



20 January 2022

Chemical Review
Australian Pesticides and Veterinary Medicines Authority
GPO Box 3262
Sydney NSW 2001

Via Email: chemicalreview@apvma.gov.au

RE: Consultation on reconsideration of anticoagulant rodenticide approvals and registrations

To whom it may concern,

We are writing in response to the Australian Pesticides and Veterinary Medicines Authority (APVMA) consultation on the reconsideration of anticoagulant rodenticide approvals and registrations.

1. Organisations involved in this submission

This submission is presented on behalf of the following organisations:

Grain Trade Australia (GTA)

Grain Trade Australia (GTA) is a national association and is the focal point for the commercial grains industry within Australia. The role of GTA is to provide a framework across Industry to facilitate and promote the trade of grain. GTA facilitates trade and works to provide an efficient, equitable and open trading environment by providing leadership, advocacy, and commercial support services to the Australian grain value chain. GTA Members are responsible for over 95% of all grain storage and freight movements made each year in Australia. Over 95% of the grain contracts executed in Australia each year refer to GTA Grain Trading Standards and/or Trade Rules.

GTA has established the Australian Grains Industry Code of Practice. All GTA Members are required to adhere to the Code of Practice. GTA Members are drawn from all sectors of the grain value chain from production to domestic end users and exporters. GTA has over 270 organisations as Members. Their businesses range from regional family businesses to large national and international trading/storage and handling companies who are involved in grain trading activities, grain storage, processing grain for human consumption and stock feed milling. A list of GTA Members is [here](#).

The National Working Party on Grain Protection (NWPGP)

The NWPGP:

- Is the industry body responsible for providing management and leadership to industry in the areas of post-harvest storage, chemical use, market requirements and chemical regulations.
- Is facilitated by Grain Trade Australia.
- Has members across the entire grain supply chain.

- Hosts an annual forum providing participants with the latest research and developments, in the area of post-harvest storage and hygiene, chemical usage and outturn tolerances, international and domestic market requirements, and regulations.
- Co-ordinates and provides government with industry views on chemicals in use on grain and associated products.
- For further details, refer to <http://www.graintrade.org.au/nwppg>

Within that context, the above organisations provide the following general comments in relation to the grain industry post farm-gate. Comments are of a general nature on grain residues and trade as they relate to the review of the use of anticoagulant approvals and registrations, and do not cover technical issues as outlined in the Public Release Summary document links. Additionally, no comment is made on the technical aspects of rodenticide registration as outlined in the Public Release Summary such as chemistry, toxicology, workplace health and safety or environment.

No comment is made on the use of rodenticide products on-farm as it is assumed grower groups will provide input, however if required further advice can be provided.

2. General comment on the use of rodenticides

As outlined in our submission on 26 June 2020 relating to the review of rodenticide products, rodenticides are used by grain industry stakeholders at various locations along the supply chain, mainly where grain is stored.

Rodenticide products are used for a number of reasons including:

- Managing mouse plagues when numbers build up in particular regions.
- General hygiene around storage infrastructure.
- To meet industry requirements which stipulate a number of management practices involved in mouse/rodent control.
- To meet requirements of the Department of Agriculture, Water and Environment (DAWE) requirements for exported product.
- To meet quarantine requirements in the Export Control Act 2020 for all prescribed commodities in every consignment to be loaded.
- To meet importing country government quarantine requirements.

While several rodenticides are registered and thus available for use in Australia, only some are frequently used:

- Around facilities, gels, pastes, liquids and larger blocks are most frequently used as they are less likely to be spread by rodents, which limits the potential contamination of grains and other feed / food stuffs.
- Powders, pellets and grains are more likely to be spread by rodents, with a higher potential for contamination and are therefore not as frequently used.
- Within a storage facility, non-toxic methods such as traps are generally used.

