



To: Chemical Review

Australian Pesticides and Veterinary Medicines Authority

cc Senator Murray Watt, Minister for the Environment and Water

cc Hon Julie Collins MP Minister for Agriculture, Fisheries and Forestry

SUBMISSION ON ANTICOAGULANT RODENTICIDE USE

(Special Gazette, 16 December 2025)

1. ORGANISATION AND RELEVANT EXPERIENCE

Owl Friendly Margaret River, established in 2018, is an association of volunteers who are contributing a wide range of capabilities to a campaign to address the insidious threat of rodenticide poisoning to owls and other wildlife in our region. We work with the community to establish the Augusta Margaret River Region as a safe haven for owls and other wildlife from rodenticide poisoning. We have chosen the Masked Owl as our icon.

Our coordinator, Dr Boyd Wykes, has a PhD in ornithology and considerable career experience as an environmental manager. (See Attachment 1 for relevant qualifications and experience). Communications coordinator, Karen Majer, has a BSc (Hons) in Zoology and career experience in environment and sustainability (See Attachment 1). Other key members of the group have experience in a wildlife and pet veterinary practice, wildlife rehabilitation, law, fundraising, business and citizen science. We are supported by scientific/technical advisors:

Dr Rob Davis, Associate Professor in Wildlife Conservation at Edith Cowan University,
Dr Michael Lohr, wildlife rodenticide specialist (Edith Cown University)

We have lived experience of the tragic loss of wildlife and the significant costs and voluntary effort involved to rescue and provide veterinary care and rehabilitation. As a focal point in our community for owls, in particular the Masked Owl, we often receive dead or injured birds found by members of the public. If living, they are taken to a vet for assessment, resulting in euthanasia or primary treatment and subsequent transfer to a wildlife rehabilitation centre. Dr Boyd Wykes has been personally involved in many of these rescues. Dead owls have been taken to Edith Cowan University for liver testing for rodenticides, partly funded by Owl Friendly MR. This research will be referred to later.

We now have over 40 “Owl Friendly” local governments and organisations in our network around Australia and many “hero” organisations, all of whom have committed to controlling rodents in their operations and premises without using Second Generation Anticoagulant Rodenticides (SGARs).

2. KEY POINTS OF OUR SUBMISSION

We support the APVMA conclusion that “--- the way products containing second-generation anticoagulant rodenticides (SGARs) are currently used is creating current risks to non-target animals, including native wildlife.” Our submission details our assessment that the proposals put forward do not address the causes of the harm to wildlife from secondary poisoning by SGARs and will therefore fail to mitigate the risks.

Public information is misleading

- We have grave concerns about the way in which the proposed regulations were communicated, including procedural fairness of the consultation.

The proposed regulations fail to mitigate the recognised risk

- The APVMA has recognised the risks in the Technical Paper but with the currently proposed regulations and use conditions, the risk remains unacceptable. The “sweeping changes” completely fail to protect Australia’s wildlife including endangered species.
- SGARs will continue to cause unacceptable risk and unintended harm. We contend that this means that the safety criteria in s14 of the AgVet Code are no longer met and that continuing registration without much stronger controls would be inconsistent with the Act.
- Section 1A of the AgVet Code requires decisions of the APVMA to be based “on science” and that the “health and safety of... animals and the environment is a first priority of the system for regulating chemical products”. Nowhere in the Special Gazette or the Technical Report is any science provided about the effectiveness of the proposed mitigation methods.
- The proposed regulations do not reflect an understanding of animal behaviour and poisoning pathways. This has led to ineffective proposals. In particular, outdoor bait stations, changes to labelling and selling unlimited poison in smaller packets will not prevent secondary poisoning of wildlife.
- It is in the public interest that SGARs be restricted chemical products.
- Proposed regulations removing registration of First Generation Anticoagulant Rodenticides will increase harm to wildlife.
- There is a need for industry-funded research to fill identified information gaps and Government-funded monitoring of success of new regulations in reducing unintended harm.
- While not a criterion in the APVMA legislation, the APVMA needs to be aware that the wildlife being harmed by SGARs includes many species of profound cultural importance to Traditional Custodians. By not addressing that harm, the APVMA and Commonwealth Government will also be judged by this failing.

These points are substantiated with references in the following sections.

3. CONCERNS WITH THE PROCESS FOLLOWED BY APVMA

3.1 Public information is misleading and has impacted procedural fairness

Understanding the proposed regulation changes requires substantial effort and recourse to a lengthy technical document and impenetrable (to the lay reader) Special Gazette.

