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The *Agricultural and Veterinary Chemical Code Act 1994* (the Act) commenced on 15 March 1995. The Agricultural and Veterinary Chemicals Code (the Agvet Code) scheduled to the Act requires notices to be published in the *Gazette* containing details of the registration of agricultural and veterinary chemical products and other approvals granted by the Australian Pesticides and Veterinary Medicines Authority. The Agvet Code and related legislation also requires certain other notices to be published in the *Gazette*. A reference to Agvet Codes in this publication is a reference to the Agvet Code in each state and territory jurisdiction.

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General information

The APVMA Gazette is published fortnightly and contains details of the registration of agricultural and veterinary chemicals products and other approvals granted by the APVMA, notices as required by the Agricultural and Veterinary Chemicals Code (the Agvet Code) and related legislation and a range of regulatory material issued by the APVMA.

Pursuant to section 8J(1) of the Agvet Code, the APVMA has decided that it is unnecessary to publish details of applications made for the purpose of notifying minor variations to registration details. The APVMA will however report notifications activity in quarterly statistical reports.

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Notice under section 34AB of the Agricultural and Veterinary Chemicals Code scheduled to the *Agricultural and Veterinary Chemicals Code Act 1994*: anticoagulant rodenticides reconsideration - proposed decision to vary and affirm active constituent approvals

- 1) I, Maria Trainer, Executive Director Science and Assurance, as the delegate of the Australian Pesticides and Veterinary Medicines Authority (APVMA) am proposing to make regulatory decisions in relation to active constituents being reconsidered as part of the anticoagulant rodenticide reconsideration conducted under Part 2, Division 4 of the Agricultural and Veterinary Chemicals Code scheduled to the *Agricultural and Veterinary Chemicals Code Act 1994* (*Agvet Code*).
- 2) I have reconsidered the following anticoagulant rodenticide active constituents:
 - a. brodifacoum;
 - b. bromadiolone;
 - c. coumatetralyl;
 - d. difenacoum;
 - e. difethialone;
 - f. diphacinone;
 - g. flocoumafen; and
 - h. warfarin.
- 3) This notice is issued under section 34AB of the *Agvet Code* and relates to the reconsideration of the anticoagulant rodenticides active constituent approvals listed in Attachment A of this notice.
- 4) The Draft Statement of Reasons for the proposed course of action pursuant to section 34AB(2)(c) is included as Attachment B of this notice.
- 5) Pursuant to section 34A(1) of the *Agvet Code*, I propose to:
 - a. vary relevant conditions of the anticoagulant rodenticide active constituent approvals listed in Attachment A of this notice in the ways set out in the draft statement of reasons in Attachment B of this notice to allow affirmation of the approvals; and
- 6) Pursuant to section 34(1) of the *Agvet Code*, I propose to:
 - a. affirm the approval, as varied, of the anticoagulant rodenticide active constituents listed in Attachment A of this notice.
- 7) The information on which the reasons are based is set out in Attachment C of this notice.

Written submissions are invited

- 8) I invite written submissions on the proposed course of action. All submissions will be considered by the APVMA prior to finalisation of this reconsideration.
- 9) Submissions or requests for further information can be sent to:

Chemical Review
Australian Pesticides and Veterinary Medicines Authority
GPO Box 574
Canberra ACT 2601, Australia

Phone: +61 2 6770 2400

Email: chemicalreview@apvma.gov.au

Please note: Submissions will be published on the APVMA website, unless you have asked for the submission to remain confidential (see [public submission coversheet](#)).

- Please lodge your submission with a public submission coversheet, which provides options for how your submission will be published.
- Note that all submissions received are subject to legislative requirements, including the *Freedom of Information Act 1982*, the *Privacy Act 1988* and the Agvet Code. In providing your submission to the APVMA, you agree to the APVMA publicly disclosing your submission in whole or summary form. The APVMA confirms that if your submission includes confidential commercial information or protected information as defined in the Agvet Code, such information will be subject to the relevant provisions of the Agvet Code including relevant limitations on use and disclosure by the APVMA.

10) The closing date for submissions is 16 March 2026.

Maria Trainer

Executive Director Science and Assurance

With the delegated authority under sections 11, 32 and 44 of the *Agricultural and Veterinary Chemicals (Administration) Act 1992*.

Attachments:

Note: The below Attachments form part of this Notice.

Attachment A: Anticoagulant rodenticide active constituent approvals subject to the reconsideration

Attachment B: Draft statement of reasons for the proposed decision to vary and affirm anticoagulant rodenticide active constituents

Attachment C: Information on which the reasons are based

Contact information

For any enquiries or further information about this matter, please contact:

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GPO Box 574
Canberra ACT 2601, Australia

Phone: +61 2 6770 2400

Email: chemicalreview@apvma.gov.au

Attachment A: Anticoagulant rodenticide active constituent approvals subject to the reconsideration

Approval number	Active constituent name	Holder
<i>First generation anticoagulant rodenticides</i>		
44211	Coumatetralyl	2022 Environmental Science Au Pty Ltd
64241	Coumatetralyl	2022 Environmental Science Au Pty Ltd
54768	Diphacinone	Neogen Australasia Pty Limited
46121	Warfarin	Ruth Consolidated Industries Pty Ltd
<i>Second generation anticoagulant rodenticides</i>		
44191	Brodifacoum Manufacturing Concentrate	Syngenta Australia Pty Ltd
44192	Brodifacoum	Syngenta Australia Pty Ltd
44522	Brodifacoum	Bell Laboratories, Inc.
48319	Brodifacoum Manufacturing Concentrate	Helidon Tech. Pty. Ltd.
62292	Brodifacoum	4 Farmers Australia Pty Ltd
67386	Brodifacoum	Pelgar International (Aus) Pty Ltd
85489	Brodifacoum	Endura S.P.A.
92406	Brodifacoum Manufacturing Concentrate	Animal Control Products Ltd
44475	Bromadiolone	Liphatech S.A.S.
47758	Bromadiolone Manufacturing Concentrate	Animal Control Technologies (Australia) Pty Ltd
47789	Bromadiolone Manufacturing Concentrate	Liphatech S.A.S.
47790	Bromadiolone Manufacturing Concentrate	Liphatech S.A.S.
49195	Bromadiolone	Bell Laboratories, Inc.
51576	Bromadiolone	Animal Control Technologies (Australia) Pty Ltd
59135	Bromadiolone	Babolna Bioenvironmental Centre Private Limited Company
67898	Bromadiolone	Endura S.P.A.
63286	Difenacoum	Pelgar International (Aus) Pty Ltd
67881	Difenacoum	Endura S.P.A.
45234	Difethialone	Liphatech S.A.S.
44267	Flocoumafen	BASF Australia Ltd.
49436	Flocoumafen	BASF Australia Ltd.
65328	Flocoumafen	BASF Australia Ltd.

Attachment B: Draft statement of reasons for proposed decision to vary and affirm anticoagulant rodenticide active constituents

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Background

Reconsideration of registration or approval

- On 2 November 2021, the APVMA provided notice under section 32 of the Agvet Code that the APVMA was considering the approval of an active constituent for a proposed or existing chemical product. This reconsideration is to be undertaken in accordance with the provisions of Division 4 of Part 2 of the Agvet Code.
- The notices issued under section 32 of the Agvet Code stated that the matters the APVMA proposed to deal with in the reconsideration included assessment of chemistry, toxicology, worker and public exposure, residues (including trade) and environment aspects of anticoagulant rodenticide active constituent approvals, product registrations and label approvals. Further, in relation to active constituents, the basis of the reconsideration was whether the actives continue to meet the safety criteria set out in section 5A of the Agvet Code and complies with any requirement prescribed by the Agricultural and Veterinary Chemicals Code Regulations 1995 (Agvet Regulations).
- The APVMA has finalised the technical assessments for this reconsideration. These assessments took into account information provided in response to the notices under section 32 of the Agvet Code issued on 2 November 2021, information provided in response to additional notices under section 32 of the Agvet Code issued on 17 March 2025 and notices under section 33 of the Agvet Code issued on 28 November 2022, 27 June 2024 and 4 July 2024, information in the APVMA records submitted for the registration of relevant products and approval of relevant labels, and any relevant information in the public domain identified by the APVMA.
- I have had regard to the technical assessments before proposing to make this decision. I agree with their conclusions (except where I indicate to the contrary in this statement of reasons).

5. I am now giving notice under section 34AB of the Agvet Code of my proposed decision to vary and affirm the active constituent approvals listed in Attachment A of this notice.

Legal framework

Affirmation

6. Section 34(1) of the Agvet Code provides for the circumstances in which the APVMA must affirm the approval of an active constituent. Relevantly it provides that the APVMA must affirm the approval of an active constituent if, and only if, it is satisfied that the constituent:
- 6.1. meets the safety criteria (section 5A), and
 - 6.2. complies with any requirement prescribed by the Agvet Regulations.

Variation required to satisfy requirements for affirmation

7. Section 34A(1) of the Agvet Code provides that if the APVMA is not satisfied under section 34(1) but is satisfied that the relevant particulars or conditions of the approval can be varied in such a way as to allow the approval to be affirmed, the APVMA must vary the relevant particulars or conditions.
8. Section 34A(2) of the Agvet Code specifies the information that the APVMA may have regard to in making a decision to vary the relevant particulars or conditions. It provides that, for the purposes of paragraph (1)(b), the APVMA may have regard only to the following:
- 8.1. submissions, information, reports, results or samples that it had regard to under section 34;
 - 8.2. submissions made to the APVMA in response to the invitation under paragraph 34AB(2)(f).

Statutory criteria

9. The statutory criteria to which reference was made in paragraphs 6 above in relation to the affirmation of the approval of an active constituent are set out below.

Safety criteria

10. The definition of 'meets the safety criteria' with respect to an active constituent and a chemical product is set out in 5A of the Agvet Code. For active constituents, subsections 5A(1) and (2) provides:

5A Definition of *meets the safety criteria*

- (1) An active constituent or chemical product ***meets the safety criteria*** if use of the constituent or product, in accordance with any instructions approved, or to be approved, by the APVMA for the constituent or product or contained in an established standard:
 - (a) is not, or would not be, an undue hazard to the safety of people exposed to it during its handling or people using anything containing its residues; and
 - (b) is not, or would not be, likely to have an effect that is harmful to human beings; and
 - (c) is not, or would not be, likely to have an unintended effect that is harmful to animals, plants or things or to the environment.
- (2) For the purposes of being satisfied as to whether an active constituent meets the safety criteria, the APVMA:

- (a) must have regard to the following:
 - (i) the toxicity of the constituent and its residues, including metabolites and degradation products, in relation to relevant organisms and ecosystems, including human beings;
 - (ii) the method by which the constituent is, or is proposed to be, manufactured;
 - (iii) the extent to which the constituent will contain impurities;
 - (iv) whether an analysis of the chemical composition of the constituent has been carried out and, if so, the results of the analysis;
 - (v) any conditions to which its approval is, or would be, subject;
 - (vi) any relevant particulars that are, or would be, entered in the Record for the constituent;
 - (via) whether the constituent conforms, or would conform, to any standard made for the constituent under section 6E to the extent that the standard relates to matters covered by subsection (1);
 - (vii) any matters prescribed by the regulations; and
 - (b) may have regard to such other matters as it thinks relevant.
11. In regard to matters prescribed by the regulations to which the APVMA must have regard for the purposes of being satisfied as to whether an active constituent meets the safety criteria, regulation 8AA of the Agvet Regulations prescribes the following:

8AA Safety criteria—active constituents

For subparagraph 5A(2)(a)(vii) of the Code, the method of analysis (if any) of the chemical composition of the active constituent concerned is a prescribed matter.

Relevant particulars

12. As defined in section 3 of the Agvet Code, in relation to the approval of an active constituent, the **“relevant particulars”** means the distinguishing number, any instructions for use and any other particulars required by paragraph 19(c) to be entered in the Record. The other particulars required for the purposes of paragraph 19(c) of the Agvet Code are prescribed by regulation 15 of the Agvet Regulations, as follows:

15 Particulars of approved active constituents to be recorded

- (1) For paragraph 19(c) of the Code, the following particulars are prescribed:
- (a) if a name is given to the active constituent by the International Union of Pure and Applied Chemistry—that name;
 - (b) if no name is given to the active constituent by the International Union of Pure and Applied Chemistry—the name given to the active constituent in the standard prescribed in respect of the active constituent for the purposes of paragraph 87(1)(a) of the Code;
 - (c) the name of the active constituent;
 - (d) the composition and purity of the active constituent;
 - (e) the name of the manufacturer of the active constituent;
 - (f) the address of each site at which the active constituent is manufactured by the manufacturer;
 - (g) identifying information for the holder of the approval of the active constituent;
 - (h) the date of entry of these particulars in the Record of Approved Active Constituents;
 - (j) identifying information for any nominated agent for the approval.

- (2) A particular mentioned in paragraphs (1)(c) to (j) is only prescribed for an active constituent approved in accordance with section 14A of the Code if the particular is readily available to the APVMA.

Findings on material questions of fact

13. In relation to the anticoagulant rodenticide active constituents listed in Attachment A of this notice, I have decided that:
- 13.1. Under section 34A(1)(a) of the Agvet Code, I am **not satisfied** that the active constituents meet the safety criteria due to:
- a. a legislative contradiction and unnecessary duplication in the quality assurance requirements condition imposed on all the active constituent approvals (detailed in paragraphs 33, 35 and 36 of these reasons); and
 - b. for specific brodifacoum, bromadiolone and difenacoum active constituent approvals, inadequate information on the composition and purity of the active constituent (detailed in paragraph 31.3 these reasons).
- 13.2. However, under section 34A(1)(b) of the Agvet Code, I am satisfied that the conditions of approval can be varied in such a way as to mitigate these concerns, and so that the active constituents will meet the safety criteria.
- 13.3. I am satisfied that there are no requirements prescribed by the regulations in relation to active constituents, other than regulation 8AA of the Agvet Regulations which is a prescribed matter in relation to the safety criteria. I have considered this prescribed requirement in paragraph 17.3 of these reasons as part of my determination as to whether the active constituents meet the safety criteria.
- 13.4. Therefore, I am satisfied that the conditions of the approval for the active constituent can be varied in such a way as to allow the active constituents to be affirmed.

Reasons

14. For the purpose of deciding whether to affirm the approvals listed in Attachment A of this notice, or to vary the relevant particulars and conditions in such a way as to allow the approvals to be affirmed, I have decided to reconsider matters covered by subsection 34(1) of the Agvet Code. That is, whether the active constituent meets the safety criteria (s 34(1)(a)) and whether the active constituent complies with any requirement prescribed by the regulations (s 34(1)(d)).
15. In determining whether the active constituents listed in Attachment A of this notice meet the safety criteria, I have considered the criteria under s 5A of the Agvet Code with respect to the use of the constituent in accordance with any instructions approved, or to be approved, by the APVMA for the constituent.
16. In determining whether the active constituents listed in Attachment A of this notice comply with any requirement prescribed by the regulations, I note that there are no requirements for active constituents prescribed by the regulations, other than regulation 8AA of the Agvet Regulations which is a prescribed matter in relation to the safety criteria. I have considered this requirement prescribed by the regulations in paragraph 17.3 of these reasons as part of my determination as to whether the active constituents meet the safety criteria.

Consideration of the safety criteria

17. For the purposes of being satisfied as to whether the active constituents listed in Attachment A of this notice meet the safety criteria, or whether the relevant particulars or conditions of these approvals could be varied in such a way so that the active constituents meet the safety criteria, I have had regard to all matters set out section 5A(2)(a) of the Agvet Code.
- 17.1. My detailed consideration of the following matters are set out below in the '*Toxicity of the active constituents*' (paragraphs 18 – 27), '*Composition and purity of active constituents*' (paragraphs 28 – 32) and '*Quality assurance requirements*' (paragraphs 33 – 37) sections of these reasons.
- a. the toxicity of the constituent and its residues, including metabolites and degradation products, in relation to relevant organisms and ecosystems, including human beings (s 5A(2)(a)(i) of the Agvet Code); and
 - b. the method by which the constituent is, or is proposed to be, manufactured (s 5A(2)(a)(ii) of the Agvet Code); and
 - c. the extent to which the constituent will contain impurities (s 5A(2)(a)(iii) of the Agvet Code); and
 - d. whether an analysis of the chemical composition of the constituent has been carried out and, if so, the results of the analysis (s 5A(2)(a)(iv) of the Agvet Code); and
 - e. any conditions to which its approval is, or would be, subject (s 5A(2)(a)(v) of the Agvet Code); and
 - f. the relevant particular 'composition and purity of the active constituent' that is, or would be, entered in the Record for the constituent (s 5A(2)(a)(vi) of the Agvet Code); and
 - g. whether the constituent conforms, or would conform, to any standard made for the constituent under section 6E to the extent that the standard relates to matters covered by subsection (1) (s 5A(2)(a)(via) of the Agvet Code).
- 17.2. Regarding any relevant particulars that are, or would be, entered in the Record for an active constituent ((s 5A(2)(a)(vi)), there has been no new information provided to the APVMA or identified by the APVMA regarding the relevant particulars that are currently entered in the Record since the approval and/or variation of the active constituents listed in Attachment A of this notice, with the exception of the composition and purity of the active constituent (regulation 15(1)(d) of the Agvet Regulations). Therefore, I consider that there is nothing that would prevent me from being satisfied that the active constituents listed in Attachment A of this notice meets the safety criteria in relation to these matters, as listed below.
- a. For completeness sake, I note that the relevant particulars for which no new information has been provided or identified are the distinguishing number, any instructions for use, the name given to the active constituent by the International Union of Pure and Applied Chemistry or in the standard prescribed in respect of the active constituent for the purposes of paragraph 87(1)(a) of the Agvet Code (regulation 15(1)(a) and (b) of the Agvet Regulations), the name of the active constituent (regulation 15(1)(c) of the Agvet Regulations), the name of the manufacturer of the active constituent (regulation 15(1)(e) of the Agvet Regulations), the address of each site at which the active constituent is manufactured by the manufacturer (regulation 15(1)(f) of the Agvet Regulations), identifying information for the holder of the approval of the active constituent (regulation 15(1)(g) of the Agvet Regulations), the date of entry of these particulars in the Record of Approved Active Constituents (regulation 15(1)(h) of the Agvet Regulations), and identifying information for any nominated agent for the approval (regulation 15(1)(j) of the Agvet Regulations)

- 17.3. There has been no new information provided to the APVMA or identified by the APVMA regarding the method of analysis (if any) of the chemical composition of the active constituent (regulation 8AA of the Agvet Regulations) since the approval and/or variation of the active constituents listed in Attachment A of this notice. Therefore, I consider that any method of analysis on record remain suitable for determining the chemical composition of anticoagulant rodenticide active constituents.

Toxicity of the active constituents

18. I have had regard to 'the toxicity of the constituent and its residues, including metabolites and degradation products in relation to relevant organisms and ecosystems, including human beings' (s 5A(2)(a)(i) of the Agvet Code) for the purposes of being satisfied that an active constituent listed in Attachment A of this notice meets the safety criteria. I have reviewed and relied upon the following assessment reports completed by the APVMA's subject matter experts. I agree with the approach and methodology and the conclusions in these assessments unless I have indicated otherwise in these reasons.
- 18.1. Studies on the toxicokinetics and metabolism of anticoagulant rodenticides in the mammalian body, as summarised in sections '3.1.2 Fate and behaviour in bitoa' and '4.2.9 Toxicokinetics' of the *Anticoagulant Rodenticides Review Technical Report*.
- 18.2. The following toxicity studies that examine adverse effects from administration of, or exposure to, anticoagulant rodenticides, using suitable mammalian laboratory animals as a surrogate for human beings, or *in vitro* studies with tissues or cell cultures, as summarised in section '4.2 Summary of available toxicological studies' of the *Anticoagulant Rodenticides Review Technical Report*.
- Brodifacoum – acute toxicity (oral, dermal, inhalation, skin irritation, eye irritation and skin sensitisation), short-term oral repeat dose toxicity, sub-chronic dietary repeat dose toxicity, developmental toxicity, reproductive toxicity and genotoxicity studies.
 - Bromadiolone – acute toxicity (oral, dermal, inhalation, skin irritation, eye irritation and skin sensitisation), sub-chronic repeat dose oral toxicity, developmental toxicity, reproductive toxicity and genotoxicity studies.
 - Coumatetralyl – acute toxicity (oral, dermal, inhalation, skin irritation, eye irritation and skin sensitisation), sub-chronic repeat dose dietary toxicity, developmental toxicity and genotoxicity studies.
 - Difenacoum – acute toxicity (oral, dermal, inhalation, skin irritation, eye irritation and skin sensitisation), short-term repeat dose toxicity (oral and dermal), developmental toxicity, reproductive toxicity and genotoxicity studies.
 - Difethialone – acute toxicity (oral, dermal, inhalation, skin irritation, eye irritation and skin sensitisation), short-term and sub-chronic repeat dose oral toxicity, developmental toxicity and genotoxicity studies.
 - Diphacinone – acute toxicity (oral, dermal, inhalation, skin irritation, eye irritation and skin sensitisation), short-term repeat dose toxicity (oral, dermal and inhalation), developmental toxicity and genotoxicity studies.
 - Flocoumafen – acute toxicity (oral, dermal, skin irritation, eye irritation and skin sensitisation), short-term and sub-chronic repeat dose oral toxicity, developmental toxicity and genotoxicity studies.

18.3. The following environmental toxicity studies on the effects of anticoagulant rodenticides on non-target animals, as summarised in section '3.2 Effects on non-target species' of the *Anticoagulant Rodenticides Review Technical Report*.

- a. Brodifacoum – primary poisoning studies on terrestrial vertebrates (mammals, birds and reptiles), secondary poisoning studies on terrestrial vertebrates (birds) and effects studies on aquatic species (fish, invertebrates and algae), soil organisms (macro-organisms) and biological methods of sewerage treatment (activated sludge).
- b. Bromadiolone – primary poisoning studies on terrestrial vertebrates (mammals and birds), secondary poisoning studies on terrestrial vertebrates (birds and reptiles) and effects studies on aquatic species (fish, invertebrates and algae), soil organisms (macro-organisms) and biological methods of sewerage treatment (*Pseudomonas putida* and activated sludge).
- c. Coumatetralyl – primary poisoning studies on terrestrial vertebrates (mammals, birds and reptiles), secondary poisoning studies on terrestrial vertebrates (mammals and birds) and effects studies on aquatic species (fish, invertebrates and algae), bees (*Apis mellifera*), soil organisms (macro-organisms) and biological methods of sewerage treatment (activated sludge).
- d. Difenacoum – primary poisoning studies on terrestrial vertebrates (mammals and birds), secondary poisoning studies on terrestrial vertebrates (birds) and effects studies on aquatic species (fish, invertebrates and algae), soil organisms (macro-organisms) and biological methods of sewerage treatment (*Pseudomonas putida* and activated sludge).
- e. Difethialone – primary poisoning studies on terrestrial vertebrates (mammals and birds), secondary poisoning studies on terrestrial vertebrates (birds), and effects studies on aquatic species (fish, invertebrates and algae), soil organisms (macro-organisms) and biological methods of sewerage treatment (activated sludge).
- f. Diphacinone – primary poisoning studies on terrestrial vertebrates (mammals, birds and reptiles), secondary poisoning studies on terrestrial vertebrates (birds) and effects studies on aquatic species (fish).
- g. Flocoumafen – primary poisoning studies on terrestrial vertebrates (mammals and birds), secondary poisoning studies on terrestrial vertebrates (birds) and effects studies on aquatic species (fish, invertebrates and algae), soil organisms (macro-organisms) and biological methods of sewerage treatment (activated sludge).
- h. Warfarin – primary poisoning studies in terrestrial vertebrates (mammals, birds and reptiles) and secondary poisoning studies in terrestrial vertebrates (mammals).

Toxicology and human health

19. The anticoagulant rodenticide active constituents coumatetralyl, diphacinone, brodifacoum, bromadiolone, difenacoum, difethialone, flocoumafen and warfarin listed in Attachment A are approved for use in agricultural chemical products (i.e. as a vertebrate poison).
20. For all anticoagulant rodenticide active constituents except warfarin (i.e. coumatetralyl, diphacinone, brodifacoum, bromadiolone, difenacoum, difethialone and flocoumafen), based on my review and consideration of the assessment of toxicity studies, as summarised in section '4.5.1 Selection of points of departure for risk assessment' of the *Anticoagulant Rodenticides Review Technical Report*, I consider that there is sufficient information to quantitatively assess the human health risks posed from occupational and non-professional use of these active constituents in agricultural chemical products.

- 20.1. I have considered the points of departure listed in Table 1. My view is that they are appropriate to assess the effects of repeat dermal and inhalation exposure to both occupational and non-professional users. I note that these points of departure are based on the most appropriate no observed adverse effect level (NOAEL) or lowest observed adverse effect level (LOAEL) in the limited toxicology database available, based on the criteria that the point of departure is protective of the effects seen in all repeat-dose studies in the database and that it is relevant to the potential effects in humans.

Table 1: Points of departure for occupational and non-professional health risk assessments

Active	Point of Departure (mg/kg bw/day)	Study
<i>First generation anticoagulant rodenticides</i>		
Coumatetralyl	0.0068 (occupational and non-professional)	16-week dietary toxicity study in rats. NOAEL of 0.0068 mg/kg bw/day based on prolonged blood clotting (prothrombin) time at the next highest dose.
Diphacinone	0.025 (occupational and non-professional)	Oral developmental toxicity study in rats. NOAEL of 0.025 mg/kg bw/day based on maternal and embryo toxicity based on increased incidence of early resorptions and post implantation loss at the next higher dose.
<i>Second generation anticoagulant rodenticides</i>		
Brodifacoum	0.001 (occupational and non-professional)	13-week dietary toxicity study in rats. NOAEL of 0.001 mg/kg bw/day based on prolonged blood clotting (prothrombin) time at the next higher dose.
Bromadiolone	0.005 (occupational)	Oral subchronic toxicity study in rabbits. NOAEL of 0.0005 mg/kg bw/day based on increased blood clotting (prothrombin) time at the next higher dose.
	0.002 (non-professional)	Developmental toxicity study in rabbits with a LOAEL of 0.002 mg/kg bw/day, noting that exposure will be much less frequent for non-professional users.
Difenacoum	0.001 (occupational and non-professional)	Developmental toxicity study in rabbits. LOAEL of 0.001 mg/kg bw/day based on haemorrhage in multiple tissues/organs at the lowest dose tested.
Difethialone	0.00125 (occupational and non-professional)	Oral developmental toxicity study in rabbits. NOAEL of 0.00125 mg/kg bw/day based on depressed weight gain in dams, elevated incidence of incompletely ossified 5th sternebra at the next highest dose of 0.0025 mg/kg bw/day.
Flocoumafen	0.0014 (occupational and non-professional)	90-day dietary toxicity study in rats. NOAEL of 0.0014 mg/kg bw/day (0.02 ppm) based on increased levels of serum cholesterol at the next highest dose of 0.0036 mg/kg bw/day (0.05 ppm).

- 20.2. I find that a margin of exposure of 1000 is appropriate to assess the risks to occupational users, based on a standard 10-fold uncertainty factor (UF¹) for inter-species extrapolation, a standard 10-fold UF for intra-species differences in susceptibility to effects, and an additional 10-fold UF to account for the lack of chronic toxicity studies in the toxicology databases. Alternatively, I find that a margin of exposure of 300 is appropriate to assess the risks to non-professional users, based on a standard 10-fold UF for inter-species extrapolation, a standard 10-fold UF for intra-species differences in susceptibility to effects, and (noting

¹ UF - Uncertainty factor (or safety factor): a reductive factor by which an observed or estimated no-observed adverse-effect level or other reference point, such as the benchmark dose or benchmark dose lower confidence limit, is divided to arrive at a reference dose or standard that is considered safe or without appreciable risk.

that the frequency of non-professional use is much more sporadic compared to occupational use) an additional 3-fold UF to account for the lack of chronic toxicity studies in the toxicology databases.

21. For all anticoagulant rodenticide active constituents except warfarin (i.e. coumatetralyl, diphacinone, brodifacoum, bromadiolone, difenacoum, difethialone and flocoumafen), based on my review and consideration of the assessment of toxicity studies, as summarised in section '4.11 Health Based Guidance Values' of the *Anticoagulant Rodenticides Review Technical Report*, I consider that the health-based guidance values (HBGVs) listed in Table 2 and Table 3 below are appropriate to assess any potential dietary risks from the use of these active constituents in agricultural chemical products.
- 21.1. Products containing anticoagulant rodenticides are not approved for use directly on food commodities and anticoagulant rodenticide residues are not expected to occur in the food chain. However, I note that there is some evidence of the potential for anticoagulant rodenticide contamination of food commodities. As documented in section '5.1 Potential for contamination in food producing situations' of the *Anticoagulant Rodenticides Review Technical Report*, this evidence includes potential exposure pathways for edible wildlife and game, and past low-level warfarin and coumatetralyl detections in pig livers that stemmed from the use of anticoagulant rodenticide chemical products in piggeries. As such, I have considered the toxicity of these active constituents with respect to any potential anticoagulant rodenticide contaminants in food commodities.
- 21.2. For both first- and second-generation anticoagulant rodenticides, tolerable daily intakes (TDI²) are relevant to the assessment of any potential chronic dietary risks associated with chemicals contaminants that may enter the food chain. I consider that the TDIs for the active constituents coumatetralyl, diphacinone, brodifacoum, bromadiolone, difenacoum, difethialone and flocoumafen listed in Table 2 are appropriate, noting that the NOAEL (or LOAEL) selected is equivalent to the point of departure selected for repeat exposure assessments (detailed in paragraph 20.1 above), the use of a standard 100-fold UF to account for inter-species extrapolation and intra-species variability in response, and the use of an additional 10-fold UF to account for all limitations in the chronic toxicology databases.

Table 2: Tolerable daily intake (TDI) for anticoagulant rodenticides

Active	TDI (mg/kg bw/day)	Study	UF
<i>First generation anticoagulant rodenticides</i>			
Coumatetralyl	0.0000068	NOAEL of 0.0068 mg/kg bw/day for significantly increased blood clotting time and haemorrhage from a 16-week dietary toxicity study in rats.	1000-fold
Diphacinone	0.000025	NOAEL of 0.025 mg/kg bw/day for increased incidence of maternal toxicity in a rat developmental toxicity study.	1000-fold
<i>Second generation anticoagulant rodenticides</i>			
Brodifacoum	0.000001	NOAEL of 0.001 mg/kg bw/day for prolonged prothrombin time in a 90-day dietary toxicity study in rats.	1000-fold
Bromadiolone	0.0000005	NOAEL of 0.0005 mg/kg bw/day for increased prothrombin time in a subchronic toxicity study in rabbits.	1000-fold

² TDI - tolerable daily intake (for humans): a level of intake of a chemical contaminant (expressed mg/kg bw/day; milligrams per kilogram of body weight per day) that can be ingested daily over an entire lifetime without any appreciable risk to health,

Active	TDI (mg/kg bw/day)	Study	UF
Difenacoum	0.000001	LOAEL of 0.001 mg/kg bw/day for haemorrhage in multiple tissues/organs in a developmental toxicity study in rabbits.	1000-fold
Difethialone	0.0000013	NOAEL of 0.00125 mg/kg bw/day for incidence of incompletely ossified sternebrae from a developmental toxicity study in rabbits.	1000-fold
Flocoumafen	0.0000014	NOAEL of 0.0014 mg/kg bw/day for incidence of increased levels of serum cholesterol from a subchronic dietary toxicity study in rats.	1000-fold

- 21.3. Second-generation anticoagulant rodenticides are designed to effectively control rodents after one feed and therefore pose an acute poisoning risk. As such, acute tolerable intakes³ for second-generation anticoagulant rodenticides are relevant to the assessment of any potential acute dietary risks associated with chemical contaminants that may enter the food chain. I consider that the acute tolerable intakes for the second-generation anticoagulant rodenticides listed in Table 3 are appropriate, noting the NOAEL (or LOAEL) from developmental toxicology studies have been selected as the effects observed could feasibly result from acute exposure, use of a standard 100-fold UF to account for inter-species extrapolation and intra-species variability in response, and use of an additional 3-fold UF where the acute tolerable intake has been derived from a LOAEL.

Table 3: Acute tolerable intake for second generation anticoagulant rodenticides

Active	Acute tolerable intake (mg/kg bw)	Study	UF
Brodifacoum	0.00001	NOAEL of 0.001 mg/kg bw/day from both developmental toxicity studies in rats and rabbits.	100-fold
Bromadiolone	0.0000007	LOAEL of 0.002 mg/kg bw/day for maternal toxicity in a developmental toxicity study in rabbits.	300-fold
Difenacoum	0.00003	LOAEL of 0.001 mg/kg bw in a developmental toxicity study in rabbits.	300-fold
Difethialone	0.000013	NOAEL of 0.00125 mg/kg bw/day from a developmental toxicity study in rabbits.	100-fold
Flocoumafen	0.00002	NOAEL of 0.002 from a developmental toxicity study in rabbits.	100-fold

22. In relation the anticoagulant rodenticide active constituent warfarin, I note that the APVMA does not have access to standard toxicity studies typically used to derive points of departure and health-based guidance values for quantitative human health risk assessment purposes. However, based on my review and consideration of the human health assessment of warfarin, as summarised in section '4.2.3 Warfarin' of the *Anticoagulant Rodenticides Review Technical Report*:

- 22.1. I note that warfarin (as the sodium salt) has been used extensively as a human anticoagulant therapeutic medicine. The therapeutic doses of warfarin range from 1 to 10 mg daily for the prevention and treatment of venous thrombosis and its extension and pulmonary embolism (equating to approximately 0.0125 to 0.125 mg/kg bw/d).

³ Acute tolerable intake (for humans): the amount of a chemical contaminant in food or drinking-water, (expressed as mg/kg of body weight), that can be ingested or absorbed over 24 hours or less, without appreciable health risk.

- 22.2. A theoretical NOAEL for warfarin may be predicted at a dose ten-fold lower than the minimum therapeutically active dose (i.e. a theoretical NOAEL of approximately 0.00125 mg/kg bw/d). Alternatively, as agricultural chemical products containing warfarin typically only contain 0.0025 to 0.05% warfarin, any potential exposure to humans from the agricultural use of the active constituent warfarin is several orders of magnitude lower than the minimum therapeutically active dose. It can therefore be reasonably inferred that any potential exposure to humans from the agricultural use of the active constituent warfarin will be less than the theoretical NOAEL with an adequate safety margin to account for any potential uncertainties in the theoretical NOAEL and any potential intra-species variability in sensitivities in humans.
- 22.3. Therefore, I consider that, in this circumstance:
- A quantitative human health risk assessment, utilising points of departure and health-based guidance values, is not required to adequately assess the risks to human beings posed by the current use of warfarin active constituents in agricultural chemical products.
 - There is sufficient toxicity information available for warfarin to qualitatively assess the risks to human beings posed by the current approved use of warfarin active constituents in agricultural chemical products.

