



Submission on use patterns for anticoagulant rodenticide products

Submission to the Australian Pesticides and Veterinary Medicines Authority
17 July 2020

Landcare Tasmania appreciates the opportunity to contribute to the APVMA consultation on use patterns for anticoagulant rodenticide products. Landcare Tasmania operates as a peak body to represent, support, strengthen and grow community Landcare in Tasmania. We support a network of over 260 community-based member groups, plus additional additional and other members, engaging in Landcare activities on public and private land throughout Tasmania to improve the health of our natural and working landscapes. In 2019 the network numbered almost 5,000 regular members and volunteers, who performed approximately 165,000 hours of voluntary community work.

Our members are contributing our vision for all the land and coasts of Tasmania to be cared for by the community. They work on a wide range of activities, including habitat restoration, invasive species eradication, farm sustainability, erosion control, wildlife management and aquatic ecosystems.

Maintaining and improving the habitat value of Tasmanian landscapes for birds of prey and other apex predators, several species of which are threatened with extinction, with a view to improving their conservation status, is a small but significant part of the Landcare Tasmania network's ambition. Landcare Tasmania is thus very concerned at the potential for the continued widespread use of second generation anticoagulant rodenticides (SGARs) to significantly undermine the work of both the community Landcare network and also of all those making contributions to the conservation of apex predators in Tasmania. Much of this work is directed at species listed as threatened with extinction under either State or Federal environment protection legislation.

Landcare Tasmania Inc.

PO Box 4791 Bathurst St, Hobart, TAS, 7000

E: support@landcaretas.org.au Ph: (03) 6234 7117

www.landcaretas.org.au

For the past four years Landcare Tasmania has been delivering a Rodenticides Community Awareness Program, guided by input from experts, to inform the public and our membership of the impacts rodenticides are having on key species and food webs across Tasmania.

We have received confirming expert advice about the significant secondary impacts of SGAR's on key Tasmania apex predator species and have passed this on to our Landcare network. Dr Michael Lohr (Edith Cowan University), Nick Mooney (Birdlife Australia Raptor Group), Adam Cisterne (The Difficult Bird Research Group) and James Paye (University of Tasmania) have all provided information from their SGAR research showing considerably impacts on key species across Tasmania.

Of particular concern are the Commonwealth EPBC Act listed threatened species, the Tasmanian masked owl (*Tyto novaehollandiae castanops*), Tasmanian wedge-tailed eagle (*Aquila audax fleayi*), Spotted-tailed quoll (*Dasyurus maculatus*), Tasmania devil (*Sarcophilus harrisii*), Eastern quoll (*Dasyurus viverrinus*), and also the Grey goshawk – white morph (*Accipiter novaehollandiae*) which is State listed.

With such concerns in mind, Landcare Tasmania has sought public donations and also successfully applied for two grants to develop and distribute information materials to members. This information is to assist people to make choices to avoid types of rodenticides (especially SGARs) and to use material and strategies to effect rodent control that do not pose undue risk of fatal poisoning to birds of prey and other apex predators. This work includes:

- information sessions in priority areas where SGAR's are likely to have the highest impacts, including areas where breeding of Masked Owl has been confirmed;
- working with primary production enterprises, community groups, councils and other public utilities to decrease unnecessary use of rodenticides in public spaces;
- on-ground activities to enhance the extent of safe habitat for species being impacted by SGAR use, e.g. artificial nest hollows for owls, and also for prey species that are either listed as threatened or otherwise of conservation concern, e.g. eastern barred bandicoot (*Perameles gunnii*) and southern brown bandicoot (*Isodon obesulus*) and Tasmanian bettong (*Bettongia gaimardi*).

Expert advice, published articles and accumulating evidence has led Landcare Tasmania to the conclusion that SGARs pose a serious, immediate and existential risk to birds of prey and other apex predators in Tasmania, especially those with large foraging ranges. In essence, the problem we face is that susceptible animals ingesting SGARs become morbid almost immediately, before they have time to complete foraging activities. This renders them easy prey for birds of prey, scavengers and other predators before they have had time to

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metabolise or excrete the poison. This is particularly problematic for those species that habitually consume prey whole.