This has prevented stakeholders from properly understanding the proposal and has undermined the consultation process.

3.2 Proposed Suspension

The wording in the Press Release is highly misleading. The first proposed regulatory mechanism is Proposed Suspension. The definition of suspension (Cambridge Dictionary) is *the act of stopping something happening, operating, etc. for a period of time. e.g. The suspension of fighting is to take effect at 6 a.m. on Monday.*

APVMA use of the word *suspension* can be taken to mean suspending all or specific registrations within the SGAR category until new regulations are in place. People have told us that that they reasonably inferred that APVMA proposes to stop sale and use of SGARs “as soon as possible after the end of a six-week consultation”.

Further reading of the release suggests that neither is this decided (“**If** the suspension goes ahead --”) nor is it a suspension in the way the term is usually understood (“SGAR products could still be used, but only in accordance with the enforceable new instructions, conditions and use patterns that will apply nationally.”) These conditions can only be understood by careful reading of the Gazette and Technical Report, which is beyond many people’s time availability or capacity.

We have personal feedback from our stakeholders including local government that confusion around the meaning of a Proposed Suspension has prevented reasonable assessment of the proposed actions.

3.3 Proposed reconsideration decisions

Referring readers to the [Anticoagulant rodenticides Review Technical Report](#), and the [APVMA Special Gazette, 16 December 2025](#) without a summary of the proposed measures is at best obfuscation and can be inferred to be a deliberate attempt to disable analysis as the basis for submissions. As an example, a request for ChatGPT yielded “*I wasn’t able to extract the **exact quoted wording about picking up or disposing of dead rodents** from the online text of the APVMA Special Gazette within this session. The Gazette page itself is long and structured with navigation links, and the specific SGAR label instructions appear to be contained in downloadable documents or embedded sections that aren’t directly visible in the scraped HTML text.*” If AI can’t do it, how long would it take a person to clarify such questions? This may not break the letter of the law, but it certainly leads to distrust and difficulty in providing a submission.

4. THE PROPOSED REGULATIONS FAIL TO MITIGATE THE RECOGNISED RISK

4.1 Harmful unintended effects on wildlife are proven and will continue

Evidence presented in this and other submissions shows that SGARs cause secondary poisoning that results in harmful unintended effects on wildlife. ¹ Research shows rodenticide exposure in a wide range of birds of prey, reptiles, frogs, fish and marsupials, including endangered species such as four quoll species, Tasmanian Devils and Tasmanian Masked Owls.^{2 3}

Evidence presented in this and other submissions shows that SGARs cause secondary poisoning that results in harmful unintended effects on wildlife.

SGAR products are LIKELY to cause unintended harm.

4.2 Failure to follow standard risk management protocols and apply scientific rigour as basis for proposed mitigation measures

Section 1A of the AgVet Code requires decisions of the APVMA to be based “on science” and that the “health and safety of... animals and the environment is a first priority of the system for regulating chemical products”. Nowhere in the Special Gazette or the Technical Report is any science provided to demonstrate that the proposed mitigation measures are likely to effectively address the known and unknown pathways by which SGARs are causing harm to wildlife.

The APVMA has failed to follow standard risk management protocols and substantiate its proposed risk mitigation measures.

¹ Cooke, R et al 2023 [Silent killers? The widespread exposure of predatory nocturnal birds to anticoagulant rodenticides - ScienceDirect](#)

Davis, R, Bateman, B, Lettoof, D & Watson, M (2024) [Mouse plague: bromadiolone will obliterate mice, but it'll poison eagles, snakes and owls, too.](#) The Conversation.

Keating, M (2024) Rat poison is moving up through food chains, threatening carnivores around the world. The Conversation.

Lohr, M (2018) Anticoagulant rodenticide exposure in an Australian predatory bird increases with proximity to developed habitat. *Science of the Total Environment* 643 (2018) 134–144

Lohr, M., Lohr, C. A., Dunlop, J., Snape, M., Pulsford, S., Webb, E., & Davis, R. (2025). *Widespread detection of second generation anticoagulant rodenticides in Australian native marsupial carnivores.* *Science of the Total Environment*, 967, 178832.

Lohr, M. & Davis, R. (2018). *Anticoagulant rodenticide use, non-target impacts and regulation: a case study from Australia.* *Science of the Total Environment*, 634, 1372-1384.