Environmental toxicology

23. Based on my review and consideration of the assessment of environmental toxicology studies set out in section '3.2.1 Effects on terrestrial vertebrates' of the *Anticoagulant Rodenticides Review Technical Report*, I consider that there is sufficient toxicology information to assess the risks of anticoagulant rodenticides to non-target terrestrial vertebrates. I note that regulatory acceptable levels (RALs) for anticoagulant rodenticide exposure of terrestrial vertebrates were not derived for quantitative risk assessment purposes, as anticoagulant rodenticides are a type of vertebrate poison and it is widely accepted that exposure of terrestrial vertebrates to these vertebrate poisons has the potential to result in death.
- 23.1. All anticoagulant rodenticides in scope of the reconsideration are considered to have a high toxicity to mammals via acute exposure (i.e. gavage administration) and/or dietary exposure when rodents are considered the representative species (LD_{50} or $LC_{50} < 100$ mg/kg bw or mg/kg food; $LDD_{50} < 10$ mg/kg bw/day). Most anticoagulant rodenticides where acute and/or dietary toxicity has been studied in non-rodent mammalian species, brodifacoum (rabbits), bromadiolone (dogs and ferrets), difenacoum (dogs), diphacinone (ferrets) and warfarin (minks) were still determined to have a high toxicity to mammals. However, it is noted that warfarin only had a moderate toxicity to dogs with acute exposure (LD_{50} 100 – 2000 mg/kg bw), and difethialone only had a low toxicity to ferrets with dietary exposure ($LDD_{50} > 200$ mg/kg bw/d).
- 23.2. Anticoagulant rodenticides also pose a secondary poisoning risk to mammals if they consume poisoned rats or mice, poisoned non-target animals or insects. Secondary poisoning studies with mammals indicate that mortality of the test animal is possible if they consume prey with a high body burden i.e. high levels of the anticoagulant rodenticide are present within the prey animal), and that mortality of mammals generally occurred after a feeding period of 3 days onwards with no clear distinction between first-generation and second-generation anticoagulant rodenticides.
- 23.3. The toxicity of anticoagulant rodenticides to birds ranged from low to high dependant on the active constituent, type of exposure and species of bird involved in the study. Based on acute exposure studies (i.e. gavage administration), brodifacoum, difenacoum, difethialone and flocoumafen were determined to have a high toxicity to birds ($LD_{50} < 100$ mg/kg bw), bromadiolone was determined to have a moderate

toxicity to birds (LD_{50} 100 – 2000 mg/kg bw), and the first-generation anticoagulant rodenticides coumatetralyl, diphacinone and warfarin were determined to have a low toxicity to birds (LD_{50} > 2000 mg/kg bw). Alternatively, based on dietary exposure studies, brodifacoum, bromadiolone, coumatetralyl, difenacoum, difethialone and flocoumafen were all determined to have a high toxicity to birds (LC_{50} < 100 mg/kg food; LDD_{50} < 10 mg/kg bw/d) and diphacinone was determined to have a moderate toxicity to birds (LC_{50} 100 – 2000 mg/kg food). Further, in a reproductive study with coumatetralyl, parental death was observed in birds with low dietary concentrations of 60 mg/kg feed.

- 23.4. In relation to secondary poisoning of birds, only second-generation anticoagulant rodenticides appear to pose a significant risk. Secondary poisoning studies with the first-generation anticoagulant rodenticides coumatetralyl, diphacinone and warfarin indicate that mortality of the test bird is unlikely if they consume poisoned animals. However, secondary poisoning studies with second-generation anticoagulant rodenticides indicate that mortality of the test bird is possible if they consume animals with high body burdens, with the secondary poisoning hazard potential being the highest for the active constituents brodifacoum and difenacoum.
- 23.5. A number of sub-lethal effects have also been observed in primary and secondary poisoning studies with mammals and birds. This includes sub-lethal effects that appear to directly relate to vitamin K antagonism, the mode of action of anticoagulant rodenticides, such as bleeding around body orifices, metrorrhagia, blood clots and internal hematomas. Further, in reproductive toxicity studies, possible effects on the ovarian function of rats were observed with long-term exposure to difenacoum, and a decreased numbers of surviving 14-day old chicks was observed with long-term exposure of birds to difenacoum or bromadiolone in drinking water.
- 23.6. The limited reptile toxicity studies support the position that reptiles have a high tolerance to anticoagulant rodenticides poisoning. Coumatetralyl, diphacinone and brodifacoum were determined to have low toxicity to fence lizards with acute exposure. Turtles and boas exhibited a relative insensitivity to diphacinone and brodifacoum, while lizards appeared to be somewhat more sensitive. Further, in relation to the effects of diphacinone and warfarin on the brown tree snake, respective lowest lethal doses of 10 and 40 mg/kg bw were determined.
24. Based on my review and consideration the assessment of environmental toxicology studies set out in sections '3.2.2 Effects on other non-target species' and '3.3.3 Risks to other non-target species' of the *Anticoagulant Rodenticides Review Technical Report*, I consider that there is sufficient toxicology information to assess the risks to aquatic species, biological methods of sewerage treatments and soil organisms from the current use of anticoagulant rodenticides in agricultural chemical products.
 - 24.1. In the available effects studies for aquatic species, brodifacoum, difenacoum, difethialone, flocoumafen were shown to be very toxic to aquatic life, diphacinone and bromadiolone were shown to be toxic to aquatic life, and coumatetralyl was found to have a low to moderate toxicity to aquatic life. There were no studies on the toxicity of warfarin to aquatic species available.
 - 24.2. The accidental exposure of sewage treatment plants to agricultural chemicals has the potential to result in an unintended effect that is harmful to biological methods of sewage treatment. In the available effects studies for biological methods of sewage treatment, coumatetralyl and bromadiolone were shown to inhibit bacterial activity in an activated sludge inhibition test at relatively high concentrations. However, brodifacoum, difenacoum, difethialone and flocoumafen did not inhibit bacterial activity at the highest concentrations tested, which was limited by the solubility of these active constituents.

- 24.3. The difethialone and flocoumafen RALs for aquatic species and biological methods of sewage treatment listed in Table 4 were derived for quantitative risk assessment purposes, as exposure of these non-target organisms is possible due to the current approved use of difethialone and flocoumafen in sewers. These RALs were calculated based on endpoints from the most sensitive available effects studies and application of a standard 10-fold assessment factor. I find that exposure of aquatic species and biological methods of sewage treatment to the active constituents difethialone and flocoumafen below the respective RALs listed in Table 4 is not expected to have an effect that is harmful to these non-target organisms.
- 24.4. In the available effects studies for soil organisms, brodifacoum, bromadiolone, coumatetralyl, difenacoum and difethialone were shown to have a low toxicity to soil macro-organisms such as earthworms, and flocoumafen was shown to have a dose-dependent inhibition effect on the reproduction of soil macro-organisms following long-term exposure. The RALs for soil organisms listed in Table 4 were derived for quantitative risk assessment purposes, based on endpoints from the available effects studies and, for acute exposure endpoints only, application of a standard 10-fold assessment factor. I find that exposure of soil organisms to brodifacoum, bromadiolone, coumatetralyl, difenacoum and difethialone below the respective RALs listed in Table 4 is not expected to have an effect that is harmful to soil organisms.
- 24.5. There are no studies on the effects of the active constituents diphacinone and warfarin on biological methods of sewage treatment or soil organisms. I consider this acceptable as exposure of biological methods of sewage treatment is not expected from these active constituents (nor brodifacoum, bromadiolone, coumatetralyl or difethialone) as they are not approved for use in sewers, and any potential soil exposure from diphacinone and warfarin may be considered insignificant as only spot contamination of soil is expected.
- 24.6. I also note that RALs for exposure of aquatic species to the active constituents brodifacoum, bromadiolone, coumatetralyl, difethialone, diphacinone and warfarin were not derived for quantitative risks assessment purposes, as the risks to aquatic species from of these active constituents could be deemed acceptable based on the current approved uses, provided that some minor precautionary measures are taken.

Table 4: Regulatory acceptable levels (RALs) for exposure of aquatic species, biological methods of sewerage treatment and soil organisms to certain anticoagulant rodenticides

Non-target group	Active	Study	RAL
Aquatic species	Difethialone	EC ₅₀ 0.0044 mg/L – acute exposure of invertebrates (<i>Daphnia magna</i>)	0.00044 mg/L
	Flocoumafen	LC ₅₀ 0.070 mg/L – acute exposure of fish (<i>Oncorhynchus mykiss</i>)	0.0070 mg/L
Biological methods of sewage treatment	Difethialone	EC ₅₀ >100 mg/L – activated sludge	10 mg/L
	Flocoumafen	EC ₅₀ >4.0 mg/L – activated sludge	0.40 mg/L
Soil organisms	Coumatetralyl	LC ₅₀ 225 mg/kg dry soil – acute exposure of macro-organisms (<i>Eisenia fetida</i>)	23 mg/kg dry soil
	Brodifacoum	LC _{50corr} >497 mg/kg dry soil – acute exposure of macro-organisms (<i>Eisenia fetida</i>)	50 mg/kg dry soil
	Bromadiolone	LC _{50corr} >665 mg/kg dry soil – acute exposure of macro-organisms (<i>Eisenia fetida</i>)	67 mg/kg dry soil
	Difenacoum	LC _{50corr} >497 mg/kg dry soil – acute exposure of macro-organisms (<i>Eisenia fetida</i>)	50 mg/kg dry soil
	Difethialone	LC _{50corr} >500 mg/kg dry soil – acute exposure of macro-organisms (<i>Eisenia fetida</i>)	50 mg/kg dry soil

Non-target group	Active	Study	RAL
	Flocoumafen	EC _{10corr} 2.8 mg/kg dry soil – chronic exposure of macro-organisms (<i>Eisenia fetida</i>)	2.8 mg/kg dry soil

25. Further, based on my review and consideration of the assessment in sections '3.2.2 *Effects on other non-target species*' and '3.3.3 *Risks to other non-target species*' of the *Anticoagulant Rodenticides Review Technical Report*, I consider that there is sufficient toxicity information to assess the risks to bees and other non-target arthropods posed from the current use of anticoagulant rodenticide active constituents in agricultural chemical products. The only toxicity study for bees indicates that coumatetralyl has a high toxicity to bees with contact exposure, though I note that there are no direct or indirect exposure pathways for bees associated with the current uses of anticoagulant rodenticides. Anticoagulant rodenticides are not expected to have an adverse effect on other terrestrial arthropods based on their mode of action, which is supported by observations that terrestrial arthropods (e.g. cockroaches, woodlice, ants, etc.) fed on bait pellets containing brodifacoum with no apparent effects during laboratory studies and baiting programs.
26. I also note that there is no toxicity information available for the effects of anticoagulant rodenticides on terrestrial plants. Based on my review and consideration of the assessment in section '3.3.3 *Risks to other non-target species*' of the *Anticoagulant Rodenticides Review Technical Report*, I consider that this toxicity information is not required as the risks to terrestrial plants were deemed acceptable based on the mode of action, method of application, low bioavailability in soil, and a lack of a similar blood-clotting mechanism in plants.

Conclusion on toxicity of the active constituents

27. I consider that there is sufficient toxicology information to assess the current use of the anticoagulant rodenticide active constituents coumatetralyl, diphacinone, brodifacoum, bromadiolone, difenacoum, difethialone, flocoumafen and warfarin in agricultural chemical products. Further, I consider that there are no other relevant matters for anticoagulant rodenticides active constituents with respect to the 'the toxicity of the constituent and its residues, including metabolites and degradation products in relation to relevant organisms and ecosystems, including human beings' (s 5A(2)(a)(i) of the Agvet Code).

Composition and purity of active constituents

28. The composition and purity of an active constituent can impact the overall toxicity of manufactured technical material (or manufacturing concentrate). Factors such as any impurities that are likely to be present, the control of the manufacturing process to consistently produce the technical material (or manufacturing concentrate), and any specifications that have been deemed appropriate for the active constituent are relevant to the considerations on composition and purity of an active constituent, and thus the considerations of the safety risks associated with approved use of an active constituent. As such, for the purposes of being satisfied that an active constituent listed in Attachment A of this notice meets the safety criteria with respect to the composition and purity of the active constituent, I had regard to the following matters set out in section 5(2)(a) of the Agvet Code:
- 28.1. the method by which the constituent is, or is proposed to be, manufactured (s 5A(2)(a)(ii) of the Agvet Code); and
- 28.2. the extent to which the constituent will contain impurities (s 5A(2)(a)(iii) of the Agvet Code); and
- 28.3. whether an analysis of the chemical composition of the constituent has been carried out and, if so, the results of the analysis (s 5A(2)(a)(iv) of the Agvet Code); and

- 28.4. the relevant particular under r 15(1)(d) of the Agvet Regulations, being the 'composition and purity of the active constituent' that is, or would be, entered in the Record for the constituent (s 5A(2)(a)(vi) of the Agvet Code); and
- 28.5. whether the constituent conforms, or would conform, to any standard made for the constituent under section 6E of the Agvet Code to the extent that the standard relates to matters covered by subsection s 5A(1) of the Agvet Code (s 5A(2)(a)(via) of the Agvet Code).
29. In having regard to the above matters, I have considered and agreed with the chemistry assessment report completed by the APVMA's subject matter experts where the following information was reviewed, as summarised in section '2.1 Chemistry and Manufacture – Active Constituents' of the *Anticoagulant Rodenticides Review Technical Report*.
- 29.1. The manufacturing method information, batch analysis results and/or the Declaration of Composition (including minimum purity and maximum impurity levels) for all active constituent approvals listed in Attachment A of this notice, which were submitted and assessed as part of the original approval.
- 29.2. The current specifications for the active constituents brodifacoum, bromadiolone, coumatetralyl, difenacoum, difethialone, diphacinone, flocoumafenin and warfarin in the *Agricultural and Veterinary Chemicals Code (Agricultural Active Constituents) Standards 2022* (Active Constituents Standards 2022), as set out in Table 5 below. The Active Constituents Standard 2022 is a standard made under section 6E(1) of the Agvet Code for active constituents used in agricultural chemical products, including anticoagulant rodenticides.
- 29.3. The Food and Agriculture Organization of the United Nations (FAO) specifications for brodifacoum technical material. The FAO specifications represent a consensus between FAO and World Health Organisation (WHO) chemistry experts regarding the acceptable composition and purity of technical actives and/or chemical products. I note that there are no FAO specifications for the anticoagulant rodenticide active constituents bromadiolone, coumatetralyl, difenacoum, difethialone, diphacinone, flocoumafen or warfarin.

Table 5: Current specifications for anticoagulant rodenticides in the Active Constituents Standards 2022

Column A Identification of the active constituent	Column B Description	Column C Minimum Purity	Column D Maximum Impurity Levels
Common Name: Brodifacoum Chemical Name: 3-[(1 <i>RS</i> ,3 <i>RS</i> ;1 <i>RS</i> ,3 <i>SR</i>)-3-(4'-bromobiphenyl-4-yl)-1,2,3,4-tetrahydro-1-naphthyl]-4-hydroxy-2 <i>H</i> -chromen-2-one CAS Number: 56073-10-0	The material shall consist of broadifacoum together with related manufacturing impurities and shall be an off-white to buff or beige powder, free from visible extraneous matter and added modifying agents.	900 g/kg minimum	
Common Name: Bromadiolone Chemical Name: Mixture of 80–100% 3-[(1 <i>RS</i> ,3 <i>SR</i>)-3-(4'-bromobiphenyl-4-yl)-3-hydroxy-1-phenylpropyl]-4-hydroxy-2 <i>H</i> -chromen-2-one and 20–0% 3-[(1 <i>RS</i> ,3 <i>RS</i>)-3-(4'-bromobiphenyl-4-yl)-3-hydroxy-1-phenylpropyl]-4-hydroxy-2 <i>H</i> -chromen-2-one CAS Number: 28772-56-7	The material shall consist of bromadiolone together with related manufacturing impurities and shall be a yellowish powder, free from visible extraneous matter and added modifying agents.	930 g/kg minimum	

Column A Identification of the active constituent	Column B Description	Column C Minimum Purity	Column D Maximum Impurity Levels
Common Name: Coumatetralyl Chemical Name: 4-hydroxy-3-[(1 <i>RS</i>)-1,2,3,4-tetrahydro-1-naphthyl]-2 <i>H</i> -chromen-2-one CAS Number: 5836-29-3	The material shall consist of coumatetralyl together with related manufacturing impurities and shall be colourless to yellowish crystals, free from visible extraneous matter and added modifying agents.	980 g/kg minimum	
Common Name: Difenacoum Chemical Name: 3-[(1 <i>RS</i> ,3 <i>RS</i> ;1 <i>RS</i> ,3 <i>SR</i>)-3-biphenyl-4-yl]-1,2,3,4-tetrahydro-1-naphthyl]-4-hydroxy-2 <i>H</i> -chromen-2-one CAS Number: 56073-07-5	The material shall consist of difenacoum with related manufacturing impurities and shall be a buff/beige powder, free from visible extraneous matter and added modifying agents.	960 g/kg minimum	
Common Name: Difethialone Chemical Name: 3-[(1 <i>RS</i> ,3 <i>RS</i> ;1 <i>RS</i> ,3 <i>SR</i>)-3-(4'-bromobiphenyl-4-yl)-1,2,3,4-tetrahydro-1-naphthyl]-4-hydroxy-1-benzothiine-2-one containing 0–15% of the (1 <i>RS</i> ,3 <i>RS</i>)-racemate and 85–100% of the (1 <i>RS</i> ,3 <i>SR</i>)-racemate CAS Number: 104653-34-1	The material shall consist of difethialone together with related manufacturing impurities and shall be a white to slightly yellowish powder, free from visible extraneous matter and added modifying agents.	The sum of isomers is 980 g/kg minimum; The ratio of (1 <i>RS</i> ,3 <i>RS</i>) isomers to (1 <i>RS</i> ,3 <i>SR</i>) isomers shall be in the range 0-15 to 85-100.	
Common Name: Diphacinone Chemical Name: 2-(diphenylacetyl)indane-1,3-dione CAS Number: 82-66-6	The material shall consist of diphacinone with related manufacturing impurities and shall be a yellow powder.	983 g/kg minimum	
Common Name: Flocoumafen Chemical Name: mixture of 50–80% <i>cis</i> -isomers 4-hydroxy-3-[(1 <i>RS</i> ,3 <i>SR</i>)-3-(4-[(4-(trifluoromethyl)phenyl)methoxy]phenyl)-1,2,3,4-tetrahydro-1-naphthyl]-2 <i>H</i> -chromen-2-one and 50–20% <i>trans</i> -isomers 4-hydroxy-3-[(1 <i>RS</i> ,3 <i>RS</i>)-3-(4-[(4-(trifluoromethyl)phenyl)methoxy]phenyl)-1,2,3,4-tetrahydro-1-naphthyl]-2 <i>H</i> -chromen-2-one CAS Number: 90035-08-8	The material shall consist of flocoumafen together with related manufacturing impurities and shall be an off-white solid, free from visible extraneous matter and added modifying agents.	950 g/kg minimum	
Common Name: Warfarin Chemical Name: 4-hydroxy-3-[(1 <i>RS</i>)-3-oxo-1-phenylbutyl]-2 <i>H</i> -chromen-2-one CAS Number: 81-81-2	The material shall consist of warfarin together with related manufacturing impurities and shall be colourless crystals, free from visible extraneous matter and added modifying agents.	990 g/kg minimum	

30. Based on my consideration of the outcomes of the chemistry risk assessments for the active constituents coumatetralyl, difethialone, diphacinone, flocoumafen and warfarin, as summarised respectively in sections '2.1.3 Active Constituent – Coumatetralyl', '2.1.5 Active Constituent – Difethialone', '2.1.6 Active Constituent – Diphacinone', '2.1.7 Active Constituent – Flocoumafen' and '2.1.8 Active Constituent – Warfarin' of the *Anticoagulant Rodenticides Review Technical Report*, I note that the specifications for coumatetralyl, difethialone, diphacinone, flocoumafen and warfarin in the *Active Constituents Standards 2022* remain appropriate. Further, I find that all coumatetralyl, difethialone, diphacinone, flocoumafen and warfarin active constituent approvals listed in Attachment A of this notice can be consistently manufactured to comply with this standard.
31. In relation to the brodifacoum, bromodiolone and difenacoum active constituents listed in Attachment A of this notice, based on my review and considerations of the outcomes of the chemistry assessment summarised

respectively in sections '2.1.1 Active Constituent – Brodifacoum', '2.1.2 Active Constituent – Bromadiolone and '2.1.4 Active Constituent – Difenacoum of the *Anticoagulant Rodenticides Review Technical Report*:

- 31.1. I note that the specifications for bromadiolone and difenacoum technical material in the *Active Constituents Standards 2022* (Table 5) remain appropriate. I also note that the FAO specification for brodifacoum technical material has a higher minimum purity (i.e., a minimum purity of 950 g/kg) than the brodifacoum technical material specification in the *Active Constituents Standards 2022* (Table 5), and that variation of the *Active Constituents Standards 2022* would ensure the provision of higher quality, higher purity technical active constituent to the Australian market and maintain consistency with international standards. However, this has not been considered as part of this anticoagulant rodenticides reconsideration conducted under Division 4 of the Agvet Code, as variation to the Active Constituent Standards is a separate legislative process and there have been no safety implications identified with respect to use of a brodifacoum technical active constituent with a purity in the range of 900 g/kg to 950 g/kg.
- 31.2. I note that the *Active Constituents Standards 2022* does not currently include an entry for brodifacoum, bromadiolone or difenacoum manufacturing concentrates and it is anticipated that the APVMA will propose to vary the *Active Constituent Standards 2022* in future to include such entries. However, this has not been considered as part of this anticoagulant rodenticides reconsideration conducted under Division 4 of the Agvet Code, as variation to the *Active Constituent Standards 2022* is a separate legislative process and there have been no safety implications identified with respect to use of brodifacoum or bromadiolone manufacturing concentrates with a composition and purity aligning with the Declaration of Composition in the APVMA Record.
- 31.3. For the majority of brodifacoum, bromodiolone and difenacoum active constituent approvals listed in Attachment A of this notice, I find that there is sufficient evidence to demonstrate they can be consistently manufactured to comply with the specifications for technical material in the *Active Constituents Standards 2022* (Table 5) and/or the Declaration of Composition in the APVMA Record for the approval. However, for a small number of brodifacoum, bromodiolone and difenacoum active constituent approvals (44192, 67898, 67881) there are inconsistencies in the information supplied to the APVMA as to whether the active constituent is manufactured and supplied as technical material or manufacturing concentrate. Therefore, I propose to add the following condition to these active constituent approvals to ensure the accuracy of APVMA records on the composition and purity of these active constituents:
- a. *'Condition of approval: Within one year of publication of the section 34AC notice of the anticoagulant rodenticides final regulatory decision, you are required to provide evidence of whether the active constituent is supplied as technical material and/or a manufacturing concentrate and evidence of the composition and purity of the active constituent. This evidence may include an updated Declaration of Composition and a certificate of analysis for a batch of active constituent manufactured within the last 5 years.'*
32. I consider that there are no other relevant matters with respect to the composition and purity of anticoagulant rodenticide active constituents. Therefore, in relation composition and purity of the active constituents and the associated matters to which I must have regard set out in paragraph 28 of these reasons, after variation of the conditions for certain brodifacoum, bromadiolone and difenacoum active constituent approvals (44192, 67898, 67881) as discussed above in paragraph 31.3 of these reasons, I find that there is nothing that would prevent me from being satisfied that the active constituents listed in Attachment A of this notice would meet the safety criteria.

Quality assurance requirements

33. The APVMA's scientific risk assessments and other considerations on the safety risks associated with the use of an agricultural or veterinary chemicals are predicated on the fact that supplied active constituents will be manufactured in accordance with the particulars that are, or would be, entered into the Record. The quality assurance process to ensure that the particulars of supplied agricultural active constituents are consistent with the particulars entered into the Record is, in part, managed by conditions to which agricultural active constituent approvals are subject. Therefore, I have regard to any conditions to which its approval is, or would be, subject (s 5A(2)(a)(v) of the Agvet Code) for the purposes of being satisfied that a product listed in Attachment A of this notice meets the safety criteria with respect to quality assurance processes.
34. As part of this consideration, I note that the agricultural active constituent approvals listed in Attachment A of this notice are subject to conditions in accordance with section 23(1)(a) of the Agvet Code, as follows:
- 34.1. Regulation 17C(1) of the Agvet Regulations prescribes conditions to which the registration of a chemical product is subject.
- 34.2. Section 5 of the *Agricultural and Veterinary Chemicals Code (Conditions of Approval or Registration) Order 2021* (Conditions of Approval or Registration Order) prescribes conditions which apply to the approval of an active constituent for a proposed or existing chemical product.
35. The active constituent listed in Attachment A of this notice are subject to additional conditions referred to as the '*Agricultural Active Constituent Quality Assurance Requirements*', which have been imposed by the APVMA under section 23(1)(b) of the Agvet Code. I **do not** consider that this condition as currently imposed remains appropriate for the following reasons:
- 35.1. The condition contains an obsolete definition which may be misleading, as it introduces a contradiction with legislative requirements into the condition. Specifically, the condition refers to the 'APVMA Standard' available on the APVMA Website, which has been replaced by the legislative instrument *Active Constituents Standards 2022*.
- 35.2. The condition is substantially redundant given the requirements of the *Active Constituents Standards 2022* and Regulation 17C(1) of the Agvet Regulations.
36. To remove the legislative contradiction and unnecessary duplication discussed in above paragraph 35 of these reasons, I propose to vary the condition referred to as the '*Agricultural Products Active Constituent Quality Assurance Requirements*' to the following:
- 36.1. *Condition of approval: Agricultural Active Constituent Quality Assurance Requirements*

A person supplying any quantity of a Batch of active constituent to another person must, at the time of supply, give the Batch Number for that Batch of active constituent to the person to whom the active constituent is being supplied.

Definitions and Interpretation

Batch means a defined quantity of material produced in a single series of operations.

Batch Number means a distinctive combination of numbers and/or letters that specifically identifies a Batch and from which the production history can be determined.

Supply has the same meaning as in Section 3 of the Agricultural and Veterinary Chemicals Code Act 1994 (Agvet Code).

37. I consider that there are no other relevant matters with respect to the quality assurance processes for anticoagulant rodenticide active constituents. Therefore, in relation to quality assurance processes, after variation of the condition discussed above in paragraph 36 of these reasons, I find that there is nothing that would prevent me from being satisfied that the active constituents listed in Attachment A of this notice would meet the safety criteria.

Safety criteria conclusions

38. Having regard to the matters and findings set out above in relation to the anticoagulant rodenticide active constituents listed in Attachment A of this notice, I am **not satisfied** the active constituents meet the safety criteria due to:
- 38.1. a legislative contradiction and unnecessary duplication in the quality assurance requirement condition imposed on all the active constituent approvals (detailed in paragraphs 33, 35 and 36 of these reasons); and
 - 38.2. for specific brodifacoum, bromadiolone and difenacoum active constituent approvals (44192, 67898, 67881), inadequate information on the composition and purity of the active constituent (detailed in paragraphs 31.3 of these reasons).
39. However, I am satisfied the conditions of the anticoagulant rodenticide active constituents listed in Attachment A of this notice can be varied in the ways set out in paragraphs 31.3 and 36 of these reasons to mitigate these concerns, and so that the active constituents will meet the safety criteria.

Attachment C: Information on which the reasons are based

The information on which the reasons in the draft statement of reasons for proposed course of action are set out below.

- 1) Information provided to the APVMA in response to notices as listed in the [Anticoagulant Rodenticides Data List](#) and cited in the Review Technical Report, noting that Confidential Commercial Information restrictions limit access to some of these data:
 - a. Issued to holders of anticoagulant rodenticide approvals and registrations on 21 November 2021 and 17 March 2025 under section 32 of the Agvet Code.
 - b. Published in the APVMA Gazette on 21 November 2021 under section 32 of the Agvet Code.
 - c. Issued to holders of anticoagulant rodenticide approvals and registrations under section 33 of the Agvet Code on 28 November 2022, 27 June 2024 and 4 July 2024.
- 2) The APVMA records for the approval of relevant active constituents, including information submitted and assessed at the time of approval.
- 3) Information assessed by the APVMA and summarised in the following published report:
 - a. Anticoagulant Rodenticides [Review Technical Report](#)
- 4) Information assessed by the APVMA in the following unpublished reports (these are internal APVMA reports which include confidential commercial information belonging to multiple parties):
 - a. Anticoagulant rodenticides – chemistry and manufacture risk assessment (Ref: A3652378, A3537438)
 - b. Anticoagulant rodenticides – human health risk assessment (Ref: A3429050)
 - c. Anticoagulant rodenticides – fate and behaviour in the environment (Ref: A3217354)
 - d. Anticoagulant rodenticides – effects on non-target species (Ref: A3218224)
 - e. Anticoagulant rodenticides – environment assessment report (Ref: A2913026)
 - f. Anticoagulant rodenticides – residues and trade assessment report (Ref: A3462884)
- 5) The relevant provisions of the Agvet Code and instruments under that Code, in particular those set out in the tables below:

Table C1: Agricultural and Veterinary Chemicals Code Act 1994

Section	Section Heading
3	Definitions
5A	Definition of <i>meets the safety criteria</i>
6E	The APVMA may make standards
19	How approval of active constituent takes place
23	Conditions of approval or registration
31	APVMA may reconsider an approval or registration
33	APVMA may require information, reports, results or samples
34	Reconsideration by APVMA

Section	Section Heading
34A	Varying relevant particulars or conditions to allow affirmation
34AA	Suspension or cancellation
34AB	Notice of proposed decision

Table C2: Agricultural and Veterinary Chemicals Code Regulations 1995

Section	Section Heading
8AA	Safety Criteria – active constituents
15	Particulars of approved active constituents to be recorded
17C	Conditions of approval or registration – active constituents and chemical products

Table C3: Other legislative instruments under the Agricultural and Veterinary Chemicals Code Act 1994

Legislative instruments
<u>Agricultural and Veterinary Chemicals Code (Conditions of Approval or Registration) Order 2021</u>
<u>Agricultural and Veterinary Chemicals Code (Agricultural Active Constituents) Standards 2022</u>

- 6) Relevant APVMA risk assessment manuals, as published on the APVMA website:
- Chemistry and manufacture (<https://www.apvma.gov.au/registrations-and-permits/data-guidelines/risk-assessment-manuals/chemistry-manufacture>)
 - Environment (<https://www.apvma.gov.au/registrations-and-permits/data-guidelines/risk-assessment-manuals/environment>)
 - Human health (<https://www.apvma.gov.au/registrations-and-permits/data-guidelines/risk-assessment-manuals/human-health>)
 - Residues and trade (<https://www.apvma.gov.au/registrations-and-permits/data-guidelines/risk-assessment-manuals/residues-trade>)
- 7) Food and Agriculture Organization of the United Nations (FAO) Specifications and Evaluations for Agricultural Pesticides: Brodifacoum. 3-[3-(4'-bromobiphenyl-4-yl)-1,2,3,4- tetrahydro-1-naphthyl]- 4-hydroxycoumarin. 2015. (<https://openknowledge.fao.org/server/api/core/bitstreams/e4bf9cc0-99c1-472b-8360-972093d4d897/content>)

Notice under section 34AB of the Agricultural and Veterinary Chemicals Code scheduled to the *Agricultural and Veterinary Chemicals Code Act 1994*: anticoagulant rodenticides reconsideration - proposed decision to vary and affirm certain chemical product registrations and label approvals

- 1) I, Maria Trainer, Executive Director Science and Assurance, as the delegate of the Australian Pesticides and Veterinary Medicines Authority (APVMA) have reconsidered the registrations of certain anticoagulant rodenticides, and their associated label approvals under Part 2, Division 4 of the Agricultural and Veterinary Chemicals Code scheduled to the Agricultural and Veterinary Chemicals Code Act 1994 (Agvet Code). The chemical product registrations and label approvals subject to the proposed decisions included in this notice are set out in Attachment A, and the reasons for my decision are set out in Attachment B.
- 2) This notice is issued under section 34AB of the Agvet Code and sets out my proposed decisions in relation to the anticoagulant rodenticides product registrations and label approvals listed in Attachment A of this notice.
- 3) Pursuant to section 34A(1) of the Agvet Code, I propose to:
 - a. vary relevant particulars and conditions of the anticoagulant rodenticide chemical product registrations listed in Attachment A of this notice in the ways set out in the draft statement of reasons in Attachment B of this notice to allow affirmation of the registrations; and
 - b. vary relevant particulars of the anticoagulant rodenticide label approvals listed in Attachment A of this notice in the ways set out in the draft statement of reasons in Attachment B of this notice to allow affirmation of the approvals.
- 4) Pursuant to section 34(1) of the Agvet Code, I propose to:
 - a. affirm the registrations, as varied, of the anticoagulant rodenticide chemical products listed in Attachment A of this notice; and
 - b. affirm the approvals, as varied, of the anticoagulant rodenticide labels listed in Attachment A of this notice.
- 5) The information on which the reasons are based is set out in Attachment C of this notice.

Written submissions are invited

- 6) I invite written submissions on the proposed course of action. All submissions will be considered by the APVMA prior to finalisation of this reconsideration.
- 7) Submissions or requests for further information can be sent to:

Chemical Review
Australian Pesticides and Veterinary Medicines Authority
GPO Box 574
Canberra ACT 2601, Australia

Phone: +61 2 6770 2400

Email: chemicalreview@apvma.gov.au

Please note: Submissions will be published on the APVMA website, unless you have asked for the submission to remain confidential (see [public submission coversheet](#)).

- Please lodge your submission with a public submission coversheet, which provides options for how your submission will be published.

- Note that all submissions received are subject to legislative requirements, including the Freedom of Information Act 1982, the Privacy Act 1988 and the Agvet Code. In providing your submission to the APVMA, you agree to the APVMA publicly disclosing your submission in whole or summary form. The APVMA confirms that if your submission includes confidential commercial information or protected information as defined in the Agvet Code, such information will be subject to the relevant provisions of the Agvet Code including relevant limitations on use and disclosure by the APVMA.

8) The closing date for submissions is 16 March 2026.

Maria Trainer

Executive Director Science and Assurance

With the delegated authority under sections 11, 32 and 44 of the *Agricultural and Veterinary Chemicals (Administration) Act 1992*.

Attachments:

Note: The below Attachments form part of this Notice.

