Australia

Removing SGARs from the retail outlets addresses the access question. It leaves the outcomes question unanswered. The RCP decision places Australia ahead of where the UK started in 2016, but behind where British Columbia arrived in 2023. The gap is not consumer access (that is now resolved). The gap is everything that follows: monitoring, conditions on professional use, escalation triggers, spatial sensitivity, and IPM obligations. Filling that gap is the purpose of FOGL's twelve requests.

5. Species That Cannot Wait for Another Decade of Data

Contamination baselines for Australian wildlife are already severe. Population viability analyses demonstrate that even small additional SGAR mortality can shift trajectories from stable decline to collapse.

Species	Status	SGAR Contamination	Population Viability Risk
Powerful Owl	Vulnerable (VIC, NSW)	83% positive (Cooke et al., 2022); 33% at toxic or lethal concentrations (Cooke et al., 2023)	Estimated 3,000–4,000 mature individuals (Garnett et al., 2011); urban populations risk demographic sinks
Northern Quoll	Endangered (EPBC)	33% carry SGAR residues (Lohr et al., 2025)	5% juvenile mortality increase → 22–54% decline within 20 years (Moro et al., 2019; cited in Lohr et al., 2025)
Chuditch	Vulnerable (EPBC)	22% carry probably lethal dose (Lohr et al., 2025)	2–4% juvenile mortality reduction shifts extinction probability from 87.9% to 12.5% (Schaefer, 2024; cited in Lohr et al., 2025)
Tasmanian Devil	Endangered (EPBC)	Sublethal exposure documented	15–30% juvenile mortality increase → 100% extinction probability within a century (CBSG, 2008; cited in Lohr et al., 2025)
Brushtail Possum	Common; key pathway species	91% positive; 42% at likely fatal levels (Scammell et al., 2024)	Primary vector for Powerful Owl secondary poisoning (Scammell et al., 2026)

These species will not benefit from an authorised use-only framework that takes three to five years to fully implement across eight jurisdictions, followed by three years of monitoring before escalation triggers activate. For critically at-risk species, the SGAR Environmental Sensitivity mapping tool (Request 7) must classify habitat for these species as high sensitivity from the outset, triggering enhanced deployment conditions immediately upon implementation. The interim 200-metre waterway buffer (Request 8) provides a minimum floor of protection for semi-aquatic and riparian species while the spatial tool is developed.

6. Implications for the Gippsland Lakes Ramsar Site

The Gippsland Lakes are a Ramsar-listed wetland of international importance, encompassing approximately 60,000 hectares (Ramsar Sites Information Service, n.d.). Under the RCP framework, professional pest controllers will continue to deploy SGARs in the townships and agricultural areas that drain directly into the Lakes system. The risk profile changes from diffuse consumer deployment to concentrated professional deployment, but aquatic contamination pathways remain unassessed and unmanaged.

The main aquatic risk pathway posed by SGAR residues to the Lakes system comes from catchment hydrology. Stormwater from townships and farm runoff into waterways throughout the Mitchell, Nicholson, Tambo, and Latrobe catchments eventually drains into the Lakes. For this reason, FOGL argues that the appropriate mechanism is a catchment-based classification: all Ramsar contributing catchments should be classified as a high environmental sensitivity area under the SGAR Environmental Sensitivity tool (Request 8), triggering conditions above the PRD baseline: pre-deployment environmental risk assessment, GPS-referenced deployment records, post-

treatment bait removal within 7 days, a reduced 21-day deployment maximum, and mandatory first-line use of FGARs or non-anticoagulant rodenticides. These conditions would operate together with the aquatic risk assessment that Request 7 calls for.

White-bellied Sea-Eagles and Wedge-tailed Eagles nest and forage across the region, with Tasmanian Wedge-tailed Eagles documented as frequently exposed to SGARs (Pay et al., 2021). Powerful Owls inhabit the forested hinterland bordering townships. Rakali, platypus, and fish-eating birds within the Ramsar site face potential exposure through aquatic food webs. The 200-metre waterway buffer (Request 8) would apply to the numerous permanent and semi-permanent waterways that feed the Lakes system, providing a minimum level of riparian protection and consistent with Victorian waterway management practice.

For a wetland of international significance, the complete absence of aquatic SGAR risk assessment is a critical deficiency in the regulatory decision under s 5A of the Agricultural and Veterinary Chemicals Code Act 1994. The argument is not that professional pest controllers should be prohibited from working in Gippsland. The argument is that when they work within any Ramsar contributing catchment across Australia, the conditions under which they operate, and the monitoring that follows, must reflect the ecological significance of the system they are potentially contaminating.