Rowley, J & Lettoof (2024) [We found pesticides in a third of Australian frogs we tested. Did these cause mass deaths?](#) CSIRO. The Conversation.

White, J & Cooke, R (2023) [Rat poison is killing our beloved native owls and tawny frogmouths – and that's the tip of the iceberg.](#) Deakin University. The Conversation.

White, J & Cooke, R. (2026) [Household rat poisons found to be 'unacceptable risk' to native animals. So why aren't they banned?](#) Deakin University. The Conversation.

² Davis, R, Dunlop, J, & Pulsford, S (2025) [Lethal second-generation rat poisons are killing endangered quolls and Tasmanian devils](#) The Conversation.

³ Mooney N. (2017). Risks of anticoagulant rodenticides to Tasmanian raptors. *Tasmanian Bird Rep.* 38, 17-35. Todd MK, Kavanah RP, Bell P, Munks SA (2018a).

4.3 The risk is unacceptable

The APVMA has acknowledged current risks to wildlife and people but is not proposing effective risk mitigation strategies. Scientific evidence, and a common-sense understanding of poisoning pathways, demonstrates that the risk, even with proposed use conditions, will remain unacceptable. The “sweeping changes” completely fail to protect Australia’s wildlife including endangered species.

The risk is unacceptable. This will remain the case after application of the proposed risk mitigation strategies – the statutory safety standard will not be satisfied.

5. IMPACTS ON THE MASKED OWL IN SOUTH WEST AUSTRALIA



Photo Steven Castan

Owl Friendly Margaret River will focus in this submission on the Masked Owl (Yornitj in the local Wadandi language) that is the icon of our campaign. Masked Owls were only recently documented in the south west by Dr Boyd Wykes and Steve Castan.⁴

5.1 Conservation status

Genetic investigation of the *Tyto novaehollandiae* complex, to which Boyd has contributed, has shown that the south west WA Masked Owl population warrants subspecies status.⁵ This status when recognised, combined with the natural history data now accumulated, is likely to result in the subspecies being elevated in conservation status from current Priority 3 (known from few locations and/or in urgent need of further surveys) on the WA Threatened and Priority Fauna list.⁶

⁴ Going owl-friendly: How grassroots advocacy is protecting native birds from dangerous rodenticides. Holly Parsons, Birdlife Australia, Boyd Wykes, Owl Friendly Margaret River, Poppy Mahon, Youth Action for Wildlife (2025). Presentation at Australasian Ornithological Congress, Perth November 2025.

⁵ Jackett, N (2025), Masks revealed: historical DNA and whole-genome sequencing clarify Masked Owl evolution. School of the Environment, University of Queensland. Presentation at Australasian Ornithological Congress, Perth November 2025.

⁶ www.dpaw.wa.gov.au February 2021

5.2 Threats to Masked Owls

Boyd's research is shedding light on their distribution and behaviour based on finding and monitoring over 12 nesting sites, previously unrecorded for south west WA. The species is very sparse in forest that has been rendered unsuitable due to structure altered by logging and fire regime and loss of native prey species.

The unexpectedly dense population in the Margaret River region's landscape of mixed agriculture, townships and forest remnants has been enabled by a shift in diet to introduced mammals associated with human activity. Analysis of over 500 regurgitated pellets collected at the nests and roosts, observed being fed to young and from material in nest chambers has revealed a diet (based on number of prey items) of around 48% black rat, 38% house mouse and 8% rabbit, with less than 5% native marsupials (including phascogale, western ringtail, mardo and dunnart).

From the work of Mike Lohr (2018)⁷, who showed alarmingly high levels of exposure for south west WA Boobooks and of Mooney (2017)⁸ Boyd was aware of the high risk to south west owl populations. When a Masked Owl eat poisoned rodents, which will be more vulnerable than healthy ones due to their weakened state, the toxins accumulates in its liver. The owl may not die immediately. Instead, it can become weak, disoriented, and more vulnerable to secondary causes of death, including vehicle strike, starvation or infection.

Owl Friendly communities in the south west are well aware of sick, injured and dead Masked Owls and other raptors being found around towns and peri-urban areas.⁹

Rodenticide poisoning was suspected as a contributing factor, especially when treating vets found evidence of haemorrhage. However without expensive liver testing, the extent of the impact of SGARs had been difficult to determine.