Attachment A: Anticoagulant rodenticide product registrations and label approvals under reconsideration that the APVMA is proposing to vary and then affirm pursuant to sections 34A(1) and 34(1) of the Agvet Code

Attachment B: Draft statement of reasons for the proposed decision to vary and affirm certain anticoagulant rodenticide products and labels

Attachment C: Information on which the reasons are based

Attachment D: Templates for proposed varied anticoagulant rodenticide labels

Contact information

For any enquiries or further information about this matter, please contact:

Chemical Review
Australian Pesticides and Veterinary Medicines Authority
GPO Box 574
Canberra ACT 2601, Australia

Phone: +61 2 6770 2400

Email: chemicalreview@apvma.gov.au

Attachment A: Anticoagulant rodenticide product registrations and label approvals under reconsideration that the APVMA is proposing to vary and then affirm pursuant to sections 34A(1) and 34(1) of the Agvet Code

Agricultural chemical	Registration number	Product name	Holder	Label approval number(s) associated with the product
First generation anticoagulant rodenticides				
Coumatetralyl	51508	Racumin Rat and Mouse Paste	2022 Environmental Science Au Pty Ltd	51508/0300, 51508/0500, 51508/0704, 51508/1005
Coumatetralyl	52098	Racumin Rat and Mouse Blocks	2022 Environmental Science Au Pty Ltd	52098/62430, 52098/133310
Coumatetralyl	59284	Bayer Racumin Rat & Mouse Killer	Bayer Cropscience Pty Ltd	59284/0505, 59284/109277
Coumatetralyl	82217	Surefire Couma All Weather Blocks Rodenticide	PCT Holdings Pty Ltd	82217/105225
Diphacinone	89433	RAMIK Bars Rodenticide	Neogen Australasia Pty Limited	89433/124858, 89433/135696
Second generation anticoagulant rodenticides				
Brodifacoum	33896	Talon Rat & Mouse Killer Pellets	Syngenta Australia Pty Ltd	33896/0108, 33896/02, 33896/0302, 33896/0399, 33896/0500, 33896/0600, 33896/105633, 33896/1198, 33896/55730
Brodifacoum	49867	Ditrac All Weather Blox Rodenticide	Bell Laboratories, Inc.	49867/0207, 49867/0997, 49867/113105, 49867/125129, 49867/139752
Brodifacoum	49868	Ditrac Rodenticide	Bell Laboratories, Inc.	49868/0108, 49868/0997, 49868/113073
Brodifacoum	50697	Tomcat II All Weather Blox Rodenticide	Bell Laboratories, Inc.	50697/0207, 50697/0898, 50697/1102, 50697/125125, 50697/142757
Brodifacoum	51181	Pestmaster Mouse & Rat Bait	Triox Pty. Ltd.	51181/0301, 51181/0699, 51181/0999, 51181/1098
Brodifacoum	51280	Tomcat II Rodenticide	Bell Laboratories, Inc.	51280/0407, 51280/0499, 51280/1006
Brodifacoum	52675	Talon Rat & Mouse Killer All Weather Wax Blocks	Syngenta Australia Pty Ltd	52675/0109, 52675/0202, 52675/0500, 52675/0510, 52675/105632, 52675/142858
Brodifacoum	54836	Fast Action Ratsak Bait Station Kills Rats and Mice	Duluxgroup (Australia) Pty Ltd	54836/1101, 54836/0207, 54836/0309, 54836/108614
Brodifacoum	54839	Rentokil Brodifacoum Paste	Rentokil Initial Pty Ltd	54839/0205
Brodifacoum	56632	Fast Action Ratsak Throwpacks Kills Rats & Mice	Duluxgroup (Australia) Pty Ltd	56632/0309, 56632/1102, 56632/51139, 56632/62792, 56632/149304
Brodifacoum	58301	Talon Rat & Mouse Killer Ezy Throw Pellets	Syngenta Australia Pty Ltd	58301/0204, 58301/1004, 58301/105634, 58301/59466
Brodifacoum	58338	Talon Rat & Mouse Killer Pellet Trays	Syngenta Australia Pty Ltd	58338/0204, 58338/1007, 58338/105637
Brodifacoum	58339	Talon Rat & Mouse Killer Wax Blocks	Syngenta Australia Pty Ltd	58339/1207, 58339/0304, 58339/0408, 58339/105629
Brodifacoum	58661	Mortein Kills Rats & Mice and The Fleas They Carry Dual Action Bait	RB (Hygiene Home) Australia Pty Ltd	58661/0208, 58661/0309, 58661/0606, 58661/119901

Agricultural chemical	Registration number	Product name	Holder	Label approval number(s) associated with the product
Brodifacoum	59323	Talon XT Pro Rodenticide Wax Blocks	Syngenta Australia Pty Ltd	59323/0510, 59323/0607, 59323/0805, 59323/1008
Brodifacoum	59875	All Weather PCT First Formula Blocks Rodenticide	PCT Holdings Pty Ltd	59875/0607, 59875/0705
Brodifacoum	59876	Surefire All Weather Blocks Rodenticide	PCT Holdings Pty Ltd	59876/0605, 59876/0607, 59876/1107
Brodifacoum	62635	Talon Mouse Bait Station	Syngenta Australia Pty Ltd	62635/1107
Brodifacoum	63624	X-Verminator Single Feed Lethal Dose Rodent Blocks	Animal Control Products Ltd	63624/1009, 63624/116937, 63624/132952
Brodifacoum	63867	Surefire Pellets Rodenticide	PCT Holdings Pty Ltd	63867/0309
Brodifacoum	63885	Mortein Kills Rats & Mice and the Fleas They Carry Dual Action Throwpack	RB (Hygiene Home) Australia Pty Ltd	63885/0409, 63885/119902
Brodifacoum	65597	Imtrade Top Cat Rodenticide Wax Blocks	Imtrade Australia Pty Ltd	65597/51397, 65597/104361
Brodifacoum	66235	Rodenthor Block Rodenticide	Zapi S.P.A	66235/56295
Brodifacoum	66331	Rodenthor Soft Bait Rodenticide	Zapi S.P.A	66331/55716
Brodifacoum	67610	Ratsak Professional Pellets	Duluxgroup (Australia) Pty Ltd	67610/56453, 67610/138137
Brodifacoum	67611	Ratsak Professional All Weather Wax Blocks	Duluxgroup (Australia) Pty Ltd	67611/56454
Brodifacoum	67652	Fast Action Ratsak Waxblocks	Duluxgroup (Australia) Pty Ltd	67652/56541, 67652/60303
Brodifacoum	68021	Brigand Rodenticide Paste	Pelgar International (Aus) Pty Ltd	68021/57286
Brodifacoum	68025	Brigand Rodenticide Blocks	Pelgar International (Aus) Pty Ltd	68025/57306
Brodifacoum	68028	Brigand Rodenticide Pellets	Pelgar International (Aus) Pty Ltd	68028/57312
Brodifacoum	68122	Pestmaster Rat & Mouse Killer Wax Blocks	Triox Pty. Ltd.	68122/57559
Brodifacoum	69017	Fast Action Ratsak Reusable Mouse Bait Station with Wax Blocks	Duluxgroup (Australia) Pty Ltd	69017/129476, 69017/59659
Brodifacoum	69119	Fast Action Ratsak Reusable Rodent Bait Station with Wax Blocks	Duluxgroup (Australia) Pty Ltd	69119/60011
Brodifacoum	69158	Fast Action Ratsak Disposable Mouse Bait Station with Wax Block	Duluxgroup (Australia) Pty Ltd	69158/60095
Brodifacoum	69209	Ratshot Rapidkill Rodenticide Blocks	Freezone Public Health Pty Ltd	69209/105162, 69209/60250
Brodifacoum	69210	Ratshot Final Kill Paste Rodenticide	Freezone Public Health Pty Ltd	69210/60254
Brodifacoum	69643	Ratal B Rat Blocks	Oztec Rural Pty Limited	69643/61308
Brodifacoum	69867	Klerat Xt Pro Rodenticide Wax Blocks	Syngenta Australia Pty Ltd	69867/61920
Brodifacoum	80029	Ratshot One Shot Rodenticide Pellets	Freezone Public Health Pty Ltd	80029/100069
Brodifacoum	80059	Farmalinx Rodi Pellets	Farmalinx Pty Ltd	80059/100142
Brodifacoum	81663	The Big Cheese Ultra Power Fast Action Bait Blocks	Pelgar International (Aus) Pty Ltd	81663/103579, 81663/146689
Brodifacoum	81664	The Big Cheese Ultra Power Rat Kill Bait Station	Pelgar International (Aus) Pty Ltd	81664/103580

Agricultural chemical	Registration number	Product name	Holder	Label approval number(s) associated with the product
Brodifacoum	81665	The Big Cheese Ultra Power Mouse Kill Bait Station	Pelgar International (Aus) Pty Ltd	81665/103581
Brodifacoum	81666	The Big Cheese Ultra Power Fast Action Bait Packs	Pelgar International (Aus) Pty Ltd	81666/103583, 81666/146690
Brodifacoum	82233	Time's Up Fast Action Baited Mouse Station	Pelgar International (Aus) Pty Ltd	82233/105245
Brodifacoum	82234	The Big Cheese Ultra Power Fast Action Disposable Mouse Kill Bait Station	Pelgar International (Aus) Pty Ltd	82234/105246, 82234/106354
Brodifacoum	83673	Fast Action Ratsak Multi Pack	Duluxgroup (Australia) Pty Ltd	83673/108828, 83673/109941
Brodifacoum	84215	Freezone Ratshot G Quickshot Rodenticide	Freezone Public Health Pty Ltd	84215/109902
Brodifacoum	85522	Time's Up Fast Action Throw Pack	Pelgar International (Aus) Pty Ltd	85522/113504, 85522/145879
Brodifacoum	85523	Time's Up Fast Action Block Bait	Pelgar International (Aus) Pty Ltd	85523/113506
Brodifacoum	86214	The Big Cheese Ultra Power Fast Action Block Bait Rodenticide	Pelgar International (Aus) Pty Ltd	86214/115020
Brodifacoum	87706	Rodenthor Gel Rodenticide	Zapi S.P.A	87706/119034, 87706/131910
Brodifacoum	88845	The Big Cheese Ultra Power Block Bait Rodenticide	Pelgar International (Aus) Pty Ltd	88845/122664, 88845/131958
Brodifacoum	88846	The Big Cheese Ultra Power All Weather Block Bait	Pelgar International (Aus) Pty Ltd	88846/122665, 88846/131959, 88846/145766
Brodifacoum	88847	The Big Cheese Ultra Power Rat and Mouse Kill Throw Packs	Pelgar International (Aus) Pty Ltd	88847/122666, 88847/131976
Brodifacoum	89039	Solo 25 Blox Rodenticide	Bell Laboratories, Inc.	89039/123473
Brodifacoum	89557	Raticate all-weather block - Brodifacoum	Freezone Public Health Pty Ltd	89557/125253
Brodifacoum	90982	ADAMA Brodifacoum Soft Bait	ADAMA Australia Pty Limited	90982/130660
Brodifacoum	91393	The Big Cheese Ultra Power Disposable Mouse Kill Bait Station	Pelgar International (Aus) Pty Ltd	91393/132093
Brodifacoum	91394	The Big Cheese Ultra Power Mouse Kill Bait Station Kit	Pelgar International (Aus) Pty Ltd	91394/132094
Brodifacoum	91401	The Big Cheese Ultra Power Rat Kill Bait Station Kit	Pelgar International (Aus) Pty Ltd	91401/132126
Brodifacoum	91553	Titan Onza Red Rodenticide Paste	Freezone Public Health Pty Ltd	91553/132635
Brodifacoum	91554	Titan Onza Red Rodenticide Blocks	Freezone Public Health Pty Ltd	91554/132644
Brodifacoum	91653	Pestmaster Brodifacoum Rat & Mouse Killer Blocks	Triox Pty. Ltd.	91653/132999
Brodifacoum	91708	Titan Onza Red Grain Bait	Freezone Public Health Pty Ltd	91708/133200
Brodifacoum	92319	TALON GT Pro Rodenticide Grain Bait Block	Syngenta Australia Pty Ltd	92319/135173
Brodifacoum	92320	TALON Rat & Mouse Killer Grain Bait Block	Syngenta Australia Pty Ltd	92320/135177

Agricultural chemical	Registration number	Product name	Holder	Label approval number(s) associated with the product
Brodifacoum	94339	Ratsak 50 Waxblocks Kills Rats & Mice	Duluxgroup (Australia) Pty Ltd	94339/142145
Brodifacoum	94350	Ratsak 50 Soft Bait Kills Rats & Mice	Duluxgroup (Australia) Pty Ltd	94350/142171
Brodifacoum	94918	No Rats & Mice One Feed Rodenticide Blocks	Pelgar International (Aus) Pty Ltd	94918/144033
Bromadiolone	39461	Rentokil Bromard	Rentokil Initial Pty Ltd	39461/0309, 39461/0800, 39461/1197, 39461/52730, 39461/106838, 39461/113385
Bromadiolone	48372	Contrac Blox	Bell Laboratories, Inc.	48372/01, 48372/0108, 48372/0508, 48372/113009, 48372/122805, 48372/125107
Bromadiolone	48374	Contrac Rodenticide	Bell Laboratories, Inc.	48374/01, 48374/113074, 48374/123187
Bromadiolone	49776	Tomcat All-Weather Blox	Bell Laboratories, Inc.	49776/01, 49776/0107, 49776/0207, 49776/0908, 49776/1105, 49776/1206, 49776/58197, 49776/125300
Bromadiolone	49782	Tomcat Rat and Mouse Bait	Bell Laboratories, Inc.	49782/01, 49782/0206, 49782/0407, 49782/0710, 49782/1105
Bromadiolone	62180	Maki Block Weather - Proof Rodenticide	Liphatech S.A.S.	62180/1207
Bromadiolone	64849	Surefire Broma Blocks Rodenticide	PCTt Holdings Pty Ltd	64849/0410
Bromadiolone	64850	Surefire Broma Pellets Rodenticide	PCT Holdings Pty Ltd	64850/0210
Bromadiolone	80379	Generation Green Rodenticide Pellet	Liphatech S.A.S.	80379/100723
Bromadiolone	80388	Bromakil Power Block for Rats and Mice	Liphatech S.A.S.	80388/100735, 80388/130542
Bromadiolone	81205	Tomcat Bait Packs	Evergreen Garden Care Australia Pty Ltd	81205/102547
Bromadiolone	81206	Tomcat All-Weather Rat & Mouse Block Baits	Evergreen Garden Care Australia Pty Ltd	81206/102549, 81206/140075
Bromadiolone	86179	Resolv Soft Bait Rodenticide	Liphatech S.A.S.	86179/114907
Bromadiolone	86331	Contrac Soft Bait	Bell Laboratories, Inc.	86331/115500, 86331/120488, 86331/120939
Bromadiolone, Difenacoum	69994	Muskil Dual Active Rodenticide Blocks with Fluo-Np Technology	Zapi S.P.A	69994/62249, 69994/113128, 69994/123005, 69994/131184
Bromadiolone, Difenacoum	82450	Muskil Soft Bait with Two Actives for Faster Kill of Rats & Mice	Zapi S.P.A	82450/105783, 82450/113141, 82450/123000
Bromadiolone, Difenacoum	84831	Ratsak Rapid Strike Dual Active Waxblocks	Zapi S.P.A	84831/111524, 84831/113394
Bromadiolone, Difenacoum	84832	Ratsak Rapid Strike Advanced Dual Active Soft Bait	Zapi S.P.A	84832/111525, 84832/113395
Difenacoum	65339	Roban Rodenticide Blocks	Pelgar International (Aus) Pty Ltd	65339/50720, 65339/57935

Agricultural chemical	Registration number	Product name	Holder	Label approval number(s) associated with the product
Difenacoum	65358	Roban Rodenticide Paste	Pelgar International (Aus) Pty Ltd	65358/50750
Difenacoum	65528	Roban Rodenticide Pellets	Pelgar International (Aus) Pty Ltd	65528/51125
Difenacoum	66399	Roban Rodenticide Placepacks	Pelgar International (Aus) Pty Ltd	66399/53566
Difenacoum	66587	Cougar Rodenticide Paste Sachets	Pelgar International (Aus) Pty Ltd	66587/53944
Difenacoum	66588	Cougar Rodenticide Wax Blocks	Pelgar International (Aus) Pty Ltd	66588/53945
Difenacoum	67484	Roban Rat And Mouse Killer Paste	Pelgar International (Aus) Pty Ltd	67484/56164
Difenacoum	67644	Time's Up Rat & Mouse Killer Ready to Use Bait Packs	Pelgar International (Aus) Pty Ltd	67644/56525
Difenacoum	67647	Time's Up All-Weather Block Bait Rodenticide	Pelgar International (Aus) Pty Ltd	67647/56528, 67647/111089
Difenacoum	67681	Time's Up Baited Mouse Kill Station	Pelgar International (Aus) Pty Ltd	67681/56618
Difenacoum	68759	Ratshot Rodenticide Paste	Freezone Public Health Pty Ltd	68759/59027
Difenacoum	68760	Ratshot Reusable Baited Rat Kill Station	Freezone Public Health Pty Ltd	68760/59028
Difenacoum	68762	Ratshot Rodenticide Blocks	Freezone Public Health Pty Ltd	68762/59030, 68762/105164
Difenacoum	68763	Ratshot Rat And Mouse Killer Paste	Freezone Public Health Pty Ltd	68763/59031
Difenacoum	69347	Roban Rodenticide Grain Bait	Pelgar International (Aus) Pty Ltd	69347/60553
Difenacoum	69911	Surefire Difenate All Weather Blocks Rodenticide	PCT Holdings Pty Ltd	69911/62048
Difenacoum	80124	All Weather PCT Pro Formula Blocks Rodenticide	PCT Holdings Pty Ltd	80124/100264
Difenacoum	80667	Ratshot-G Rodenticide Grain Bait	Freezone Public Health Pty Ltd	80667/101364
Difenacoum	85512	Amgrow Patrol All Weather Blocks Rodenticide	Australian Agribusiness (Holdings) Pty Ltd	85512/113486
Difenacoum	87869	The Big Cheese Home Choice All Weather Block Bait	Pelgar International (Aus) Pty Ltd	87869/119608, 87869/123663, 87869/127037
Difenacoum	87870	The Big Cheese Home Choice Rat & Mouse Kill Throw Packs	Pelgar International (Aus) Pty Ltd	87870/119609, 87870/123664
Difenacoum	89203	The Big Cheese Home Choice Rat & Mouse Killer Ready to Use Bait Station	Pelgar International (Aus) Pty Ltd	89203/123969
Difenacoum	89204	The Big Cheese Home Choice Mouse Killer Bait Station	Pelgar International (Aus) Pty Ltd	89204/123972, 89204/136722
Difenacoum	89206	The Big Cheese Home Choice Rat Killer Bait Station	Pelgar International (Aus) Pty Ltd	89206/123976
Difenacoum	89510	Surefire Difenate Paste Bait Rodenticide	PCT Holdings Pty Ltd	89510/125105
Difenacoum	89556	Raticate all-weather block - Difenacoum	Freezone Public Health Pty Ltd	89556/125251

Agricultural chemical	Registration number	Product name	Holder	Label approval number(s) associated with the product
Difenacoum	91552	Titan Onza Blue Rodenticide Grain Bait	Freezone Public Health Pty Ltd	91552/132630
Difenacoum	91555	Titan Onza Blue Rodenticide Paste	Freezone Public Health Pty Ltd	91555/132645
Difenacoum	91556	Titan Onza Blue Rodenticide Blocks	Freezone Public Health Pty Ltd	91556/132647
Difenacoum	91657	Pestmaster Difenacoum Rat & Mouse Killer Blocks	Triox Pty. Ltd.	91657/133025
Difenacoum	92812	Roban 25 All Weather Block Bait	Pelgar International (Aus) Pty Ltd	92812/136720
Difenacoum	94917	No Mice Difend Rodenticide Blocks	Pelgar International (Aus) Pty Ltd	94917/144032
Difethialone	62178	Generation Blue Max Block Single-Feed Rodenticide	Liphatech S.A.S.	62178/1009
Difethialone	62694	Generation Block Single-Feed Rodenticide	Liphatech S.A.S.	62694/1209, 62694/53580, 62694/104029
Difethialone	66889	Generation Firststrike Single-Feed Rodenticide	Liphatech S.A.S.	66889/54630
Difethialone	69086	Rodilon Pro Rodenticide	Liphatech S.A.S.	69086/59936
Difethialone	80381	Generation Blue Rodenticide Block	Liphatech S.A.S.	80381/100726
Difethialone	80382	Generation Blue Rodenticide Pellet	Liphatech S.A.S.	80382/100727
Difethialone	80386	Generation Blue Rodenticide Soft Bait	Liphatech S.A.S.	80386/100731
Flocoumafen	47768	Storm Wax Block Rodenticide	BASF Australia Ltd.	47768/01, 47768/0609
Flocoumafen	54191	Storm Secure Wax Block Rodenticide	BASF Australia Ltd.	54191/0501, 54191/0508, 54191/0609, 54191/0704, 54191/1102, 54191/129919
Flocoumafen	80663	Storm Soft Bait Rodenticide	BASF Australia Ltd.	80663/101357, 80663/129939
Flocoumafen	90839	Stratagem Soft Bait Rodenticide	BASF Australia Ltd.	90839/130175
Flocoumafen	90840	Stratagem Wax Block Rodenticide	BASF Australia Ltd.	90840/130176

Attachment B: Draft statement of reasons for the proposed decision to vary and affirm certain anticoagulant rodenticide products and labels

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Background

Reconsideration of anticoagulant rodenticide chemical products and labels

- On 2 November 2021, the APVMA provided notices under section 32 of the Agvet Code that the APVMA was reconsidering the registration of chemical products containing anticoagulant rodenticides and the approval of labels for containers for these chemical products. This reconsideration is being undertaken in accordance with the provisions of Division 4 of Part 2 of the Code.

2. The notices issued under section 32 of the Agvet Code stated that the matters the APVMA proposed to deal with in the reconsideration included assessment of chemistry, toxicology, worker and public exposure, residues (including trade) and environment aspects of anticoagulant rodenticide active constituent approvals, product registrations and label approvals. Further, in relation to chemical products and labels, the basis of the reconsideration was whether the products continue to meet the safety criteria set out in section 5A of the Agvet Code, the products continue to meet the trade criteria as set out in section 5C of the Agvet Code, the labels continue to meet the labelling criteria set out in section 5D of the Agvet Code, and the product and label complies with any requirement prescribed by the *Agricultural and Veterinary Chemicals Code Regulations 1995* (Agvet Regulations).
3. In those notices while the APVMA did have concerns about whether:
 - 3.1. the products continue to meet the safety criteria set out in section 5A of the Agvet Code,
 - 3.2. the products continue to meet the trade criteria as set out in section 5C of the Agvet Code, and
 - 3.3. the labels continue to meet the labelling criteria set out in section 5D of the Agvet Code,

no concerns were raised about whether the use of products in accordance with current instructions for use are not effective. Therefore, whether the products continue to meet the efficacy criteria as set out in section 5B of the Agvet Code was not included as a matter to be dealt with as part of the anticoagulant rodenticide reconsideration in notices issued under section 32 of the Agvet Code and the APVMA has not decided to deal with this matter during the reconsideration.
4. Section 32(2B) of the Agvet Code provides that nothing in subsections (1), (2) or (2A) requires the APVMA to deal with a particular matter as part of the reconsideration. During the reconsideration, the APVMA decided not to deal with whether chemical products continue to meet the trade criteria as part of the reconsideration. The basis for deciding not to deal with these trade aspects is that if chemical products are used in accordance with instructions for use necessary to ensure they meet the safety criteria, any product that is the subject of trade between Australia and places outside of Australia should not contain any anticoagulant rodenticide residues.
5. Therefore, the reconsideration of the chemical products containing anticoagulant rodenticides was limited to consideration of whether the APVMA is satisfied that the relevant chemical products met the safety criteria and comply with any requirements prescribed by the Agvet Regulations.
6. The reconsideration of anticoagulant rodenticide label approvals considered whether the labels meet the labelling criteria, with respect to whether a label contains adequate instructions to ensure, as far as reasonably practicable, that the product meets the safety criteria.
7. The APVMA has finalised the technical assessments for this reconsideration. These assessments took into account information provided in response to the notices under section 32 of the Agvet Code issued on 2 November 2021, information provided in response to additional notices under section 32 of the Agvet Code issued on 17 March 2025 and notices under section 33 of the Agvet Code issued on 28 November 2022, 27 June 2024 and 4 July 2024, information in the APVMA records submitted for the registration of relevant products and approval of relevant labels, and any relevant information in the public domain identified by the APVMA (Attachment C).
8. I have had regard to the technical assessments before proposing to make this decision. I agree with their conclusions (except where I indicate to the contrary in this statement of reasons).

9. I am now giving notice under section 34AB of the Agvet Code of my proposed decision to vary and affirm the chemical product registrations and label approvals listed in Attachment A of this notice.

Legal framework

Affirmation

10. Section 34(1) of the Agvet Code provides that the APVMA must affirm an approval or registration if, and only if, it is satisfied that:
- 10.1. for a chemical product registration – that the product meets the safety criteria, the trade criteria and the efficacy criteria, and the product complies with any requirement prescribed by the Agvet Regulations.
 - 10.2. for a label – that the label meets the labelling criteria and the label complies with any requirement prescribed by the Agvet Regulations.
11. Subsection 34(2) of the Agvet Code provides that subsection (1) applies only to the extent that the APVMA decides to reconsider matters covered by the subsection.

Variation required to satisfy requirements for affirmation

12. Section 34A(1) of the Agvet Code provides that if the APVMA is not satisfied under section 34(1) but is satisfied that the relevant particulars or conditions of the approval or registration can be varied in such a way as to allow the approval to be affirmed, the APVMA must vary the relevant particulars or conditions.
13. Section 34A(2) of the Agvet Code specifies the information that the APVMA may have regard to in making a decision to vary the relevant particulars or conditions. It provides that, the APVMA may have regard only to the following:
- 13.1. submissions, information, reports, results or samples that it had regard to under section 34;
 - 13.2. submissions made to the APVMA in response to the invitation under paragraph 34AB(2)(f).

Statutory criteria

14. The statutory criteria to which reference was made in paragraph 10 above in relation to the affirmation of the registration of a chemical product and approval of a label are set out below.

Safety criteria

15. The definition of *'meets the safety criteria'* with respect to an active constituent and a chemical product is set out in section 5A of the Agvet Code. In relation to chemical products, subsections 5A(1) and (3) of the Agvet Code provides:

5A Definition of *meets the safety criteria*

- (3) An active constituent or chemical product ***meets the safety criteria*** if use of the constituent or product, in accordance with any instructions approved, or to be approved, by the APVMA for the constituent or product or contained in an established standard:

- (d) is not, or would not be, an undue hazard to the safety of people exposed to it during its handling or people using anything containing its residues; and
 - (e) is not, or would not be, likely to have an effect that is harmful to human beings; and
 - (f) is not, or would not be, likely to have an unintended effect that is harmful to animals, plants or things or to the environment.
- (3) For the purposes of being satisfied as to whether a chemical product meets the safety criteria, the APVMA:
- (a) must have regard to the following:
 - (i) the toxicity of the product and its residues, including metabolites and degradation products, in relation to relevant organisms and ecosystems, including human beings;
 - (ii) the relevant poison classification of the product under the law in force in this jurisdiction;
 - (iii) how the product is formulated;
 - (iv) the composition and form of the constituents of the product;
 - (v) any conditions to which its registration is, or would be, subject;
 - (vi) any relevant particulars that are, or would be, entered in the Register for the product;
 - (via) whether the product conforms, or would conform, to any standard made for the product under section 6E to the extent that the standard relates to matters covered by subsection (1);
 - (vii) any matters prescribed by the regulations; and
 - (b) may have regard to one or more of the following:
 - (i) the acceptable daily intake of each constituent contained in the product;
 - (ii) any dietary exposure assessment prepared under subsection 82(4) of the *Food Standards Australia New Zealand Act 1991* as a result of any proposed variation notified under subsection 82(3) of that Act in relation to the product, and any comments on the assessment given to the APVMA under subsection 82(4) of that Act;
 - (iii) whether any trials or laboratory experiments have been carried out to determine the residues of the product and, if so, the results of those trials or experiments and whether those results show that the residues of the product will not be greater than limits that the APVMA has approved or approves;
 - (iv) the stability of the product;
 - (v) the specifications for containers for the product;
 - (vi) such other matters as it thinks relevant.

16. In regard to matters in which the APVMA must have regard to for the purposes of being satisfied as to whether a chemical product meets the safety criteria, regulation 8AB of the Agvet Regulations prescribes the following:

8AB Safety criteria—chemical products

- (1) For subparagraph 5A(3)(a)(vii) of the Code, the following are prescribed matters for a chemical product:
 - (a) for all chemical products—the method of analysis (if any) of the chemical composition and form of the constituents of the chemical product;
 - (b) for a product manufactured in Australia—whether each step in the manufacture of the product complies, or will comply, with the manufacturing principles and the Australian GMP Code;

- (c) for a product manufactured outside Australia—whether each step in the manufacture of the product complies, or will comply, with a standard that the APVMA has determined is comparable to the manufacturing principles and the Australian GMP Code;
 - (d) for a molluscicide in the form of a bait and of which the active constituent is metaldehyde:
 - (i) whether the product contains sufficient green pigment or dye to colour the bait a distinctive green colour; and
 - (ii) whether the product contains, in the bait, any bone meal or other product of animal origin;
 - (e) for a molluscicide in the form of a bait and of which the active constituent is methiocarb:
 - (i) whether the product contains sufficient blue pigment or dye to colour the bait a distinctive blue colour; and
 - (ii) whether the product contains, in the bait, any bone meal or other product of animal origin;
 - (f) for an agricultural chemical product to be applied to seeds to be stored before planting or sowing—whether the product contains sufficient pigment or dye to colour the seed to enable the seed to be readily distinguished from seed to which the product has not been applied.
- (2) However, paragraphs (1)(b) and (c) do not apply if the product is prescribed under subregulation 59(1) for the purposes of section 120A of the Code.

17. In relation to subregulation 8AB(2) of the Agvet Regulation, there are a number of chemical products prescribed under subregulation 59(1) for the purposes of section 120A of the Code. For the reconsideration of anticoagulant rodenticide chemical products, I note that ‘any agricultural chemical product’ is prescribed in paragraph 59(1)(a) for the purposes of section 120A of the Code.

Efficacy criteria

18. The definition of ‘*meets the efficacy criteria*’ with respect to a chemical product is set out in section 5B of the Agvet Code. As outlined in paragraph 3 above, the APVMA did not consider the efficacy criteria as part of this reconsideration.

Trade criteria

19. The definition of ‘*meets the trade criteria*’ with respect to a chemical product is set out in section 5C of the Agvet Code. As outlined in paragraph 4 above, the APVMA did not consider the trade criteria as part of this reconsideration.

Labelling criteria

20. The definition of ‘*meets the labelling criteria*’ with respect to a label for containers for a chemical product is set out in section 5D of the Agvet Code. This provides:

5D Definition of meets the labelling criteria

- (1) A label for containers for a chemical product ***meets the labelling criteria*** if the label contains adequate instructions relating to such of the following as are appropriate:
- (a) the circumstances in which the product should be used;
 - (b) how the product should be used;
 - (c) the times when the product should be used;
 - (d) the frequency of the use of the product;
 - (e) the withholding period after the use of the product;

- (f) the re-entry period after the use of the product;
 - (g) the disposal of the product when it is no longer required;
 - (h) the disposal of containers of the product;
 - (i) the safe handling of the product and first aid in the event of an accident caused by the handling of the product;
 - (j) any matters prescribed by the regulations.
- (2) For the purposes of being satisfied as to whether a label meets the labelling criteria, the APVMA must have regard to the following:
- (a) any conditions to which its approval is, or would be, subject;
 - (b) any relevant particulars and instructions that are, or would be, entered in the relevant APVMA file for the label;
 - (c) whether the label conforms, or would conform, to any standard made for the label under section 6E to the extent that the standard relates to matters covered by subsection (1);
 - (d) any matters prescribed by the regulations.

21. In regard to adequate instructions to be contained on a label for containers for a chemical product, regulation 8AE of the Agvet Regulations prescribes the following:

8AE Labelling criteria

- (1) For paragraph 5D(1)(j) of the Code, the following are prescribed matters:
- (a) for a chemical product that is a veterinary chemical product—the duration of any treatment using the product;
 - (b) the prevention of undue prejudice to trade or commerce between Australia and places outside of Australia;
 - (c) the appropriate signal words (if any) required by the current Poisons Standard;
 - (d) for a chemical product that is a date-controlled chemical product—the storage of containers for the product;
 - (e) any other matter determined by the APVMA CEO under subregulation (2).
- (2) For paragraph 6(2)(c) of the Act, the APVMA CEO may determine matters in relation to which a label must contain adequate instructions.

22. As defined in section 3 of the Agvet Code, “**adequate**”, in relation to instructions on a label, ‘means adequate to ensure, as far as reasonably practicable, that the product meets the safety criteria and the trade criteria.’ These criteria are set out above, at paragraphs 15 and 19, respectively.

23. There are no matters prescribed by the regulations with respect to section 5D(2)(d) of the Agvet Code.

Relevant particulars

24. As defined in section 3 of the Agvet Code, in relation to the registration of a chemical product, the “**relevant particulars**” means the distinguishing number, any instructions for use and any other particulars required by paragraph 20(1)(c) to be entered in the Register. The particulars prescribed by the regulations for the purpose of paragraph 20(1)(c) of the Agvet Code are detailed in regulation 16 of the Agvet Regulations, as follows:

16 Particulars of registered chemical products to be recorded

For paragraph 20(1)(c) of the Code, the following particulars are prescribed:

- (a) the distinguishing name of the chemical product;
- (b) the constituents of the chemical product;

- (c) the concentration of each constituent of the chemical product;
- (d) if possible, the composition and purity of each active constituent of the chemical product;
- (da) the formulation type for the chemical product;
- (db) the net contents for the chemical product;
- (e) identifying information for the holder of the registration of the chemical product;
- (g) the name of each manufacturer of the chemical product;
- (h) the address of each site at which the chemical product is manufactured by the manufacturer;
- (j) the date of entry of these particulars in the Register of Chemical Products;
- (k) identifying information for any nominated agent for the registration.

