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13 March 2026

Chemical Review
Australian Pesticides and Veterinary Medicines Authority
GPO BOX 574
Canberra ACT 2480

Endorsed by the LGNSW Board
in April 2026

Via email: chemicalreview@apvma.gov.au

Draft Submission on proposed regulatory decisions on anticoagulant rodenticides

Local Government NSW (LGNSW) is the peak body for local government in NSW, representing NSW general purpose councils and related entities. LGNSW facilitates the development of an effective community-based system of local government in the State.

LGNSW welcomes the opportunity to comment on the Australian Pesticides and Veterinary Medicines Authority (APVMA) proposed regulatory decisions on anticoagulant rodenticides, as outlined in its Special Gazette of 16 December 2025.

This is a draft submission and is subject to review and approval of the LGNSW Board. Any changes will be advised at the earliest opportunity.

Background

The APVMA Special Gazette outlined its proposal to:

- Reconsider or vary the use of anticoagulant rodenticide active constituents in specific products;
- vary certain chemical product registrations and label approvals;
- cancel certain chemical product registrations and label approvals.

The specific products the APVMA has considered are:

- four first generation anticoagulant rodenticide (FGAR) products. FGARs typically require multiple feeds over several days to deliver a lethal dose.
- 22 second generation anticoagulant rodenticides (SGAR) products containing the active ingredients: brodifacoum, bromadiolone, difenacoum, difethialone and floucoumafen. SGARs have a higher toxicity and can generally be lethal with one dose.

To support its proposed regulatory decision, the APVMA has prepared a technical report¹ providing an overview of the assessments that have been conducted by the APVMA and of the specialist advice received from its advisory agencies. The assessments consider

¹ [Anticoagulant Rodenticides Review Technical Report](#), December 2025 (p19)

aspects such as toxicology of the active constituents and product, occupational exposure aspects, environmental fate, toxicity, potential exposure and hazard, and efficacy and target crop or animal safety.

The APVMA's proposed changes include measures such as:

- Restricting use of products to indoors only for the control of mice and to indoors and within 2 metres from buildings for the control of rats.
- Prohibiting burrow baiting for the control of rats.
- Mandating the use of tamper-resistant bait stations in certain situations.
- Limiting supply and use of all commercial anticoagulant rodenticide products to trained professionals only and limiting the pack sizes of all domestic anticoagulant rodenticide products.
- Updated instructions relating to the placement of baits, management/monitoring of bait stations during treatment, management of dead rodents and other potential poisoned animals during treatment, the expected duration of treatment, and clean-up of bait/bait stations at the end of treatment.
- Cancellation of products that do not contain both a bittering agent and a dye, and cancellation of all liquid and powder bait concentrate products.

APVMA announcement

On 10 March 2026 the APVMA announced that the registration of all products containing SGARs will be suspended for one year from 24 March 2026, in recognition that the current use of SGAR products presents unacceptable risks to non-target animals including native wildlife. During the suspension period, SGAR products already in possession may only be used in accordance with revised APVMA instructions. For domestic applications this means not using the product outdoors, only using it in tamper resistant bait stations, and for not more than 35 days. For commercial situations the instructions are similar but enable baiting of rats within 2 metres of buildings.

During the suspension period the APVMA has also recommended to the Australian Department of Agriculture, Fisheries and Forestry that chemical products containing any SGARs be declared restricted chemical products (RCPs). Declaring SGARs as RCPs will enable tighter controls on their purchase and use, including restricting access to individuals who meet specific training and licensing requirements.

LGNSW policy position

The LGNSW [Policy Platform](#) consolidates the voices of councils across NSW, reflecting the collective positions of local government on issues of importance and guiding LGNSW in its advocacy on behalf of the local government sector. As per the Policy Platform, LGNSW advocates for:

13.6 Policies and practices that maximise biodiversity and the protection of threatened and endangered species, including:
d) A ban on the sale of unsafe backyard netting and Second Generation Anticoagulant Rodenticides.

Specific positions in relation to rodenticides:

2022 / L12 - Protecting wildlife from rat poison and ban SGARs

That Local Government NSW calls on the NSW State Government to:

1. legislate to ban the retail sale of Second Generation Anticoagulant Rodenticides (SGARs) in NSW.
2. change the state government's pest management practices for state owned properties to stop the use of SGARs.
3. advocate through the joint Commonwealth–States Agriculture Ministers' Meeting (AMM) for a national ban on the retail sale of SGARs.
4. investigate nominating SGARs as a key threatening process under the NSW Biodiversity Conservation Act 2016.
5. encourage landholders through Local Land Services to avoid the use of SGARs and responsibly manage pest issues through licensed professionals.

2025 / 108 - Use of rodenticides

That Local Government NSW advocates to the NSW Government for:

1. The development and funding of non-toxic, humane rodent control alternatives, including physical deterrents, trapping, and ecological management.
2. A statewide public education campaign on the dangers of rodenticides to native wildlife, pets, and the availability of safer alternatives.

Response

Councils have raised significant concerns about the impacts that SGARs can have on native wildlife, including powerful owls and other birds of prey, mammals and reptiles. Although SGARs are highly toxic, rodents that ingest these baits often do not die immediately, making them easy prey. Even after the rodent has died, the active compounds remain in its system and can cause secondary poisoning in animals that consume the carcass, including both native species and introduced predators such as domestic cats and dogs.

LGNSW welcomes the APVMA's announcement of 10 March 2026 and the detailed consideration the APVMA has given to this issue. Although LGNSW is unable to comment on the registration and labelling changes proposed to specific products, our overarching position is that the retail sale of SGARs should be prohibited, and their use restricted to trained professionals in clearly defined high priority situations.

To support a phaseout of SGARs, it is essential to accelerate the development and availability of nontoxic and humane rodent control alternatives. Public awareness is also critical: communities must be informed about the risks associated with SGARs and the safer alternatives available.

We note that in the APVMA's original proposal and the 10 March announcement the APVMA has updated label instructions, including requirements for bait placement, bait station management, and disposal of dead rodents. However, product users – particularly those familiar with a product – may not read the revised instructions. This reinforces the need for broader public education as well as clear point of sale information.

LGNSW welcomes the APVMA's proposal to cancel the registration of products that do not contain both a bittering agent and a dye (due to the health and safety risks this poses for humans and non-target animals), and the cancellation of all liquid and powder bait concentrate products. Other measures proposed by the APVMA such as restricting the use of SGARs to indoors/within 2 metres of a building, and prohibiting rat burrow baiting, are also positive steps towards phasing-out the use of SGARs.

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Thank you again for the opportunity to comment on the APVMA's proposed regulatory decision in relation to anticoagulant rodenticides. If you would like further information on LGNSW's position, please contact Susy Cenedese, Strategy Manager Environment on 02 9242 4080 or Susy.Cenedese@lgnsw.org.au.

Yours sincerely

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