FRIENDS OF GIPPSLAND LAKES

Parks and Reserves Inc.

Incorporated Association · Est. 2005

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SUBMISSION TO THE DEPARTMENT OF AGRICULTURE, FISHERIES AND FORESTRY

Declaring Second-Generation Anticoagulant Rodenticides as Restricted Chemical Products — Discussion Paper (DAFF, 2026)

Public consultation closing 5 pm AEST, 11 June 2026

10 June 2026

Submitted by Friends of Gippsland Lakes, Parks and Reserves Inc.

Summary of key points

Friends of Gippsland Lakes (FOGL) makes this submission on the single matter on which the department has sought views: whether to proceed with amending Schedule 4 of the Code Regulations to declare the five SGAR active constituents as restricted chemical products. Our position is straightforward.

- FOGL strongly supports the proposed declaration of products containing brodifacoum, bromadiolone, difenacoum, difethialone and flocoumafen as restricted chemical products (RCPs), and urges the department to proceed with the Schedule 4 amendment without delay.
- The public-interest case is established and overwhelming. Published Australian science documents pervasive SGAR contamination across the food web — including in EPBC-listed and FFG-listed threatened species — at concentrations that population modelling links to materially elevated extinction risk.
- The declaration directly addresses the single largest source of uncontrolled SGAR deployment: unsupervised use by untrained household consumers. Restricting supply to authorised persons is the most direct way to reduce the volume of these poisons entering the food web.
- The declaration is proportionate, not prohibition. First-generation anticoagulants (FGARs) and non-anticoagulant rodenticides remain available to households; farmers and commercial operators can become authorised users; and the APVMA retains emergency-permit powers for events such as mouse plagues.
- FOGL identifies no legitimate reason for the declaration not to proceed. The most likely objection — that international controls have not reduced wildlife contamination — does not withstand scrutiny, because no comparable jurisdiction has removed consumer access, which is precisely what the RCP declaration achieves.
- The principal additional impact the decision-maker should weigh is the cost of delay. The APVMA's one-year suspension already provides a transition runway, and the operational rollout — state and territory authorised-person frameworks — can run concurrently with it; what should not happen is for transition to delay the Schedule 4 amendment itself, since for the threatened species concerned the resulting harm is irreversible.

1. About this submission and its scope

Friends of Gippsland Lakes, Parks and Reserves Inc. (FOGL) is an incorporated conservation association established in 2005. Our members care for and advocate for the Gippsland Lakes — a wetland of international importance listed under the Ramsar Convention — together with the parks and reserves of its catchments. FOGL made a detailed submission to the APVMA's anticoagulant rodenticides reconsideration.

This submission responds to the department's discussion paper and is deliberately confined to the question the department has asked: whether to proceed with amending Schedule 4 of the Agricultural and Veterinary Chemicals Code Regulations 1995 to declare the five SGAR active constituents as RCPs. FOGL has separately raised, and will continue to raise, matters concerning conditions of use, wildlife monitoring and implementation directly with the APVMA and with state and territory authorities, consistent with the division of responsibilities the discussion paper describes. We do not rehearse those matters here. On the narrow question before the department, our answer is an unqualified yes.

2. Question 1 — Do you support declaring these products as RCPs?

FOGL strongly supports the declaration. Restricting supply of brodifacoum, bromadiolone, difenacoum, difethialone and flocoumafen to authorised persons is necessary, proportionate, and clearly in the public interest. Four considerations make the case.

First, SGARs have precisely the hazard profile the RCP mechanism exists to manage.

As the discussion paper itself records, SGARs are single-feed baits — a lethal dose can be taken in one feeding — that break down more slowly than FGARs and pose a higher risk of secondary poisoning to non-target animals. These are inherently dangerous products whose safe use depends on strict adherence to directions and on an understanding of secondary-poisoning ecology. That is the textbook case for limiting use to persons with the relevant knowledge, skills or qualifications, which is exactly what an RCP declaration achieves.