7. Consolidated Requests

FOGL makes the following twelve requests of the APVMA, DAFF, and state and territory authorities. Where a request exceeds the APVMA's direct statutory remit, it is framed as a recommendation from the APVMA to DAFF, consistent with the APVMA's advisory role in the RCP framework. Requests are grouped thematically below; body section cross-references are provided where the detailed argument appears.

Monitoring and accountability

1. **Recommend establishment of a national SGAR wildlife residue monitoring programme** (via DAFF/RCP declaration), with annual reporting, sentinel species, industry levy funding, and independent administration.
2. **Publish a regulatory guidance document on escalation triggers:** if sentinel contamination does not decline significantly within three years of full RCP implementation, additional restrictions to be considered. Framework to guide, not fetter, the APVMA's powers under ss 34–34AA.
3. **Include mandatory record-keeping as a label direction** on all re-registered SGAR products (active ingredient, quantity, site, proximity to sensitive areas, duration, bait-take, non-target mortality). Recommend DAFF establish a national register.

Professional use conditions

4. **Specify nationally consistent minimum training and compliance standards** in APVMA advice to DAFF and state/territory authorities, covering secondary poisoning ecology, threatened species identification, IPM-first obligations, site-specific environmental risk

assessment, and reporting subject to a comprehensive auditing regime with meaningful penalties (such as loss of license) for repeat breaches.

5. **Impose a mandatory IPM-first label direction:** SGARs only where non-chemical methods and FGARs have been considered and documented as inadequate. Squarely within APVMA's power under the labelling criteria in ss 5D and 14 of the Agvet Code.
6. **Require time-limited deployment plans** with defined end dates as a label direction. Open-ended or permanent baiting programmes must not be permitted.

Environmental protection: spatial framework

7. **Complete aquatic risk assessments** for all five SGAR active ingredients across all registered use patterns, including urban stormwater pathways.
8. **Develop a national SGAR Environmental Sensitivity mapping tool** (recommend to DAFF), integrating threatened species habitat suitability models, Ramsar wetland boundaries and contributing catchments, and waterway riparian buffers. Web-accessible and address-searchable. Within high-sensitivity areas, conditions above the PRD baseline: mandatory pre-deployment environmental risk assessment; GPS-referenced deployment records with non-target mortality reporting; post-treatment site inspection and bait removal within 7 days; reduced 21-day maximum deployment (vs 35-day PRD baseline); and FGARs/non-anticoagulant rodenticides as required first-line treatment, with SGARs only where first-line methods are documented as inadequate. Operational before re-registration following suspension.
9. **Impose interim spatial protections pending the sensitivity tool:** (a) 200-metre exclusion zone around permanent waterways, consistent with the upper range of Victorian riparian protection buffers and published rakali foraging ecology (Fisheries Scientific Committee NSW, 2019); (b) mandatory pre-deployment check of NatureKit, VBA, or relevant state biodiversity atlas, with result recorded in deployment records.
10. **Ensure monitoring independence:** no monitoring, training, or stewardship body should be funded or governed by rodenticide manufacturers. The UK CRRU model must not be replicated.

Structural and national reform

11. **Support nomination of SGAR exposure as a Key Threatening Process** under the EPBC Act, triggering a national Threat Abatement Plan.
12. **Publish an RCP implementation timeline** within 60 days of DAFF's acceptance, specifying milestones for state/territory training and licensing, sensitivity tool development, monitoring establishment, and first annual report.

8. Conclusion

FOGL welcomes the RCP decision. Removing SGARs from retail shelves is a significant and overdue advance. The APVMA deserves credit for acting on the weight of scientific evidence and public concern.

But the international record shows that restricting access is the easier part of the problem; reducing wildlife contamination is the harder part. The UK spent seven years on the most comprehensive professional stewardship programme attempted in any jurisdiction. Training improved. Self-reported practice improved. Barn owl contamination did not decline. Australia's RCP decision goes further than the UK on consumer access, but behind British Columbia on every other element: IPM obligations, time limits, deployment reporting, monitoring, and escalation. The gap between the RCP decision and a functional professional-use framework is the gap FOGL's twelve requests are designed to fill.

Australia has the opportunity to learn from the UK's documented failure rather than repeating it. The twelve requests in this submission are designed to ensure that the RCP framework delivers the environmental outcomes it promises, not in a decade, but within a timeframe that matters for the Powerful Owls, quolls, and eagles that are dying now.

> *Extinction is permanent. Regulatory frameworks are not. If the professional-only model fails to reduce wildlife contamination within three years, the framework must adapt. The species we are trying to protect do not have the luxury of a second seven-year experiment.*

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