

Chemical Review  
Office of the Chief Regulatory Scientist  
Australian Pesticides and Veterinary Medicines Authority  
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### Consultation on use patterns for anticoagulant rodenticide products

Thank-you for conducting the review and providing this opportunity for submissions. I write as coordinator of a group of volunteers, the Margaret River Region Rodenticide Action Group, who have for several years mounted an awareness campaign to protect the wide range of wildlife susceptible to rodenticide poisoning that we are fortunate to have living in proximity to our township homes and businesses.

We have set up communication platforms to support this campaign, under the banner Owl Friendly Margaret River Region:

[ww.owlfriendly.org.au](http://ww.owlfriendly.org.au)    [f/owlfriendlymargaretriver](https://www.facebook.com/owlfriendlymargaretriver)

Respectfully



Dr Boyd Wykes 11 June 2020

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OWL FRIENDLY MARGARET RIVER REGION



"MAKING THE AUGUSTA MARGARET RIVER REGION A SAFE HAVEN FOR  
OWLS AND OTHER WILDLIFE FROM RODENTICIDE POISONING."

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**SUBMISSION TO THE AUSTRALIAN PESTICIDES AND VETERINARY MEDICINES AUTHORITY:  
REVIEW OF USE PATTERNS FOR ANTICOAGULANT RODENTICIDE PRODUCTS**

**Margaret River Rodenticide Action Group**

Key Points:

1. Second Generation Anticoagulant Rodenticide products are freely available with little to no retail restrictions, for use in domestic premises, animal production facilities and food production facilities.
2. The research has now been conducted in Australia that provides the evidence already known from elsewhere in the world that these compounds are a serious threat to wildlife, both directly and through indirect poisoning via baited target and non-target prey.
3. Many of the most commonly-used and freely available rodenticides contain SGARs that are banned or restricted in other countries.
4. Ideally we suggest a total ban placed on Second Generation Anticoagulant Rodenticides (SGARs).
5. At the least, we need:
  - SGARs removed from retail sale to the public by listing as Schedule 7 poisons, and
  - stricter requirements that baits be placed in a manner that makes them inaccessible to wildlife.
6. If not totally banned, we and other communities will need to continue to continue to raise awareness and educate at the local level, but with the much less daunting task of promoting rodent control in accordance with the stricter requirements.

## BACKGROUND TO THE SUBMISSION

### (i) **SGARs pose a threat to wildlife**

I first became aware of the harm Second Generation Anticoagulant Rodenticides (SGARs) are causing for wildlife in our region when Dr Michael Lohr made contact to seek dead Boobooks for his PhD research at Edith Cowan University's Joondalup fauna research lab. When sharing this request with community members at a Saturday morning coffee at our local Saturday markets, a Shire Councillor walked up holding a dead owl she had just found in the grounds of the Tertiary Campus site of the markets. This and other Boobooks collected from our district proved to have the debilitating levels of SGARs that Mike and colleagues subsequently revealed in a research publication.

- Lohr MT and Davis RA (2018) Anticoagulant rodenticide use, non-target impacts and regulation: A case study from Australia. *Science of the Total Environment* 634:1372–1384.

Since that time the team at the ECU Joondalup fauna research lab have further investigated the extent of SGAR risk to our wildlife through primary and secondary pathways.

- Lohr MT (2018) Anticoagulant rodenticide exposure in an Australian predatory bird increases with proximity to developed habitat. *Science of the Total Environment* 643:134–144.
- Lohr MT (2018) Anticoagulant rodenticide: Implications for Wildlife Rehabilitation. Conference Paper.
- Leettoof DC, Lohr MT, Buseti F, Bateman PW and Davis RA (2020) Toxic time bombs: Frequent detection of anticoagulant rodenticides in urban reptiles at multiple trophic levels. *Science of the Total Environment* 724:138218.

### (ii) **Masked Owl heads a local community campaign to address the SGAR threat**

The Margaret River Rodenticide Action Group was formed bringing together representation from a variety of relevant interests with a range of expertise to tackle the issue at a local community level: <https://owlfriendly.org.au/about-us/>

The 'poster child' for the resulting Owl Friendly campaign is the Masked Owl: <https://owlfriendly.org.au/our-nocturnal-birds/the-masked-owl/>.

