WILDLIFE VICTORIA

ON CALL TO HELP

03 8400 7300

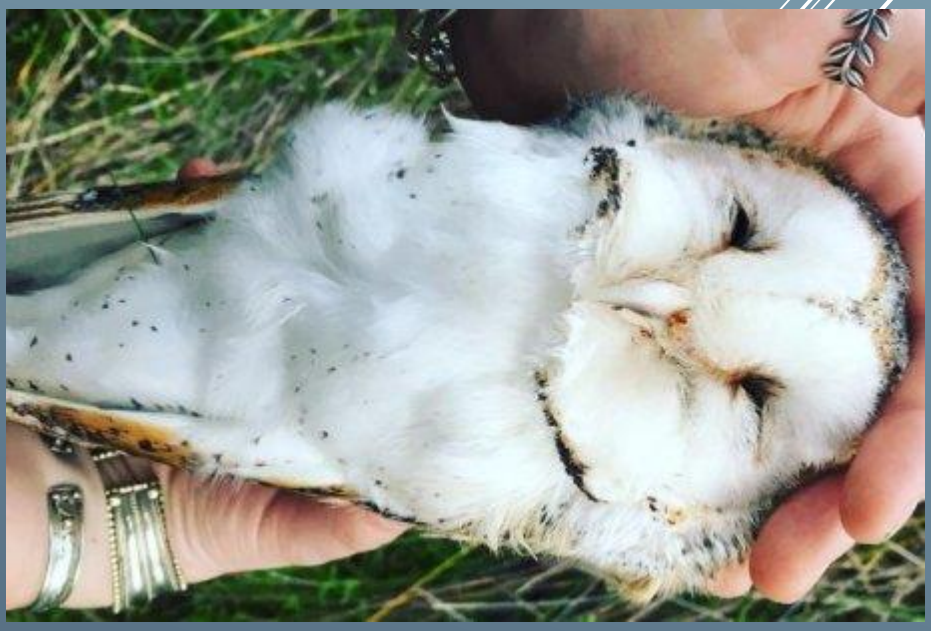

Photo (Chelsea Fox): A barn owl dead of suspected secondary AR poisoning

CONSULTATION ON USE PATTERNS FOR ANTICOAGULANT RODENTICIDE PRODUCTS

WILDLIFE VICTORIA SUBMISSION

Submission prepared by:

Dr Megan Davidson
CEO, Wildlife Victoria

22nd June 2020

Our organization

Wildlife Victoria is a not-for-profit charity that has for 30 years provided a community service to respond to reports of sick, injured, and orphaned Australian wildlife in the state of Victoria. We receive over 80,000 requests for assistance each year from the community, resulting in about 50,000 birds, mammals and reptiles being helped annually. Among these are individuals from 118 listed species, including 41 listed as Endangered or Critically Endangered. In some cases, rescued animals that cannot not be rehabilitated and released become part of important captive breeding programs to ensure the future of the species.

We have a network of over 1,000 volunteers who rescue and transport sick, injured or orphaned wildlife, a large network of veterinarians who assess and treat, and registered wildlife carers who rehabilitate animals and release them back into the wild.

We advocate for wildlife whenever their welfare is under threat or compromised. We seek to positively influence decision-makers on regulatory frameworks, policies and operations affecting wildlife. We support efforts by government, community groups and individuals to ameliorate threats to wildlife, particularly those that are caused by humans.

The problem

The widespread use of anticoagulant rodenticides (ARs) in Australia for rodent control results in primary poisoning of small mammals (possums and bandicoots) and secondary poisoning of the owls, raptors and reptiles that eat rodents. Researchers have pointed to the lack of attention in Australia, relative to other countries, to an issue that is "a potentially serious threatening process for native carnivores" (Lohr & Davis, 2018, p.1376)[1]. They also note that evidence from other countries has established the risks to human health and wildlife populations (p.1377) and that the "extent and severity of AR poisoning in wildlife may be greater in Australian than elsewhere in the world" (p.1372).

In the absence of a centralised database it is difficult to estimate the size of the problem. Our wildlife rescue service in Victoria receives over 400 reports each year about sick or injured owls and raptors. In 2018 the number of reports was over 800, with an unusually high number between May and September, sparking an investigation by Wildlife Health Australia.[2] The birds were mainly Barn owls, but Nankeen kestrels, Boobook owls and several other species were also affected. Forty-eight dead birds were submitted for examination. Although most had died from starvation and trauma, "38% of the Barn owns and Nankeen Kestrels tested had 2nd generation ARs detected in their livers at levels which are considered possible or likely to cause toxicity." (p.5).

Although all raptors are susceptible to secondary poisoning, the impact on species listed as endangered or vulnerable to extinction are of greatest concern. The following birds are listed in either Victorian state legislation (The Flora and Fauna Guarantee Act 1988) or federal legislation (Environment Protection and Biodiversity Conservation Act 1999) or both:

[1] Lohr, M.T. & Davis, R.A. (2018). Anticoagulant rodenticide use, non-target impacts and regulation: A case study from Australia. *Science of the Total Environment*, 634:1372-1384.

[2] Hawes, M. (2018). Birds of prey mortality and morbidity event 2018 – Victoria. Agriculture Victoria Research

- Barking Owl (*Ninox connivens connivens*)
- Grey Goshawk (*Accipiter novaehollandiae novaehollandiae*)
- Grey Falcon (*Falco hypoleucos*)
- Masked Owl (*Tyto novaehollandiae novaehollandiae*)
- Powerful Own (*Ninox strenua*)
- Sooty Owl (*Tyto tenebricosa tenebricosa*)
- Square tailed Kite (*Lophoictinia isura*)
- White bellied sea-eagle (*Haliaeetus leucogaster*)

The great irony is that ARs kill many animals that provide rodent-control services.

The solution: tighter controls on sale and use

To balance the need for rodent control against the risks to wildlife, greater control is needed at both point of sale, and the conditions for use.

These dangerous products should not be available for sale to the public, as they currently are. Sale should only be permitted to licenced pest controllers, via commercial supply chains, and only in formulations that can be secured in anchored, tamper-resistant bait stations.

Use of ARs should not be permitted outdoors, unless there are clearly outlined exemptions in exceptional circumstances.

The use of ARs by licenced pest controllers should comply with the industry code of best practice.[3]

Additional efforts should be made to provide the public with a range of rodent reduction and control measures that do not include the use of AR, which is considered the "last resort" intervention for rodent control (AEPMA, 2019). Homeowners and commercial operations can freely use the first four interventions in the hierarchy of controls, and are denied only the fifth, which would continue to be available via a commercial, licensed pest controller.

AEPMA Hierarchy of Controls

1. Exclusion
2. Removal of food and water sources
3. Reduction of hiding/concealment opportunities
4. Trapping*
5. Anticoagulant Rodenticide

* It should be noted that the sale and use of glue traps is now prohibited in Victoria under the *Prevention of Cruelty to Animals Regulations 2019*.

[3] Australian Environmental Pest Managers' Association (AEPMA) (2019). AEPMA's Industry Code of Best Practice for Rodent Management