25. I note that the term ***“instructions for use”*** as used in this statement of reasons means the chemical product relevant particular of any instructions for use to be entered in the Register.
26. As defined in section 3 of the Agvet Code, in relation to the approval of a label, the ***“relevant particulars”*** means the information required to be recorded in the relevant APVMA file by subparagraphs 21(c)(i) to (iva). Section 21 of the Agvet Code details how the approval of a label takes place, including the information to be recorded in the relevant APVMA file, as follows:

21 How approval of label takes place

Approval of a label takes place when the APVMA:

- (a) determines the particulars prescribed by the regulations that are appropriate to be contained on the label; and
- (b) gives a distinguishing number to the label; and
- (c) records the following information in the relevant APVMA file:
 - (i) the name of the person who applied for the approval as the holder of the approval;
 - (ii) the name of any nominated agent for the approval;
 - (iii) the distinguishing number;
 - (iv) the instructions and any particulars that are to be contained on the label;
 - (iva) any other particulars prescribed by the regulations;
 - (v) any conditions of the approval imposed by the APVMA.

27. The particulars prescribed for the purposes of paragraph 21(a) and subparagraph 21(c)(iva) of the Agvet Code are set out in regulation 17 of the Agvet Regulations, as detailed below. The particulars prescribed in subregulation 17(1) of the Agvet Regulations are also the particulars that are to be contained on the label and recorded in the relevant APVMA for the purposes of subparagraph 21(c)(iv) of the Agvet Code.

17 Particulars for label

- (1) For paragraph 21(a) of the Code, the following particulars are prescribed:
 - (a) the appropriate signal words required by the current Poisons Standard;
 - (b) the name of the chemical product that is to appear on a label for containers of the chemical product;
 - (c) the name of each active constituent of the product;
 - (d) the proportion of each active constituent of the product;
 - (e) the name of each constituent for the product that is:
 - (i) not an active constituent; and
 - (ii) classified as a poison in the current Poisons Standard;
 - (f) the proportion of each constituent referred to in paragraph (e);

- (h) the net contents of the product;
 - (j) particulars determined by the APVMA CEO under subregulation (2).
- (2) For paragraph 6(2)(c) of the Act, the APVMA CEO may determine additional particulars to be placed on a label for a product.
- (3) For subparagraph 21(c)(iva) of the Code, the following information is prescribed in relation to the approval of a label for a chemical product, unless the information has already been recorded for the approval of the label as part of the registration of the chemical product:
- (a) identifying information for the holder of the approval;
 - (b) identifying information for any nominated agent for the approval;
 - (c) the distinguishing name of the chemical product that is prescribed under paragraph 16(a) and entered in the Register;
 - (d) the distinguishing number of the chemical product that is entered in the Register.

Phase-out provisions

28. The provisions of the Agvet Code which relate to “phase-out” of products bearing earlier approved labels (where labels are varied prior to being affirmed) are set out below.

Phase-out of products bearing earlier-approved labels

29. As set out in subsection 81(1A) of the Agvet Code, in the absence of a permit, it is an offence to supply, or cause or permit to be supplied, a registered chemical product in a container if the label attached to it does not state the relevant particulars for the approved label. If the APVMA varies the label particulars in the course of a reconsideration, it may determine that it is appropriate that chemical products bearing earlier approved labels (i.e. labels stating the particulars as they were prior to the variation decision) be permitted to be supplied for a period after the variation decision. Section 81(3) of the Agvet Code empowers the APVMA to make such a determination.
30. While the Code is silent as to the matters which might bear upon such a determination, it is clear, taking into account the object and purpose of the Code, that the risks attending the use of products in accordance with instructions appearing on earlier approved labels are relevant to the APVMA’s decision whether to determine a phase-out period, and the length of any phase-out period.

Findings on material questions of fact

31. In relation to the anticoagulant rodenticide chemical products listed in Attachment A of this notice:
- 31.1. Under section 34A(1)(a) of the Agvet Code, I am **not satisfied** that the chemical products meet the safety criteria, as I am **not satisfied** that the use of chemical products in accordance with current instructions:
- a. **would not be likely** to have an unintended effect that is harmful to animals, including non-target terrestrial vertebrates and aquatic species⁴.
 - b. **would not be likely** to pose an undue hazard to the safety of people exposed to it during its handling or people using anything containing its residues, including potential safety concerns for

⁴ Section 5A(1)(c) Agvet Code.

professional workers who handle the chemical products during application and/or people who are involved in clean-up activities⁵.

- c. **would not be likely** not have an effect that is harmful to human beings, including potential safety concerns related to vulnerable human beings who may inadvertently access baits, human beings who may hunt for wild game in treated areas and/or the potential for contamination of food commodities that may be consumed by human beings⁶.

31.2. However, under section 34A(1)(b) of the Agvet Code, I am satisfied that the relevant particulars and conditions of the registrations can be varied in such a way as to allow me to be satisfied that products will meet the safety criteria.

31.3. I am satisfied that there are no additional requirements prescribed by the regulations for chemical product registrations beyond those that I considered with respect to whether the chemical products meet the safety criteria.

31.4. Therefore, I am satisfied that the relevant particulars and conditions of the registrations can be varied in such a way as to allow the registrations to be affirmed.

32. In relation to the labels for anticoagulant rodenticide chemical products listed in Attachment A of this notice:

32.1. Under section 34A(1)(a) of the Agvet Code, I am **not satisfied** that these labels meet the labelling criteria as they contain inadequate instructions to ensure, as far as reasonably practicable, that the associated chemical product meets the safety criteria.

32.2. However, under section 34A(1)(b) of the Agvet Code, I am satisfied that the relevant particulars of the label approval can be varied in such a way so that the labels meet the labelling criteria.

32.3. I am satisfied that there are no additional requirements prescribed by the regulations for labels for containers of chemical products beyond those that I considered with respect to whether the label approvals meet the labelling criteria.

32.4. Therefore, I am satisfied that the relevant particulars of the label approvals can be varied in such a way as to allow the approvals to be affirmed.

Reasons

33. For the purpose of deciding whether to affirm the approvals and registrations listed in Attachment A of this notice, or to vary the relevant particulars and conditions in such a way as to allow the approvals and registrations to be affirmed, I have considered the following:

33.1. For the chemical product registrations, whether the product meets the safety criteria and whether the product complies with any requirement prescribed by the regulations.

33.2. For the label approvals, that is whether the label meets the labelling criteria and whether the label complies with any requirement prescribed by the regulations.

⁵ Section 5A(1)(a) Agvet Code.

⁶ Section 5A(1)(b) Agvet Code.

34. That being said, for the products that contain a combination of the active constituents brodifacoum and fipronil (registrations 58661 and 63885), I have decided to only reconsider the matters listed in paragraph 33.1 of these reasons to the extent that they relate to the fact that the chemical products contain the active constituent brodifacoum.
35. In determining whether the products listed in Attachment A of this notice meet the safety criteria, I note that anticoagulant rodenticides are not listed chemical products and no established standard containing instructions has been made in accordance with section 8U(7) of the Agvet Code. Therefore, I have considered whether the products listed in Attachment A of this notice meet the safety criteria with respect to the use of the product in accordance with any instructions approved, or to be approved, by the APVMA.
36. In determining whether the chemical products and labels listed in Attachment A of this notice comply with any requirement prescribed by the regulations, I note that there are no additional requirements prescribed by the regulations beyond those that I have considered with respect to whether the chemical product registrations meet the safety criteria, and whether the label approvals meet the labelling criteria.

Consideration of the safety criteria

37. For the purposes of determining whether I am satisfied as to whether the chemical products listed in Attachment A of this notice meet the safety criteria, and, if not, am I satisfied that the relevant particulars or conditions of these registrations could be varied in such a way so that the chemical products meet the safety criteria, I have had regard to all matters set out section 5A(3)(a) of the Agvet Code.
- 37.1. In regard to any relevant particulars that are, or would be, entered in the Register for a product ((s 5A(3)(a)(vi)), there has been no new information provided to the APVMA or identified by the APVMA since the registration and/or variation of the chemical products listed in Attachment A of this notice with respect to the following: the distinguishing number, the distinguishing name (regulation 16(a) of the Agvet Regulations), identifying information for the holder of the registration (regulation 16(e) of the Agvet Regulations), the name of each manufacturer (regulation 16(g) of the Agvet Regulations), the address of each site at which the chemical product is manufactured (regulation 16(h) of the Agvet Regulations), the date of entry of these particulars in the Register (regulation 16(j) of the Agvet Regulations), and identifying information for any nominated agent for the registration (regulation 16(k) of the Agvet Regulations). Therefore, I consider that there is nothing that would prevent me from being satisfied that a product listed in Attachment A of this notice meets the safety criteria in relation to these relevant particulars.
- 37.2. In regard to the remaining matters set out in section 5A(3)(a) of the Agvet Code that the APVMA must have regard to in considering whether a chemical product meets the safety criteria:
- a. The *'Likelihood of an unintended effect that is harmful to animals, plants or things or to the environment – s 5A(1)(c)'* section of these reasons (paragraphs 39 – 75) includes my detailed considerations on the following matters, as relevant to the safety of animals, plants or things or to the environment:
- the toxicity of the product and its residues, including metabolites and degradation products, in relation to relevant organisms and ecosystems, including human beings (s 5A(3)(a)(i)); and
 - how the product is formulated (s 5A(3)(a)(iii)); and

- the following relevant particulars that are, or would be, entered in the Register for the product (s 5A(3)(a)(vi): any instructions for use, and the net contents (regulation 16(db) of the Agvet Regulations)).
- b. The '*Undue hazard to the safety of humans and harmful effects on human beings – s 5A(1)(a)–(b)*' section of these reasons (paragraphs 76 – 112) includes my detailed considerations on the following matters, as relevant to the safety of people exposed to chemical products during handling, people using anything containing product residues and human beings:
- the toxicity of the product and its residues, including metabolites and degradation products, in relation to relevant organisms and ecosystems, including human beings (s 5A(3)(a)(i)); and
 - the relevant poison classification of the product under the law in force in this jurisdiction (s 5A(3)(a)(ii)); and
 - how the product is formulated (s 5A(3)(a)(iii)); and
 - the following relevant particulars that are, or would be, entered in the Register for the product (s 5A(3)(a)(vi): any instructions for use.
- c. The '*Chemistry and manufacture matters related to the safety criteria – s 5A(1)(a)–(c)*' section of these reasons (paragraphs 113 – 126) includes my detailed consideration of the following matters, as they pertain to whether a chemical product meets the safety criteria:
- how the product is formulated (s 5A(3)(a)(iii)); and
 - the composition and form of the constituents of the product (s 5A(3)(a)(iv)); and
 - any conditions to which its registration is, or would be, subject (s 5A(3)(a)(v)); and
 - the following relevant particulars that are, or would be, entered in the Register for the product (s 5A(3)(a)(vi): the constituents of the chemical product (regulation 16(b) of the Agvet Regulations), the concentration of each constituent (regulation 16(c) of the Agvet Regulations), the composition and purity of each active constituent (if possible) (regulation 16(d) of the Agvet Regulations), and the formulation type (regulation 16(da) of the Agvet Regulations); and
 - whether the product conforms, or would conform, to any standard made for the product under section 6E to the extent that the standard relates to matters covered by subsection 5A(1) of the Agvet Code ((s 5A(3)(a)(vi)).

37.3. In regard to the prescribed matters for a chemical product set out in regulation 8AB of the Agvet Regulations for the purpose of subparagraph 5A(3)(a)(vii) of the Agvet Code.

- a. There has been no new information provided to the APVMA or identified by the APVMA regarding the method of analysis (if any) of the chemical composition and form of the constituents of the chemical product (regulation 8AB(1)(a) of the Agvet Regulations) since the registration and/or variation of the chemical products listed in Attachment A of this notice. Therefore, I consider that the method of analysis (if any) in the APVMA records remain suitable for determining the chemical composition and form of the constituents of anticoagulant rodenticide chemical products.
- b. Regulations 8AB(1)(b) and (c) of the Agvet Regulations do not apply to the anticoagulant rodenticide chemical products listed in Attachment A of this notice, as they are captured by the exclusion in regulation 8AB(2) of the Agvet Regulations.

- c. Regulations 8AB(1)(d) and (e) of the Agvet Regulations do not apply to the anticoagulant rodenticide products listed in Attachment A of this notice, as they are not a molluscicide in the form of a bait, nor do they contain the active constituent metaldehyde or methiocarb.
- d. Regulations 8AB(1)(f) does not apply to the anticoagulant rodenticide products listed in Attachment A of this notice, as they are not agricultural chemical products to be applied to seeds to be stored before planting or sowing.

38. For the purposes of being satisfied as to whether the chemical products listed in Attachment A of this notice meet the safety criteria, or whether the relevant particulars or conditions of these registrations could be varied in such a way so that the chemical products meet the safety criteria, the matters set out in section 5A(3)(b) of the Agvet Code are discretionary.

38.1. I have chosen not to have regard the discretionary matters listed in sections 5A(3)(b)(i), (ii) and (iii) of the Agvet Code, as they are not relevant to anticoagulant rodenticide chemical products based on their registered use patterns. As detailed in the section '5. Residues and trade' of the *Anticoagulant Rodenticides Review Technical Report*, there are no registered uses of anticoagulant rodenticide products for direct application to commodities grown for human food or to food producing livestock or poultry. Further, I note the recommendation in section '5.4 Agricultural and Veterinary Chemicals (MRL Standard for Residues of Chemical Products) Instrument 2023' of the *Anticoagulant Rodenticides Review Technical Report* that any current temporary maximum residues limits approved by the APVMA for anticoagulant rodenticides should be removed from the *Agricultural and Veterinary Chemicals (MRL Standard for Residues of Chemical Products) Instrument 2023* (MRL Standard)

38.2. There has been no new information provided to the APVMA or identified by the APVMA regarding the stability of the product (s 5A(3)(b)(iv)) and the specifications for containers for the product (s 5A(3)(b)(v)) since the registration and/or variation of the chemical products listed in Attachment A of this notice. Therefore, I consider that there is nothing that would prevent me from being satisfied that the anticoagulant rodenticide products listed in Attachment A of this notice meet the safety criteria in relation to these matters.

38.3. In relation to the discretionary matters listed in section 5(3)(b)(vi) of the Agvet Code, there are no other matters that I think relevant with respect to whether the anticoagulant rodenticide products listed in Attachment A of this notice meet the safety criteria.

Likelihood of an unintended effect that is harmful to animals, plants or things or to the environment – s 5A(1)(c)

39. For a chemical product to meet the safety criteria, section 5A(1)(c) of the Agvet Code requires that the use of those chemical products, in accordance with any instructions approved, or to be approved, by the APVMA would not be likely to have an unintended effect that is harmful to animals, plants or things or to the environment.

40. When considering this criteria, I have specifically considered whether the use of the chemical products in accordance with any instructions approved, or to be approved, would be likely to have an unintended effect that is harmful to animals, plants or and other things in the environment that may be impacted by the use of agricultural chemical products, including:

40.1. non-target terrestrial vertebrates,

40.2. aquatic species,

- 40.3. biological methods of sewage treatment,
- 40.4. soil organisms,
- 40.5. bees and other terrestrial arthropods,
- 40.6. and terrestrial plants.

Risks to non-target terrestrial vertebrates

41. In considering whether the use of the chemical products listed in Attachment A of this notice in accordance with instructions approved by the APVMA would be likely to have an unintended effect that is harmful to terrestrial vertebrates, I have considered the environmental risk assessments summarised in section '3. *Environment*' of the *Anticoagulant Rodenticides Review Technical Report* to the extent that it relates to terrestrial vertebrates and the following relevant matters that the APVMA must have regard to for the purposes of being satisfied as to whether a chemical product meets the safety criteria:
- 41.1. the toxicity of the product and its residues, including metabolites and degradation products, in relation to relevant organisms and ecosystems, including human beings (s 5A(3)(a)(i)); and
 - 41.2. how the product is formulated (s 5A(3)(a)(iii)); and
 - 41.3. the relevant particulars 'any instructions for use' and 'the net contents' (regulation 16(db)) that are, or would be, entered in the Register for the product (s 5A(3)(a)(vi)).

Toxicity of anticoagulant rodenticides to terrestrial vertebrates

42. Based on my review and consideration of the assessment of environmental toxicology studies set out in section '3.2.1 *Effects on terrestrial vertebrates*' of the *Anticoagulant Rodenticides Review Technical Report*, I note that:
- 42.1. All anticoagulant rodenticides in scope of the reconsideration are considered to have a high toxicity to mammals via acute exposure (i.e. gavage administration) and/or dietary exposure when rodents are considered the representative species (LD_{50} or $LC_{50} < 100$ mg/kg bw or mg/kg food; $LDD_{50} < 10$ mg/kg bw/day). Most anticoagulant rodenticides where acute and/or dietary toxicity has been studied in non-rodent mammalian species, brodifacoum (rabbits), bromadiolone (dogs and ferrets), difenacoum (dogs), and diphacinone (ferrets) were still determined to have a high toxicity to mammals. However, difethialone only had a low toxicity to ferrets with dietary exposure ($LDD_{50} > 200$ mg/kg bw/d).
 - 42.2. Anticoagulant rodenticides also pose a secondary poisoning risk to mammals if they consume poisoned rats or mice, poisoned non-target animals or insects. Secondary poisoning studies with mammals indicate that mortality of the test animal is possible if they consume prey with a high body burden (i.e. high levels of the anticoagulant rodenticide are present within the prey animal), and that mortality of mammals generally occurred after a feeding period of 3 days onwards with no clear distinction between first-generation and second-generation anticoagulant rodenticides.
 - 42.3. The toxicity of anticoagulant rodenticides to birds ranged from low to high dependant on the active constituent, type of exposure and species of bird involved in the study. Based on acute exposure studies (i.e. gavage administration), brodifacoum, difenacoum, difethialone and flocoumafen were determined to have a high toxicity to birds ($LD_{50} < 100$ mg/kg bw), bromadiolone was determined to have a moderate toxicity to birds (LD_{50} 100 – 2000 mg/kg bw), and the first-generation anticoagulant rodenticides coumatetralyl, diphacinone was determined to have a low toxicity to birds ($LD_{50} > 2000$ mg/kg bw).

Alternatively, based on dietary exposure studies, brodifacoum, bromadiolone, coumatetralyl, difenacoum, difethialone and flocoumafen were all determined to have a high toxicity to birds ($LC_{50} < 100$ mg/kg food; $LDD_{50} < 10$ mg/kg bw/d) and diphacinone was determined to have a moderate toxicity to birds (LC_{50} 100 – 2000 mg/kg food). Further, in a reproductive study with coumatetralyl, parental death was observed in birds with low dietary concentrations of 60 mg/kg feed.

- 42.4. In relation to secondary poisoning of birds, only second-generation anticoagulant rodenticides appear to pose a significant risk. Secondary poisoning studies with the first-generation anticoagulant rodenticides coumatetralyl, and diphacinone indicate that mortality of the test bird is unlikely if they consume poisoned animals. However, secondary poisoning studies with second-generation anticoagulant rodenticides indicate that mortality of the test bird is possible if they consume animals with high body burdens, with the secondary poisoning hazard potential being the highest for the active constituents brodifacoum and difenacoum.
 - 42.5. A number of sub-lethal effects have also been observed in primary and secondary poisoning studies with mammals and birds. This includes sub-lethal effects that appear to directly relate to vitamin K antagonism (the mode of action of anticoagulant rodenticides) such as bleeding around body orifices, metrorrhagia, blood clots and internal hematomas. Further, in reproductive toxicity studies, possible effects on the ovarian function of rats were observed with long-term exposure to difenacoum, and a decreased numbers of surviving 14-day old chicks was observed with long-term exposure of birds to difenacoum or bromadiolone in drinking water.
 - 42.6. The limited reptile toxicity studies support the position that reptiles have a high tolerance to anticoagulant rodenticides poisoning. Coumatetralyl, diphacinone and brodifacoum were determined to have low toxicity to fence lizards with acute exposure. Turtles and boas have exhibited a relative insensitivity to diphacinone and brodifacoum, while lizards appeared to be somewhat more sensitive. Further, in relation to the effects of diphacinone on the brown tree snake, a lowest lethal dose of 10 mg/kg was determined.
43. I further note that regulatory acceptable levels (RALs) for anticoagulant rodenticide exposure of terrestrial vertebrates were not derived for quantitative risk assessment purposes, as anticoagulant rodenticides are a type of vertebrate poison and it is widely accepted that exposure of terrestrial vertebrates to these vertebrate poisons has the potential to result in death. Noting this position is also supported by the assessment of toxicity studies for terrestrial vertebrates detailed in paragraph 42 of these reasons, I have considered and agree with this approach and the qualitative, weight-of-evidence risk assessment methodology used.

Are the risks to terrestrial vertebrates currently being managed?

44. In determining whether the risks to terrestrial vertebrates posed by the use of anticoagulant chemical products are currently being managed, adverse experience reports and monitoring data from Australia and overseas were reviewed in a qualitative, weight-of-evidence risk assessment that is summarised in sections '3.1.2 Fate and behaviour in biota', '3.2.1 Effects on terrestrial vertebrates' and '3.3.2 Risks to terrestrial vertebrates' of the *Anticoagulant Rodenticides Review Technical Report*. I have considered and agree with the approach and methodology and the conclusions of this assessment unless I have indicated otherwise in these reasons. Based on my review and consideration of the risk assessment summarised in sections '3.1.2 Fate and behaviour in biota', '3.2.1 Effects on terrestrial vertebrates' and '3.3.2 Risks to terrestrial vertebrates' of the *Anticoagulant Rodenticides Review Technical Report*:
 - 44.1. I note that only 4 incidents involving mortality in Australian wildlife that have been attributed to use of anticoagulant rodenticide chemical products in a specific time and place have been published in literature from 1983 to 2002. However, I also note there are a significant number of adverse experience reports in

overseas wildlife have been attributed to similar or equivalent uses of anticoagulant rodenticide chemical products to those approved in Australia. The available worldwide incident reports that have been attributed to either approved use or unspecified use of anticoagulant rodenticide are summarised in *Appendix A (Tables 90, 100, 106, 112, 122, 131 and 147)* of the *Anticoagulant Rodenticides Review Technical Report*.

- 44.2. Regarding Australian wildlife monitoring data, I note that there has been a number of detections of anticoagulant rodenticides residues in potential rodent eating species including snakes, lizards, quolls, Tasmanian devils and many raptors. I also note that multiple incidents considered to be anticoagulant rodenticide poisoning of wildlife have been reported in literature, including in mammalian species (e.g. antechinus, bandicoots, gliders, native rats, possums), birds (e.g. raptors, corellas, frogmouths, galahs, gulls, ibis, kookaburra, parrots, songbirds, starling), reptiles (e.g. lizards, snakes) and amphibians. Further, I note that of the 696 incidents recorded by the Australian national electronic Wildlife Health Information System (eWHIS) between 2006 to 2021, 77 (11%) involved suspected anticoagulant rodenticide poisoning.
- 44.3. I note that population level effects on terrestrial vertebrates from the use of anticoagulant rodenticide chemical products in Australia has not been established. That being said, I note that the true number of poisonings and the corresponding impacts on terrestrial vertebrate populations are not known, as the reported anticoagulant rodenticide poisonings and occurrences in wildlife detailed above are only those that have been detected. I also note that anticoagulant rodenticide residue burdens in wildlife can accumulate over time with repeat exposures, which in some cases may result in the accumulation of sufficient levels of anticoagulant rodenticide residues to cause death or morbidity resulting in death by other means. Further, I consider that appreciable mortality of wildlife from use of anticoagulant rodenticide chemical products is an unintended effect that is harmful to these animal species, even without population level effects.
- 44.4. Finally, I note that the source of anticoagulant rodenticides detections in Australian monitoring data is difficult to trace due to the delay in onset of symptoms and the large hunting areas of the non-target terrestrial vertebrates involved. However, on the present evidence, I cannot identify any plausible sources of anticoagulant rodenticide exposure apart from currently registered products with labels containing approved instructions by the APVMA. I consider that use of anticoagulant rodenticide chemical products in accordance with the instructions currently approved by the APVMA is a feasible potential source of these detections. Further, I note that while intentional misuse of anticoagulant rodenticides chemical product may be a contributing factor to these detections in wildlife, it is also feasible that accidental misuse of chemical products due to misinterpretation of the current instructions for use may be a contributing factor to these detections, indicating that these current instructions for use are insufficient. It is my preliminary view is that use of anticoagulant rodenticide chemical products in accordance with the instructions currently approved by the APVMA is likely to contribute to these detections.
45. Based on my review and consideration the information detailed above in paragraphs 42 and 44 of these reasons, I am **not satisfied** that the use of anticoagulant chemical products in accordance with current instructions **would not be likely to** have an unintended effect that is harmful to non-target terrestrial vertebrates. In short, this is because exposure to anticoagulant rodenticides may have lethal or sub-lethal harmful effects on non-target mammals and birds, and the frequent detections of anticoagulant rodenticides in the wider environment demonstrate that the current risk mitigation measures in place are insufficient to prevent exposure of non-target wildlife and the associated unintended harmful effects.

Exposure scenarios and potential for risk mitigation

46. Based on my review and consideration of primary and secondary poisoning exposure scenarios for non-target terrestrial vertebrates detailed in section '3.3.2 Risks to terrestrial vertebrates' of the *Anticoagulant Rodenticides Review Technical Report*, and the fact that anticoagulant rodenticides are a type of vertebrate poison, I consider that all potential risks to individual non-target terrestrial vertebrates associated with use of anticoagulant rodenticide chemical products cannot be completely eliminated.
47. For the ready-to-use anticoagulant rodenticide chemical products listed in Attachment A of this notice, I have reviewed and considered the best practice risk mitigation measures that were assessed in the environmental risk assessment, as summarised in sections '3.3.2 Risks to terrestrial vertebrates' of the *Anticoagulant Rodenticides Review Technical Report*, and whether application of these mitigation measures would sufficiently minimise the risk to non-target terrestrial vertebrates so that the use of the products in accordance with any instructions to be approved by the APVMA **would not be likely** to have an unintended effect that is harmful to non-target terrestrial vertebrates.
48. The prevention of unintended effects that are harmful to non-target terrestrial vertebrates from the use of anticoagulant rodenticides chemical products is of worldwide concern and multiple countries have introduced varied risk mitigation strategies to reduce entry of anticoagulant rodenticide residues into the environment. Based on my review and consideration on the assessment of all information and overseas experiences summarised in section '3.3.2 Risks to terrestrial vertebrates' of the *Anticoagulant Rodenticides Review Technical Report*:
 - 48.1. I note that a number of countries have implemented some best practice risk mitigation measures with limited or no measurable success in reducing wide scale secondary exposure of wildlife (specifically, undomesticated non-target terrestrial vertebrates). However, I also note there are already some significant differences in the permissible uses of anticoagulant rodenticides in Australia and other countries that impact secondary poisoning risks. This includes the fact SGARs are not registered for use in crops or other open area scenarios (which by definition pose a significantly higher risk to non-target wildlife). Nevertheless, I consider that comprehensive and integrated risk management strategies are required to minimise the likelihood of entry of anticoagulant rodenticides into the Australian environment.
 - 48.2. I further note that the implementation of best practice risk mitigation measures on chemical products containing only certain anticoagulant rodenticide active constituents has been shown to shift the residues detected in wildlife to different anticoagulant rodenticide active constituents. Therefore, I consider that appropriate risk mitigation measures to reduce the likelihood of non-target terrestrial vertebrate exposure should be applied consistently across chemical products containing all anticoagulant rodenticide active constituents in scope of the reconsideration.
49. The risk mitigation measures that I consider necessary to ensure that the use of anticoagulant rodenticide chemical products in accordance with any instructions to be approved by the APVMA **would not be likely** to have an unintended effect that is harmful to non-target terrestrial vertebrates, and my reasoning, are detailed in the 'Risk mitigation measures for all chemical products – terrestrial vertebrates' (paragraphs 50 – 53), 'Risk mitigation measures for commercial products – terrestrial vertebrates' (paragraphs 54 – 57) and 'Risk mitigation measures for domestic products – terrestrial vertebrates' (paragraphs 59 – 61) sections below.

Risk mitigation measures for all chemical products – terrestrial vertebrates

50. Based on my review and consideration of sections '3.2.1 Effects on terrestrial vertebrates' and '3.4.2 Supported products and uses' of the *Anticoagulant Rodenticides Review Technical Report*, and as discussed above in paragraph 42 of these reasons, I note that all anticoagulant rodenticides in scope of the reconsideration are toxic to terrestrial vertebrates. Therefore, I consider that the hazard warning statement '**Hazardous to wildlife.**' is required as part of the instructions for use for all anticoagulant rodenticide chemical products.

51. In relation to instructions for use on the acceptable locations to place anticoagulant rodenticide chemical products, based on my review and consideration of the risk assessments summarised in sections '3.3.2 Risks to terrestrial vertebrates', '3.4.1 Products and uses not supported' and '3.4.2 Supported products and uses' of the *Anticoagulant Rodenticides Review Technical Report*:

- 51.1. I note it is widely accepted that the use of anticoagulant rodenticide chemical products poses a low risk to the environment when placed indoors, which is supported by residues monitoring data from studies involving indoor application of anticoagulant baits. Further, given the natural behaviour of house mice (being closely associated with humans), I note that restricting the placement of baits to indoor use only is a feasible risk mitigation measure to reduce the primary poisoning risks for non-target wildlife. As such, for all chemical products listed in Attachment A of this notice that are approved for control of mice (all products excluding 89206), I consider that the following restraint '**DO NOT place bait stations outdoors around buildings for control of mice.**' is required to be added to the instructions for use, and that all instructions related to the control of mice in outdoor situations should be removed from the instructions for use.
- 51.2. Similarly, I note the environmental recommendation that for chemical products approved for use around buildings, all outdoor bait stations for the control of rats must be placed within 2 meters of buildings. Given the intent of this recommendation, for all chemical products listed in Attachment A of this notice that are approved for control of rats, except those coumatetralyl chemical products approved for use in agricultural crops (52098, 82217), I consider that the restraint '**DO NOT place bait stations more than 2 meters from buildings.**' is required to be added to the instructions for use, and that all instructions that indicate bait may be placed at a further distance from buildings should be removed from the instructions for use.
- 51.3. I consider that the primary poisoning risks for non-target terrestrial vertebrates associated with application of anticoagulant rodenticide chemical products to burrows outdoors around buildings is unacceptable due to the probability of baits being spilled outside the burrow or ejected from burrows by rodents. I note that several flocoumafen chemical products contain instructions for use to direct people to place baits inside rodent burrows or rat holes around buildings (54191, 80663, 90839, 90840). Additionally, while other chemical products do not have explicit instructions for use on burrow baiting, there are currently no instructions that would prohibit use of certain burrow baiting techniques. As such, for chemical products listed in Attachment A of this notice that are approved for control of rats (all products listed in Attachment A excluding 54839, 62635, 67681, 69017, 69158, 81665, 82233, 82234, 89204, 91393, 91394, 94917), I consider that the restraint '**DO NOT apply this product directly into burrows.**' is required to be added to the instructions for use, and that all instructions related to burrow baiting are to be removed from the instructions for use.

52. In relation to the secondary poisoning risks associated with use of anticoagulant rodenticide chemical products in accordance with instructions and the disposal of carcasses and uneaten bait, based on my review and consideration of the risk assessments summarised in sections '3.3.2 Risks to terrestrial vertebrates' and '3.4.2 Supported products and uses' of the *Anticoagulant Rodenticides Review Technical Report*:

- 52.1. I note that a number of non-target terrestrial vertebrate species are known to feed on rodents including mammals (e.g., quolls, pigs), predatory and scavenging bird species (e.g. raptors, barn owls, Australian kestrels, crows and ravens) and reptiles (e.g., snakes, lizards, bungarras). I also note that terrestrial invertebrates (e.g., slugs, snails, millipedes, cockroaches, weta, ants) are known to feed on anticoagulant rodenticide products, meaning that secondary poisoning of non-target invertebrate-eating wildlife is possible. Furthermore, I note that animals exposed to anticoagulant rodenticide residues through secondary poisoning pathway may in turn also be fed on by other predatory and scavenging species, meaning anticoagulant rodenticide residues may move through multiple trophic layers.

52.2. I therefore consider it critical that risk mitigation measures are utilised to reduce the likelihood of the secondary poisoning of non-target predatory and scavenging terrestrial vertebrate species and invertebrate-eating wildlife through the consumption of poisoned rodents or terrestrial invertebrates such as slugs and snails. As such, for all chemical products listed in Attachment A of this notice, I consider that the instruction: ***‘Search for and dispose of dead rodents and slugs/snails in the infested area at each visit to prevent secondary poisoning. In case slugs/snails are present, move bait station to another location within the rodent infested site, away from slugs/snails.’*** is required to be added to the instructions for use.

53. Finally, in relation to how the products are formulated, based on my review and consideration of the risk assessments summarised in sections ‘3.3.2 Risks to terrestrial vertebrates’ and ‘3.4.1 Products and uses not supported’ of the *Anticoagulant Rodenticides Review Technical Report*, I consider that a bittering agent and dye are critical formulation components to prevent unintended effects that are harmful to non-target terrestrial vertebrates.

53.1. I note that bittering agents are well-known repellents to non-target terrestrial vertebrate species such as cats, dogs, horses and birds, but do not change the efficacy of baits against target rodent species.

53.2. Further, in relation to dyes, I note that the colouring of baits (in particular, yellow and green) has been shown to have a consumption deterrent effect for certain species of birds, which is important for outdoor baiting situations where small non-target species may be able to enter bait stations and/or bait may be spilled or expelled from bait stations by the target species.

53.3. My consideration on whether the formulations of the chemical products listed in Attachment A of this notice contain the requisite bittering agent and dye is discussed in the “*How the product is formulated – constituents – bittering agent and dye*” (paragraphs 121 – 123) section of these reasons below.

Risk mitigation measures for commercial products – terrestrial vertebrates

54. In general, commercial pest-control products are agricultural chemical products that are designed to be used in a commercial enterprise. I note that the chemical products subject to this notice that I consider to be commercial anticoagulant rodenticide chemical products have been classified as such in Table 17 in Attachment D in this notice.

55. In relation to the recommendation in section ‘3.4.2 Supported products and uses’ of the *Anticoagulant Rodenticides Review Technical Report* that all commercial anticoagulant rodenticide chemical products be declared as restricted chemical products, in order to restrict supply and use of these chemical products to trained professionals that are expected to have advanced knowledge in rodent behaviour and risks to local non-target species.

55.1. A ***restricted chemical product*** is defined by section 3 of the Agvet Code as a chemical product declared by regulations made for the purposes of section 93 to be a restricted chemical product. Under section 94 of the Agvet Code, a restricted chemical product can only be supplied to a person who is authorised to use the product under another law of this jurisdiction. This authorisation typically is from the laws of a state and territory and is limited to people with specific training or qualifications in the safe use of these restricted chemical products.