The Masked Owl of south eastern Australia is considered endangered in many areas. The status and life-history of our south west Masked Owl is so little known that its genetic relationship with these other populations has yet to be investigated and its Western Australian conservation status is Priority 3, meaning uncertain, known from several locations and does not appear to be under imminent threat. A citizen scientist team led by myself as a retired ornithologist has discovered that Margaret River has a vibrant Masked Owl population, preying on rats and mice around human habitation.

We are the first to have documented roosting and nesting sites for the SW WA population, which has enabled collections of hundreds of regurgitated pellets as a basis for establishing their prey. Full analysis has yet to be undertaken but results for approximately 124 pellets at one roost contained jaws of 104 rats, 124 mice and only one other prey item, a Western Ringtail Possum. Not surprisingly therefore, analysis of livers from several Masked Owls found debilitated and dying, plus victims of vehicle collisions, is revealing high levels of SGAR poisoning. The data are being compiled by the UCU Joondalup fauna research lab. Quoted here is preliminary feedback from Mike Lohr regarding the first Masked Owl to be tested, an adult female, found 9 August 2017 alive 'near the creek' in bushland at Meelup (near the coastal township of Dunsborough), euthanized by veterinarian Felicity Bradshaw, a member of the Rodenticide Action Group:

*"Detectable levels of two different second generation anticoagulant rodenticides. The one which made up the majority of what was detected (brodifacoum) is commonly available in stores and is regularly used by private residents and professional pest control companies. The other one (flocoumafen) is, as far as I can tell, only sold in bulk quantities and is used exclusively by*

professionals. It's a bit difficult to tell whether this bird was directly killed by rodenticide without a full necropsy, but the overall levels are certainly high enough to be dangerous. ”

(iii) **Strong community support: Rodenticide Campaign ramped up through Bendigo Bank sponsorship**

In early 2020, the Augusta and Districts Community (Bendigo) Bank offered sponsorship to invigorate the Owl Friendly campaign. <https://owlfriendly.org.au/sponsors/>

As highlighted on the website enabled by this sponsorship, the campaign has support from across the community, including:

- Nature Conservation Margaret River Region, our peak conservation body
- Shire of Augusta Margaret River with respect to health requirements for rodent control
- Margaret River Chamber of Commerce and Industry to tackle the issue at the pest control and client level
- Transition Margaret River to get the message out to householders
- Margaret River Busselton Tourism Association to reach accommodation and tourism venues and their clients
- WA Department of Biodiversity, Conservation and Attractions
- Undalup Association, representing the Wadandi people, the Traditional Owners of the region.

We also have a growing number of Owl Friendly Heroes: organisations, businesses and individuals who are supporting the campaign by adopting (or requiring their pest control contractors to deliver) best practice rodent control and are willing to be recognised publicly for this leadership.

Feedback from hardware retail outlets is that sales of SGARs have halved over the time of the campaign, with a commensurate increase in sale of first generation baits and trap alternatives.

Other components of the campaign include supporting veterinary response to wildlife potentially suffering from poisoning, and supporting wildlife care organisations treat poisoned wildlife.

We continue to work with our ECU colleagues to obtain wildlife for liver analysis.

(iv) **Protecting conservation values - other avenues for tackling the issue**

We are aware of discussion as to whether a submission should be made to the Commonwealth Government for recognition of SGARs as a threatening process under the EPBC Act.

<https://www.environment.gov.au/biodiversity/threatened/key-threatening-processes>

Our understanding is that there are grounds for listing including ongoing research revealing a wider range of wildlife taking up SGARS through previously unsuspected secondary pathways. For example, through invertebrates and reptiles accessing bait stations, suffering little to no harm themselves but being a vector to many diurnal and nocturnal species for which they are prey. Such listing would likely prove unnecessary if appropriate restraints are placed on availability and use of SGARs by the Australian Pesticides and Veterinary Medicines Authority.