This is a new problem specifically associated with the more potent SGARs. The high concentrations of SGARs found in reptiles is also concerning not only for the native reptile species being impacted directly but also for the secondary impacts associated with ingestion by the threatened species listed previously.

We would thus like to make the following comments and suggestions to APVMA to improve the environmental safety of any use of SGARs.

SGARs should not be approved for domestic use. Alternatives are available, including the trusty rat and mouse trap, physical barriers and also more modern devices such as electric and other non-chemical lethal traps. Current patterns of heavy promotion and ready availability means that SGARs are widely distributed across the feeding range of most individuals of most apex predator species, including those with the largest of foraging ranges. It is this pervasive exposure that poses a serious threat to individuals and populations of apex predators.

SGARs should only be approved for use in particular commercial premises that can demonstrate significant commercial loss attributable to failure to control rodents using other materials and strategies. Protocols to establish such failure need to be clearly established and understood both by companies providing pest control services and companies managing such commercial premises. Use of SGARs needs to be seen as a last resort, only available to those with demonstrably serious and intractable problems. The mere presence of rodent pest problems should not be regarded as sufficient to justify resorting to use of SGARs.

Alternatives to SGARs are available. A decision by APVMA to reduce SGAR use needs to be complemented with work that facilitates a transition to alternatives. New regulations need to be designed to severely limit use of SGARs and to ensure animals taking bait cannot leave the bait station. Even within commercial use, SGARs will continue to pose a serious threat to species if allowed to continue under the current suite of control methods developed for first-generation products.

A key condition of any approval to use SGARs should be that users can demonstrate effectiveness in collecting, humanely killing and safely disposing of morbid and dead animals before they become exposed to both scavengers and birds of prey, to eliminate the risk of secondary poisoning. Use of SGARs creates a materially different risk of secondary

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poisoning compared to earlier materials and strategies, such that very different parameters controlling their use need to be established. Mere admonitions on the label risk being more honoured in the breach if old use habits are allowed to persist with these new poisons.

Given the practical difficulties in the environmentally safe deployment of SGARs, **Landcare Tasmania urges APVMA to take an appropriately precautionary approach** to defining the circumstances in which they can be used. Two suggestions we would like to make are that SGAR use should be:

- i. limited to 'one-way' bait stations to prevent morbid animals from returning to the general environment; and
- ii. excluded from outdoor use.

Landcare Tasmania appreciates that individual landholders, and those involved in supply chains servicing those landholders, have a wide range of very different needs for pest control services. There may thus be special circumstances where the appropriately precautionary deployment of SGARs is warranted. We are particularly concerned to ensure that:

1. Use of SGARs is restricted to the extent necessary to ensure that secondary poisoning of carnivorous wildlife is not exacerbated. Listed threatened species have statutory recognition that they are likely to become extinct if the factors causing them to be threatened are not addressed. As there are several listed threatened species impacted by SGARs, we consider that the APVMA has a duty to ensure that risks of secondary poisoning are reduced rather than just not exacerbated.
2. Species of wildlife that prey on rodent pests, especially raptors, are properly recognised for the economic contribution they make to healthy landscapes and businesses. It makes no sense to exacerbate the pest rodent problem by undermining natural control mechanisms. It makes better sense to help landholders and their service providers to work with the environment, rather than against it, to get the outcomes they want.
3. Regulators and users of rodent pesticides, and the wider landholding community and their service providers, understand and appreciate the value of top predators in maintaining a healthy balance throughout all trophic levels of food chains across both natural and working landscapes and the additional impact that SGARs impose. This is particularly true of species which forage over large areas such as Tasmanian Devils, Eastern Quolls and Wedge-tailed Eagles. We are all the poorer without healthy populations of these species.

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