⁷ Lohr, M (2018) Anticoagulant rodenticide exposure in an Australian predatory bird increases with proximity to developed habitat. *Science of the Total Environment* 643 (2018) 134–144

⁸ Mooney N. (2017). Risks of anticoagulant rodenticides to Tasmanian raptors. *Tasmanian Bird Rep.* 38, 17-35. Todd MK, Kavanah RP, Bell P, Munks SA (2018a).

⁹ Holly Parsons, Birdlife Australia, Boyd Wykes, Owl Friendly Margaret River, Poppy Mahon, Youth Action for Wildlife (2025). Going owl-friendly: How grassroots advocacy is protecting native birds from dangerous rodenticides. Presentation at Australasian Ornithological Congress, Perth November 2025.

Boyd Wykes, Owl Friendly Margaret River, and Rob. Davis, Assoc. Prof. in Wildlife Conservation, ECU. (2025). One lost and one found - a tale of two owls using citizen science approaches (2025) Presentation at Australasian Ornithological Congress, Perth November 2025.

Recently published liver analysis data (Clarke et al 2025)¹⁰ reinforces recognition that rodenticide poison is one of the main threats to survival of the Tasmanian subspecies of Masked Owl, which is listed as Endangered under the *Tasmanian Threatened Species Protection Act 1995* and Vulnerable under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999*.¹¹

New research by Edith Cowan University into the cause of death of Masked Owls collected in Western Australia's rural south west and in Perth has now shown conclusively that SGARS were implicated.^{12 13} The research results were released to the media on 18 February 2026. Of 13 birds tested from the south west, all had toxic or lethal levels of SGARs. This was also the case for three Masked Owls found in metropolitan Perth. All significant exposure was to second generation anticoagulant poisons, particularly Brodifacoum, with some exposed to more than one type of bait. Lead researcher Dr Rob Davis, Associate Professor in Wildlife Conservation at Edith Cowan University, described the data from liver tests as shocking and cause for a ban on public sale and strict regulation on the use of deadly SGARs.

The potential population impacts are cause for great concern, especially given current expected elevation of the conservation status of the birds. Dr Davis's conclusion is that if these levels were true for all of the south west population of Masked Owl, the sobering bottom line is that we would not have a population. It is probably an overestimate because most of the owls were hit by cars or were found debilitated or dead by members of the public. Research shows high susceptibility to being hit by vehicles when suffering rodenticide toxicity. However while the sample of birds tested likely overrepresents birds with sub-lethal exposure, it probably underrepresents birds that got a lethal dose and died quietly in dense bushland where nobody is likely to find them.

This new research adds to the overwhelming and consistent body of evidence already supplied to the APVMA that these baits are killing our wildlife at completely unacceptable levels. This is supported by evidence in Section 4.2.

An understanding of poisoning pathways clearly demonstrates that the measures proposed by APVMA cannot stop secondary poisoning. Masked Owls will continue to be at grave risk.

¹⁰ Clarke J., Zehntner N., Hutchinson J.P., Ceballos M.R, Tedone L., Jordan T.B, Pay J., Mooney N., Hocking D.P. (2025). Unmasking the impact of second-generation anticoagulant rodenticides on Masked owls (*Tyto novaehollandiae castanops*) in Tasmania. *Emu - Austral Ornithology*, DOI: 10.1080/01584197.2025.2507301.

¹¹ Forest Practices Authority 2014, 'Identifying masked owl habitat', Fauna Technical Note No. 17, Forest Practices Authority, Hobart, Tasmania.

¹² (Paper in prep.) See Media Release Owl Friendly Margaret River 18 February 2026 (Attachment 2)

¹³ Lohr M., Wykes B., Davis R., Yaschenko N., Buckley S. (2025). Rodenticides in two Southwest WA owl species: What factors drive exposure? Presentation at Australasian Ornithological Congress, Perth November 2025.



Masked Owls showing high to lethal levels of SGARs in liver testing. Photos Karen Majer

6. WHY THE APVMA MITIGATION STRATEGIES WON'T WORK

6.1 Poisoning pathways

The APVMA has recognised that risks to non-target animals arise from both primary exposure (direct ingestion of bait) and secondary exposure (consumption of poisoned rodents) but has demonstrated a lack of scientific rigour and understanding of animal and human behaviour when formulating the proposed suite of mitigation measures, especially those relating to bait stations and labelling.