55.2. I note that no anticoagulant rodenticide chemical products have been declared by the Agvet Regulations as restricted chemical products, given that they are not specified in Column 2 of Schedule 4 in accordance with regulation 45 of the Agvet Regulations. I also note that commercial pest-control products containing

anticoagulant rodenticides cannot be restricted chemical products without being so declared by the Agvet Regulations.

55.3. I have considered and agree with the risk assessment conclusions that the supply and use of commercial anticoagulant rodenticide chemical products should be restricted to trained professionals in order to reduce the risks to non-target terrestrial vertebrates associated with the use of the inherently hazardous vertebrate poisons, as summarised in section '3.4.2 Supported products and uses' of the *Anticoagulant Rodenticides Review Technical Report*. In the absence of the legislative authority to register these chemical products as restricted chemical products, I make the following findings with respect to all commercial anticoagulant rodenticide chemical products listed in Attachment A of this notice:

- a. I find that the following condition of registration is required to restrict permissible supply of the chemical product to trained professionals: **'DO NOT supply this product to any person unless the person has a current statement of attainment from a registered training organisation stating the person has completed the training course CPPUPM3006 - Manage pests by applying pesticides, or an equivalent unit of competency.'**
- b. I find that the following instructions for use are required to restrict permissible use of the chemical product to trained professionals: **'DO NOT use this product unless you have a current qualification in the nationally recognised training course for rodent pest management CPPUPM3006 - Manage pests by applying pesticides, or an equivalent unit of competency.'**

56. Further, in relation to instructions for use for commercial anticoagulant rodenticide chemical products, based on my review and consideration of the risk assessments and recommendations summarised in sections '3.3.2 Risks to terrestrial vertebrates' and '3.4.2 Supported products and uses' of the *Anticoagulant Rodenticides Review Technical Report*:

56.1. In relation to the use of bait stations to protect placed bait and reduce the risk of unintended exposure to non-target terrestrial vertebrates:

- a. I note that the use of bait stations or covered bait points reduces the risk of unintended exposure of granivorous birds as visual recognition plays a dominant role in birds locating food items. I also note that the use of bait stations reduces the risk unintended exposure of other non-target terrestrial vertebrates, as only non-target species that are the same size or smaller than the target rodents can access the bait station.
- b. I note the recommendation in the *Anticoagulant Rodenticides Review Technical Report* that tamper-resistant bait stations should be used to reduce the risks to non-target terrestrial vertebrates, or that covered or protected bait points may be used as long as they provide the same level of protection for non-target species and humans as tamper-resistant bait stations. However, from a risk management perspective, I consider that covered or bait points inherently offer less protection to ground-based non-target terrestrial vertebrates compared to tamper-resistant bait stations, and it is not evident how adequate instructions for use may be developed in order to manage the increased risk to wildlife posed by the use of covered or bait points in outdoor settings.
- c. I also note that bait stations should be fixed to the ground or other structures to prevent the bait from being easily spilled from the bait station by movement of the bait station.
- d. Based on my above considerations, I make the finding that the instruction **'DO NOT place bait outdoors unless it is in a tamper-resistant bait station which is secured in place.'** is required to be added to the instructions for use for all commercial anticoagulant rodenticide chemical

products listed in Attachment A of this notice, and any instructions that may be contrary to this requirement are to be removed from the instructions for use.

56.2. I note that continued rodent activity after 35 days of treatment may indicate that the baiting strategy in use is ineffective due to resistance build up or the movement of rodents, and that continued use of this treatment regime without an evaluation may needlessly increase the risk of unintended exposure of non-target wildlife. Therefore, for all commercial anticoagulant rodenticide chemical products listed in Attachment A of this notice, with respect to the treatment of active rodent infestations, I consider that the following instructions for use are required: **‘DO NOT use the product beyond 35 days without an evaluation of the state of the infestation and of the efficacy of the treatment.’**

56.3. I note that the pulse baiting technique is appropriate for the most potent, single-feed second-generation anticoagulant rodenticides, but not first-generation anticoagulant rodenticides where multiple feeds are required for the target rodent to receive a lethal dose. Therefore, for the commercial anticoagulant rodenticide chemical products listed in Attachment A of this notice that contain the first-generation anticoagulant rodenticides coumatetralyl or diphacinone (51508, 52098, 82217 and 89433), I consider that the following instructions for use are required **‘DO NOT use the product in pulsed baiting treatments.’**

57. I note that a number of best practice risk mitigation measures related to minimising primary and secondary poisoning of non-target terrestrial vertebrates are detailed in the environmental risk assessment but were not included as recommended instructions in the environment section of the *Anticoagulant Rodenticides Review Technical Report*. This includes to survey sites before use of anticoagulant rodenticide chemical products, to have indicative instructions for regular inspections of bait sites and to remove uneaten baits at the end of the baiting period. While I consider that any professional that has been trained in the safe use of anticoagulant rodenticide chemical products would include these measures as part of their baiting strategy, I also consider that inclusion of corresponding instructions for use as a part of chemical product registrations is important to emphasise the necessity of these safety measures and minimise the likelihood of environmental contamination. As such, based on my review and consideration of the environmental risk assessment summarised in section ‘3.3.2 Risks to terrestrial vertebrates’ of the *Anticoagulant Rodenticides Review Technical Report*, and the referenced report *Risk Mitigation Measures for Anticoagulant Rodenticides as Biocidal Products*⁷:

57.1. I note that a survey of the infested site that considers the pest species, their area of activity, the extent of the infestation and any indications of the presence of non-target animals is critical to ensuring that an appropriate baiting strategy is used that minimises the potential environmental contamination. As such, for all commercial anticoagulant rodenticide chemical products listed in Attachment A of this notice, I consider that the following instructions for use are required: **‘Survey site prior to treatment, including assessment of the extent of infestation and identification of any indications of the presence of non-target animals.’**

57.2. I note that uneaten bait remaining after treatment of a rodent infestations poses an unnecessary continued risk for non-target terrestrial vertebrates, and that removal of the uneaten bait at the end of the treatment minimises the duration of potential exposure of non-target animals. As such, for all commercial anticoagulant rodenticide chemical products listed in Attachment A of this notice, I consider that the following instructions for use are required: **‘Remove all uneaten bait at the end of treatment.’**

57.3. I note there are also environmental safety considerations in relation to visiting and inspecting bait sites during treatment, including ensuring that the baits remain protected from non-target animals and checking for any signs that baits have been accessed by non-target animals. Therefore, I consider that the

⁷ Berny Ph, Esther A, Jacob J, Prescott C, 2014. Risk mitigation measures for anticoagulant rodenticides as biocidal products. European Commission contract no 07-0307/2012/638259/ETU/D3.

instruction ***'Inspect bait sites at intervals no more than 7 days apart.'*** is required to be added to the instructions for use for all commercial anticoagulant rodenticide chemical products listed in Attachment A of this notice, excluding chemical products whose current instructions for use require bait site inspections at shorter time intervals (e.g. daily or every 3 days). Further, I consider that all instructions that direct people to inspect bait sites at generic time intervals (e.g. regularly) or at time intervals greater than 7 days should be removed from the instructions for use of commercial chemical products.

57.4. Further, with respect to the treatment of active rodent infestations, given that I consider that instructions to inspect bait sites at intervals of no more than 7 days apart and remove all uneaten bait at the end of treatment are required, I also consider that the instruction ***'Record the number and locations of bait stations for the purpose of inspection, replacement and later removal.'*** is required to be added to the instructions for use for all commercial anticoagulant rodenticide chemical products listed in Attachment A of this notice.

58. Finally, regarding the instructions for use for commercial anticoagulant rodenticide chemical products that relate to the disposal of dead rodents and slugs/snails discussed in paragraph 52.2 of these reasons above, the disposal of uneaten bait discussed in paragraph 57.2 of these reasons above, and the disposal of product when no longer required and containers of the product:

58.1. I consider that retrieved uneaten bait needs to be carefully disposed of to reduce the likelihood of primary poisoning of non-target terrestrial vertebrates, and any collected dead rodents or slugs/snails need to be carefully disposed of to reduce the likelihood of secondary poisoning of non-target terrestrial vertebrates. As such, based on the recommendations in section '3.4.2 Supported products and uses' of the *Anticoagulant Rodenticides Review Technical Report*, I consider that the following instructions for use are required for all commercial anticoagulant rodenticide chemical products listed in Attachment A of this notice: ***'Dispose of slugs/snails in a way non-target animals are not exposed. Dispose of dead rodents and uneaten bait in compliance with local, state or territory government regulations.'***

58.2. For all commercial anticoagulant rodenticide chemical products listed in Attachment A of this notice, I also consider that the instructions for use related to disposal of product when no longer required and product containers should be varied to ***'Triple rinse containers before disposal. Break, crush or puncture and deliver empty packaging to an approved waste management facility. If an approved waste management facility is not available, dispose of empty packaging in compliance with relevant local, state or territory government regulations. Dispose of unused product in compliance with relevant local, state or territory government regulations. DO NOT burn empty containers or product.'*** noting that current instructions may be misleading with respect to environmental safety (as further detailed below in paragraph 146 of these reasons).

Risk mitigation measures for domestic products – terrestrial vertebrates

59. In general, domestic pest-control products are agricultural chemical products that are designed to be supplied to and used by the general public for the control of common pests in private dwellings. I note that the chemical products subject to this notice that I consider to be domestic anticoagulant rodenticide chemical products have been classified as such in Table 17 in Attachment D in this notice.

60. Based on my review and consideration of the risk assessments summarised in sections 3.3.2 *Risks to terrestrial vertebrates*, '3.4.1 Products and uses not supported' and '3.4.2 Supported products and uses' of the *Anticoagulant Rodenticides Review Technical Report*:

- 60.1. I note that there is a high risk of unintentional exposure of non-target terrestrial vertebrates associated with the availability of large pack sizes of anticoagulant rodenticide chemical products. This is in part due to the fact that large pack sizes facilitate the over-use of these chemical products due to the placement of excessive number of bait points proportionate to the size of the infestation. I also note that large pack sizes of domestic anticoagulant rodenticide chemical products are not required for a typical rodent infestation in domestic locations, and that the general public are not expected to be trained in the best practice application and safe use of these anticoagulant rodenticide chemical products.
- 60.2. I consider that limiting the pack size of products that are available to the general public is a feasible method of reducing this risk to non-target terrestrial vertebrates. As such, I make the finding that the net contents of all anticoagulant rodenticide domestic anticoagulant rodenticide chemical products listed in Attachment A of this notice should be limited to the maximum net contents listed in Table 6, based on the active constituent and bait type of the chemical product. I note that maximum net contents listed in Table 6 below have been adapted in line with the recommendations of the European Commission, which are set out in the *Risk Mitigation Measures for Anticoagulant Rodenticides as Biocidal Products*⁸ final report.

Table 6: Maximum net contents for domestic pest-control products

Active Constituent	Bait type	Maximum net contents (g)
FGARs: coumatetralyl and diphacinone	Grain, pellet or paste	750
	Wax blocks	1500
SGARs: brodifacoum, bromadiolone, difenacoum, difethialone and flocoumafen	Grain, pellet or paste	150
	Wax blocks	300

61. In relation to instructions for use for domestic anticoagulant rodenticide chemical products, based on my review and consideration of the risk assessments and recommendations summarised in section 3.3.2 *Risks to terrestrial vertebrates* and '3.4.2 Supported products and uses' of the *Anticoagulant Rodenticides Review Technical Report*:
- 61.1. I note that mandated use of tamper resistant bait stations by domestic users is recommended to reduce the risk of unintended exposure of non-target terrestrial vertebrates. I consider this appropriate given that tamper resistant bait stations prevent any non-target species larger than the target rodent from accessing the bait and that domestic users are not expected to be trained on the safe use of anticoagulant rodenticide chemical products. I also note that securing these tamper resistant bait stations prevents baits from being spilled. Noting the intent of these recommendations, I consider that the following restraint and instructions are required to be added to the instructions for use for all domestic anticoagulant rodenticide chemical products listed in Attachment A of this notice: ***'DO NOT place baits unless in tamper-resistant bait stations.'*** and ***'Use in tamper resistant bait stations only. If bait can be dislodged from bait station, fix tamper-resistant bait stations to the ground or other structures.'***
- 61.2. I note that the continued rodent activity after 35 days of treatment may indicate the treatment is ineffective due to resistance build up or the movement of rodents, and continued application of baits by untrained domestic users may needlessly increase the risk of unintended exposure of non-target wildlife. Therefore, I consider that the following instructions for use are required for all domestic anticoagulant rodenticide chemical products listed in Attachment A of this notice: ***'DO NOT use the product for longer than 35***

⁸ Berny Ph, Esther A, Jacob J, Prescott C, 2014. *Risk mitigation measures for anticoagulant rodenticides as biocidal products*. European Commission contract no 07-0307/2012/638259/ETU/D3.

days. If rodent activity is still observed after 35 days, seek advice from the product supplier or call a pest control service.'

61.3. I note that advanced knowledge is required to effectively use the pulsed baiting technique, and domestic users are not expected to be trained on the application of anticoagulant rodenticide chemical products. Therefore, I consider that the following instructions for use are required for all domestic anticoagulant rodenticide chemical products listed in Attachment A of this notice: **'DO NOT use the product in pulsed baiting treatments.'**

62. Finally, regarding the instructions for use for commercial anticoagulant rodenticide chemical products that relate to the disposal of dead rodents and slugs/snails discussed in paragraph 52.2 of these reasons above, the disposal of any uneaten bait that may be collected at the end of treatment, and the disposal of product when no longer required and containers of the product:

62.1. I consider that any retrieved uneaten bait needs to be carefully disposed of to reduce the likelihood of primary poisoning of non-target terrestrial vertebrates, and any collected dead rodents or slugs/snails need to be carefully disposed of to reduce the likelihood of secondary poisoning of non-target terrestrial vertebrates. I note that there are recommendations in the '3.4.2 Supported products and uses' of the *Anticoagulant Rodenticides Review Technical Report*, to dispose of slugs/snails in a way that non-target animals are not exposed and dead rodents/uneaten bait in compliance with local, state or territory government regulations. However, given that the general public are not expected to be trained in ways of preventing non-target access not in local, state or territory government regulations, the limited quantity of baits proposed to be available in packs of domestic anticoagulant rodenticide chemical products as set out in Table 6 above, and the associated relatively small rodent infestations that are anticipated to be controlled using these domestic products, I consider that the following instructions for use are required for all domestic anticoagulant rodenticide chemical products listed in Attachment A of this notice: **'Dispose of slugs/snails, dead rodents and uneaten bait by wrapping in paper, placing in plastic bag and putting in garbage.'**

62.2. Similarly, I also consider that the instructions for use related to disposal of product when no longer required and product containers should be varied to **'Dispose of empty containers and unused product by wrapping in paper placing in plastic bag and putting in garbage.'** for all domestic anticoagulant rodenticide chemical products listed in Attachment A of this notice.

Risks to other non-target species

63. In considering whether the use of anticoagulant rodenticide chemical products in accordance with instructions would be likely to have an unintended effect that is harmful to aquatic species, biological methods of sewage treatment, bees and other terrestrial arthropods, soil organisms and terrestrial plants, I have considered the environmental risk assessments summarised in section '3. Environment' of the *Anticoagulant Rodenticides Review Technical Report* to the extent that it relates to these non-target species and the following relevant matters that the APVMA must have regard to for the purposes of being satisfied as to whether a chemical product meets the safety criteria:

- 63.1. the toxicity of the product and its residues, including metabolites and degradation products, in relation to relevant organisms and ecosystems, including human beings (s 5A(3)(a)(i)); and
- 63.2. the relevant particulars 'any instructions for use', that are, or would be, entered in the Register for the product (s 5A(3)(a)(vi)).

Aquatic species

64. Based on my review and consideration of toxicity information and recommendations summarised in sections '3.2.2 Effects on other non-target species' and '3.4.2 Supported products and uses' of the *Anticoagulant Rodenticides Review Technical Report*:
- 64.1. I note that in the available effects studies for aquatic species, the active constituents brodifacoum, difenacoum, difethialone, flocoumafen were shown to be very toxic to aquatic life (EC/LC₅₀ <1 mg/L). Therefore, I consider that the aquatic hazard warning statement '**Very toxic to aquatic life.**' is required as part of the instructions for use for brodifacoum, difenacoum, difethialone and flocoumafen chemical products.
- 64.2. I note that in the available effects studies for aquatic species, and the active constituents diphacinone and bromadiolone were shown to be toxic to aquatic life (EC/LC₅₀ 1-10 mg/L). Therefore, I consider that the aquatic hazard warning statement '**Toxic to aquatic life.**' is required for bromadiolone and diphacinone chemical products.
- 64.3. I note that coumatetralyl was found to have a low to moderate toxicity to aquatic life in the available effects studies. As such, I consider no aquatic hazard warning statement is required for coumatetralyl chemical products.
65. All chemical products in scope of the reconsideration are approved for use in and around buildings, and a number of ready-to-use chemical products containing coumatetralyl are approved for use in agricultural crops (52098, 82217). In relation to the risks posed to aquatic species from the use of anticoagulant rodenticide chemical products in these situations (in and around buildings and in agricultural crops), and based on my review and consideration of sections '3.3.3 Risks to other non-target species' and '3.4.2 Supported products and uses' of the *Anticoagulant Rodenticides Review Technical Report*:
- 65.1. I have only considered the risks posed to aquatic species from use of anticoagulant rodenticides chemical products in a bait station (requirement detailed in paragraphs 56.1 and 61.1 of these reasons). I note that in most instances when bait is contained in a bait station and placed in and around buildings or in agricultural crops, exposure of natural aquatic areas is considered negligible as only a small amount of contamination is expected around the bait station.
- 65.2. I note that the placement of baits in certain areas (e.g. intertidal areas or areas liable to flooding) may result in accidental entry of anticoagulant rodenticide chemical products into natural aquatic areas or drainage systems. As such, I consider that the following precautionary instructions are required to prevent use of anticoagulant rodenticide chemical products in situations where unacceptable aquatic life exposure may occur: '**DO NOT contaminate wetlands or watercourses with this product or used containers. Place the bait stations in areas not liable to flooding. When placing bait stations close to water drainage systems, ensure that bait contact with water is avoided.**'
- 65.3. I am satisfied that the current use of chemical products in and around buildings, in accordance with these additional instructions for use, and when bait is contained in a bait station, is not expected to have an effect that is harmful to aquatic species. Further, I am satisfied that the current use of certain coumatetralyl chemical products (52098, 82217) in agricultural crops in accordance with these additional instructions for use, and when bait is contained in a bait station, is not expected to have an effect that is harmful to aquatic species.
66. A number of chemical products containing difethialone and flocoumafen are also currently approved for use in sewer systems (66889, 69086, 80386, 80663, 90839), and exposure of aquatic species to these anticoagulant rodenticides is possible as there can be significant releases to surface waters via sewerage treatment plants. The

risks posed to aquatic species from use of chemical products containing difethialone and flocoumafen in sewer systems, in accordance with approved instructions, was determined using quantitative risk assessment methodologies in the environmental risk assessment. I have considered and agree with the approach and methodology and the conclusions in these assessments unless I have indicated otherwise in these reasons. Based on my review and consideration of the risk assessments summarised in sections '3.2.2 Effects on other non-target species' and '3.3.3 Risks to other non-target species' of the *Anticoagulant Rodenticides Review Technical Report*:

- 66.1. I note that in the available effects studies for aquatic species, the anticoagulant rodenticides difethialone and flocoumafen were shown to be very toxic to aquatic life (EC/LC₅₀ <1 mg/L). I also note that the difethialone and flocoumafen RALs for of aquatic species listed in Table 7 were calculated based on endpoints from the most sensitive available effects studies and application of a standard 10-fold assessment factor. I consider that exposure of aquatic species to difethialone and flocoumafen below the respective RALs listed in Table 7 is not expected to have an effect that is harmful to these non-target organisms.
- 66.2. I note that the potential risks to aquatic species from use of difethialone and flocoumafen chemical products in sewer systems have been assessed through environmental exposure modelling using the contemporary methodology outlined in the *ECHA (European Chemicals Agency) Revised Emission Scenario Document for Product Type 14 – Rodenticides*. This methodology involved first calculating a predicted surface water concentrations from use of chemical products in sewers based on the application rate of the relevant chemical product, a range of default input parameters and an intrinsic chemical property known as the organic-carbon normalised partition coefficient (*Tables 48, 51 and 52 of the Anticoagulant Rodenticides Review Technical Report*) and second, calculating a risk quotient using this predicted surface water concentration and the relevant RAL (*Table 53 of the Anticoagulant Rodenticides Review Technical Report*). With this model methodology, an acceptable risk quotient of less than or equal to one represents an acceptable level of exposure to aquatic species (i.e. that exposure to aquatic species will be less than the aquatic species RAL).
- 66.3. I note that the aquatic species risk quotients calculated for use of difethialone and flocoumafen chemical products in sewers are in the acceptable range (Table 7). As such, based on the outcomes of this environmental exposure modelling, I am satisfied that use of difethialone and flocoumafen chemical products in sewers in accordance with current instruction for use is not expected to have an unintended effect that is harmful to aquatic species.

Table 7: Aquatic species – difethialone and flocoumafen – regulatory acceptable levels (RALs) and risk quotients (RQs) calculated for use in sewers

Active	Study endpoint	RAL (mg/L)	RQ (acceptable RQ ≤1)
Difethialone	EC ₅₀ 0.0044 mg/L – acute exposure of invertebrates (<i>Daphnia magna</i>)	0.00044	<0.01
Flocoumafen	LC ₅₀ 0.070 mg/L – acute exposure of fish (<i>Oncorhynchus mykiss</i>)	0.0070	0.74

Biological methods of sewage treatment

67. A number of chemical products containing difethialone and flocoumafen are currently approved for use in sewers (66889, 69086, 80386, 80663, 90839), and therefore exposure of biological methods of sewage treatment to these anticoagulant rodenticides is possible. The risks posed to these biological methods of sewage treatment from use of chemical products containing difethialone and flocoumafen in sewers, in accordance with approved

instructions, was determined using quantitative risk assessment methodologies in the environmental risk assessment. I have considered and agree with the approach and methodology and the conclusions in these assessments unless I have indicated otherwise in these reasons. Based on my review and consideration of the risk assessments summarised in sections '3.2.2 Effects on other non-target species' and '3.3.3 Risks to other non-target species' of the *Anticoagulant Rodenticides Review Technical Report*:

- 67.1. I note that in the available effects studies for biological methods of sewage treatment, difethialone and flocoumafen did not inhibit bacterial activity at the highest concentrations tested, which was limited by the solubility of these active constituents. I also note that the difethialone and flocoumafen RALs for soil biological methods of sewage treatment listed in Table 8 were calculated based on endpoints from the available effects studies and application of a standard 10-fold assessment factor. I consider that exposure of biological methods of sewage treatment to difethialone and flocoumafen below the respective RALs listed in Table 8 is not expected to have an effect that is harmful to these non-target organisms.
- 67.2. I note that the potential risks to biological methods of sewage treatment from use of difethialone and flocoumafen chemical products in sewer systems have been assessed through environmental exposure modelling using the contemporary methodology outlined in the *ECHA Revised Emission Scenario Document for Product Type 14 – Rodenticides*. This methodology involved first calculating a predicted environmental concentration in sewerage treatments plants based on the predicted surface water concentration (discussed in paragraph 66.2 of these reasons) and a dilution factor of 10, and second, calculating a risk quotient using this predicted environmental concentration in sewerage treatments plants and the relevant RAL (*Table 59 of the Anticoagulant Rodenticides Review Technical Report*). With this model methodology, an acceptable risk quotient of less than or equal to one represents an acceptable level of exposure to biological methods of sewage treatment (i.e. that exposure to biological methods of sewage treatment will be less than the corresponding RAL).
- 67.3. I note that the biological methods of sewage treatment risk quotients calculated for use of difethialone and flocoumafen chemical products in sewers are in the acceptable range (Table 8). As such, based on the outcomes of this environmental exposure modelling, I am satisfied that use of difethialone and flocoumafen chemical products in sewers in accordance with current instructions is not expected to have an unintended effect that is harmful to biological methods of sewage treatment.

Table 8: Biological methods of sewage treatment – difethialone and flocoumafen – regulatory acceptable levels (RALs) and risk quotients (RQs) calculated for use in sewers

Active	Study endpoint	RAL (mg/L)	RQ (acceptable RQ ≤1)
Difethialone	EC ₅₀ >100 mg/L – activated sludge	10	<0.01
Flocoumafen	EC ₅₀ >4.0 mg/L – activated sludge	0.40	0.13

68. In relation to chemical products containing the anticoagulant rodenticides brodifacoum, bromadiolone, coumatetralyl, difenacoum and diphacinone, I note that these chemical products are not currently approved for use in sewers and therefore that exposure to biological methods of sewage treatment from use of these products in accordance with instructions is not expected. Therefore, I am satisfied that the use of these chemical products in accordance with instructions is unlikely to have an unintended effect that is harmful to biological methods of sewage treatment.

Bees and other terrestrial arthropods

69. I note that the limited information available on the effects of anticoagulant rodenticides on bees indicates that the active constituent coumatetralyl has a high toxicity to bees with contact exposure. However, I note there are no

direct or indirect exposure pathways for bees expected from current uses of anticoagulant rodenticide chemical products. Therefore, based on my review and consideration of the risk assessment summarised in section '3.3.3 Risks to other non-target species' of *Anticoagulant Rodenticides Review Technical Report*, I find that the use of anticoagulant rodenticides products in accordance with instructions is unlikely to have an unintended effect that is harmful to bees.

70. I note that anticoagulant rodenticides are not expected to have an adverse effect on other terrestrial arthropods based on their mode of action, which is supported by observations in both laboratory studies and baiting programs where terrestrial arthropods (e.g. cockroaches, woodlice, ants, etc.) have fed on bait pellets containing brodifacoum with no apparent effects. Therefore, based on my review and consideration of the risk assessment summarised in sections '3.2.2 Effects on other non-target species' and '3.3.3 Risks to other non-target species' of the *Anticoagulant Rodenticides Review Technical Report*, I am satisfied that the use of anticoagulant rodenticide products in accordance with instructions is unlikely to have an unintended effect that is harmful to terrestrial arthropods.

Soil organisms

71. The risks posed to soil organisms by use of chemical products containing brodifacoum, bromadiolone, coumatetralyl, difenacoum, difethialone, and flocoumafen was determined using quantitative risk assessment methodologies. I have considered and agree with the approach and methodology and the conclusions in these assessments unless I have indicated otherwise in these reasons. Based on my review and consideration of the risk assessment summarised in sections '3.2.2 Effects on other non-target species' and '3.3.3 Risks to other non-target species' of the *Anticoagulant Rodenticides Review Technical Report*:

71.1. I note that brodifacoum, bromadiolone, coumatetralyl, difenacoum and difethialone have a low toxicity to soil macro-organisms such as earthworms with acute exposure, and flocoumafen had a dose-dependent inhibition effect on the reproduction of soil macro-organisms with long-term exposure. I also note that the RALs for soil organisms listed in Table 9 below were derived from the endpoints of the available effects studies, and application of a standard 10-fold assessment factor to endpoints from acute exposure studies only. I consider that exposure of soil organisms to brodifacoum, bromadiolone, coumatetralyl, difenacoum, difethialone and flocoumafen below the respective RALs listed in Table 9 is not expected to have an unintended effect that is harmful to soil organisms.

71.2. I note that the potential risks to soil organisms from use of brodifacoum, bromadiolone, coumatetralyl, difenacoum, difethialone and flocoumafen chemical products have been assessed through environmental exposure modelling using the contemporary methodology outlined in the *ECHA Revised Emission Scenario Document for Product Type 14 – Rodenticides*. This methodology involved first calculating the predicted environmental concentration in soil for each use pattern that may result in soil exposure based on the application rate, the bait type, and a range of default input parameters (*Tables 46, 47, 55 and 56 of the Anticoagulant Rodenticides Review Technical Report*). The worst-case soil exposure scenario, which is the use pattern that resulted in the highest predicted environmental concentration in soil, was then determined for these chemical products. Finally, a risk quotient was calculated using the predicted environmental concentration in soil from the worst-case exposure scenario and the relevant soil organism RAL (*Table 57 of the Anticoagulant Rodenticides Review Technical Report*). With this model methodology, an acceptable risk quotient of less than or equal to one represents an acceptable level of exposure to soil organisms (i.e. that exposure to soil organisms will be less than the corresponding soil organisms RAL).

71.3. I note that the soil organisms risk quotients calculated for the worst-case scenario use of brodifacoum, bromadiolone, coumatetralyl, difenacoum, difethialone and flocoumafen chemical products are in the acceptable range (Table 9). As such, based on the outcomes of this environmental exposure modelling, I

am satisfied that use of brodifacoum, bromadiolone, coumatetralyl, difenacoum, difethialone and flocoumafen chemical products in accordance with current instructions is not expected to have an unintended effect that is harmful to soil organisms.

Table 9: Soil organisms – brodifacoum, bromadiolone, coumatetralyl, difenacoum, difethialone and flocoumafen – regulatory acceptable levels (RALs) and risk quotients (RQs)

Active	Study endpoint	RAL (mg/kg dry soil)	Worst-case exposure scenario assessed	RQ (acceptable RQ ≤1)
Coumatetralyl	LC ₅₀ 225 mg/kg dry soil – acute exposure of macro-organisms (<i>Eisenia fetida</i>)	23	PEC* 0.90 mg/kg dry soil – mouse control using loose grain/fruit bait in stations around buildings	0.04
Brodifacoum	LC _{50corr} >497 mg/kg dry soil – acute exposure of macro-organisms (<i>Eisenia fetida</i>)	50	PEC* 0.38 mg/kg dry soil – rat control using loose grain/pellet bait in stations around buildings	<0.01
Bromadiolone	LC _{50corr} >665 mg/kg dry soil – acute exposure of macro-organisms (<i>Eisenia fetida</i>)	67	PEC* 0.98 mg/kg dry soil – rat control using loose grain/pellet bait in stations around buildings	0.01
Difenacoum	LC _{50corr} >497 mg/kg dry soil – acute exposure of macro-organisms (<i>Eisenia fetida</i>)	50	PEC* 0.38 mg/kg dry soil – rat control using loose grain/pellet bait in stations around buildings	<0.01
Difethialone	LC _{50corr} >500 mg/kg dry soil – acute exposure of macro-organisms (<i>Eisenia fetida</i>)	50	PEC* 0.15 mg/kg dry soil – mouse control using loose grain/pellet bait in stations around buildings	<0.01
Flocoumafen	EC _{10corr} 2.8 mg/kg dry soil – chronic exposure of macro-organisms (<i>Eisenia fetida</i>)	2.8	PEC* 0.088 mg/kg dry soil – rat control using loose grain/pellet bait in stations around buildings	0.03

*PEC: predicted environmental concentration in soil

72. I note that a quantitative risk assessment was not conducted to determine the risks posed to soil organisms from use of chemical products containing diphacinone, as there was no information available on the effects on soil organisms. However, based on my review and consideration of the risk assessment summarised in section ‘3.3.3 Risks to other non-target species’ of the *Anticoagulant Rodenticides Review Technical Report*, I note that the exposure of soil and soil organisms resulting from the use of diphacinone chemical products in and around buildings may be considered insignificant, as only spot contamination is likely to occur. Therefore, I am satisfied that the use of diphacinone chemical products in accordance with instructions is not expected to have an unintended effect that is harmful to soil organisms.

Terrestrial plants

73. Based on my review and consideration of the risk assessment summarised in section ‘3.3.3 Risks to other non-target species’ of *Anticoagulant Rodenticides Review Technical Report*, I note that there is no toxicity information available for the effects of anticoagulant rodenticides on terrestrial plants but that any risks posed from use of anticoagulant chemical products are considered acceptable due to the mode of action, method of application, low bioavailability in soil, and a lack of a similar blood-clotting mechanism in plants. Therefore, I am satisfied that the use of anticoagulant rodenticide chemical products is not expected to have an unintended effect that is harmful to terrestrial plants.

Overall considerations on the likelihood of unintended harmful environmental effects

74. I consider that there are no other relevant matters with respect to whether the use of anticoagulant rodenticide chemical products in accordance with instructions would have an unintended effect that is harmful to animals, plants or things or to the environment.
75. I am not satisfied that use of the ready-to-use anticoagulant rodenticides chemical products listed in Attachment A of this notice in accordance with current instructions would not be likely to have an unintended effect that is harmful to animals, plants or things or to the environment. However, I am satisfied that use of these products would not be likely to have an unintended effect that is harmful to animals, plants or things or to the environment after variation of the instructions for use and/or net contents detailed above in paragraphs 50 – 52, 55 – 62, 64 and 65 of these reasons, in addition to variations with respect to chemistry and manufacture matters related to the safety criteria that are detailed below in paragraphs 117, 123, 125 and 126.2 and of these reasons.

Undue hazard to the safety of humans and harmful effects on human beings – s 5A(1)(a)–(b)

76. To be satisfied that the anticoagulant rodenticide chemical products in Attachment A of this notice meet the safety criteria, sections 5A(1)(a) and 5A(1)(b) of the Agvet Code requires that the use of chemical products, in accordance with any instructions approved, or to be approved, by the APVMA would not be an undue hazard to the safety of people exposed to it during its handling or people using anything containing its residues and would not be likely to have an effect that is harmful to human beings. When considering these criteria, I have specifically considered the intrinsic hazards of anticoagulant rodenticides and the risks that may associated with occupational and non-professional use of chemical products, bystander exposure and any potential dietary exposure when products are used in accordance with instructions.
77. In considering whether the use of anticoagulant rodenticide chemical products in accordance with instructions would be an undue hazard to the safety of people exposed to it during its handling or people using anything containing its residues or would be likely to have an effect that is harmful to human beings, I have also considered the risk assessments summarised in the sections ‘4. Toxicology and human health’ and ‘5. Residues and trade’ of the *Anticoagulant Rodenticides Review Technical Report* to the extent that they relate the following relevant matters that the APVMA must have regard to for the purposes of being satisfied as to whether a chemical product meets the safety criteria:
- 77.1. the toxicity of the product and its residues, including metabolites and degradation products, in relation to relevant organisms and ecosystems, including human beings (s 5A(3)(a)(i)); and
- 77.2. the relevant poison classification of the product under the law in force in this jurisdiction (s 5A(3)(a)(ii)); and
- 77.3. how the product is formulated (s 5A(3)(a)(iii)); and
- 77.4. the relevant particulars ‘any instructions for use’, that are, or would be, entered in the Register for the product (s 5A(3)(a)(vi)).

Hazards of anticoagulant rodenticides***Hazards information***

78. In considering the human health risks associated with the current use of anticoagulant rodenticides chemical products, I have reviewed and relied upon the hazard assessments completed by the APVMA’s subject matter

experts which have assessed the following information. I have considered and agree with the approach and methodology and the conclusions in these assessments unless I have indicated otherwise in these reasons.