Second, the harm is documented in Australian wildlife — it is neither hypothetical nor merely imported from overseas.

The published Australian evidence is extensive and consistent. SGAR residues are pervasive across the food web, and in several threatened species the measured concentrations sit at levels that population modelling associates with sharply elevated extinction risk:

Species	Status	SGAR contamination (Australian data)	Population-viability signal
Powerful Owl	Vulnerable (VIC, NSW)	83.3% positive; brodifacoum present in every positive bird (Cooke et al. 2022)	Est. 3,000–4,000 mature individuals (Garnett et al. 2011); low-density urban populations of tenuous viability (Cooke et al. 2022)
Common Brushtail Possum	Common; principal owl prey	91% positive; 42% at likely-lethal or toxic levels (Scammell et al. 2024)	Principal dietary route transferring SGARs to the Powerful Owl; SGAR profiles in owls mirror those in possums (Scammell et al. 2024)

Species	Status	SGAR contamination (Australian data)	Population-viability signal
Chuditch (Western Quoll)	Vulnerable (EPBC)	22% carried a probably-lethal dose (Lohr et al. 2025)	Lohr et al. (2025) estimate a 2–4% rise in deaths could increase extinction risk by ~75%, with ~22% of any population at risk per generation — potentially enough alone to tip the species toward extinction
Tasmanian Devil	Endangered (EPBC)	~15% carried likely-lethal doses (Lohr et al. 2025, n=20); scavenges poisoned carcasses	Largest sample in the marsupial-carnivore study; SGARs detected even in animals from remote areas (Lohr et al. 2025)
Marsupial carnivores (5-species study)	All EPBC-listed	50% of 52 individuals positive; 21% carried more than one SGAR (Lohr et al. 2025)	First documentation of pervasive SGAR exposure in native marsupial carnivores, including in remote locations (Lohr et al. 2025)

Exposure extends well beyond these species. Tasmanian wedge-tailed eagles carry SGARs at 74% (n=50; Pay et al. 2021), and Cooke et al. (2023) documented the same pattern of widespread exposure across a broader suite of nocturnal predatory birds. Anticoagulant rodenticide has been detected even in Australian frogs (Rowley et al. 2024). Victoria has documented SGAR exposure in at least 15 species listed under the Flora and Fauna Guarantee Act 1988 (DEECA 2023), and the APVMA's own delegate has acknowledged this weight of evidence. This is the harm the declaration responds to.

Third, the declaration targets the largest uncontrolled source of these poisons.

The discussion paper anticipates that household users would no longer be able to purchase SGARs. That is the decisive public-interest benefit. Unsupervised residential use by untrained consumers represents an enormous volume of uncontrolled deployment — applications made with no environmental-awareness obligations, no record-keeping, and no accountability for non-target outcomes. Removing general retail access is the most direct available means of reducing the quantity of SGARs entering the food web; and the established pharmacology confirms that it is the sustained input of these persistent, bioaccumulative compounds that maintains the secondary-poisoning pathway (Elliott et al. 2024). Reduce the largest uncontrolled input, and you reduce the harm.

Fourth, the RCP declaration is the right legal instrument, and a stronger one than the alternative.

The RCP mechanism is well established: twelve chemical products or classes are already declared as RCPs under Schedule 4, operating through the same authorised-person architecture. The declaration is therefore an application of existing, proven machinery rather than a novel experiment. As the discussion paper records, state and territory chemical coordinators advised during the APVMA's consultation that declaring SGARs as RCPs would provide the most robust legal framework for restricting access to authorised users in a nationally consistent manner. It is also a stronger and more durable control than the 'trained user' limitation contemplated in the December 2025 proposed regulatory decision, because the authorised-person requirement is enforceable through state and territory control-of-use law.

