



# CATTLE COUNCIL OF AUSTRALIA

## SUBMISSION

16 July 2020

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

Via email: [chemicalreview@apvma.gov.au](mailto:chemicalreview@apvma.gov.au)

Dear Sir/Madam

### **Re: Submission on Consultation on Use Patterns for Anticoagulant Rodenticide Products**

Cattle Council of Australia (Cattle Council) is the peak industry organisation representing and promoting the needs of Australia's grass-fed cattle producers through consultation with, and providing policy advice to, key industry organisations, relevant Federal Government Departments and other bodies regarding issues of national and international importance.

Established in 1979, Cattle Council's direct reach to producers, either by state farming organisation membership, associate membership, or direct individual membership, equates to more than 15,000 levy paying cattle producers and accounts for the majority of Australia's beef cattle herd.

Cattle Council welcomes the opportunity to provide a comment on the Consultation on Use Patterns for Anticoagulant Rodenticide Products. We provide this submission without prejudice to any additional submission from our members or individual producers.

### **Background**

The following comments are made in relation to the Australian Pesticide and Veterinary Medicines Authority (APVMA) request for submissions (per APVMA Gazette No. 7, 7th April 2020) on use patterns of anticoagulant rodenticide products, and specifically on CONSIDERATIONS 5 (c) 5 (e), 5 (f) and 5 (g).

Using the APVMA PubCRIS search engine an analysis of the registrations of the three First Generation Anticoagulant Rodenticides (FGARs) listed (warfarin, coumatetralyl and diphacinone) shows 18 registrations, for a total of 13 branded products.

The five Second Generation Anticoagulant Rodenticides (SGARs) listed (brodifacoum, bromadiolone, difenacoum, difethialone and flocoumafen) show a total of 186 registrations with 160 branded products.

## General Comments and Recommendations

An examination of the label directions of in excess of 44 branded products currently listed on the APVMA PubCRIS search engine revealed concerning variations in content for the “General Instructions”, “Precautions”, “Protection”, and “Storage and Disposal” sections of the various labels.

Whilst some of this variation could be attributed to the changing label requirements over many years (some products were registered many years ago by the National Registration Authority, the predecessor to the APVMA), more recent registrations also reveal inconsistencies.

**Recommendation:** Older labels should be reviewed as a matter of urgency, and either approval withdrawn, or the registrant advised to submit a new updated label consistent with current requirements for approval. Advice on carcase disposal is sometimes located in “Protection”, sometimes in “Storage and Disposal”, sometimes in “General Instructions” and sometimes is not present at all. Some labels carry instructions to burn or bury carcases, some suggest burn or bury with a warning not to place carcases in rubbish bins whilst other labels advised carcases should be wrapped and placed in rubbish bins.

**Recommendation:** Consistent carcase disposal advice must be included on all labels for all FGARs and SGARs (bury or burn, do not place in rubbish bins), and should be included in the “Protections” section.

**Recommendation:** All labels should be evaluated for advice/instructions on carcase disposal and labels not currently providing any advice on carcase disposal should be suspended pending updating by the registrant.

**Recommendation:** The “Storage and Disposal” section should be restricted to advice on storage and disposal of product and containers/wrapping to avoid carcase disposal being overlooked.

Some “Precautions” carry little advice. Animal warnings frequently under the heading “Protection of Livestock, Wildlife, Crustaceans, Fish and Environment” list pigs, poultry, dogs, cats, birds and wildlife but do not mention other livestock, yet the ingestion of either the rodenticide, or poisoned carcases poses very real health and trade risks to the Australian beef and sheepmeat export industries.

**Recommendation:** Warnings should include references to cattle and sheep as well as pigs and poultry when discussing “livestock”.

“General Instructions” / “Instructions for Use” vary considerably on placement instructions.

**Recommendation:** Greater emphasis should be placed on access prevention by non-target animals.

## Specific Comments

*5 c): The need for anticoagulant rodenticide products to be used in or around buildings, including those used to house livestock, or in or around on-farm buildings (including homesteads).*

The use of anticoagulants is an essential part of biosecurity risk management (control of rats and mice) on farms and feedlots in and around grain storage areas, haysheds, and feedmills. These products must remain available for production and storage of grain and livestock fodder.

*5 e): The likelihood of compliance with post-application sanitisation instruction (e.g. the timely collection of poisoned rodent carcasses, and the appropriate disposal of carcasses).*

In some circumstances, the detection of carcases and subsequent disposal can be quite difficult, and it is not unusual to find desiccated carcases when grain storage areas / hay sheds are emptied. As noted below,

some of the products assessed did not carry any instructions on carcase disposal. Greater emphasis in label instructions for frequent checks for carcasses, and consistent disposal instructions would improve compliance.

*5 f): The label instructions, particularly the adequacy of instructions to prevent inadvertent exposure to the product.*

The label directions of over 40 branded products were examined. The label instructions for disposal of carcasses varied considerably between products, often instructions were conflicting between different brands. Some products did not carry any label instructions on carcase disposal. Carcase disposal should receive greater prominence and appear in bold font in the same section of the label for all products – “Precautions”.

*5 g): Critical uses for anticoagulant rodenticide products, particularly in primary production.*

Rodent control is a critical management tool in many circumstances for agricultural production in the grain and livestock sectors, both for routine control of rodents and during plagues. The different formulations of anticoagulants (pellets, paste, blocks etc.) provide an easy to use solution, and offer numerous control methods depending on situations. The continued availability of anticoagulants for use in agriculture is an essential management tool.

Should the APVMA require any additional information, please do not hesitate to contact our office on 1300 653 038 or email [cca@cattlecouncil.com.au](mailto:cca@cattlecouncil.com.au).

Yours sincerely

Travis Tobin  
Chief Executive Officer