The measures proposed will still allow wildlife to access rat poisons and suffer primary poisoning. Research conducted by Edith Cowan University at Bunbury TAFE shows that a wide range of wildlife in addition to rodents directly access bait in bait stations. (Paper in prep. See submission by Dr M. Lohr). Rodents, marsupials, reptiles and insects that access the bait will continue to access poison, disperse and cause secondary poisoning. This is the most likely explanation for why SGAR exposure is being documented in such a wide range of wildlife around Australia.

SGARs are found throughout the food chain, including in endangered Powerful Owls that feed on arboreal possums not rodents.^{14 15 16}

While supermarkets and hardware stores stock SGARs as their main rodenticide products, and most pest control companies use these poisons, owls and all other wildlife will continue to have a high risk of exposure through secondary poisoning.

6.2 Outdoor bait stations

The proposed mitigation actions rely heavily on secure bait stations located within 2 metres of buildings. The notion that the use of bait stations accompanied by new labelling on the poisons will reduce wildlife harm assumes that rodents will die in a place where they can be collected and disposed of. This is clearly impractical. Rodents do not die *in situ*. After feeding, poisoned rodents can remain active for weeks before dying, moving through gardens, parks and bushland. They may return over several days to consume more bait, even taking it from multiple places as demonstrated by the Edith Cowan research that found a Masked Owl with more than one second generation poison in its liver.

Rats become ‘mobile poison’ and in their weakened state are easy prey for up to 18 days before death. They may die at some distance from the bait, becoming a source of secondary poison for scavengers.

Recent research carried out by Dr Rob Davis and Dr Mike Lohr (Edith Cowan University)¹⁷ involved motion camera recordings at bait stations around the Bunbury TAFE campus (using “blank” not poison baits), showed wildlife including the Brush-tailed Phascogale entering. It is listed as *Conservation Dependent* under the WA Biodiversity Conservation Act. Phascogales also form part of the diet of Masked Owls.

¹⁴ Possums are poisoned which is poisoning powerful owls STOTEN 2024 (Open Access) [The missing toxic link: Exposure of non-target native marsupials to second-generation anticoagulant rodenticides \(SGARs\) suggest a potential route of transfer into apex predators - ScienceDirect](#)

¹⁵ Powerful owl diet has not shifted to rodents. They are poisoned with rodenticides via poisoned possums STOTEN 2026 (Open Acces) [Beyond rodents: Apex predator diet reveals possum-mediated rodenticide poisoning - ScienceDirect](#)

¹⁶ Powerful owls impacted by rodenticides STOTEN 2022 (Paywall) [Widespread exposure of powerful owls to second-generation anticoagulant rodenticides in Australia spans an urban to agricultural and forest landscape - ScienceDirect](#)

¹⁷ Interactions Between Native Fauna and Rodenticides Placed in Bait Boxes in Western Australia’s South-West. Davis *et al* in prep.



Phascogale entering bait station. Photos courtesy of Edith Cowan University.

In addition, the observations show that reptiles including King's Skinks, cockroaches and other insects, and slugs can enter bait stations and become sources of secondary poisoning. King's Skinks are eaten by raptors. Insects and slugs are eaten by a range of wildlife including diurnal and nocturnal birds – pictured below a raven and a boobook waiting outside a bait station.



King's Skink entering bait station. Boobook Owl

Raven

Photos courtesy of Edith Cowan University.

It is patently clear from considerable research that SGARs in bait stations contribute to the predominant pathway killing our wildlife - secondary poisoning.

Use of bait stations will not prevent primary or secondary poisoning and are NOT a sufficient risk mitigation strategy for Masked Owls and all other creatures.

6.3 Changes to labelling

The Technical Report acknowledges:

- Many wildlife exposures occur in urban/peri-urban areas.
- Products sold in retail settings contribute to environmental load.
- Even label-compliant use can result in poisoned rodents being available to predator.

Even when users try to comply with instructions, this will still be the case under new labelling provisions, which are impractical or impossible to implement. The idea that requiring pest controllers and the public to periodically search and dispose of dead

rodents will address this issue is ludicrously unlikely, impracticable and ineffectual given the movements of rodents described above. Weekly checking of bait stations by commercial operators will make no difference – the damage is long done by then.

Telling people to prevent secondary poisoning of wildlife is a nonsense. How - shoo them away from nearby bushland or parks?

“Labelling, classified as an "Administrative Control", is an ineffective tool for hazard mitigation.”¹⁸

6.4 Safety criteria

Under s14 of the AgVet Code, the APVMA must be satisfied that a product:

- would not be likely to have an unintended effect that is harmful to animals or the environment, and
- would not be likely to have an effect that is harmful to human beings, and
- would not pose an undue hazard.