- 78.1. Studies on the toxicokinetics and metabolism of anticoagulant rodenticides in the mammalian body, as summarised in sections '3.1.2 Fate and behaviour in biota' and '4.2.9 Toxicokinetics' of the *Anticoagulant Rodenticides Review Technical Report*.
- 78.2. The following toxicity studies that examine adverse effects from administration of or exposure to anticoagulant rodenticides, using suitable mammalian laboratory animals as a surrogate for human beings, or *in vitro* studies with tissues or cell cultures, as summarised in section '4.2 Summary of available toxicological studies' of the *Anticoagulant Rodenticides Review Technical Report*.
 - a. Brodifacoum – acute toxicity (oral, dermal, inhalation, skin irritation, eye irritation and skin sensitisation), short-term oral repeat dose toxicity, sub-chronic dietary repeat dose toxicity, developmental toxicity, reproductive toxicity and genotoxicity studies.
 - b. Bromadiolone – acute toxicity (oral, dermal, inhalation, skin irritation, eye irritation and skin sensitisation), sub-chronic repeat dose oral toxicity, developmental toxicity, reproductive toxicity and genotoxicity studies.
 - c. Coumatetralyl – acute toxicity (oral, dermal, inhalation, skin irritation, eye irritation and skin sensitisation), sub-chronic repeat dose dietary toxicity, developmental toxicity and genotoxicity studies.
 - d. Difenacoum – acute toxicity (oral, dermal, inhalation, skin irritation, eye irritation and skin sensitisation), short-term repeat dose toxicity (oral and dermal), developmental toxicity, reproductive toxicity and genotoxicity studies.
 - e. Difethialone – acute toxicity (oral, dermal, inhalation, skin irritation, eye irritation and skin sensitisation), short-term and sub-chronic repeat dose oral toxicity, developmental toxicity and genotoxicity studies.
 - f. Diphacinone – acute toxicity (oral, dermal, inhalation, skin irritation, eye irritation and skin sensitisation), short-term repeat dose toxicity (oral, dermal and inhalation), developmental toxicity and genotoxicity studies.
 - g. Flocoumafen – acute toxicity (oral, dermal, skin irritation, eye irritation and skin sensitisation), short-term and sub-chronic repeat dose oral toxicity, developmental toxicity and genotoxicity studies.
- 78.3. Adverse experiences reports involving anticoagulant rodenticides chemical products in Australia as summarised in section '4.3 Human adverse events involving anticoagulant rodenticide exposure in Australia' of the *Anticoagulant Rodenticides Review Technical Report*.
- 78.4. The current entries in the *Therapeutic Goods (Poisons Standard—June 2025) Instrument 2024* (the Poisons Standard) for brodifacoum, bromadiolone, coumatetralyl, difenacoum, difethialone, diphacinone and flocoumafen. The Poisons Standard is a Legislative Instrument for the purposes of the *Legislation Act 2003*. The Poisons Standard may also be cited as the Standard for the Uniform Scheduling of Medicines and Poisons (the SUSMP).

Poisons Standard

79. The relevant poisons classification of the anticoagulant rodenticides coumatetralyl, diphacinone, brodifacoum, bromadiolone, difenacoum, difethialone or flocoumafen (**relevant active constituents**) in the current Poisons

Standard, at concentrations relevant to the ready-to-use chemical products listed in Attachment A of this notice, are set out below in Table 10 of this notice.

80. I note that the human health assessment concluded that no changes to the poison classifications of the relevant active constituents at concentrations relevant to the ready-to-use chemical products listed in Attachment A of this notice are required, as summarised in section '4.10 Poisons Standard' of the *Anticoagulant Rodenticides Review Technical Report*.

80.1. In relation to the conclusion that diphacinone meets the Scheduling Policy Framework criteria for inclusion in Schedule 7 of the Poisons Standard based on its acute hazards, I note this relates directly to the technical active constituent concentrations and would not impact the poisons classification of anticoagulant rodenticide chemical products formulated to contain 0.005% diphacinone.

81. Further, I note that the information in the APVMA records on the poison classification of the ready-to-use anticoagulant rodenticides chemical products listed in Attachment A are consistent with the current requirements of the Poisons Standard, detailed below in Table 10 of this notice. As such, I consider that the current poisons classification for all ready-to-use chemical products listed in Attachment A of this notice remain appropriate.

Table 10: The Poison Standard entries relevant to ready-to-use agricultural rodenticide chemical products

Active	Poison Classification	Description
<i>First generation anticoagulant rodenticides</i>		
Coumatetralyl	Schedule 5 – Caution	COUMATETRALYL in rodenticides containing 0.05% or less of coumatetralyl.
Diphacinone	Schedule 6 – Poisons	DIPHACINONE
<i>Second generation anticoagulant rodenticides</i>		
Brodifacoum	Schedule 6 – Poisons	BRODIFACOUM in preparations containing 0.25% or less of brodifacoum.
Bromadiolone	Schedule 6 – Poisons	BROMADIOLONE in preparations containing 0.25% or less of bromadiolone.
Difenacoum	Schedule 6 – Poisons	DIFENACOUM in preparations containing 0.25% or less of difenacoum.
Difethialone	Schedule 6 – Poisons	DIFETHIALONE in rodent baits containing 0.0025% or less of difethialone.
Flocoumafen	Schedule 6 – Poisons	FLOCOUMAFEN in preparations containing 0.005% or less of flocoumafen.

First aid instructions

82. First aid instructions specify the initial action to be taken to counteract the effects of exposure to a chemical product, based on the intrinsic hazards of the constituents contained within the formulated chemical products. Based on my review and consideration of the recommendation in section '4.9.1 First Aid Instructions' of the *Anticoagulant Rodenticides Review Technical Report*, I consider that the first aid instructions '**If poisoning occurs, contact a doctor or Poisons Information Centre. Phone Australia 13 11 26, New Zealand 0800 764 766. Vitamin K1 (Phytomenadione) is antidotal.**' are required in the instructions for use of all anticoagulant rodenticides chemical products listed in Attachment A of this notice.

Occupational and non-professional user safety

83. The use of ready-to-use anticoagulant rodenticide chemical products may result in exposure of professional (occupational) and non-professional users during product application and re-handling activities, such as bait clean-up operations and removal and disposal of rodent carcasses.

Occupational users – product application

84. In relation to chemical products containing the relevant active constituents, I note a first-tier risk characterisation was conducted to assess the risks posed to occupational users from application of ready-to-use baits. Based on my review of the risk assessment parameters summarised in sections '4.5 Exposure and Risk Assessment' and '4.7 Basic parameters used in the exposure assessments and risk characterisations' of the *Anticoagulant Rodenticides Review Technical Report*, I also note that this first-tier risk characterisation considered application at the highest currently approved application rate for each anticoagulant rodenticide and, in the absence of any user exposure studies for the use of anticoagulant rodenticide chemical products, used the United States Environmental Protection Agency (US EPA) Occupational Pesticide Handler Exposure Calculator (OPHEC).
85. Based on my review and consideration of the assessment of available toxicity studies for the relevant active constituents summarised in section '4.5 Exposure and Risk Assessment' of the *Anticoagulant Rodenticides Review Technical Report*:
- 85.1. I find that the points of departure listed in Table 11 are appropriate to assess the effects of repeat exposure to occupational users. I note that these points of departure are based on the most appropriate no observed adverse effect level (NOAEL) or lowest observed adverse effect level (LOAEL) in the limited toxicology database available, based on the criteria that the point of departure is protective of the effects seen in all repeat-dose studies in the database and that it is relevant to the potential effects in humans.
- 85.2. I find that a margin of exposure of 1000 is appropriate to assess the risks to occupational users, based on a standard 10-fold uncertainty (UF) for inter-species extrapolation, a standard 10-fold UF for intra-species differences in susceptibility to effects, and an additional 10-fold UF to account for the lack of chronic toxicity studies in the toxicology databases. As such, I consider that a margin of exposure of greater than or equal to 1000 calculated using the US EPA OPHEC model represents a safe level of exposure for occupational users.

Table 11: Points of departure for occupational and non-professional health risk assessments

Active	Point of Departure (mg/kg bw/day)	Study
<i>First generation anticoagulant rodenticides</i>		
Coumatetralyl	0.0068 (occupational and non-professional)	16-week dietary toxicity study in rats. NOAEL of 0.0068 mg/kg bw/day based on prolonged blood clotting (prothrombin) time at the next highest dose.
Diphacinone	0.025 (occupational and non-professional)	Oral developmental toxicity study in rats. NOAEL of 0.025 mg/kg bw/day based on maternal and embryo toxicity based on increased incidence of early resorptions and post implantation loss at the next higher dose.
<i>Second generation anticoagulant rodenticides</i>		
Brodifacoum	0.001 (occupational and non-professional)	13-week dietary toxicity study in rats. NOAEL of 0.001 mg/kg bw/day based on prolonged blood clotting (prothrombin) time at the next higher dose.
Bromadiolone	0.0005 (occupational)	Oral subchronic toxicity study in rabbits. NOAEL of 0.0005 mg/kg bw/day based on increased blood clotting (prothrombin) time at the next higher dose.

Active	Point of Departure (mg/kg bw/day)	Study
	0.002 (non-professional)	Developmental toxicity study in rabbits with a LOAEL of 0.002 mg/kg bw/day, noting that exposure will be much less frequent for non-professional users.
Difenacoum	0.001 (occupational and non-professional)	Developmental toxicity study in rabbits. LOAEL of 0.001 mg/kg bw/day based on haemorrhage in multiple tissues/organs at the lowest dose tested.
Difethialone	0.00125 (occupational and non-professional)	Oral developmental toxicity study in rabbits. NOAEL of 0.00125 mg/kg bw/day based on depressed weight gain in dams, elevated incidence of incompletely ossified 5th sternebra at the next highest dose of 0.0025 mg/kg bw/day.
Flocoumafen	0.0014 (occupational and non-professional)	90-day dietary toxicity study in rats. NOAEL of 0.0014 mg/kg bw/day (0.02 ppm) based on increased levels of serum cholesterol at the next highest dose of 0.0036 mg/kg bw/day (0.05 ppm).

86. For the occupational user exposure modelling with the US EPA OPHEC, in addition to the selected points of departure and the margin of exposure listed above, I note that default values or assumptions have been selected for the assessment parameters of body weight (adult), dermal and inhalation absorption factors, number of bait stations loaded per day and area treated (*Table 60: Parameters, assumptions and models used in risk assessment for rodenticide users* in the *Anticoagulant Rodenticides Review Technical Report*). Finally, based on the current instructions for use for chemical products, I note that this modelling was conducted on the basis that the user is wearing a single layer of clothing and gloves and that the products are applied by hand or with a cup (or scoop/measure), as either loose baits or within refillable bait stations.
87. In relation to margins of exposure calculated in the first-tier risk characterisation for the occupational use of chemical products containing the relevant active constituents, based on my review and consideration of the risk assessment summarised in section *‘4.8.1 Professional users’* of the *Anticoagulant Rodenticides Review Technical Report*:
- 87.1. I note that the margins of exposure calculated for hand application of loose baits, either as broadcast baits or in refillable bait stations, **are not** within the acceptable range of greater than or equal to 1000 (Table 12). As such, for the chemical products listed in Attachment A of this notice whose current instructions for use permit an occupational user to apply loose baits by hand while only wearing a single layer of clothing and gloves, I consider that the use in accordance with the current approved instructions **may** pose an undue hazard to an occupational user exposed to the chemical product during application.
- 87.2. I also note that the margins of exposure calculated for the application of loose baits using a cup (or scoop/measure) are well above the minimum acceptable margin of exposure of 1000 (Table 12). I consider that it can be inferred from the cup application modelling outcomes that the use of chemical products packaged within a caulking gun, sachets or place packs or within a pre-baited bait station would also result in acceptable levels of exposure for occupational users, provided that the bait itself is not handled.
- 87.3. As such, I find that instructions that direct people to wear disposable gloves when using the product and to not touch the bait are required to mitigate the risks to occupational users who apply the anticoagulant rodenticides chemical products listed in Attachment A of this notice (further detailed below in *‘Safety directions’* section at paragraphs 92 – 93 of these reasons). I also consider that any current instructions for use that indicate people should avoid touching the bait should be varied to **‘DO NOT touch bait’**. Finally, I am satisfied that any potential exposure from application of current chemical products containing the relevant active constituents in accordance with the varied instructions would not be an undue hazard to occupational users.

Table 12: Occupational users – outcomes summary for the first-tier risk characterisation

Active	Application method	Application rate	MOE* (hand application)	MOE* (cup application)
<i>First generation anticoagulant rodenticides</i>				
Coumatetralyl	Broadcast baits	1.14 g ac/ha	310	170 000
	Refillable bait stations	38.1 mg ac/bait station	29	16 000
Diphacinone	Broadcast baits	0.68 g ac/ha	520	280 000
	Refillable bait stations	22.5 mg ac/bait station	180	100 000
<i>Second generation anticoagulant rodenticides</i>				
Brodifacoum	Broadcast baits	0.3 g ac/ha	16	8 900
	Refillable bait stations	10 mg ac/bait station	170	92 000
Bromadiolone	Broadcast baits	0.68 g ac/ha	3.6	1 900
	Refillable bait stations	22.5 mg ac/bait station	39	21 000
Difenacoum	Broadcast baits	0.3 g ac/ha	16	8 900
	Refillable bait stations	10 mg ac/bait station	170	92 000
Difethialone	Broadcast baits	0.12 g ac/ha	50	28 000
	Refillable bait stations	4 mg ac/bait station	150	82 000
Flocoumafen	Broadcast baits	4 g ac/ha	57	31 000
	Refillable bait stations	4 mg ac/bait station	170	91 000

*Acceptable MOE for product application by occupational users is ≥ 1000

Non-professional users – product application

88. In relation to chemical products containing the relevant active constituents, I note a first-tier risk characterisation was also conducted to assess the risks posed to non-professional users from application of ready-to-use baits. Based on my review of the risk assessment parameters summarised in sections ‘4.5 Exposure and Risk Assessment’ and ‘4.7 Basic parameters used in the exposure assessments and risk characterisations’ of the *Anticoagulant Rodenticides Review Technical Report*, I also note that this first-tier risk characterisation considered application at the highest currently approved application rate for each anticoagulant rodenticide and, in the absence of any user exposure studies for the use of anticoagulant rodenticide chemical products, used the US EPA Standard Operating Procedures (SOP) for Residential Pesticide Exposure Assessment and, specifically, the Residential Handler SOP calculator.
89. Based on my review and consideration the assessment of available toxicity studies for the relevant active constituents summarised in section ‘4.5 Exposure and Risk Assessment’ of the *Anticoagulant Rodenticides Review Technical Report*:
- 89.1. I find that the points of departure listed in Table 11 are appropriate to assess the effects of repeat exposure to non-professional users. I note that these points of departure are based on the most appropriate no observed adverse effect level (NOAEL) or lowest observed adverse effect level (LOAEL) in the limited toxicology database available, based on the criteria that the point of departure is protective of the effects seen in all repeat-dose studies in the database and that it is relevant to the potential effects in humans.
- 89.2. I find that a margin of exposure of 300 is appropriate to assess the risks to non-professional users, based on a standard 10-fold UF for inter-species extrapolation, a standard 10-fold UF for intra-species

differences in susceptibility to effects, and (noting that the frequency of non-professional use is much more sporadic compared to occupational use) an additional 3-fold UF to account for the lack of chronic toxicity studies in the toxicology databases. As such, I consider that a margin of exposure of greater than or equal to 300 calculated using the US EPA Residential Handler SOP model represents a safe level of exposure for non-professional users.

90. For the exposure modelling for non-professional users using the US EPA Residential Handler SOP Calculator, in addition to the selected points of departure and the margin of exposure listed above, I note that default values or assumptions have been selected for the assessment parameters of body weight (adult), dermal and inhalation absorption factors, number of bait stations loaded per day and area treated (*Table 60: Parameters, assumptions and models used in risk assessment for rodenticide users* in the *Anticoagulant Rodenticides Review Technical Report*). Finally, as is standard practice when assessing any potential exposure of non-professionals from use of agricultural chemical products, it has been assumed that the individuals handling the chemical products are not wearing any specialised personal protective equipment (PPE).
91. In relation to the first-tier risk characterisation for the non-professional use of chemical products containing the relevant active constituents, based on my review and consideration of the risk assessment summarised in section *'4.8.2 Non-professional use'* of the *Anticoagulant Rodenticides Review Technical Report*, I note that the margins of exposure calculated are in the acceptable range of greater than or equal to 300 (Table 13). Therefore, I am satisfied that use of the chemical products listed in Attachment A of this notice in accordance with current instructions would not be an undue hazard to non-professionals exposed to the chemical products during application.

Table 13: Non-professional users – outcomes summary for the first-tier risk characterisation

Active	Application rate (mg ac/bait station)	MOE*
<i>First generation anticoagulant rodenticides</i>		
Coumatetralyl	22.9	1 300
Diphacinone	22.5	2 200
<i>Second generation anticoagulant rodenticides</i>		
Brodifacoum	10	740
Bromadiolone	22.5	660
Difenacoum	10	740
Difethialone	4	2 300
Flocoumafen	4	2 600

*Acceptable MOE for product application by non-professional users is ≥ 300

Safety directions

92. Safety directions are product-specific (or formulation-specific) instructions for use designed to ensure the safe handling of agricultural chemical products. They include statements relating to the potential hazards of chemical products, precautions that should be taken both during and after use of the chemical product, and the requirements for protective equipment to ensure the safety of the user during handling and use of the chemical products.
93. Based on my review and consideration the assessment of the risks posed to both occupational and non-professional users from application of anticoagulant rodenticides chemical products detailed above, and the recommendations in section *'4.9.2 Safety Directions'* of the *Anticoagulant Rodenticides Review Technical Report*,

I consider that the relevant safety directions set out in Table 14 below are required as part of the instructions for use of the anticoagulant rodenticides chemical products listed in Attachment A of this notice.

Table 14: Safety directions for ready-to-use anticoagulant rodenticides chemical products

Active	Formulation	Safety Directions
<i>First generation anticoagulant rodenticides</i>		
Coumatetralyl	RB 0.4 g/kg or less in sachet or place pack	Repeated minor exposure may have a cumulative poisoning effect. When using the product wear disposable gloves. During cleanup, disposal operations of bait and bait stations and when handling rodent carcasses wear single layer clothing and disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water. After each day's use wash contaminated clothing.
	RB 0.4 g/kg or less in block formulation	Repeated minor exposure may have a cumulative poisoning effect. Do not touch bait, use scoop or measure. When using the product wear disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water.
	RB 0.4 g/kg or less in pellet formulation	Repeated minor exposure may have a cumulative poisoning effect. Avoid contact with eyes and skin. Do not inhale dust. Do not touch bait, use scoop or measure. When using the product wear disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water.
Diphacinone	RB 0.05 g/kg or less in block formulation	Repeated minor exposure may have a cumulative poisoning effect. Do not touch bait, use scoop or measure. When using the product wear disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water.
	RB 0.05 g/kg or less in pellet formulation	Repeated minor exposure may have a cumulative poisoning effect. Avoid contact with eyes and skin. Do not inhale dust. Do not touch bait, use scoop or measure. When using the product wear disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water.
<i>Second generation anticoagulant rodenticides</i>		
Brodifacoum	RB 0.05 g/kg or less in sachet or place pack	Repeated minor exposure may have a cumulative poisoning effect. When using the product wear disposable gloves. During cleanup, disposal operations of bait and bait stations and when handling rodent carcasses wear single layer clothing and disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water. After each day's use wash contaminated clothing.
	RB 0.05 g/kg or less in block formulation	Repeated minor exposure may have a cumulative poisoning effect. Do not touch bait, use scoop or measure. When using the product wear disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water.
	RB 0.05 g/kg or less in pellet formulation	Repeated minor exposure may have a cumulative poisoning effect. Avoid contact with eyes and skin. Do not inhale dust. Do not touch bait, use scoop or measure. When using the product wear disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water.
	RB 0.05 g/kg or less as a paste in caulking gun	Repeated minor exposure may have a cumulative poisoning effect. Do not touch bait. When using the product wear disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water.

Active	Formulation	Safety Directions
Bromadiolone	RB 0.05 g/kg or less in sachet or place pack	Repeated minor exposure may have a cumulative poisoning effect. When using the product wear disposable gloves. During cleanup, disposal operations of bait and bait stations and when handling rodent carcasses wear single layer clothing and disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water. After each day's use wash contaminated clothing.
	RB 0.05 g/kg or less in block formulation	Repeated minor exposure may have a cumulative poisoning effect. Do not touch bait, use scoop or measure. When using the product wear disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water.
	RB 0.05 g/kg or less in pellet formulation	Repeated minor exposure may have a cumulative poisoning effect. Avoid contact with eyes and skin. Do not inhale dust. Do not touch bait, use scoop or measure. When using the product wear disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water.
	RB 0.1 g/kg or less as a paste in caulking gun	Repeated minor exposure may have a cumulative poisoning effect. Do not touch bait. When using the product wear disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water.
Difenacoum	RB 0.05 g/kg or less in sachet or place pack	Repeated minor exposure may have a cumulative poisoning effect. Will irritate the skin. May irritate eyes. Avoid contact with eyes and skin. When using the product wear disposable gloves. During cleanup, disposal operations of bait and bait stations and when handling rodent carcasses wear single layer clothing and disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water. After each day's use wash contaminated clothing.
	RB 0.05 g/kg or less in block formulation	Repeated minor exposure may have a cumulative poisoning effect. Will irritate the skin. May irritate eyes. Avoid contact with eyes and skin. Do not touch bait, use scoop or measure. When using the product wear disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water.
	RB 0.05 g/kg or less in pellet formulation	Repeated minor exposure may have a cumulative poisoning effect. May irritate the eyes. Avoid contact with eyes and skin. Do not inhale dust. Do not touch bait, use scoop or measure. When using the product wear disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water.
Difethialone	RB 0.025 g/kg or less in sachet or place pack	Repeated minor exposure may have a cumulative poisoning effect. May irritate eyes. Avoid contact with eyes. When using the product wear disposable gloves. During cleanup, disposal operations of bait and bait stations and when handling rodent carcasses wear single layer clothing and disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water. After each day's use wash contaminated clothing.
	RB 0.025 g/kg or less in block formulation	Repeated minor exposure may have a cumulative poisoning effect. May irritate eyes. Avoid contact with eyes. Do not touch bait, use scoop or measure. When using the product wear disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water.
	RB 0.025 g/kg or less in pellet formulation	Repeated minor exposure may have a cumulative poisoning effect. May irritate the eyes. Avoid contact with eyes and skin. Do not inhale dust. Do not touch bait, use scoop or measure. When using the product wear disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water.

Active	Formulation	Safety Directions
Flocoumafen	RB 0.05 g/kg or less in sachet or place pack	Repeated minor exposure may have a cumulative poisoning effect. When using the product wear disposable gloves. During cleanup, disposal operations of bait and bait stations and when handling rodent carcasses wear single layer clothing and disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water. After each day's use wash contaminated clothing.
	RB 0.05 g/kg or less in block formulation	Repeated minor exposure may have a cumulative poisoning effect. Do not touch bait, use scoop or measure. When using the product wear disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water.

Re-handling and clean-up activities

94. I note there is the potential for dermal exposure of workers to residues of anticoagulant rodenticides chemical products while they are performing post-application activities, including bait clean-up operations and removal and disposal of rodent carcasses, based on my review section '4.8.4 Risk associated with re-handling and clean-up activities' of the *Anticoagulant Rodenticides Review Technical Report*. The level of dermal exposure expected was not quantitatively modelled in the human health risk assessment, though was expected to be lower or similar to the estimated exposure of users during application of block, pellet and paste chemical products.
95. Based on my review and consideration of the recommendations in section '4.9.3 Additional labelling requirements' of the *Anticoagulant Rodenticides Review Technical Report*, and due to the intrinsic hazards of anticoagulant rodenticides and the importance of good occupational hygiene, I consider that similar protective measures are required for workers involved in re-handling activities as were deemed necessary for product application. As such, to mitigate risks to workers involved in re-handling activities, I find that the precautionary instructions '**During cleanup and disposal operations of bait and bait stations, wear a single layer of clothing and disposable gloves. Wear disposable gloves when handling rodent carcasses. Wash clothes after performing re-handling activities.**' are required to be added to the instructions for use for all chemical products listed in Attachment A of this notice.

Bystander exposure

96. There is the potential for bystanders to be exposed to anticoagulant rodenticide chemical products once the baits have been applied in either indoor or outdoor areas. Based my review and consideration of information on accidental exposures of human beings to anticoagulant chemical products, as summarised in section '4.3 Human adverse events involving anticoagulant rodenticide exposure in Australia' of the *Anticoagulant Rodenticides Review Technical Report*, I note that the majority of incidents reviewed as part of this reconsideration have involved young children inadvertently accessing the baits and that they have generally resulted in either no adverse effects or relatively minor effects. That said, the consumption of anticoagulant rodenticides chemical products by vulnerable human being has the potential to result in the need for medical care.
97. To further aid in the reduction of potential human poisonings resulting from accidental exposure to anticoagulant rodenticide products, based on my review and consideration of the recommendations in the sections '4.9.3 Additional labelling requirements' and '4.9.4 Formulation Recommendations' of the *Anticoagulant Rodenticides Review Technical Report*, I consider that the following risk mitigation measures are necessary:
- 97.1. For commercial anticoagulant rodenticide chemical products listed in Attachment A of this notice, to prevent accidental exposure through children's exploratory behaviour, the instructions for use '**DO NOT place bait in areas that are accessible to children. In child-accessible areas baits must be place in tamper-resistant bait stations. If bait can be dislodged from bait station, bait station must be**

secured in place.⁹ are required to be added. I note that these children-specific instructions for use are not required for the domestic anticoagulant rodenticide chemical products listed in Attachment A of this notice, as it is proposed that tamper-resistant bait stations, secured in place if bait dislodgement is possible, must be used in all situations, as detailed above in paragraph 61.1 of these reasons.

- 97.2. In relation to how the product is formulated, I consider that a bittering agent and dye are critical formulation components to prevent effects that are harmful to human beings. I note the bittering agent is intended to reduce the likelihood of bait ingestion by a vulnerable human being, as they are likely to stop consuming an unpalatable item if accidentally accessed, and the marker dye is intended to provide a visual reference to indicate if a vulnerable human being has ingested some of the chemical product. My consideration on whether the formulations of the chemical products listed in Attachment A of this notice contain the requisite bittering agent and dye is discussed in the “*How the product is formulated – constituents – bittering agent and dye*” (paragraphs 121 – 123) section of these reasons below.

Potential dietary exposure risks

98. Anticoagulant rodenticide chemical products are not registered for direct application to commodities grown for human food or to food producing livestock or poultry and are therefore not expected to occur in the food chain. However, I note that there is some evidence of the potential for anticoagulant rodenticide contamination of food commodities. As documented in section ‘5.1.2 In and around buildings’ of the *Anticoagulant Rodenticides Review Technical Report*, this evidence includes potential exposure pathways for edible wildlife and game, and past low-level warfarin and coumatetralyl detections in pig livers that stemmed from use of anticoagulant rodenticide chemical products in piggeries. Therefore, in considering the any potential dietary exposure risks from use of the ready-to-use anticoagulant rodenticides chemical products listed in Attachment A of this notice in accordance with instructions, I have considered the health-based guidance values of anticoagulant rodenticides and the potential for accidental exposure of food commodities to anticoagulant rodenticides.

Health-based guidance values

99. For all chemical products containing the relevant active constituents, based on my review and consideration of the assessment summarised in section ‘4.11 Health Based Guidance Values’ of the *Anticoagulant Rodenticides Review Technical Report*, I consider that the health-based guidance values (HBGVs) listed in Table 15 and Table 16 below are appropriate to assess any potential dietary risks from the use of anticoagulant rodenticide chemical products.
- 99.1. For both first- and second-generation anticoagulant rodenticides, tolerable daily intakes (TDI⁹) are relevant to my considerations of any potential chronic dietary risks associated with chemical contaminants that may enter the food chain. I consider that the TDIs for the relevant active constituents listed in Table 15 are appropriate, noting that the NOAEL (or LOAEL) selected is equivalent to the point of departure selected for repeat exposure assessment of occupational users (detailed in paragraph 85.1 above), the use of a standard 100-fold UF to account for inter-species extrapolation and intra-species variability in response, and the use of an additional 10-fold UF to account for all limitations in the chronic toxicology databases.

Table 15: Tolerable daily intake (TDI) for anticoagulant rodenticides

Active	TDI (mg/kg bw/day)	Study	UF
<i>First generation anticoagulant rodenticides</i>			

⁹ TDI - tolerable daily intake (for humans): a level of intake of a chemical contaminant (expressed mg/kg bw/day; milligrams per kilogram of body weight per day) that can be ingested daily over an entire lifetime without any appreciable risk to health,

Active	TDI (mg/kg bw/day)	Study	UF
Coumatetralyl	0.0000068	NOAEL of 0.0068 mg/kg bw/day for significantly increased blood clotting time and haemorrhage from a 16-week dietary toxicity study in rats.	1000-fold
Diphacinone	0.000025	NOAEL of 0.025 mg/kg bw/day for increased incidence of maternal toxicity in a rat developmental toxicity study.	1000-fold
<i>Second generation anticoagulant rodenticides</i>			
Brodifacoum	0.000001	NOAEL of 0.001 mg/kg bw/day for prolonged prothrombin time in a 90-day dietary toxicity study in rats.	1000-fold
Bromadiolone	0.0000005	NOAEL of 0.0005 mg/kg bw/day for increased prothrombin time in a subchronic toxicity study in rabbits.	1000-fold
Difenacoum	0.000001	LOAEL of 0.001 mg/kg bw/day for haemorrhage in multiple tissues/organs in a developmental toxicity study in rabbits.	1000-fold
Difethialone	0.0000013	NOAEL of 0.00125 mg/kg bw/day for incidence of incompletely ossified sternebrae from a developmental toxicity study in rabbits.	1000-fold
Flocoumafen	0.0000014	NOAEL of 0.0014 mg/kg bw/day for incidence of increased levels of serum cholesterol from a subchronic dietary toxicity study in rats.	1000-fold

99.2. Second-generation anticoagulant rodenticides are designed to effectively control rodents after one feed and therefore pose an acute poisoning risk. As such, acute tolerable intakes¹⁰ for second-generation anticoagulant rodenticides are relevant to my considerations of any potential acute dietary risks associated with chemical contaminants that may enter the food chain. I consider that the acute tolerable intakes for the second-generation anticoagulant rodenticides listed in Table 16 are appropriate, noting the NOAEL (or LOAEL) from developmental toxicology studies have been selected as the effects observed could feasibly result from acute exposure, use of a standard 100-fold UF to account for inter-species extrapolation and intra-species variability in response, and use of an additional 3-fold UF where the acute tolerable intakes has been derived from a LOAEL.

Table 16: Acute tolerable intake for second generation anticoagulant rodenticides

Active	Acute tolerable intake (mg/kg bw)	Study	UF
Brodifacoum	0.00001	NOAEL of 0.001 mg/kg bw/day from both developmental toxicity studies in rats and rabbits.	100-fold
Bromadiolone	0.0000007	LOAEL of 0.002 mg/kg bw/day for maternal toxicity in a developmental toxicity study in rabbits.	300-fold
Difenacoum	0.00003	LOAEL of 0.001 mg/kg bw in a developmental toxicity study in rabbits.	300-fold
Difethialone	0.000013	NOAEL of 0.00125 mg/kg bw/day from a developmental toxicity study in rabbits.	100-fold
Flocoumafen	0.00002	NOAEL of 0.002 from a developmental toxicity study in rabbits.	100-fold

¹⁰ Acute tolerable intake (for humans): the amount of a chemical contaminant in food or drinking-water, (expressed as mg/kg of body weight), that can be ingested or absorbed over 24 hours or less, without appreciable health risk.

Potential for exposure of food commodities

100. I note that the health-based guidance values for anticoagulant rodenticides listed in Table 15 and Table 16 above are relatively low due to the toxic nature of this class of chemicals. As such, I find that the potential for accidental anticoagulant rodenticide exposure of commodities grown for human food or for food producing livestock or poultry needs be minimised so that the use of these chemical products in accordance with instructions would not be likely to have an effect that is harmful to human beings who consume associated food commodities. I note that this determination is consistent with the recommendations in section '5.4 Agricultural and Veterinary Chemicals (MRL Standard for Residues of Chemical Products) Instrument 2023' of the *Anticoagulant Rodenticides Review Technical Report* regarding the MRL Standard. That is, the recommendations to remove any temporary maximum residues limits currently approved for anticoagulant rodenticides and to establish a Table 5 entry for all anticoagulant rodenticide chemicals in scope of the reconsideration on the basis that their residues do not or should not occur in food or animal feeds.

Edible wildlife (non-target) exposure

101. I note that limited monitoring data on anticoagulant rodenticides in Australia show evidence of secondary poisoning across fish, terrestrial invertebrates, native rodents and rodent-eating species such as snakes, lizards, quolls and raptors, and that some of these wildlife species are part of the traditional diets of indigenous peoples. Based on my review and consideration of the assessment summarised in section '5.1.4 Edible wildlife (non-target) exposure' of the *Anticoagulant Rodenticides Review Technical Report*, I also note there is insufficient information on the residues profile and consumption of these edible wildlife species to conduct a quantitative contemporary dietary risk assessment.
102. The risk mitigation measures necessary to prevent non-target wildlife species access to anticoagulant rodenticides chemical products are discussed in detail in the '*Risks to non-target terrestrial vertebrates*' section of these reasons (paragraphs 41 – 62). I consider that the mitigation measure details in this section, including formulation requirements, access restrictions and instructions for use, are also required to reduce the likelihood of exposure of edible wildlife to anticoagulant rodenticides and therefore the likelihood that the use of the chemical products listed in Attachment A of this notice in accordance with instructions would have an effect that is harmful to human beings.
103. Further, based on my review and consideration of the recommendations in section '5.1.4 Edible wildlife (non-target) exposure' of the *Anticoagulant Rodenticides Review Technical Report*, I consider that the following instructions for use, specifically related to edible wildlife and game, are required for all chemical products listed in Attachment A of this notice in order to reduce the likelihood of accidental exposure of edible wildlife and game to anticoagulant rodenticide chemical products:
- 103.1. the restraint '**DO NOT bait in areas where wildlife may be collected for human consumption**', and
- 103.2. the precautionary directions '**Caution should be used when baiting near areas where hunting of wildlife may occur. Careful consideration of bait placement is necessary to avoid secondary exposure from contaminated wildlife that may be consumed.**'.
104. Based on my review of the risk assessment summarised in section '5.1.4 Edible wildlife (non-target) exposure' of the *Anticoagulant Rodenticides Review Technical Report*, I note that it is not always possible for regulation to ensure that zero contamination of edible wildlife may occur through use of chemical products, and that any consumers should inspect any wild catch for signs of disease or contamination prior to consumption and should not consume the catch if any signs of disease or contamination are present. However, I consider that the likelihood is extremely low that use of the anticoagulant rodenticides chemical products listed in Attachment A of

this notice in accordance with the proposed varied particulars (including instructions for use) and conditions would result in the contamination of edible wildlife and game. Therefore, I am satisfied that that use of the anticoagulant rodenticides chemical products listed in Attachment A of this notice in accordance with the proposed varied particulars and conditions would not be likely to have an effect that is harmful to human beings that consume edible wildlife.

