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**THE LEGISLATIVE ASSEMBLY FOR THE
AUSTRALIAN CAPITAL TERRITORY**

ELEVENTH ASSEMBLY

**ACT Government Submission – Second-Generation Anti-Coagulant Rodenticides
Paper for Tabling**

**Presented by
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Minister for Climate Change, Environment, Energy and Water
17 March 2026**

Chemical Review
Australian Pesticides and Veterinary Medicines Authority
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16 March 2026

Dear Chemical Review

Proposed Reforms to Second-generation Anticoagulant Rodenticides

I refer to the announcement of the Australian Pesticides and Veterinary Medicines Authority (APVMA) on 16 December 2025 proposing regulatory reforms for second-generation anticoagulant rodenticides (SGARs). I note that a further announcement was made on 10 March 2026 asserting the APVMAs certification to declare any chemical products containing SGARs as Restricted Chemical Products (RCPs) and the parallel interim suspension of the registration of all products containing SGARs.

Thank for the opportunity to comment on the APVMA's proposed reforms.

The ACT strongly supports the APVMA's proposed reforms, including the declaration of SGARs as RCPs to enact stricter controls governing their sale and use. The ACT Government previously provided submissions to the APVMA in 2020 and 2022 during the consultation process on SGAR regulation, supporting stronger restrictions on the availability and use of these compounds.

The impacts of SGARs on native fauna have been an area of active research for the ACT Government for several years. In addition to the risks identified by the APVMA, the ACT has supported testing for anticoagulant rodenticides in native wildlife. Liver samples from 153 deceased or euthanised animals from across Australia were analysed by Edith Cowan University as part of opportunistic surveillance of anticoagulant exposure in wildlife.

Key findings from this work include:

- **Widespread exposure:** SGARs were detected in 68% of sampled animals, with multiple compounds often detected in the same individual. These results indicate a high prevalence of anticoagulant rodenticide exposure across a range of Australian wildlife species.
- **Threatened species affected:** Seven species testing positive across the dataset are listed under Australian state or Commonwealth legislation, including the endangered Spotted-tail Quoll (*Dasyurus maculatus*) and Eastern Quoll (*Dasyurus viverrinus*).
- **Exposure across multiple trophic groups:** SGARs were detected not only in predators but also in herbivores, insectivores and omnivores, including Brushtail Possums, Sulphur-crested Cockatoos and common bird species such as Currawongs and

Magpies. Two first-generation anticoagulant rodenticides were also detected at low levels in a small number of samples.

- **Brodifacoum (a SGAR) is a key concern:** This compound was detected in approximately half of all animals tested and was often present at higher concentrations than other compounds.
- **Toxicity thresholds remain uncertain:** Toxicity thresholds for many Australian species remain poorly characterised, meaning the ecological consequences of chronic exposure are not fully understood.

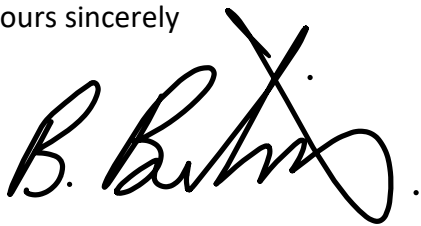
More recently, the ACT has contributed data to research published in 2025 investigating anticoagulant exposure in Australian marsupial carnivores. This study examined five threatened dasyurid species, including the Spotted-tail Quoll, Eastern Quoll, Northern Quoll, Tasmanian Devil and Chuditch. Approximately 50% of individuals tested positive for anticoagulant rodenticides, with 32.7% showing sub-lethal exposure and 17.3% assessed as likely having died as a result of anticoagulant poisoning. This represents the first published evidence of anticoagulant rodenticide exposure in dasyurid marsupial carnivores.

Taken together, these findings indicate that exposure of native wildlife to anticoagulant rodenticides is widespread in Australia and that current controls have not been sufficient to prevent secondary poisoning of non-target species. The ACT therefore supports the APVMA's proposed reforms, including declaring SGARs as RCPs.

A nationally consistent regulatory approach is critical to enable states and territories to effectively reduce risks to native fauna under Australia's national chemical regulation framework.

The ACT looks forward to supporting the APVMA in implementing these important reforms to address the risks posed by anticoagulant rodenticides and to better protect Australia's native wildlife.

Yours sincerely

A handwritten signature in black ink, appearing to read 'B. Burkevics', with a large 'X' mark over the top part of the signature.

Bren Burkevics
Conservator of Flora and Fauna