We contend that the scientific evidence presented in the preceding section proves continuing harm to animals. This means that the safety criteria in s14 of the AgVet Code are no longer met and that continuing registration would be inconsistent with the Act.

It is in the public interest that SGARs be restricted chemical products.

6.5 Regulations deregistering FGARs will increase harm

SGARs (second-generation anticoagulant rodenticides) are more toxic to non-target species than first-generation products, and are slower to break down, meaning they have a higher potential for secondary poisoning of predators and scavengers.

Scientific studies indicate that secondary exposure of birds (e.g. owls) to SGARs has the potential to result in lethal outcomes, whereas first-generation products generally do not lead to lethal secondary exposures.

It is mystifying that proposed regulation in the Special Gazette propose to deregister all products with FGAR active ingredients except Racumin, which are a safer public choice from the viewpoint of secondary poisoning, and continue to classify 38 lethal, long-lasting SGARs as domestic and therefore freely available in shops.

This demonstrates that although under s14 of the AgVet Code, the APVMA must be satisfied that a product would not be likely to have an unintended effect that is harmful to animals or the environment, this is not the aim of the proposed Regulations.

¹⁸ Laughery, K. R., & Wogalter, M. S. (2014). A three-stage model of warning effectiveness. *Applied Ergonomics*, 45(1), 1-10.

7. SOCIAL LICENCE AND CULTURAL CONCERNS

7.1 Social licence

The reaction of media and the community indicates a powerful backlash against the APVMA proposals. A Facebook post on 18 February on the Owl Friendly Margaret River website was widely supported and shared.



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Shoppers should be able to walk into stores under the assumption that the products available to them for pest control aren't going to kill native animals. Customers of commercial pest controllers should be confident that wildlife on their properties will not be killed as a consequence of rodent control measures.

High levels of concern have been demonstrated across organisations and the wider community.

7.2 Cultural concerns

Underpinning all of the research and campaigning undertaken by Owl Friendly Margaret River is the principle that “the country that the Owl Friendly program works in and for encompasses the traditional lands of the Wadandi people. Our campaign to raise appreciation of and protection for our nocturnal wildlife contributes to a broader imperative that our community learn from and work with our region’s Traditional Owners to restore a human harmony with country – a harmony that was maintained for tens of thousands of years before colonial appropriation. We are working closely with the Undalup Association to achieve an ‘Owl Friendly’ region.¹⁹

See submission from Dr Wayne Webb, Cultural Custodian and Elder of the Wadandi people and Chair of the Undalup Association.

Owls have a powerful cultural significance in Wadandi culture.

A foundation totemic creation belief²⁰ is that Wau-oo (the mopoke) and Beenar (the white owl), during the cold, dark, formless period of the Nyitting (Dreaming) created all the Bibbulmun (Nyungar) people and gave them their social structure by dividing them into two moieties manitchmat (white cockatoo) and wordungmat (crow) symbolizing darkness and light.

¹⁹ <https://owlfriendly.org.au/>

²⁰ documented by Daisy Bates in 1923

Owl voices as night spirits: an ethno-ornithological approach to the understanding of the significance of night bird calls and social control in traditional Nyungar culture. Ken Macintyre¹, Barb Dobson and Iva Hayward-Jackson. <https://www.anthropologyfromtheshed.com/owl-voices-as-night-spirits-an-ethno-ornithological-approach-to-the-understanding-of-the-significance-of-night-bird-calls-and-social-control-in-traditional-nyungar-culture>

Yornitj is the traditional Dworden wongie (local dialect) name for the Masked Owl, described as a 'spirit shape-changer' by Wadandi Elder, Dr Wayne Webb.²¹

While not a criterion in the APVMA legislation, the Government must be aware that social and cultural concerns weigh heavily in submissions, contact with politicians and across social media.

8. THE NEED FOR RESEARCH AND MONITORING

8.1 Identified needs for further research

The APVMA identifies:

- Limited national systematic wildlife monitoring.
- Incomplete mortality attribution.
- Under-reporting of poisoning events.
- Limited Australian population-level studies.

Despite these gaps, it concludes there is sufficient evidence of environmental exposure to justify regulatory reconsideration.

The recent research we have quoted has been carried out in universities and organisations such as ours with no support from Government or the manufacturers of the rat poisons who profit from their sale. Testing the livers of Masked Owls for the Edith Cowan research has cost \$300 per bird.