Finally, the declaration preserves every legitimate use. Households retain first-generation anticoagulants and non-anticoagulant rodenticides; commercial operators and primary producers can become authorised users; and the APVMA can still issue emergency permits for situations such as mouse plagues. Importantly, the declaration does not impede the use of SGARs in conservation

itself: brodifacoum and related compounds are central to island and threatened-species eradication programmes, which are run by professionals who would readily qualify as authorised persons. The declaration therefore restricts the most hazardous products at the point of greatest uncontrolled risk — untrained domestic use — while leaving legitimate professional, agricultural and conservation applications intact. This is targeted regulation, not a ban on rodent control. For these reasons, FOGL supports the declaration and asks that it proceed.

3. Question 2 — Are there any reasons the declaration should not proceed?

FOGL has carefully considered the objections most likely to be raised and identifies no sufficient reason for the declaration not to proceed. We address the principal objections below. On examination, each either does not withstand scrutiny or is, on closer inspection, a reason to proceed.

(a) "International controls have not reduced wildlife contamination, so the declaration will not work either." The most careful form of this objection points to the United Kingdom. FOGL takes it seriously, but it does not support refusing the declaration, for a decisive reason. The UK's rodenticide stewardship regime controlled professional use while leaving consumer access to small retail packs largely intact throughout. The proposed RCP declaration does what the UK has never done: it removes general consumer access entirely. The UK's barn-owl monitoring — contamination persisting between roughly 79.5% and 90%, with no statistically significant decline from the 81% baseline (Shore et al. 2016; Ozaki et al. 2022) — therefore tells us about the limits of professional stewardship while consumer access is retained. It tells us nothing about removing consumer access, because that has not been tried, with published outcomes, anywhere. The APVMA's own delegate recorded that international measures have achieved limited or no measurable success in reducing wide-scale secondary exposure, while also noting that Australian conditions differ (there is no registered SGAR use in crops or open areas here). Read correctly, the international record is a reason to act at least as decisively as the RCP declaration does — not a reason to hold back.

(b) "The declaration is disproportionate and will burden households and businesses." It is not prohibition, and it is carefully targeted. FGARs and non-anticoagulant rodenticides remain available to households without restriction, so effective domestic rodent control is preserved. Commercial operators and farmers can become authorised users under existing state and territory frameworks. The restriction is confined to the five most hazardous actives — single-feed, persistent and bioaccumulative — and leaves lower-risk tools in place. A measure that restricts only the most dangerous products, to the users least equipped to manage their risks, while preserving alternatives for everyone, is proportionate by design.

(c) "Rodent control, and therefore public health, will suffer." Rodent-borne disease and the need for effective control are legitimate considerations, but the framework manages them. Authorised professional users retain access to SGARs for the situations that genuinely warrant them; first-generation anticoagulants and non-anticoagulant rodenticides remain available to everyone else; and the APVMA retains the power to issue emergency permits for events such as mouse plagues. FOGL acknowledges that some rodent populations carry resistance to anticoagulants and that first-generation products act more slowly, but a range of effective alternatives remains on the market for domestic use, and the most difficult infestations can be referred to an authorised professional. What changes is unsupervised access by untrained consumers to the most hazardous products — not the availability of effective rodent control.

(d) "The declaration is novel or administratively difficult." It is neither. Twelve chemical products or classes already operate as RCPs under Schedule 4 through the same authorised-person machinery, so the legal architecture is established and understood. State and territory chemical coordinators

have themselves advised that the RCP route is the most robust path to nationally consistent control. The declaration uses existing instruments for their intended purpose.

(e) "The decision should wait for further evidence." The evidence is already sufficient and the time-cost of delay is real. The APVMA — the independent, science-based regulator — has already certified that the declaration is in the public interest, and the published Australian science is extensive and consistent. Population-viability analyses show that even small additional mortality can move threatened-species trajectories toward collapse. Delay is not a neutral holding position; it sustains the very exposure the declaration is designed to reduce.

In short, FOGL submits that there is no reason of efficacy, proportionality, public health, administrability or evidence that should stop the declaration. The arguments advanced against it, properly examined, are arguments for proceeding.

4. Question 3 — Additional impacts the decision-maker should weigh

The single most important additional impact is the impact of not proceeding, or of proceeding too slowly. FOGL asks the department to weigh the following, each of which points toward proceeding promptly.

