

Chemical Review
Australian Pesticides and Veterinary Medicines Authority
GPO Box 574
Canberra ACT 2601



16 March 2026

Re: Anticoagulant rodenticides proposed regulatory decisions

The Australian Meat Industry Council (AMIC) welcomes the opportunity to provide comment on the APVMA’s proposed regulatory decisions arising from the reconsideration of anticoagulant rodenticides.

As the peak industry body representing Australia’s post-farmgate meat sector, AMIC represents meat processors, smallgoods manufacturers, boning rooms, cold stores, wholesalers, distributors, exporters and independent retail butchers. AMIC supports a science-based regulatory framework that protects human health and the environment while maintaining effective biosecurity, food safety and operational integrity across the supply chain.

We recognise the APVMA’s detailed technical review and the importance of managing risks to non-target animals, including native wildlife. Measures that are grounded in robust scientific evidence and that effectively address identified exposure pathways are supported in principle.

At the same time, it is important that regulatory responses remain proportionate to the demonstrated risk and carefully distinguish between different use environments and user groups. Anticoagulant rodenticides play a critical role in maintaining biosecurity and hygiene in food processing environments, where effective rodent control is essential to protect food safety, animal welfare and worker health.

In this context, AMIC offers the following comments for the APVMA’s consideration.

Importance of professional pest management in processing facilities

Rodenticide use in meat processing establishments typically occurs within highly controlled and audited environments. In practice, most processing facilities:

- engage licensed professional pest management contractors
- deploy tamper-resistant bait stations
- operate under documented pest management programs
- maintain routine monitoring and carcass removal procedures
- are subject to regular third-party and regulatory audit

These controls materially reduce the likelihood of non-target exposure compared with unmanaged or domestic use settings.

AMIC therefore encourages APVMA to clearly differentiate between professionally managed commercial food facilities and higher-risk use contexts, particularly domestic and uncontrolled outdoor environments, when finalising regulatory measures.

Maintaining access to effective rodent control tools

Effective rodent management is a foundational requirement for meat processing establishments. Failure to maintain adequate control can create risks including:

- contamination of food products
- biosecurity breaches
- regulatory non-compliance
- compromised hygiene in lairage areas
- increased public health risk from uncontrolled rodent populations

While AMIC supports measures that strengthen stewardship and reduce environmental exposure pathways, it is important that regulatory settings continue to enable effective professional pest management in high-risk food production environments.

In particular, AMIC notes that second-generation anticoagulant rodenticides (SGARs) are often relied upon in situations involving heavy infestations or where resistance to first-generation products has emerged. Any restrictions that materially limit access to effective tools in professionally managed settings should be carefully evaluated against the potential unintended consequences of reduced rodent control efficacy.

Targeted and practical risk mitigation measures

AMIC supports consideration of risk mitigation measures that demonstrably reduce exposure pathways, including strengthened label instructions, the mandatory use of tamper-resistant bait stations where appropriate, proportionate carcass search and disposal practices, and professional user controls where risk-justified.

However, AMIC recommends that APVMA avoid one-size-fits-all restrictions that do not reflect the markedly different risk profiles between domestic, agricultural and professionally managed food processing environments. Where feasible, regulatory settings should prioritise controls on higher-risk use patterns while recognising existing audited industry systems, maintaining appropriate flexibility for professional pest managers and supporting outcome-based risk management approaches. This will help ensure that environmental protections are strengthened without creating unintended biosecurity or food safety risks.

Ongoing engagement with industry

We support continued engagement between APVMA, pest management professionals and affected industries as the reconsideration progresses. Further technical dialogue

would assist in ensuring that final regulatory settings are both scientifically robust and operationally workable across different sectors.

AMIC would welcome the opportunity to provide additional information on pest management practices within meat processing facilities should this assist the APVMA's consideration.

Conclusion

AMIC supports the APVMA's objective of reducing risks to non-target animals and strengthening stewardship of anticoagulant rodenticides. With appropriately targeted and proportionate measures, it should be possible to achieve improved environmental outcomes while maintaining the effective rodent control systems that underpin food safety and biosecurity in Australia's meat processing sector.

AMIC appreciates the opportunity to contribute to this consultation and looks forward to continued engagement as the review progresses. Should you wish to discuss the content of this submission further, please contact Sue Viana, Manager – Animal Welfare & Integrity Systems, at sviana@amic.org.au.

Yours sincerely,



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