The APVMA treats sub-lethal exposure as:

- Scientifically plausible
- Insufficiently quantified at a population scale
- Contributing to uncertainty in risk assessment

This uncertainty is important: under the legislation, unresolved uncertainty can weigh toward precaution where risks may be unacceptable.

The APVMA has acknowledged uncertainty. Under the Precautionary Principal, it is outrageous that these products are not being banned until, and if, the manufacturers prove how their products can be made safe for the environment.

²¹ We acknowledge that this intellectual property belongs to Dr Wayne Webb as a cultural custodian of the Wadandi.

8.2 Monitoring

APVMA has failed to propose any means of monitoring current rodenticide harm to wildlife and a program to determine whether actions resulting from this review are reducing poisoning of wildlife, pets and people. This is a fundamental component of all risk management protocols e.g. EPA Vic: Step 4 Check Controls: Controls that are put in place to prevent or mitigate risks must be monitored to ensure they work as planned.”²²

There is now sufficient base-line exposure data on a wide range of at-risk species to establish monitoring programs to determine whether the eventual restrictions required by the APVMA are effective in sufficiently mitigating the risks. We recognise that APVMA is not empowered to spend any of the 90% of its funding that it obtains from licensing products on research into the risks these products pose to the environment. However, the APVMA can require action to be funded and taken by other parties such as government departments or manufacturers as a requisite for continued use of any products, or as a requisite for enabling suspended products to be re-registered. We urge the APVMA to liaise with the relevant Commonwealth Departments – Agriculture and Environment – to propose achievable research and monitoring actions that will address the inexcusable current Catch 22 that unfunded community and research bodies must provide the evidence on behalf of Australia’s wildlife in order to gain protection from the recognised harm being done by SGARs.

It is vital to implement monitoring to ascertain whether the finalised, new conditions reduce poisoning of non- target animals to levels that do not place endangered species of wildlife and all of the wildlife that lives in proximity to where people live and work at unacceptable levels of risk.

²² <https://www.epa.vic.gov.au/16951-assessing-and-controlling-risk-guide-business>

RECOMMENDATIONS

In recognition of scientific evidence, remove SGARs permanently from public sale and apply strict controls on their commercial use.

1. *Immediately issue stop-sale directions for all SGAR products pending gazettal of effective regulations.*
2. *Certify that it is in the public interest to list all SGAR products as “Commercial”.*
3. *Ban commercial (pest controller) use of SGARs except under strict regulation for exceptional purposes.*
4. *Upgrade training for licenced pest controllers to ensure secondary poisoning risks are a priority consideration in any future use.*
5. *Implement monitoring to ascertain whether the new conditions imposed reduce poisoning of non- target animals.*
6. *Create a National Stewardship Program to perform tasks such as review training and certification courses for professional pest controllers, implement and fund wildlife-monitoring programs, and create an online reporting tool for alleged instances of non-compliance.*
7. *Recommend Integrated Pest Management strategies that prioritise non- anticoagulant control methods for rodent management.*

ATTACHMENT 1: RELEVANT QUALIFICATIONS AND EXPERIENCE

DR BOYD WYKES

Background relevant to providing this submission includes the following:

- Conducted PhD research on the Helmeted Honeyeater which provided the basis for the conservation program that has brought Victoria's State Bird Emblem back from the brink of extinction.
- Worked alongside Martin Copley to purchase the property and write the management plan for establishing Karakamia, the first of Australian Wildlife Conservation's sanctuaries.
- As Senior Environmental Manager, headed up the team responsible for all of Department of Defence environmental and cultural matters in Western Australia, including receiving a 2002 Australia Day Council recognition for helping establish a national Department of Defence Environmental Management System based on ISO14001.
- In retirement, since 2017 I have studied the SW WA Masked Owl, which is so little known that its nest has only been documented through this study, enabling insights into its biology and conservation status. This includes determining that its diet has shifted to rats and mice around human habitation and cultivation and as a consequence is suffering alarmingly high exposure to second generation anticoagulant rodenticides.

KAREN MAJER

Background relevant to providing this submission includes the following:

- Science degree (BSc Hons), majoring in Zoology and Physiology, University of Western Australia
- Graduate Diploma in Media, Australian Film and Television School
- Graduate Certificate in Sustainability, Curtin University Sustainability Policy Institute
- More than 40 years employment experience in communication with a speciality in government programs and environmental management.
- Experience in policy and planning across several Government agencies (environment, natural resource management, water resources, waterways, arts and tourism).
- Past Chair of Shire of Augusta Margaret River Sustainability Advisory Committee.
- In retirement, over 12 years volunteering with several community groups including Owl Friendly Margaret River.

