



11 June 2026

Agvet Chemicals Legislation and Reform  
Department of Agriculture, Fisheries and Forestry  
Canberra ACT 2601

Via email: [agvetreform@aff.gov.au](mailto:agvetreform@aff.gov.au)

## **Re: Declaring second generation anticoagulant rodenticides as restricted chemical products**

The National Farmers' Federation (NFF) welcomes the opportunity to provide a submission into the public consultation regarding *Declaring second generation anticoagulant rodenticides as restricted chemical products*.

The NFF does not support the APVMA proposal to declare second generation anticoagulant rodenticides (SGARs) as Restricted Chemical Products (RCPs) unless continuing access to SGARs for primary producers is guaranteed.

SGARs (products containing brodifacoum, bromadiolone, difenacoum, difethialone and flocoumafen) play a valuable role in effective rodent control across a wide range of agricultural industries and production systems, ensuring food hygiene standards are maintained while reducing disease risks to animals and humans.

The NFF believes it is vital that access to SGARs for legitimate agricultural users, without onerous barriers to access or blanket restrictions, must be safeguarded.

Any restrictions on SGARs should be clear, risk-appropriate, and must account for the expertise of farmers in handling and applying chemicals as well as recognise established training pathways and on-farm stewardship plans as mechanisms to ensure the safe, effective use of SGARs in agriculture.

While opposing the proposal to declare SGARs as RCPs, if the proposed restrictions do proceed, the NFF recommends:

- Primary producers are explicitly recognised as authorised users across all jurisdictions.
- Existing agricultural chemical accreditation is recognised as sufficient.
- Adequate transition arrangements are provided, including time for training, workforce adjustment and supply chain adaptation.

### **Do you support declaring SGARs as restricted chemical products?**

The NFF does not support the proposal in its current form.

We recognise the importance of managing risks to non-target species as highlighted by the APVMA. However, the proposed RCP declaration fails to account for the vital role of SGARs in agriculture and surrounding communities. Cost-effective on-farm controls for rodents, both in paddocks and around buildings and structures, as well as in regional communities, are crucial to food safety, animal and human health and wellbeing, trade and market access, and containment of plague events. Rodent control is also required for primary producers to meet their legal biosecurity obligations in many jurisdictions.

We note the limited availability of effective, reliable alternatives to SGARs in many current agricultural use-cases, as well as documented resistance to first generation anticoagulant rodenticides (FGARs). Removing agricultural access to SGARs would significantly undermine the industry's ability to prevent or respond to rodent infestations – with a wide range of negative impacts including productivity losses across both grain and livestock industries, trade and market access loss, heightened animal and human disease risks, damage to farm machinery, infrastructure, and other property, higher costs of alternative rodent control activities, as well as social and psychological impacts. These risks are exacerbated by mouse plague outbreaks, such as the 2021 mouse plague which had a total direct cost of \$100.62m in NSW alone, 67.10% of which was born by farmers.<sup>1</sup>

Maintaining access to safe, effective rodent control products for agricultural use – such as SGARs – is vital to reducing these risks and costs.

### **Are there reasons why an RCP declaration should not proceed?**

The NFF believes farmers' access to SGARs for legitimate and necessary agricultural usage must be safeguarded. The NFF refers to the reasons outlined above in addition to those highlighted by NFF members in their own submissions.

Continuing access must be ensured regardless of whether an RCP declaration proceeds. If an RCP declaration *does* proceed, the NFF believes requirements to become an 'authorised person', under state and territory frameworks, must not be overly onerous, restrictive, irrelevant or costly. That is, it must provide meaningful access to SGARs for primary producers by recognising existing training or certification such as AQF3 Chemical Accreditation (encompassing courses AHCCCHM304 and AHCCCHM307), ChemCert, or stewardship plans such as Australian Pork Limited's (APL) *Industry Rodenticide Stewardship Plan*.

The NFF is concerned at previous APVMA statements regarding training courses such as CPPUPM3006 potentially being required to become an authorised person with regards to the use of SGARs. This training course is not agriculture-specific, and in many cases is not relevant to agricultural pest control. Requiring an often-irrelevant course imposes a significant barrier to accessing SGARs that farmers – especially those who already follow rodenticide stewardship plans or have existing chemical training – should not face. CPPUPM3006 training is often inaccessible to those in rural and remote areas.

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<sup>1</sup> Okello, Walter et al. "A multi-dimensional assessment of the 2021 mouse plague in New South Wales, Australia: Economic impacts and policy responses." *PLoS one* vol. 21,4 e0338405. 21 Apr. 2026, doi:10.1371/journal.pone.0338405

If agriculture-specific chemical training is not recognised, it raises the deeply concerning prospect of agricultural producers being forced to hire professional pest controllers to apply SGARs to manage rodents. From both a cost and accessibility standpoint – especially in rural and remote areas – this is an unacceptable perverse outcome of a potential RCP declaration.

**Are there any additional impacts from declaring SGARs as RCPs that we should consider (e.g. transition periods)?**

Given the above considerations, the NFF urges an RCP declaration is not made until such time as producers are guaranteed ongoing access to SGARs. This would require further work with states and territories, as well as training providers and industry, to ensure any potential state and territory frameworks for becoming an authorised person do not pose barriers to access for primary producers. A transition period would be required to allow for industry stewardship programs to realign with updated requirements, for training and certification programs to be updated if required, and for existing legally acquired stock to be utilised.

The NFF is a willing partner in this further work, and welcomes the opportunity to provide additional input.

The NFF also urges the Department to consider the submissions of NFF members, which highlight additional commodity-specific concerns with the proposal.

Yours sincerely

**MICHAEL GUERIN**  
Chief Executive Officer