The grain industry when using rodenticides follows all label directions as required by legislation. In addition, GTA members must comply with the Australian grain industry Code of Practice for the management of grain along the supply chain. Various requirements are listed in that Code, including compliance with domestic legislation for chemical use, and compliance with customer and export country regulatory requirements.

3. Residues and Trade

There are three key issues to consider when marketing grain within Australia or on the export market, in relation to rodenticides:

a) Legislation applying to rodenticide use

Most markets do not impose restrictions on the use or otherwise regarding rodenticides. There are however some markets that prohibit the use of particular chemicals.

Markets in general rely on the Australian regulatory system to adequately control availability, use and compliance with rodenticides to ensure various aspects such as food hygiene, food safety and WH&S are appropriately managed.

There are however some markets where restrictions on the use of rodenticides are required in order to supply grain from Australia. In the case of oilseed canola to the European Union, one commercial contract scheme used by Australian exporters requires that particular rodenticides are not used on the oilseed crop at any stage during crop growth or storage unless exemptions are granted for various reasons. Other schemes that are available to supply canola to that market have similar requirements.

It is anticipated that the focus on restrictions of rodenticides will gradually increase in future in other markets that follow the European Union approach.

b) Market contracts and regulatory requirements for residues of rodenticides

In general market commercial contracts do not list a tolerance on residues of rodenticides. The majority rely on grain being supplied in compliance with market maximum residue limits (MRL); either the importing country MRL, the customer MRL or the Australian MRL. For certain rodenticides the MRL may differ in each scenario or there may not be an MRL.

GTA is not aware of any instance in recent years where an export or domestic consignment has been rejected due to the presence of a rodenticide above any MRL requirement of that customer. The APVMA may be aware of the significant rodent contamination of grain in the recent sorghum crop and the requirement for industry to extensively clean and manage contamination of that sorghum prior to outturn to remove rodent carcasses and rodent droppings. Despite a significant use of rodenticides as permitted during the cropping phase and during storage of sorghum prior to outturn, the absence of rodenticide residues indicates several things, including:

- Label directions are adequate for those products used.
- Industry compliance with label directions was high.
- The risk of rodenticide residues arising in grain is considered very low.

Therefore, from a commercial trade perspective only, the grain industry does not have any concerns with the current rodenticide products registered for use in Australia, label directions in general and the risk of residues arising in grain following rodenticide use in the locations where those products are currently permitted to be used by legislation.

c) Grain Standards listing a range of limits for contaminants associated with rodents

As noted above, the prior sorghum harvest presented significant issues in managing the contamination of grain to meet market requirements. In many grain Trading Standards (and in legislation for export/importing grain) there are limits for:

- Live rodents (nil)
- Dead rodents (nil)

- Rodent animal material such as hair, body pieces (nil)
- Rodent droppings (nil to very low levels)

In general, there is a requirement that grain complies with all food safety requirements and is fit for human and / or animal consumption. Rodents and the resulting contaminants must be controlled not only to meet the limits applied but also as good management practices.

The sorghum harvest and supply of product showed industry can meet market and regulatory expectations despite some difficulties. It could be expected similar issues will arise in 2022 with other commodities in localised areas given current rodent activity and “sources of food in the field for numbers to increase”.

Despite these challenges, it is expected that as per prior history, industry will be able to market grain that continues to meet the above-mentioned tolerances and rodenticide residues. This can only occur through the availability of rodenticides and adequate controls on their availability and use. The grain industry would not support any unwarranted changes to the availability and use patterns unless any restrictions over and above currently employed are fully justified from a scientific viewpoint.

GTA believes any commercial contract requirements, or consumer perceptions of rodenticides should be managed by the industry and not from a regulatory viewpoint where not scientifically valid.

Thank you for your consideration of this submission.

Yours sincerely,

A handwritten signature in black ink, appearing to read "P O Shannassy". The signature is written in a cursive, slightly slanted style.

Pat O'Shannassy
CEO, Grain Trade Australia