ATTACHMENT 2



OWL FRIENDLY MARGARET RIVER REGION



“Shocking” rat poison levels in WA Masked Owls point to need for a ban

Scientists this week released results of research into the cause of death of Masked Owls collected in Western Australia’s rural south west and in Perth.

They described the data from liver tests as shocking and cause for a ban on public sale and strict regulation on the use of deadly ‘second generation’ rat poisons that are killing owls as well as other native wildlife and family pets. The animals sicken and die of internal bleeding after eating rodents that have consumed rat baits up to 18 days prior.

Lead researcher Dr Rob Davis, Associate Professor in Wildlife Conservation at Edith Cowan University, said that of 13 birds tested from the south west, all had toxic or lethal levels of rat poisons that are freely available on our supermarket and hardware shelves and are used by some commercial pest controllers. This was also the case for three Masked Owls found in metropolitan Perth.

All significant exposure was to long-lasting ‘one-dose kills’ poisons, particularly Brodifacoum, with some exposed to more than one type of bait.

Common brands with the active ingredient Brodifacoum include Talon, Tomcat II, Ditrac, Ratsak and Surefire.

“If these levels were true for all of the south west population of Masked Owl, the sobering bottom line is that we would not have a population,” Dr Davis said. “However, it’s probably an overestimate because most of the owls were hit by cars or were found debilitated or dead by members of the public. Research shows high susceptibility to being hit by vehicles when suffering rodenticide toxicity.

“While the sample of birds tested likely overrepresents birds with sub-lethal exposure, it probably underrepresents birds that got a lethal dose and died quietly in dense bushland where nobody is likely to find them.”

Dr Davis says that these disturbing findings were not that surprising given the team from Owl Friendly Margaret River, led by Dr Boyd Wykes, has shown that Masked Owls have shifted from native prey to survive on the rats and mice associated with people. What has been a surprise is other research showing rodenticide exposure in a wide range of birds of prey, reptiles, frogs, fish and marsupials, including endangered species such as four quoll species, Tasmanian Devils and Tasmanian Masked Owls.

“We have evidence that the major pathway for poisons entering the food chain is wildlife eating dead and dying rodents as well as directly accessing outdoor bait stations,” Dr Wykes said.

“Testing the livers of these Masked Owls has cost \$300 per bird.

“The current research has been carried out in universities with no support from Government or the manufacturers of the rat poisons who profit from their sale.

“It’s outrageous that these products are not being banned until the manufacturers prove how their products can be made safe for the environment.

“A current Government review of rodenticides has proposed new regulations that completely fail to protect wildlife. Outdoor bait stations, changes to labelling and selling unlimited poison in smaller packets will not prevent poisoning of wildlife.

“I encourage everyone to speak out. Call on Senator Murray Watt to intervene and ban this owl poison.”

Quotes from BirdLife Australia CEO Kate Millar

BirdLife Australia CEO Kate Millar says the Australian Pesticides and Veterinary Medicines Authority (APVMA) must end the public sale of dangerous second-generation anticoagulant rodenticides (SGARs).

“This new research finding adds to the overwhelming and consistent body of evidence already supplied to and acknowledged by the APVMA, that these baits are killing wildlife at unacceptable levels.

“Shoppers should be able to walk into stores under the assumption that the products available to them for pest control aren’t going to kill native animals, but that isn’t the case,” said Ms Millar.

“Instead of taking meaningful action, the APVMA are proposing a series of weak reforms that will utterly fail to prevent the death of birds including powerful owls, magpies, and Australia’s favourite bird, the tawny frogmouth.

“For years, BirdLife Australia and our supporters have been supplying evidence calling for sensible regulation of dangerous rodenticides to protect birds, wildlife, and pets from avoidable harm.

“The evidence is clear, and the choice is clear. Rat bait that kills owls should be banned from public sale to protect shoppers from inadvertently poisoning wildlife, especially when safer products are available on the very same shelves.

“There may be tightly controlled situations, including some emergency or conservation contexts, where short-term SGAR use by trained professionals is considered necessary. But the routine and widespread use of long-lasting SGARs is causing unacceptable wildlife mortality at a national scale.”

You can find information on the Owl Friendly Margaret River [website](#).