

# The Role of the Chemical Regulator in Vertebrate pest control

registrations, permits, reconsiderations and research

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### Who is the APVMA



- The national regulator of veterinary medicines and agricultural chemical products
- Took responsibility from state regulators in 1993
- Any vertebrate poison is in APVMA remit

#### Role of the APVMA

- Consider new product registrations
- Approve variations
- Permits
- Chemical Reconsiderations
  - 1080 reviewed in 2008 national labels and state restrictions
  - Anti coagulate rodenticide currently underway



#### What the APVMA must consider

- Chemistry manufacturing and stability
- Human safety handling, PPE, accidental exposure
- Environmental safety take by non targets, any risk of environmental residue or contamination e.g. water bodies
- Efficacy bait encounter, palatability, field stability
- Residues/trade Human exposure through diet, traded commodities –
   maybe be relevant for pigs, deer

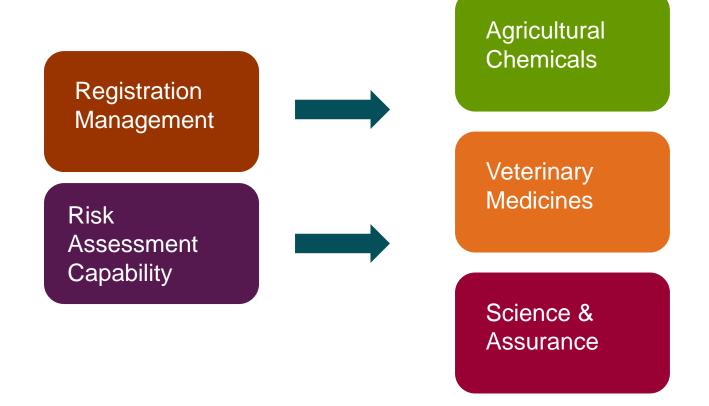


#### Roles in the APVMA

- Risk Assessor Considers a particular risk area e.g. environmental or human safety
- Risk Manager Manages an application, takes advice from the risk assessors, produces a label and makes a recommendation to the delegate.
- Delegate The final decision maker.



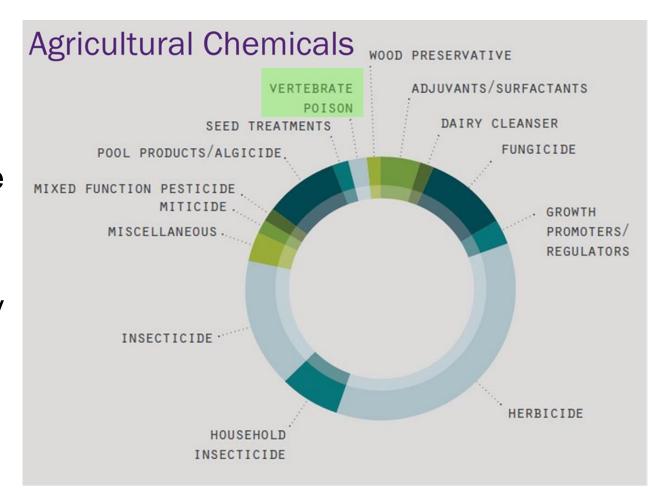
## **APVMA Restructure effective 1 September 2025**





#### **Some Stats**

- Approx 12,800 registered products
- 5000 applications/year
- 50% new products, new actives or issue of new permits
- Vertebrate pest products are the minority



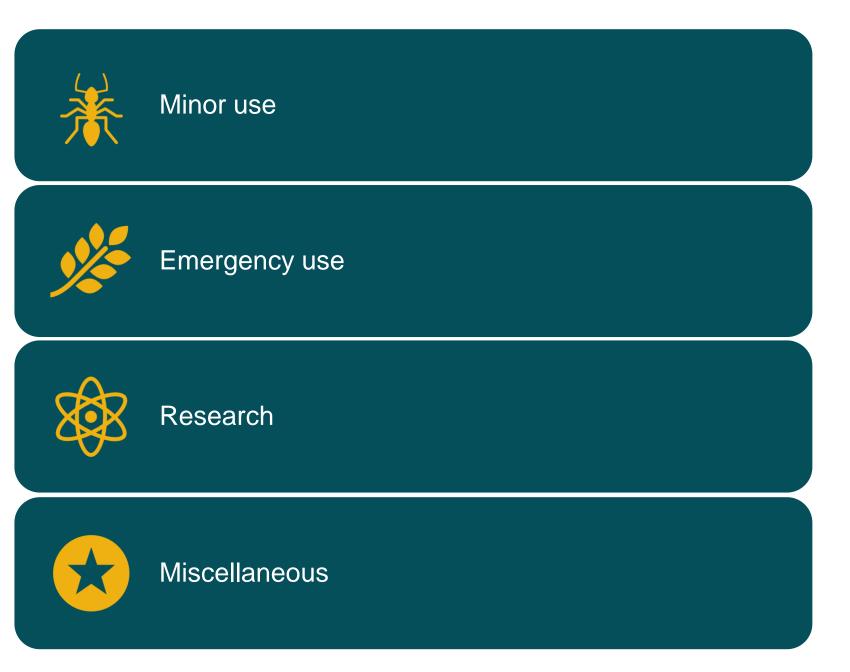
## Registered vertebrate poisons / products

- 1080
- PAPP
- Sodium Nitrite
- Pindone
- Yellow Phosphorous
- Strychnine
- Various rodenticides
- Bait matrix varies depending on target species



## Types of Permits

This is the most likely to have relevance for vertebrate pest control



## Permits vs registered products

Registration	Permits
Applicant is company seeking to hold a product registration	Applicant is a user or user representative e.g. a grower group
Registered product	Registered or unregistered product
Approved active	Approved or unapproved active
Doesn't expire (as long as renewal is paid)	Limited duration (up to 5 years). All criteria reassessed at renewal.
All data requirements fulfilled	May require further data for renewal
Data specific to crop/use pattern	May rely on data from same crop group, overseas, literature, or extrapolation
Do not consider whether: use is minor, alternatives are available or if there is a genuine need	Consider if there are 'reasonable grounds' for not issuing a permit e.g. there is already a registered product for that use.

## Regulatory Challenges



- Defined in the legislation as Restricted Chemical Products
  - PAPP
  - 1080
  - Pindone (except for ready to use)
- Can only be supplied to authorised persons
- Increased responsibility/workload is placed on to states

## Regulatory Challenges



- The use of Pesticide Control Orders (PCO)
  - Some PCOs may allow reduced restrictions relative to the APVMA label
  - Is this the purpose of a PCO?

## Regulatory Challenges



- Should states consider holding a 1080 product registration for their own jurisdiction.
  - Freedom to update label without all state agreement
  - Could use existing manufacturer, just own a label





## **Scientific Challenges**

- Difficulties in demonstrating efficacy
  - Often a low number of targets,
  - Very expensive/difficult to catch and release

- Efficacy and Safety are often in opposition
  - greater efficacy equals reduced safety

## **Passion Challenges**



- You are passionate about making a difference
  - Your priority is often environment not profit
  - You are experienced and hands on not paper pushers

The APVMA cannot assume intent or knowledge

### How you can help us

- Remember that vertebrate poisons are not the main part of our work
  - Educate us APVMA would welcome a seminar
- Tell us the story, don't just provide the data
- We must follow our challenging legislation (even when this inconveniences us) so humour us and play along.



### How we can help you

- PAA and Meetings
- Item 25 Consider data without a product submission

Note: exempt actives – do not need an approved active source

- **1080**
- Strychnine
- Pindone
- Phosphorous/Carbon disulfide







## Any questions?

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