In and around buildings uses

105. Based on my review of the risk assessment summarised in section '5.1.2 *In and around buildings*' of the *Anticoagulant Rodenticides Review Technical Report*, I note that all anticoagulant rodenticide chemical products listed in Attachment A of this notice are approved for use in and around buildings. Further, the specific 'in and around buildings' use situations with the greatest risk of anticoagulant rodenticides contaminating food commodities and entering the human food chain include in and around animal husbandry facilities such as stables, milking parlours, cow sheds, poultry sheds, pig arks, and any building concerned in the storage, preparation, distribution, sale or consumption of food.
106. Based on my review and consideration of the risk assessment summarised in '5.1.2 *In and around buildings*' of the *Anticoagulant Rodenticides Review Technical Report*, I note that that APVMA is aware of past low-level warfarin and coumatetralyl detections in pig livers stemming from the use of anticoagulant rodenticide chemical products in piggeries, but that the APVMA has not been made aware of any further detections or incidents of exposure related to warfarin or coumatetralyl in pigs since remediation measures were taken at the time. Nevertheless, based on the potential for exposure of commodities grown for human food or for food producing livestock or poultry, I consider that the current instructions for use of the chemical products listed in Attachment A of this notice are **insufficient** to mitigate potential contamination risks associated with use of anticoagulant rodenticides in and around buildings, in accordance with the approved instructions.
107. In relation to the use of anticoagulant rodenticides chemical products in and around buildings, based on my review and consideration of the risk assessments summarised in sections '5.1.2 *In and around buildings*', '5.1.3 *Bait formulation*' and '5.1.5 *Carcass management*' of the *Anticoagulant Rodenticides Review Technical Report*:
 - 107.1. For all chemical products listed in Attachment A of this notice, I consider that the following instructions for use are required:
 - a. the hazard warning statement '**Hazardous to livestock and poultry.**',
 - b. the precautionary instructions '**DO NOT place bait in areas where there is a possibility of contaminating food, livestock feed or surfaces that come in direct contact with food or livestock feed.**' that relate to contamination risks, and
 - c. the instructions '**DO NOT place baits in locations that are accessible to domestic animals, livestock, non-target native animals or birds.**' and '**DO NOT allow livestock or poultry to consume dead or moribund mice and rats. All dead or moribund animals and rodent faeces from baited rodents MUST be removed from areas accessible to livestock or poultry.**' regarding the protection of animals and livestock.
 - 107.2. I consider that the specific use of anticoagulant rodenticides chemical products in and around animal, livestock and poultry houses, associated equipment, and food and feed processing areas poses the greatest risk of contamination of food commodities that may be consumed by human being. I note that chemical products formulated as loose pellets and grain baits were not supported in the residues assessment for use in these situations, as these bait types have the highest potential to contaminate food commodities due to spillage from a bait station by the target animal or during a routine check. I also

consider that domestic anticoagulant rodenticide chemical products should not be used in these situations, due to the risks to human beings posed by inadvertent contamination of food commodities and that these products are proposed to be available to the general public who have not been trained in their safe use. Therefore, for commercial products formulated as loose pellets or grain and all domestic products listed in Attachment A of this notice (see Table 17 in Attachment D), I consider that the instruction ***'DO NOT place baits in and around animal, livestock and poultry houses, associated equipment, and food and feed processing areas.'*** is required to be added to the instructions for use and that any instructions related to the use of these products in and around animal, livestock and poultry houses, associated equipment, or food and feed processing areas should be removed from the instructions for use.

107.3. Finally, for commercial products listed in Attachment A of this notice that are formulated and packaged as blocks, paste in a caulking gun or paste/pellets in a sachet or place pack (see Table 17 in Attachment D), I consider that the following instructions for use are required to be added in order to mitigate any potential risks associated with contamination of food commodities from use of the products in and around buildings:

- a. the restraints ***'DO NOT place in animal or livestock housing unless used in tamper-resistant and weather-resistant bait stations fixed to the ground or other structures.'***, ***'DO NOT place bait or bait stations above areas which would allow them to contaminate pig and poultry food or drinking water.'***, and
- b. the precautionary directions ***'When used in food producing animal housing situations careful consideration is necessary regarding the placement of bait stations to ensure any rodenticide contamination of water, feed or livestock is prevented.'***

108. Based on my review and consideration of the risk assessment summarised in sections '5.1.2 In and around buildings', '5.1.3 Bait formulation' and '5.1.5 Carcass management' of the *Anticoagulant Rodenticides Review Technical Report*, I consider that use of the chemical products listed in Attachment A of this notice in and around buildings in accordance with the proposed varied instructions for use noted above, in conjunction with relevant industry best practices, is not expected to result in the contamination of livestock or poultry feeds or animal commodities including meat offal milk and eggs. As such, I am satisfied that the use of the chemical products listed in Attachment A of this notice in and around buildings with the proposed varied instructions for use would not be likely have an effect that is harmful to human beings who consume these animal commodities.

Field crop uses

109. Based on my review and considerations of the assessment summarised in section '5.1.1. Field crops' of the *Anticoagulant Rodenticides Review Technical Report*, I note that the use of coumatetralyl chemical products in currently registered agricultural cropping situations would not be likely to result in contamination of food commodities so long as livestock is not permitted to graze in the baiting area and the baiting material does not come into direct contact with the food commodity (i.e. a macadamia nut), crop (i.e. parts of the tree) or the soil in which crops are grown. Therefore, I consider:

109.1. The following instructions for use are required for relevant coumatetralyl chemical products (52098, 82217), to reduce the risk of exposure of livestock and horticultural commodities:

- a. the restraints ***'DO NOT place bait in food crop situations unless in tamper-resistant and weather-resistant bait stations. DO NOT graze or feed livestock near treated areas whilst bait is present.'***, and
- b. the directions ***'Use in tamper-resistant and weather-resistant bait stations only. Bait stations must be fixed to the ground or other structures to prevent movement.'*** and ***'The bait material***

must be placed in a bait station. Bait must not come in direct contact with crops, food products or soil in which crops are grown.'

109.2. In relation to the currently approved use of certain coumatetralyl chemical products (52098, 82217) in macadamia field crops, the following instructions for use are also required: ***'Locate bait stations around crop perimeters or in the outer 3 rows for macadamia cropping (particularly between the crop and grassy or bush habitats), near obvious rat runs, and/or close to known rat hiding spots such as stumps, rocks, logs or burrows.'***

110. In relation to certain ready-to-use coumatetralyl chemical products (52098, 82217), I find that use in agricultural crops, in accordance with the proposed varied instructions for use noted above, would not be likely to contaminate food commodities and therefore would not be likely have an effect that is harmful to human beings who consume the associated food commodities.

Overall considerations on whether there is an undue hazard to the safety of humans or harmful effects on human beings

111. I consider that there are no other relevant matters with respect to whether the use of anticoagulant rodenticide chemical products in accordance with instructions would be an undue hazard to the safety of people exposed to products during their handling or people using anything containing their residues or would have an effect that is harmful to human beings.
112. I am not satisfied that the use of the ready-to-use anticoagulant rodenticides chemical products listed in Attachment A of this notice in accordance with current instructions would not be an undue hazard to the safety of people exposed to it during its handling or people using anything containing its residues and would not be likely to have an effect that is harmful to human beings. However, I am satisfied that the use of these products would not be an undue hazard to the safety of people exposed to it during its handling or people using anything containing its residues and would not be likely to have an effect that is harmful to human beings after variation of the instructions for use detailed above in paragraphs 82, 87.3, 93, 95, 97.1, 102, 103, 107 and 109 of these reasons, in addition to variations with respect to chemistry and manufacture matters related to the safety criteria that are detailed below in paragraphs 117, 123, 125 and 126.2 and of these reasons.

Chemistry and manufacture matters related to the safety criteria – s 5A(1)(a)–(c)

Quality assurance requirements

113. The APVMA's scientific risk assessments and other considerations on the safety risks associated with the use of an agricultural or veterinary chemicals are predicated on the fact that supplied product will be manufactured and formulated in accordance with the particulars that are, or would be, entered into the Register. The quality assurance process to ensure that the particulars of supplied agricultural chemical products are consistent with the particulars entered into the Register is, in part, managed by conditions to which agricultural chemical product registrations are subject and a Standard for chemical products made under section 6E of the Agvet Code, named the *Agricultural and Veterinary Chemicals Code (Allowable Variation in Concentrations of Constituents in Agricultural Chemical Products) Standard 2022 (Allowable Variation in Concentrations of Constituents in Agricultural Chemical Products Standard)*. Therefore, for the purposes of being satisfied that a product listed in Attachment A of this notice meets the safety criteria with respect to quality assurance processes, I have considered the following matters set out in section 5A(3)(a) of the Agvet Code:

113.1. any conditions to which its registration is, or would be, subject (s 5A(3)(a)(v) of the Agvet Code); and

- 113.2. whether the product conforms, or would conform, to any standard made for the product under section 6E to the extent that the standard relates to matters covered by subsection 5A(1) of the Agvet Code (s 5A(3)(a)(via) of the Agvet Code).
114. As part of this consideration, I note that the agricultural chemical product registrations listed in Attachment A of this notice are subject to conditions in accordance with section 23(1)(a) of the Agvet Code, as follows:
- 114.1. Regulation 17C(2) of the Agvet Regulations prescribes conditions to which the registration of a chemical product is subject. Anticoagulant rodenticides registrations are subject to the conditions prescribed in items 1, 2, 5, 6 and 7 of the table in regulation 17C(2) of the Agvet Regulations. In accordance with subsection 17C(3)(a) of the Agvet Code Regulations, table-items 3 and 4 do not apply to the registrations, as any agricultural chemical product is prescribed under regulation 59(1) for the purposes of section 120A of the Agvet Code.
- 114.2. Registrations of agricultural chemical products are also subject to the conditions of registration prescribed in section 6 of the *Agricultural and Veterinary Chemicals Code (Conditions of Approval or Registration) Order 2021 (Conditions of Approval or Registration Order)*.
115. I have considered the *Allowable Variation in Concentrations of Constituents in Agricultural Chemical Products Standard*, which prescribes the maximum allowable variation of the concentration of constituents in registered agricultural chemical products from the nominal quantities recorded in the Register for active constituents and non-active constituents. I consider that the products listed in Attachment A of this notice conform to the *Allowable Variation in Concentrations of Constituents in Agricultural Chemical Products Standard*, to the extent that the Standard relates to matters covered by subsection 5A(1) of the Agvet Code.
116. The chemical products listed in Attachment A of this notice are also subject to additional conditions referred to as the '*Agricultural Products Active Constituent Quality Assurance Requirements*', which have been imposed by the APVMA under section 23(1)(b) of the Agvet Code. I **do not** consider that this condition as currently imposed remains appropriate for the following reasons:
- 116.1. The condition, as imposed on most product registrations, contains obsolete definitions that may be misleading as they introduce contradictions with legislative requirements into the condition. Specifically, the condition refers to the 'APVMA Standard' available on the APVMA Website, which has been replaced by the legislative instrument *Agricultural Active Constituents Standards 2022*. The condition also refers to the 'registrant' rather than the 'holder', a term defined in section 3 of the Agvet Code.
- 116.2. The condition is substantially redundant given the requirements already imposed by the Agvet Code or the Agvet Regulations.
117. To remove the legislative contradictions and unnecessary duplication discussed in above paragraph 116 of these reasons, I find that the condition referred to as the '*Agricultural Products Active Constituent Quality Assurance Requirements*' can be varied to the following:
- 117.1. *Condition of Registration - Agricultural Chemical Products Active Constituent Quality Assurance Requirements*
1. *The holder of the registration for a chemical product must not supply or cause the supply of the chemical product unless the active constituent contained in the chemical product was manufactured at a site of manufacture listed in the Record.*

2. The holder of the registration for a chemical product must not supply or cause the supply of the chemical product unless the holder possesses a record that demonstrates:

- the active constituent(s) in the chemical product comply with Agricultural and Veterinary Chemicals Code (Agricultural Active Constituents) Standards 2022; and*
- if there is a standard made under section 6E of the Agricultural and Veterinary Chemicals Code scheduled to the Agricultural and Veterinary Chemicals Code Act 1994 (Agvet Code) for any constituent in the chemical product that is not an active constituent, that the constituent complies with that Standard; and*

3. The records referred to in condition 2 above must include batch analysis results for the constituent(s) with the following information:

- the name and address of the manufacturer of the constituent*
- the Batch Number of the Batch of the constituent*
- the date of manufacture of the Batch of the constituent*
- the date of the analysis of the Batch of the constituent*
- the analysis result(s) for the constituent purity and/or content and/or isomer ratio and/or the specified impurities as per the relevant Standard for the constituent*
- reference to the validated analytical method(s) used to determine the constituent purity and/or the content and/or the isomer ratio and/or the specified impurities*

4. The holder of the registration for a chemical product must not supply or cause the supply of any quantity of a Batch of the chemical product unless the holder possesses a record that contains the following information for that Batch of the chemical product:

- the name of the chemical product*
- the distinguishing number of the registration of the chemical product*
- if the chemical product was imported into Australia by another person on behalf of, or pursuant to an arrangement with the holder, the name and address of the importer, and the date of importation*
- if the chemical product was manufactured in Australia by another person on behalf of, or pursuant to an arrangement with the holder, the name and address of the manufacturer, and the date of manufacture*
- the batch number of the chemical product from which the quantity was supplied and the quantity of the chemical product in that batch.*

5. The records referred to in conditions 2 and 4 above must be kept by the holder for at least 2 years.

6. The APVMA may request a holder to provide any records created and maintained under these conditions and, where the APVMA requests records be produced to it, a holder must provide the records to the APVMA.

7. For the purposes of this condition:

- Batch means a defined quantity of material produced in a single series of operations.*
- Batch Number means a distinctive combination of numbers and/or letters that specifically identifies a batch from which the production history can be determined.*
- Possess means in the possession of the holder or in the possession of another person pursuant to an arrangement with the holder.*
- Record includes information stored or recorded by means of a computer.*

- *Supply has the same meaning as in Section 3 of the Agricultural and Veterinary Chemicals Code Act 1994 (Agvet Code).*

118. I have no further concerns related to the quality assurance processes of the chemical products listed in Attachment A of this notice, with respect to whether these chemical products meet the safety criteria, after variation of the condition detailed above in paragraph 117 of these reasons.

Formulation of a chemical product

119. In relation to the formulation details of the chemical products listed in Attachment A of this notice, I note that I must have regard to the following matters in order to determine whether a chemical product meets the safety criteria:

119.1. how the product is formulated (s 5A(3)(a)(iii) of the Agvet Code); and

119.2. the composition and form of the constituents of the product (s 5A(3)(a)(iv) of the Agvet Code); and

119.3. the following relevant particulars that are, or would be, entered in the Register for the product (s 5A(3)(a)(vi) of the Agvet Code): the constituents (regulation 16(b) of the Agvet Regulations), the concentration of each constituent (regulation 16(c) of the Agvet Regulations), the composition and purity of each active constituent (if possible) (regulation 16(d) of the Agvet Regulations), and the formulation type (regulation 16(da) of the Agvet Regulations).

120. My detailed consideration of these matters are set out in the '*How the product is formulated – constituents – bittering agent and dye*' (paragraphs 121 – 123) and '*How the product is formulated – formulation type*' (paragraphs 124 – 125), and '*Composition and form of the constituents – concentration and purity of the active constituent*' (paragraph 126) sections of these reasons.

How the product is formulated – constituents – bittering agent and dye

121. I consider that a bittering agent and dye are critical formulation components of anticoagulant rodenticide chemical products to reduce the likelihood of an effect that is harmful to human beings or an unintended effect that is harmful to non-target terrestrial vertebrates, as detailed above in paragraphs 53 and 97.2 of this statement of reasons.

122. Based on a review of the details of the constituents of the chemical products that are entered into the Register for the chemical products listed in Attachment A of this notice, as summarised in section '*2.2 Chemistry and Manufacture – Chemical Products*' of the *Anticoagulant Rodenticides Review Technical Report*, I note:

122.1. all chemical products listed in Attachment A have a formulation entered into the Register that contain both the requisite bittering agent and dye as constituents; and

122.2. there are two chemical products listed in Attachment A that have multiple formulations entered into the Register, where one (or more) of the formulations registered does not contain the requisite bittering agent and/or dye as constituents.

123. For those chemical products (52098, 63624), I consider that that, unless they can be varied so that the formulation details (encompassing the relevant particulars constituents and the concentration of each constituent) entered into the Register contain the requisite bittering agent and dye as constituents, they will not meet the safety criteria.

How the product is formulated – formulation type

124. In relation to the formulation type of the chemical products, I note that the majority of chemical products listed in Attachment A of the notice have the formulation type 'BA – Bait' entered into the Register, while a small number of products have the formulation type 'BK – Block', 'PE – Pellet', 'RB – Ready to use bait' or 'SA – Sachet' entered into the Register. I **do not** consider that the formulation types of 'BA – Bait', 'BK – Block', 'PE – Pellet' or 'SA – Sachet' entered into Register remain appropriate, as they are outdated terminologies that do not accurately reflect that these chemical products are in a ready-to-use form.
125. Therefore, based on my review and consideration of the recommendations in section '2.2 Chemistry and Manufacture – Chemical Products' of the *Anticoagulant Rodenticides Review Technical Report*, I find that the formulation type entered into the Register for the chemical products listed in Attachment A of this notice can be varied to '**RB – Ready to use bait**', with the exception of the limited number of chemical products that already contain this formulation type (89039, 89510, 89203, 89204, 89206, 90982, 91401).

Composition and form of the constituents – concentration and purity of the active constituent

126. In relation to the composition and purity of active constituents contained in the chemical products, based on my review and considerations of the chemistry and manufacture assessment as summarised in section '2.2 Chemistry and Manufacture – Chemical Products' of the *Anticoagulant Rodenticides Review Technical Report*:
- 126.1. I note there are potential inconsistencies in the formulation details entered into the Register for certain chemical products listed in Attachment A of this notice, specifically related to the concentration and/or purity of the anticoagulant rodenticide active constituent. These potential inconsistencies could stem from whether the product is formulated using a source of active constituent manufactured as technical material or a manufacturing concentrate (i.e. diluted technical material intended for use in preparing product formulations), use of an alternate active constituents approved by the APVMA with a differing minimum purity, or changes to the approval of an active constituent over time.
- 126.2. While I consider that any resulting minor discrepancies in the formulation details would not have a significant impact on the overall safety of these chemical products, the APVMA requires accurate and current information on how a chemical product is formulated. As such, for products in Attachment A of this notice where potential inconsistencies in the concentration and purity of the active constituent entered into the Register have been identified (51181, 52675, 54836, 56632, 59875, 59876, 63624, 63867, 66235, 66331, 67610, 67611, 67652, 69017, 69119, 69158, 69994, 80059, 82450, 83673, 84831, 84832, 85512, 87706, 87869, 87870, 89039, 89203, 89204, 89206, 89510, 90982, 92319, 92320), I find that the following condition can be added to satisfy sections 5A(3)(a)(iii) and 5A(3)(a)(iv) of the Agvet Code:
- a. *Condition of registration: Within one year of publication of the section 34AC notice of the anticoagulant rodenticide final regulatory decision, you are required to:*
- *confirm the current manufacturing source(s) of active constituent used in this chemical product;*
 - and*
 - *provide evidence, such as a certificate of analysis, as to whether this active constituent is supplied to you as technical material or a manufacturing concentrate; and*
 - *confirm the full formulation details of the chemical product based on the purity of the current manufacturing source(s) of active constituent used.*
- Please note, if necessary, this information may be provided directly to the APVMA by the manufacture(s).*

Other considerations on the formulation of a chemical product

127. After variation of the relevant particulars and conditions as proposed above in paragraphs 122 - 123, 125 and 126.2 of these reasons, I have no further concerns related to the formulation details of the chemical products listed in Attachment A of this notice, with respect to whether these chemical products meet the safety criteria.

Safety criteria conclusions

128. I am **not satisfied** that the anticoagulant rodenticide chemical products listed in Attachment A of this notice meet the safety criteria chemical, as I am not satisfied that the use of chemical products in accordance with current instructions:
- 128.1. **would not be likely** to have an unintended effect that is harmful to animals¹¹. This includes potential safety concerns related to non-target terrestrial vertebrates (paragraphs 41 – 62) and aquatic species (paragraphs 64 – 65).
- 128.2. **would not be likely** to pose an undue hazard to the safety of people exposed to it during its handling or people using anything containing its residues¹². This includes potential safety concerns related to professional workers who handle the chemical products during application (paragraphs 84 – 87) and/or people involved in clean-up activities (paragraphs 94 – 95).
- 128.3. **would not be likely** to have an effect that is harmful to human beings¹³. This includes potential safety concerns for vulnerable human beings who may inadvertently access baits (paragraphs 96 – 97), human beings who may hunt for wild game in areas treated with anticoagulant rodenticide chemical products (paragraphs 101 – 104) and/or the potential for contamination of food commodities that may be consumed by human beings (paragraphs 105 – 110).
129. I am satisfied that the that the relevant particulars and conditions of the registrations can be varied in the following ways so that the anticoagulant rodenticide chemical products listed in Attachment A of this notice will meet the safety criteria. This includes:
- 129.1. Variation of the relevant particular 'instructions for use' of all anticoagulant rodenticide chemical products, as detailed above in paragraphs 50, 51, 52.2, 55.3, 56, 57, 58, 61, 62, 64, 65.2, 82, 87.3, 93, 95, 97.1, 102, 103, 107 and 109 of these reasons.
- 129.2. Variation of the relevant particular 'net contents' of domestic anticoagulant rodenticide chemical products, as detailed above in paragraph 60 of this statement of reasons.
- 129.3. Variation of the formulation details (encompassing the relevant particulars constituents and the concentration of each constituent) of certain anticoagulant rodenticide chemical products (52098, 63624), as detailed above in paragraphs 122 - 123 of these reasons.
- 129.4. Variation of the relevant particular 'formulation type' for all anticoagulant rodenticide chemical products, excluding 89039, 89510, 89203, 89204, 89206, 90982, 91401, as detailed in paragraph 125 of these reasons.

¹¹ Section 5A(1)(c) Agvet Code.

¹² Section 5A(1)(a) Agvet Code.

¹³ Section 5A(1)(b) Agvet Code.

129.5. Variation of the conditions of registration for all anticoagulant rodenticide chemical products, as detailed above in paragraphs 55.3, 117 and 126.2 of these reasons.

Consideration of the labelling criteria

130. To affirm the labels for the chemical products set out in Attachment A of this notice, I must be satisfied that the labels meet the labelling criteria and, if not, I must be satisfied that the relevant particulars or conditions of these approvals could be varied in such a way so that the labels meet the labelling criteria. That is, I must be satisfied that the labels contain adequate instructions relating to the matters set out in section 5D(1) of the Agvet Code, as are appropriate, or that the relevant particulars or conditions could be varied so that the labels do contain adequate instructions.
- 130.1. I note this means the label must contain instructions in relation the matters set out in section 5D(1) that are adequate to ensure, as far as reasonably practicable, that the product meets the safety criteria and the trade criteria, in accordance with the definition of 'adequate' in section 3 of the Agvet Code in relation to instructions on a label for containers for a chemical product.
- 130.2. I also note that a label instruction may include a direction, caution, warning or recommendation, in accordance with the definition of 'instruction' in section 3 on the Agvet Code.
131. For the purposes of being satisfied as to whether the labels listed in Attachment A of this notice meet the labelling criteria, or, if not, whether the relevant particulars or conditions of these approvals could be varied in such a way so that the labels meet the labelling criteria, I have had regard to all criteria set out section 5D(2)(a) of the Agvet Code.
- 131.1. There has been no new information provided to the APVMA or identified by the APVMA regarding any conditions to which label approvals are subject (s 5D(2)(a) of the Agvet Code) and any relevant particulars and instructions that are entered in the relevant APVMA file for the labels (s 5D(1)(b) of the Agvet Code) since the approval of the labels listed in Attachment A of this notice, **with the exception of** the instructions that are to be contained on the label (s 21(c)(iv) of the Agvet Code), the name of the chemical product that is to appear on a label for containers of the chemical product (regulation 17(1)(b) of the Agvet Regulations) and the net contents of the product (regulation 17(1)(h) of the Agvet Regulations). Therefore, I consider that there is nothing that would prevent me from being satisfied that a label listed in Attachment A of this notice meets the labelling criteria in relation to the following matters:
- a. The name of the person who applied for the approval as the holder of the approval (s 21(c)(i)); the name of any nominated agent for the approval (s 21(c)(ii)); the distinguishing number (s 21(c)(iii)); any other particulars prescribed by the regulations (s 21(c)(iva)); and any conditions of the approval imposed by the APVMA (s 21(c)(v)).
 - b. In relation to particulars to be contained on the label ((s 21(c)(iv)), the appropriate signal words required by the current Poisons Standard (regulation 17(1)(a) of the Agvet Regulations); the name of each active constituent of the product (regulation 17(1)(c) of the Agvet Regulations); the proportion of each active constituent of the product (regulation 17(1)(d) of the Agvet Regulations); the name and proportion of each constituent for the product that is not an active constituent and classified as a poison in the current Poisons Standard (regulations 17(1)(e) and (f) of the Agvet Regulations); and any particulars determined by the APVMA CEO under subregulation 17(2) of the Agvet Regulations (regulation 17(1)(j) of the Agvet Regulations).

131.2. My considerations of the instructions that are to be contained on the label (s 21(c)(iv)), the name of the chemical product that is to appear on a label for containers of the chemical product (regulation 17(1)(b) of the Agvet Regulations) and the net contents of the product (regulation 17(1)(h) of the Agvet Regulations) and are set out below, respectively, in the *'Instructions that are to be contained on the label (section 21(c)(iv) of the Agvet Code)'* (paragraphs 132 – 151), *'Name of the chemical product that is to appear on a label for containers of the chemical product (regulation 17(1)(b) of the Agvet Regulations)'* (paragraphs 152 – 154) and *'net contents of the product (regulation 17(1)(h) of the Agvet Regulations)'* (paragraphs 155 – 156) sections of these reasons.

131.3. There is no standard for the labels of anticoagulant rodenticides chemical products made under section 6E of the Agvet Code (s 5D(1)(c)). Further, there are no matters prescribed by the regulations for the purposes of section 5D(2)(d) of the Agvet Code.

Instructions that are to be contained on the label (section 21(c)(iv) of the Agvet Code)

132. I consider that instructions relating to the withholding period after the use of the product (section 5D(1)(e) of the Agvet Code) are not appropriate for a label listed in Attachment A of this notice based on the use patterns of these anticoagulant rodenticide chemical products, noting that they are not registered for use in food producing animals or crops, or crops that would be fed to an animal. I consider that instructions relating to all other matters set out in section 5D(1) of the Agvet Code are relevant to the labels of anticoagulant rodenticide products listed in Attachment A of this notice.

133. As set out above in the *'Consideration of the safety criteria'* (paragraphs 37 – 129) section of these reasons, I am not satisfied that the chemical products listed in Attachment A meet the safety criteria, and have proposed a number of variations to the instructions for use of the chemical products (in addition to other relevant particulars and conditions) so that I am satisfied that the chemical products as varied will meet the safety criteria. Similarly, based on these considerations, I am not satisfied that the associated labels contain adequate instructions related to the following matters to ensure, as far as reasonably practicable, that the product meets the safety criteria. The proposed variations to these instructions are set out in the following respective sections of these reasons:

133.1. The circumstances in which the product should be used (section 5D(1)(a) of the Agvet Code) (paragraphs 136 – 138 of these reasons).

133.2. How the product should be used (section 5D(1)(b) of the Agvet Code) (paragraphs 139 – 143 of these reasons).

133.3. The frequency of the use of the product (section 5D(1)(c) of the Agvet Code) (paragraphs 144 – 145 of these reasons).

133.4. The disposal of the product when it is no longer required and containers of the product (sections 5D(1)(g) and (h) of the Agvet Code) (paragraphs 146 – 148 of these reasons).

133.5. The safe handling of the product and first aid in the event of an accident caused by the handling of the product (section 5D(1)(i) of the Agvet Code) (paragraphs 149 – 151 of these reasons).

134. I am satisfied that the current instructions on the labels listed in Attachment A of this notice relating to the times when the products should be used (section 5D(1)(c) of the Agvet Code) and the re-entry period after use of the products (section 5D(1)(f) of the Agvet Code) are adequate to ensure, as far as reasonably practicable, that the product meets the safety criteria.

- 134.1. In relation to the times when the product should be used, I note that current label instructions indicate that the product should be used when there is an active rodent infestation that should be controlled. Further, I note that labels of certain chemical products (33896, 48372, 52675, 59323, 66235, 66331, 69867, 69994, 82450, 86179, 87706, 89557, 90982) currently state that monitoring and/or maintenance treatments can be used at sensitive sites when there is no current rodent infestation. The information that I have considered as part of this reconsideration does not indicate that additional instructions related to the times when the product should be used are required, and I therefore consider that the current instructions remain adequate.
- 134.2. I note that there are no current label instructions for a re-entry period after the use of the product. Based on the information considered as part of this reconsideration, I do not consider that there is a period of time after treatment during which it is unsafe for a person to enter the place without wearing appropriate protective clothing and/or equipment and therefore I consider that the current nil re-entry period instructions remain adequate. In making this determination, I have considered that these chemical products are ready-to-use baits placed in bait stations and the risk mitigation measures proposed to reduce the risk to bystanders who may enter the treatment area and to workers involved in clean-up activities, as discussed above respectively in paragraphs 97 and 95 of these reasons.
135. In regard to the prescribed matters for the labelling criteria that are set out in regulation 8AE(1) of the Agvet Regulations for the purpose of paragraph 5D(1)(j) of the Agvet Code:
- 135.1. Label instructions relating to the duration of any treatment using the product (regulation 8AE(1)(a) of the Agvet Regulations) are not required on a label of a products listed in Attachment A of this notice, as they are not veterinary chemical products.
- 135.2. I do not consider that any specific instructions related to the prevention of undue prejudice to trade or commerce between Australia and places outside of Australia (regulation 8AE(1)(b) of the Agvet Regulations) are required on the label of a product listed in Attachment A of this notice. This is because I consider that adequate label instructions ensuring, as far as reasonably practicable, that an anticoagulant rodenticide product meets the safety criteria are also adequate to ensure that any product that is the subject of trade between Australia and places outside of Australia should not contain any anticoagulant rodenticide residues.
- 135.3. I note that the current instructions on the label of a product listed in Attachment A of this notice include the appropriate signal words required by the current Poisons Standard (regulation 8AE(1)(c) of the Agvet Regulations).
- 135.4. Label instructions relating to the storage of containers for the product (regulation 8AE(1)(d) of the Agvet Regulations) are not required on a label of a products listed in Attachment A of this notice, as they are not date-controlled chemical products.
- 135.5. There is no other matter determined by the APVMA CEO under subregulation 8AE(2) of the Agvet Regulations in relation to adequate instructions that a label must contain (regulation 8AE(1)(e) of the Agvet Regulations).

The circumstances in which the product should be used - s 5D(1)(a)

136. I note that I was **not satisfied** that anticoagulant rodenticides chemical products meet the safety criteria when used in certain circumstances due to potential safety concerns associated with non-target terrestrial vertebrates and potential contamination of food commodities, and that current labels of anticoagulant rodenticide chemical products permit use in these circumstances. Therefore, so that the labels listed in Attachment A of this notice

contain adequate instructions to ensure, as far as reasonably practicable, that products meet the safety criteria, I consider the following:

- 136.1. The instructions listed in paragraph 55.3.b of these reasons are required in the restraints section of the labels of all commercial anticoagulant rodenticide chemical products, based on the determination that the use of these commercial anticoagulant rodenticide chemical products should be restricted to trained professionals.
- 136.2. The directions listed in paragraph 51.1 of these reasons are required in the restraints section of the label of all anticoagulant rodenticide chemical products approved for the control of mice, as use of these chemical products outdoors for the control of mice was not supported. Further, all current instructions related to the control of mice in outdoor situations should be removed from the labels of all anticoagulant rodenticide chemical products (see templates for proposed varied labels in Attachment D).
- 136.3. The directions listed in paragraph 51.2 of these reasons are required in the restraints section of the label of chemical products approved for use for the control of rats, excluding certain chemical products containing coumatetralyl that are approved for use in agricultural crops (52098, 82217), based on the determination that the use of chemical products outside of buildings should be limited to within 2 meters of a building. Further, all current instructions that indicate bait may be placed at a further distance from buildings should be removed from the labels of these chemical products (see templates for proposed varied labels in Attachment D).
- 136.4. The directions listed in paragraph 51.3 of these reasons are required in the restraints section of the label of all anticoagulant rodenticide chemical products approved for use for the control of rats, as the use of burrow baiting techniques with these chemical products was not supported. Further, all current instructions that indicate that use burrow baiting techniques is permitted should be removed from the labels of these chemical products (see templates for proposed varied labels in Attachment D).
- 136.5. The directions listed in paragraph 107.2 of these reasons are required in the restraints section of the labels of commercial anticoagulant rodenticide chemical products that are formulated as loose pellets or grain and all domestic anticoagulant rodenticide chemical products (see Table 17 in Attachment D), as the use of these chemical products in and around animal, livestock and poultry houses, associated equipment, and food and feed processing areas was not supported. Further, any current instructions related to the use of these chemical products in and around animal, livestock and poultry houses, associated equipment, or food and feed processing areas should be removed from the labels (see templates for proposed varied labels in Attachment D).
137. Further, I note that for certain domestic anticoagulant rodenticide chemical products listed in Attachment A of this notice (54836, 56632, 58661, 59284, 62635, 63885, 69017, 69119, 69158, 82233, 82234, 83673, 94339, 94350), the circumstance in which the product should be used is not explicitly stated on the label of these chemical products. Given that, in general, domestic pest-control products are designed to be supplied to and used by the general public for the control of common pests in private dwellings, I consider that the situation '**in domestic buildings**' should be added to the label instructions with respect to the control of mice, and the situation '**in and around domestic buildings**' should be added to the label instructions with respect to the control of rats (see templates for proposed varied labels in Attachment D).
138. I am satisfied that, after variation of the label instructions in the ways detailed in paragraphs 136 – 137 above, the instructions related to the circumstances in which the product should be used are adequate for the purpose of labels listed in Attachment A of this notice meeting the labelling criteria.