The benefit foregone by delay is measured in irreversible harm.

Every baiting season in which the largest uncontrolled source of SGARs remains on general retail sale sustains the secondary-poisoning pathway now documented across the Australian food web. For species already at the edge, the modelling indicates that marginal changes in mortality are decisive. For the Chuditch — of which roughly 22% of any population is estimated to be at risk from these poisons each generation — Lohr et al. (2025) conclude that an increase in deaths of just 2–4% could raise extinction risk by around 75%, such that exposure to rat poison alone may be enough to tip the species toward extinction. The same acute sensitivity to mortality is well established for the Northern Quoll, whose persistence depends heavily on juvenile survival: a 5% rise in juvenile mortality is projected to drive a 22–54% population decline within 20 years (Moro et al. 2019). Removing a significant, avoidable, non-target source of mortality is therefore exactly the kind of intervention that matters for these species — and its benefit is time-sensitive, because it cannot be recovered later if it is forgone now.

On a transition period: the one-year suspension already provides the runway.

The APVMA's one-year suspension of SGAR registrations (APVMA Gazette No. 5, 10 March 2026; commencing 24 March 2026) already provides a substantial runway during which registrants, retailers and users can adjust, and during which permitted use may continue under notified directions and restraints. FOGL recognises that the practical machinery of the declaration — in particular, the standing-up of authorised-person training and licensing by the states and territories — will take time to put in place, and that this work should proceed concurrently with the suspension year so that authorised-person pathways are ready when the declaration takes effect. The point FOGL presses is that this implementation work should run in parallel with, not delay, the Schedule 4 amendment itself. The decision to declare and the operational rollout are separable: the amendment can and should be made now, with transition arrangements running alongside it. A lengthy additional transition before the declaration itself takes effect would defer its benefits without a corresponding public benefit and would prolong avoidable exposure of non-target wildlife. If any party seeks to delay the declaration pending transition, the onus should fall on that party to show why the existing suspension year and a concurrent rollout are insufficient.

The impacts on legitimate users are manageable and already provided for.

As the discussion paper anticipates, households will retain FGARs and non-anticoagulant rodenticides; commercial applicators can be licensed as authorised persons; farmers and primary producers can become authorised users or rely on alternatives; and emergency permits remain available. The principal adjustment is a shift away from the most hazardous products by the user group least equipped to manage their risks — which is the intended and beneficial effect of the declaration, not an unintended cost of it.

Proceeding aligns the Commonwealth with directions already set elsewhere.

A declaration aligns the Commonwealth position with Victoria's listing of the poisoning of native wildlife by anticoagulant rodenticides as a threatening process under the Flora and Fauna Guarantee Act 1988 (DEECA 2023), and with the broader international trajectory toward tighter SGAR controls. It also delivers regulatory clarity and a single, nationally consistent control for industry. These are positive impacts that weigh in favour of proceeding.

For FOGL's own region, the benefit is tangible: the raptors, eagles and semi-aquatic species of the Gippsland Lakes and its catchments stand to gain directly from removing the largest uncontrolled source of these poisons from general circulation. We see the affected wildlife; the declaration matters to it.

5. Conclusion

FOGL welcomes and strongly supports the proposed declaration of the five SGAR active constituents as restricted chemical products, and asks the department to amend Schedule 4 of the Code Regulations to give it effect without delay. The declaration is supported by the APVMA's public-interest certification, by an extensive and consistent body of Australian scientific evidence, and by the advice of state and territory chemical coordinators. It is proportionate, it preserves every legitimate use, and there is no sound reason for it not to proceed.

Extinction is permanent; the benefit of acting now cannot be recovered by acting later. FOGL urges the department to proceed promptly. We acknowledge the work of the APVMA, of BirdLife Australia and its Act for Birds campaign, and of the more than 280 scientists and the many conservation organisations whose evidence and advocacy brought this proposal to the point of decision.

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