

MemberUpdate

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TOPIC: A Government Review of the use of Anticoagulant Rodenticides – Grain Industry input is requested

DISTRIBUTION: GTA Members – primary contact list. Please circulate to all appropriate internal parties.

1. Purpose

Important consultation – A Government Review of the use of Anticoagulant Rodenticides - Grain Industry input is requested.

The Australian Pesticides and Veterinary Medicines Authority (APVMA) is reviewing [\(here\)](#) the use of anticoagulant rodenticides "on the basis of concerns for worker exposure, public health and environmental safety".

2. Background

Rodenticide products are regularly used by many premises throughout the grain supply chain to control rodent pests. Therefore, the impact of any potential usage changes may be significant on participants within the grain industry.

Based on informal advice, GTA is aware that the failure of rodent control in Export Registered Establishments in the past has led to consignment rejection, consignment re-direction and suspension of exporters for a period of time. It could also lead to suspension of an export market, with resulting costs to the Australian economy & industry reputation.

It is important to note (not inclusive):

- a) Rodenticides may be used to control vermin in order to meet contractual requirements of grain contamination listed in grain standards/contracts. Their controlled use is especially important in any "mouse plague" or where numbers are gathering (such as reports in parts of western VIC this year).
- b) There is a **nil tolerance of live rodents and carcasses in all prescribed grain export consignments.**
- c) In addition, Department of Agriculture, Water and Environment (DAWE) outline in Volume 8 of the Plant Export Operations Manual various levels of rodent and vermin droppings that must be met in all grain export consignments:
 - i. In any single sample (2.25 L or equivalent) not more than seven droppings.
 - ii. In any two consecutive samples (each sample 2.25 L or equivalent) not more than four droppings in total.
 - iii. Nil in mung beans.
- d) Rodenticides may be used at an Export Registered Establishment as part of the hygiene and pest control program, whereby DAWE have a number of controls regarding exports, including that Export Registered Establishments:
 - i. Must have a documented system for waste removal and cleaning.
 - ii. Must be cleaned regularly to ensure they are maintained in a hygienic manner.
 - iii. Must have a documented pest control system that includes preventative and protective measures against pests.

The APVMA have asked for a range of information to be provided, through a series of short questions. Given the relative importance of this topic, **GTA is seeking input into a Submission it will provide to the APVMA on behalf of GTA Members.**

GTA Members are urged to respond on specific questions included in the APVMA Consultation (under the heading Consideration) either directly to the APVMA or via GTA.

3. Calling for Submissions

- a) Submissions on the APVMA Consultation are sought from GTA Members and other interested parties.
- b) Submissions should be lodged by emailing submissions@graintrade.org.au and title your email – APVMA Consultation – Rodenticides.
- c) Submissions should be received by **COB 12th June 2020.**
- d) A proforma for lodging submissions can be accessed [here](#), noting that submissions do not need to be supported by other GTA Members, however, if they are supported, please indicate on the form. Please also respond via the questions raised by APVMA in the Consultation Paper.
- e) Unless marked “confidential” and appropriate supporting reasons are provided, all submissions may be placed on the GTA website for industry review.