How the product should be used – s 5D(1)(b)

139. In relation instructions on how the product should be used on the labels of commercial anticoagulant rodenticide chemical listed in Attachment A of the notice, in order for the labels to contain adequate instructions to ensure, as far as reasonably practicable, that products meet the safety criteria, I consider the following:
- 139.1. The directions listed in paragraph 56.1.d, 97.1 and 103.1 of these reasons are required in the restraints section of all commercial anticoagulant rodenticide chemical products, to reduce the likelihood of an unintended effect that is harmful to non-target terrestrial vertebrates and an effect that is harmful to human beings, including children that may be in the vicinity of the treatment area and people that may hunt for wild game.
- 139.2. The directions listed in paragraph 56.3 of these reasons are required in the restraints section of labels of commercial coumatetralyl and diphacinone chemical products (51508, 52098, 82217 and 89433), noting that this baiting technique is not appropriate for chemical products that contain these first-generation anticoagulant rodenticides due to the increased risk of target mice or rats consuming a non-lethal dose of the bait.
- 139.3. For the labels of commercial anticoagulant rodenticide chemical products that are formulated as blocks, paste in a caulking gun or paste/pellets in a sachet or place pack (see Table 17 in Attachment D), the directions listed in paragraph 107.3.a of these reasons are required in the restraints section and the cautionary directions listed in paragraph 107.3.b of these reasons are required in the directions for use section in order to reduce potential contamination risks associated with food commodities that may be consumed by human beings.
- 139.4. For the labels of certain coumatetralyl products approved for use in agricultural crops (52098, 82217), the directions listed in paragraph 109.1.a of these reasons are required in the restraints section and the directions listed in paragraphs 109.1.b and 109.2 of these reasons are required in the directions for use section in order to mitigate potential contamination risks associated with food commodities grown from these agricultural crops.
- 139.5. The directions and cautionary statements listed in paragraphs 103.2 and 107.1.b of these reasons are required in the precautions section of labels of all commercial anticoagulant rodenticide chemical products, to reduce potential contamination risks associated with use of products in areas where wildlife and game may be hunted and in and around buildings.
- 139.6. The warning statements and directions listed in paragraph 50, 52.2, 58.1, 107.1.a and 107.1.c of these reasons are required in the protections section of all commercial anticoagulant rodenticide chemical products, under the sub-heading **'PROTECTION OF LIVESTOCK AND WILDLIFE'**, in order to reduce the likelihood of an unintended effect that is harmful to non-target terrestrial vertebrates and reduce the potential contamination risks associated with wild game and livestock.
- 139.7. The relevant warning statement, based on the active constituent of the product, and directions listed respectively in paragraphs 64 and 65.2 of these reasons are required in the protections section of the labels of all commercial anticoagulant rodenticide chemical products, under the sub-heading **'PROTECTION OF FISH, CRUSTACEANS AND ENVIRONMENT'**, in order to mitigate the risks that the use of the chemical products in accordance with instructions may have an unintended effect that is harmful to aquatic species.
- 139.8. The directions listed in paragraph 57 of these reasons are required in the directions for use section of all commercial anticoagulant rodenticide chemical products in order to reduce the likelihood that use of the

chemical products in accordance with instructions may have an unintended effect that is harmful to non-target terrestrial vertebrates. For this reason, I also consider that the direction ***'Use placebo or unpoisoned bait blocks if the placement of the bait presents a hazard to non-target animals'*** is required on the labels of all commercial chemical products with instructions for monitoring and/or maintenance treatments (33896, 48372, 52675, 59323, 66235, 66331, 69867, 69994, 82450, 86179, 87706, 89557, 90982).

139.9. Finally, as details in paragraph 87.3 of these reasons, any current instructions of the labels of anticoagulant rodenticide chemical products that indicate people should avoid touching the bait for various reasons should be varied to ***'DO NOT touch bait'*** in order to mitigate safety concerns for people who handle these chemical products.

140. In relation instructions on how the product should be used on the labels of domestic anticoagulant rodenticide chemical listed in Attachment A of the notice, in order for the labels to contain adequate instructions to ensure, as far as reasonably practicable, that products meet the safety criteria, I consider the following:

140.1. The directions listed in paragraph 61.1 of these reasons are required respectively in the restraints and how to use sections of the labels of all domestic anticoagulant rodenticide chemical products to reduce the risks associated with non-target terrestrial vertebrates and children inadvertently accessing baits, as detailed in paragraphs 61.1 and 97.1 of these reasons.

140.2. The directions listed in paragraph 103.1 of these reasons are required in the restraints section of all domestic anticoagulant rodenticide chemical products to reduce potential contamination risks associated wild game that people may hunt.

140.3. The directions listed in paragraph 61.3 of these reasons are required in the restraints section of all domestic anticoagulant rodenticide chemical products, noting that the pulsed baiting technique requires specialised knowledge to implement safely and effectively, which non-professional users of domestic products are not expected to have.

140.4. The directions and cautionary statements listed in paragraphs 103.2 and 107.1.b of these reasons are required in the precautions section of labels of all domestic anticoagulant rodenticide chemical products, under a sub-heading of ***'CAUTION'***, to reduce potential contamination risks associated with use of products in areas where wildlife and game may be hunted and in and around buildings.

140.5. The warning statements and directions listed in paragraphs 50, 52.2, 62.1, 107.1.a and 107.1.c of these reasons are required in the precautions section of all domestic anticoagulant rodenticide chemical products, under a sub-heading of ***'PROTECTION OF LIVESTOCK AND WILDLIFE'***, in order to reduce the likelihood of an unintended effect that is harmful to non-target terrestrial vertebrates and reduce the potential contamination risks associated with wild game and livestock.

140.6. The relevant warning statement, based on the active constituent of the product, and directions listed respectively in paragraphs 64 and 65.2 of these reasons are required in the precautions section of the labels of all domestic anticoagulant rodenticide chemical products, under a sub-heading of ***'PROTECTION OF FISH, CRUSTACEANS AND ENVIRONMENT'***, in order to mitigate the risks that the use of the chemical products in accordance with instructions may have an unintended effect that is harmful to aquatic species.

140.7. Finally, as details in paragraph 87.3 of these reasons, any current instructions of the labels of anticoagulant rodenticide chemical products that indicate people should avoid touching the bait for various

reasons should be varied to ***'DO NOT touch bait'*** in order to mitigate safety concerns for people who handle these chemical products.

141. I also consider that any current instructions on how the product should be used in labels of anticoagulant rodenticide chemical products that are contradictory or comparable to the instructions on how the product should be used that I consider necessary, as detailed in paragraphs 139 or 140 of these reasons, should be removed from the relevant labels of anticoagulant rodenticide chemical products (see templates for proposed varied labels in Attachment D).
142. Further, I note that certain labels of anticoagulant rodenticide chemical products listed in Attachment A of this notice contain only outdated textual instructions on how the products should be used. In order to be satisfied of the adequacy of instructions on these labels, I consider that the outdated textual instructions should be converted to contemporary tabular instructions, which include details on the situations where product should be used, the pests to be controlled by the product, the application rate of the products, and any other critical comments that relate to how the product should be used (see templates for proposed varied labels in Attachment D).
143. I am satisfied that, after variation of the label instructions in the ways detailed in paragraphs 139 – 142 above, the instructions related to how the product should be used are adequate for the purpose of labels listed in Attachment A of this notice meeting the labelling criteria.

The frequency of the use of the product – s 5D(1)(d)

144. I note that the current label instructions for the labels of products listed in Attachment A of the notice indicate that users should replace baits as they are consumed by target rodents and to maintain the supply of baits until rodent activity ceases. In addition to these instructions, I consider the following based on the fact that continued rodent activity after 35 days of treatment may indicate that the baiting strategy in use is ineffective due to resistance build up or the movement of rodents:
- 144.1. In relation to the labels of commercial anticoagulant rodenticide chemical products listed in Attachment A of this notice, continued use of this treatment regime without an evaluation may needlessly increase the risk of unintended exposure of non-target wildlife and therefore the directions for use set out in paragraph 56.2 of these reasons are required so that the labels contain adequate instructions to ensure, as far as reasonably practicable, that the products meet the safety criteria.
- 144.2. In relation to the labels of domestic anticoagulant rodenticide chemical products listed in Attachment A of this notice, continued application of baits by untrained domestic users may needlessly increase the risk of unintended exposure of non-target wildlife and therefore the directions for use set out in paragraph 61.2 of these reasons are required so that the labels contain adequate instructions to ensure, as far as reasonably practicable, that the products meet the safety criteria.
145. I am satisfied that, after variation of the label instructions in the ways detailed in paragraph 144 above, the instructions related to the frequency of use of the product are adequate for the purpose of labels listed in Attachment A of this notice meeting the labelling criteria.

The disposal of the product when it is no longer required and containers of the product – s 5D(1)(g) and (h)

146. In relation to the labels of commercial anticoagulant rodenticide chemical products, I note that the current instructions for the disposal of the product when it is no longer required and for the disposal of containers for the product may be misleading, with respect to environmental safety, as they contain outdated instructions which refer to 'landfill' and/or incorrectly infer that product containers can be disposed of via burial in a disposal pit in all jurisdictions. Therefore, for the labels of commercial products listed in Attachment A of this notice, I consider that

the directions related to the disposal of product when it is no longer required and product containers set out in paragraph 58.2 should replace the current disposal directions so that the labels to contain adequate instructions to ensure, as far as reasonably practicable, that the products meet the safety criteria.

147. In relation to the labels of domestic anticoagulant rodenticide chemical products listed in Attachment A of this notice, I consider that the directions related to the disposal of product when no longer required and product containers set out in paragraph 62.2 of these reasons should replace current disposal directions so that the labels contain adequate instructions to ensure, as far as reasonably practicable, that the products meet the safety criteria.
148. I am satisfied that, after variation of the label instructions in the ways detailed in paragraphs 146 – 147 above, the instructions related to the disposal of product when no longer required and product containers are adequate for the purpose of labels listed in Attachment A of this notice meeting the labelling criteria.

The safe handling of the product and first aid in the event of an accident caused by the handling of the product – s 5D(1)(i)

149. In relation to the label instructions on the safe handling of the product in Attachment A of this notice:
- 149.1. I consider that the warnings and directions related to the safe handling of the product during product application in Table 14 are required in the safety directions of the respective labels of anticoagulant rodenticides chemical products, so that the labels contain adequate instructions to ensure, as far as reasonably practicable, that the products meet the safety criteria. Therefore, I consider that instructions in Table 14 should replace the current safety directions on the respective labels of products listed in Attachment A of this notice.
- 149.2. Further, I consider that the directions for the safe re-handling of product remains and other clean-up activities set out in paragraph 95 of these reasons are required, so that the labels contain adequate instructions to ensure, as far as reasonably practicable, that the products meet the safety criteria. Therefore, I consider that these instructions should be added to the safety directions of all labels of products listed in Attachment A of this notice.
150. In relation to label instructions on the first aid in the event of an accident caused by the handling of the product listed in Attachment A of this notice:
- 150.1. I consider that the directions set out in paragraph 82 of these reasons are required as the first aid instructions on the labels of all anticoagulant rodenticide chemical products, so that they contain adequate instructions to ensure, as far as reasonably practicable, that products meet the safety criteria. Therefore, where necessary, I consider that these directions should replace the current first aid instructions on the labels of products listed in Attachment A of this notice.
- 150.2. Further, based on my review and considerations of the recommendation in section '4.9.1 First Aid Instructions' of the *Anticoagulant Rodenticides Review Technical Report*, I do not consider that any warnings related to first aid are required on the label of an anticoagulant rodenticide chemical product. Therefore, where necessary, I consider that any current first aid warnings should be removed from the labels of the products listed in Attachment A of this notice (see templates for proposed varied labels in Attachment D).
151. I am satisfied that, after variation of the label instructions in the ways detailed in paragraphs 149 – 150 above, the instructions related to the safe handling of the product and first aid in the event of an accident caused by the handling of the product are adequate for the purpose of labels listed in Attachment A of this notice meeting the labelling criteria.

Name of the chemical product that is to appear on a label for containers of the chemical product (regulation 17(1)(b) of the Agvet Regulations)

152. In relation to labels for certain chemical products (56632, 58301, 63885, 85522, 88847, 87870), I am **not satisfied** that the name of the chemical product that is to appear on the label remains appropriate after variation of the instructions on how to use the product detailed above in paragraphs 56.1, 61.1, 97.1 and 107.3 of these reasons. That is because the current label names contain the phrase 'throw packs' or 'throw pellets', which will become misleading as it is proposed that these anticoagulant rodenticide chemical products should be contained within a tamper-resistant bait station in either most or all situations. I note that, under regulation 18F(1)(b) of the Agvet Regulations, a label must not contain misleading information about the use of the chemical product to which the label relates.
153. For the labels of these chemical products (56632, 58301, 63885, 85522, 88847, 87870), I consider that the current labels names that will become misleading after variation of the instructions of how to use the chemical product can be varied so that the phrases 'throw pack(s)' or 'throw pellets' are replaced with 'pellet pack(s)'. I am satisfied that the label names as varied are adequate for the purpose of labels listed in Attachment A of this notice meeting the labelling criteria.
154. For remaining labels of chemical products listed in Attachment A of this notice, I am satisfied that the name of the chemical product that is to appear on the label remain adequate for the purpose of these labels meeting the labelling criteria.

Net contents of the product (regulation 17(1)(h) of the Agvet Regulations)

155. In relation to the labels of domestic anticoagulant rodenticide chemical products listed in Attachment A of this notice that have a net contents greater than those listed in Table 6, I am **not satisfied** that the net contents of the products remain appropriate for the purpose of the products meeting the safety criteria, for the reasons detailed in paragraph 60 of these reasons. For these labels, I consider the net contents of the product can be varied to have a maximum net content in line with Table 6, based on the active constituent and bait type of the product. I am satisfied that, after variation as proposed, the net contents will be adequate for the purpose of labels of domestic anticoagulant rodenticide chemical products listed in Attachment A of this notice meeting the labelling criteria.
156. In relation to the labels of commercial anticoagulant rodenticide chemical products listed in Attachment A of this notice, I am satisfied that the current net contents of the product remain adequate for the purpose of the labels meeting the labelling criteria.

Labelling criteria conclusions

157. I am **not satisfied** that the labels of anticoagulant rodenticide chemical products listed in Attachment A of this notice meet the labelling criteria as they contain inadequate instructions to ensure, as far as reasonably practicable, that the associated chemical product meets the safety criteria.
158. I am satisfied that the that the relevant particulars of the approvals can be varied in the following ways so that the labels of anticoagulant rodenticide chemical products listed in Attachment A of this notice will meet the labelling criteria. This includes:
- 158.1. Variation of the relevant particular 'the instructions and any particulars that are to be contained on the label' for all labels of anticoagulant rodenticide chemical products, as detailed in paragraphs 132 – 151 of these reasons. This includes variation of the instructions on the circumstances in which the products should be used, how the products should be used, the frequency of the use of the products, the disposal of

the products when it is no longer required and containers of the products, and the safe handling of the products and first aid in the event of an accident caused by the handling of the products.

158.2. Variation of the relevant particular 'the name of the chemical product that is to appear on a label for containers of the chemical product' for certain labels of anticoagulant rodenticide chemical products (56632, 58301, 63885, 85522, 88847, 87870), as detailed in paragraphs 152 – 154 of these reasons.

158.3. Variation of the relevant particular 'the net contents of the product' for the labels of domestic anticoagulant rodenticide chemical products, as detailed in paragraphs 155 – 156 of these reasons.

Conclusions

159. Having regard to the matters set out above regarding the anticoagulant rodenticides chemical products listed in Attachment A of this notice.

159.1. I am **not satisfied** that the products meet the safety criteria chemical due as I am **not satisfied** that the use of chemical products in accordance with current instructions:

- a. **would not be likely** to have an unintended effect that is harmful to animals, including non-target terrestrial vertebrates and aquatic species.
- b. **would not be likely** to pose an undue hazard to the safety of people exposed to it during its handling or people using anything containing its residues, including potential safety concerns for professional workers who handle the chemical products during application and/or people who are involved in clean-up activities.
- c. **would not be likely** to have an effect that is harmful to human beings, including potential safety concerns related to vulnerable human beings who may inadvertently access baits, human beings who may hunt for wild game in treated areas and/or the potential for contamination of food commodities that may be consumed by human beings.

159.2. I am satisfied that the relevant particulars and conditions of the registrations can be varied in such a way as to allow me to be satisfied that products will meet the safety criteria, as detailed in paragraph 129 of this statement of reasons. I am also satisfied that there are no additional requirements prescribed by the regulations for chemical product registrations beyond those that I considered with respect to whether the chemical products meet the safety criteria.

159.3. Therefore, I am satisfied that the relevant particulars and conditions of the registrations can be varied in such a way as to allow the registrations to be affirmed.

160. Having regard to the matters set out above regarding the labels of anticoagulant rodenticides chemical products listed in Attachment A of this notice.

160.1. I am **not satisfied** that these labels meet the labelling criteria as they contain inadequate instructions to ensure, as far as reasonably practicable, that the associated chemical product meets the safety criteria.

160.2. I am satisfied that the relevant particulars of the label approval can be varied in such a way so that the labels meet the labelling criteria, as detailed in paragraph 158 of this statement of reasons. I am also satisfied that there are no additional requirements prescribed by the regulations for labels of chemical products beyond those that I considered with respect to whether the label approvals meet the labelling criteria.

160.3. Therefore, I am satisfied that the relevant particulars of the label approvals can be varied in such a way as to allow the approvals to be affirmed

161. Consequently, I propose to:

161.1. Pursuant to section 34A(1) of the Agvet Code:

- a. Vary the relevant particulars and conditions of the chemical product registrations listed in Attachment A, in the manner set out in paragraph 129 of this statement of reasons, to allow affirmation under section 34(1) of the Agvet Code; and
- b. Vary the relevant particulars of the label approvals listed in Attachment A, in the manner set out in paragraph 158 of this statement of reasons, to allow affirmation under section 34(1) of the Agvet Code.

161.2. Pursuant to section 34(1) of the Agvet Code:

- a. affirm the registrations, as varied, of the anticoagulant rodenticide chemical products listed in Attachment A of this notice; and
- b. affirm the approvals, as varied, of the labels of anticoagulant rodenticide chemical products listed in Attachment A of this notice.

Attachment C: Information on which the reasons are based

The information on which the reasons in the draft statement of reasons for proposed course of action are set out below.

- 1) Information provided to the APVMA in response to notices as listed in the [Anticoagulant Rodenticides Data List](#) and cited in the Review Technical Report, noting that Confidential Commercial Information restrictions limit access to some of these data:
 - a. Issued to holders of anticoagulant rodenticide approvals and registrations on 21 November 2021 and 17 March 2025 under section 32 of the Agvet Code.
 - b. Published in the APVMA Gazette on 21 November 2021 under section 32 of the Agvet Code.
 - c. Issued to holders of anticoagulant rodenticide approvals and registrations under section 33 of the Agvet Code on 28 November 2022, 27 June 2024 and 4 July 2024.
- 2) The APVMA records for the registration of relevant products and approval of relevant labels, including information submitted and assessed at the time of registration and approval.
- 3) Information assessed by the APVMA and summarised in the following published report:
 - a. Anticoagulant Rodenticides [Review Technical Report](#)
- 4) Information assessed by the APVMA in the following unpublished reports (these are internal APVMA reports which include confidential commercial information belonging to multiple parties):
 - a. Anticoagulant rodenticides – chemistry and manufacture risk assessment (Ref: A3652378, A3537438)
 - b. Anticoagulant rodenticides – human health risk assessment (Ref: A3429050)
 - c. Anticoagulant rodenticides – fate and behaviour in the environment (Ref: A3217354)
 - d. Anticoagulant rodenticides – effects on non-target species (Ref: A3218224)
 - e. Anticoagulant rodenticides – environment assessment report (Ref: A2913026)
 - f. Anticoagulant rodenticides – residues and trade assessment report (Ref: A3462884)
- 5) The relevant provisions of the Agvet Code and instruments under that Code, in particular those set out in the tables below:

Table C4: Agricultural and Veterinary Chemicals Code Act 1994

Section	Section Heading
3	Definitions
5A	Definition of <i>meets the safety criteria</i>
5B	Definition of <i>meets the efficacy criteria</i>
5C	Definition of <i>meets the trade criteria</i>
5D	Definition of <i>meets the labelling criteria</i>
6E	The APVMA may make standards
20	How registration of chemical product takes place
21	How approval of label takes place

Section	Section Heading
23	Conditions of approval or registration
31	APVMA may reconsider an approval or registration
33	APVMA may require information, reports, results or samples
34	Reconsideration by APVMA
34A	Varying relevant particulars or conditions to allow affirmation
34AA	Suspension or cancellation
34AB	Notice of proposed decision

Table C5: *Agricultural and Veterinary Chemicals Code Regulations 1995*

Section	Section Heading
8AB	Safety Criteria – chemical products
8AD	Trade Criteria
8AE	Labelling Criteria
16	Particulars of registered chemical products to be recorded
17	Particulars for label
17C	Conditions of approval or registration – active constituents and chemical products
18	Conditions of registration of chemical products – containers
18E	Labelling standards and requirements

Table C6: Other legislative instruments under the *Agricultural and Veterinary Chemicals Code Act 1994*

Legislative instruments
<u>Agricultural and Veterinary Chemical Code (Efficacy Criteria) Determination 2014</u>
<u>Agricultural and Veterinary Chemicals Code (Conditions of Approval or Registration) Order 2021</u>
<u>Agricultural and Veterinary Chemicals Code (Agricultural Active Constituents) Standards 2022</u>
<u>Agricultural and Veterinary Chemicals Code (Allowable Variation in Concentrations of Constituents in Agricultural Chemical Products) Standard 2022</u>

6) Relevant APVMA risk assessment manuals, as published on the APVMA website:

- a. Chemistry and manufacture (<https://www.apvma.gov.au/registrations-and-permits/data-guidelines/risk-assessment-manuals/chemistry-manufacture>)
- b. Environment (<https://www.apvma.gov.au/registrations-and-permits/data-guidelines/risk-assessment-manuals/environment>)

- c. Human health (<https://www.apvma.gov.au/registrations-and-permits/data-guidelines/risk-assessment-manuals/human-health>)
- d. Residues and trade (<https://www.apvma.gov.au/registrations-and-permits/data-guidelines/risk-assessment-manuals/residues-trade>)

7) The following risk assessment methodologies and assessments from international regulators.

- a. European Chemicals Agency (ECHA). 2018. Revised emission scenario document for product type 14 (rodenticides). Helsinki, Finland
- b. Berny Ph, Esther A, Jacob J, Prescott C. 2014. Risk mitigation measures for anticoagulant rodenticides as biocidal products. European Commission contract no 07-0307/2012/638259/ETU/D3.
- c. United States Environmental Protection Agency (US EPA). 2021, Occupational Pesticide Handler Exposure Calculator (OPHEC) (version date: May 2021).
<https://www.epa.gov/sites/production/files/2021-05/opp-hed-occupational-handler-exposure-may-2021.xlsx>
- d. United States Environmental Protection Agency (US EPA). 2012. Residential (Handler) Standard Operating Procedures (SOPs). <https://www.epa.gov/pesticide-science-and-assessing-pesticide-risks/standard-operating-procedures-residential-pesticide#sops>
- e. Food and Agriculture Organization of the United Nations (FAO) Specifications and Evaluations for Agricultural Pesticides: Brodifacoum. 3-[3-(4'-bromobiphenyl-4-yl)-1,2,3,4- tetrahydro-1-naphthyl]- 4-hydroxycoumarin. 2015. (<https://openknowledge.fao.org/server/api/core/bitstreams/e4bf9cc0-99c1-472b-8360-972093d4d897/content>)

8) *Therapeutic Goods (Poisons Standard—June 2025) Instrument 2024* (i.e. the Standard for the Uniform Scheduling of Medicines and Poisons)

Attachment D: Templates for proposed varied anticoagulant rodenticide labels

Representative labels for anticoagulant rodenticide chemical products are provided below

Table 17: Representative template labels for varied anticoagulant rodenticide chemical labels

Registration number	Product name	Active Constituent(s)	Commercial or domestic product	Substance	Template Label
33896	Talon Rat & Mouse Killer Pellets	Brodifacoum	Commercial	RB 0.05 g/kg or less in pellet formulation	3a
49867	Ditrac All Weather Blox Rodenticide	Brodifacoum	Commercial	RB 0.05 g/kg or less in block formulation	1c
49868	Ditrac Rodenticide	Brodifacoum	Commercial	RB 0.05 g/kg or less in pellet formulation	3b
50697	Tomcat II All Weather Blox Rodenticide	Brodifacoum	Commercial	RB 0.05 g/kg or less in block formulation	1c
51181	Pestmaster Mouse & Rat Bait	Brodifacoum	Commercial	RB 0.05 g/kg or less in pellet formulation	3b
51280	Tomcat II Rodenticide	Brodifacoum	Commercial	RB 0.05 g/kg or less in pellet formulation	3b
52675	Talon Rat & Mouse Killer All Weather Wax Blocks	Brodifacoum	Commercial	RB 0.05 g/kg or less in block formulation	1a
54836	Fast Action Ratsak Bait Station Kills Rats and Mice	Brodifacoum	Domestic	RB 0.05 g/kg or less in sachet or place pack	7a
54839	Rentokil Brodifacoum Paste	Brodifacoum	Commercial	RB 0.05 g/kg or less as a paste in caulking gun	2b
56632	Fast Action Ratsak Throwpacks Kills Rats & Mice	Brodifacoum	Domestic	RB 0.05 g/kg or less in sachet or place pack	7a
58301	Talon Rat & Mouse Killer Ezy Throw Pellets	Brodifacoum	Domestic	RB 0.05 g/kg or less in sachet or place pack	7a
58338	Talon Rat & Mouse Killer Pellet Trays	Brodifacoum	Domestic	RB 0.05 g/kg or less in sachet or place pack	7a
58339	Talon Rat & Mouse Killer Wax Blocks	Brodifacoum	Domestic	RB 0.05 g/kg or less in block formulation	5a
58661	Mortein Kills Rats & Mice and The Fleas They Carry Dual Action Bait	Brodifacoum, Fipronil	Domestic	RB 0.05 g/kg or less in pellet formulation	6
59323	Talon XT Pro Rodenticide Wax Blocks	Brodifacoum	Commercial	RB 0.05 g/kg or less in block formulation	1a
59875	All Weather PCT First Formula Blocks Rodenticide	Brodifacoum	Commercial	RB 0.05 g/kg or less in block formulation	1b
59876	Surefire All Weather Blocks Rodenticide	Brodifacoum	Commercial	RB 0.05 g/kg or less in block formulation	1b
62635	Talon Mouse Bait Station	Brodifacoum	Domestic	RB 0.05 g/kg or less in block formulation	5b
63624	X-Verminator Single Feed Lethal Dose Rodent Blocks	Brodifacoum	Commercial	RB 0.05 g/kg or less in block formulation	1b
63867	Surefire Pellets Rodenticide	Brodifacoum	Commercial	RB 0.05 g/kg or less in pellet formulation	3b
63885	Mortein Kills Rats & Mice and the Fleas They Carry Dual Action Throwpack	Brodifacoum, Fipronil	Domestic	RB 0.05 g/kg or less in sachet or place pack	7b
65597	Imtrade Top Cat Rodenticide Wax Blocks	Brodifacoum	Commercial	RB 0.05 g/kg or less in block formulation	1b

Registration number	Product name	Active Constituent(s)	Commercial or domestic product	Substance	Template Label
66235	Rodenthor Block Rodenticide	Brodifacoum	Commercial	RB 0.05 g/kg or less in block formulation	1a
66331	Rodenthor Soft Bait Rodenticide	Brodifacoum	Commercial	RB 0.05 g/kg or less in sachet or place pack	4a
67610	Ratsak Professional Pellets	Brodifacoum	Commercial	RB 0.05 g/kg or less in pellet formulation	3b
67611	Ratsak Professional All Weather Wax Blocks	Brodifacoum	Commercial	RB 0.05 g/kg or less in block formulation	1b
67652	Fast Action Ratsak Waxblocks	Brodifacoum	Domestic	RB 0.05 g/kg or less in block formulation	5a
68021	Brigand Rodenticide Paste	Brodifacoum	Commercial	RB 0.05 g/kg or less in sachet or place pack	4b
68025	Brigand Rodenticide Blocks	Brodifacoum	Commercial	RB 0.05 g/kg or less in block formulation	1b
68028	Brigand Rodenticide Pellets	Brodifacoum	Commercial	RB 0.05 g/kg or less in pellet formulation	3b
68122	Pestmaster Rat & Mouse Killer Wax Blocks	Brodifacoum	Commercial	RB 0.05 g/kg or less in block formulation	1d
69017	Fast Action Ratsak Reusable Mouse Bait Station with Wax Blocks	Brodifacoum	Domestic	RB 0.05 g/kg or less in block formulation	5b
69119	Fast Action Ratsak Reusable Rodent Bait Station with Wax Blocks	Brodifacoum	Domestic	RB 0.05 g/kg or less in block formulation	5a
69158	Fast Action Ratsak Disposable Mouse Bait Station with Wax Block	Brodifacoum	Domestic	RB 0.05 g/kg or less in block formulation	5b
69209	Ratshot Rapidkill Rodenticide Blocks	Brodifacoum	Commercial	RB 0.05 g/kg or less in block formulation	1b
69210	Ratshot Final Kill Paste Rodenticide	Brodifacoum	Commercial	RB 0.05 g/kg or less in sachet or place pack	4b
69643	Ratal B Rat Blocks	Brodifacoum	Commercial	RB 0.05 g/kg or less in block formulation	1d
69867	Klerat Xt Pro Rodenticide Wax Blocks	Brodifacoum	Commercial	RB 0.05 g/kg or less in block formulation	1a
80029	Ratshot One Shot Rodenticide Pellets	Brodifacoum	Commercial	RB 0.05 g/kg or less in pellet formulation	3b
80059	Farmalinx Rodi Pellets	Brodifacoum	Commercial	RB 0.05 g/kg or less in pellet formulation	3b
81663	The Big Cheese Ultra Power Fast Action Bait Blocks	Brodifacoum	Commercial	RB 0.05 g/kg or less in block formulation	1b
81664	The Big Cheese Ultra Power Rat Kill Bait Station	Brodifacoum	Domestic	RB 0.05 g/kg or less in block formulation	5a
81665	The Big Cheese Ultra Power Mouse Kill Bait Station	Brodifacoum	Domestic	RB 0.05 g/kg or less in block formulation	5b
81666	The Big Cheese Ultra Power Fast Action Bait Packs	Brodifacoum	Commercial	RB 0.05 g/kg or less in sachet or place pack	4b
82233	Time's Up Fast Action Baited Mouse Station	Brodifacoum	Domestic	RB 0.05 g/kg or less in block formulation	5b
82234	The Big Cheese Ultra Power Fast Action Disposable Mouse Kill Bait Station	Brodifacoum	Domestic	RB 0.05 g/kg or less in block formulation	5b
83673	Fast Action Ratsak Multi Pack	Brodifacoum	Domestic	RB 0.05 g/kg or less in block formulation	5a

Registration number	Product name	Active Constituent(s)	Commercial or domestic product	Substance	Template Label
84215	Freezone Ratshot G Quickshot Rodenticide	Brodifacoum	Commercial	RB 0.05 g/kg or less in pellet formulation	3b
85522	Time's Up Fast Action Throw Pack	Brodifacoum	Commercial	RB 0.05 g/kg or less in sachet or place pack	4b
85523	Time's Up Fast Action Block Bait	Brodifacoum	Commercial	RB 0.05 g/kg or less in block formulation	1b
86214	The Big Cheese Ultra Power Fast Action Block Bait Rodenticide	Brodifacoum	Commercial	RB 0.05 g/kg or less in block formulation	1b
87706	Rodenthor Gel Rodenticide	Brodifacoum	Commercial	RB 0.05 g/kg or less as a paste in caulking gun	2a
88845	The Big Cheese Ultra Power Block Bait Rodenticide	Brodifacoum	Commercial	RB 0.05 g/kg or less in block formulation	1e
88846	The Big Cheese Ultra Power All Weather Block Bait	Brodifacoum	Domestic	RB 0.05 g/kg or less in block formulation	5c
88847	The Big Cheese Ultra Power Rat and Mouse Kill Throw Packs	Brodifacoum	Domestic	RB 0.05 g/kg or less in sachet or place pack	7c
89039	Solo 25 Blox Rodenticide	Brodifacoum	Commercial	RB 0.05 g/kg or less in block formulation	1f
89557	Raticate all-weather block - Brodifacoum	Brodifacoum	Commercial	RB 0.05 g/kg or less in block formulation	1a
90982	ADAMA Brodifacoum Soft Bait	Brodifacoum	Commercial	RB 0.05 g/kg or less in sachet or place pack	4a
91393	The Big Cheese Ultra Power Disposable Mouse Kill Bait Station	Brodifacoum	Domestic	RB 0.05 g/kg or less in block formulation	5d
91394	The Big Cheese Ultra Power Mouse Kill Bait Station Kit	Brodifacoum	Domestic	RB 0.05 g/kg or less in block formulation	5d
91401	The Big Cheese Ultra Power Rat Kill Bait Station Kit	Brodifacoum	Domestic	RB 0.05 g/kg or less in block formulation	5c
91553	Titan Onza Red Rodenticide Paste	Brodifacoum	Commercial	RB 0.05 g/kg or less in sachet or place pack	4b
91554	Titan Onza Red Rodenticide Blocks	Brodifacoum	Commercial	RB 0.05 g/kg or less in block formulation	1b
91653	Pestmaster Brodifacoum Rat & Mouse Killer Blocks	Brodifacoum	Commercial	RB 0.05 g/kg or less in block formulation	1b
91708	Titan Onza Red Grain Bait	Brodifacoum	Commercial	RB 0.05 g/kg or less in pellet formulation	3b
92319	TALON GT Pro Rodenticide Grain Bait Block	Brodifacoum	Commercial	RB 0.05 g/kg or less in block formulation	1b
92320	TALON Rat & Mouse Killer Grain Bait Block	Brodifacoum	Commercial	RB 0.05 g/kg or less in block formulation	1b
94339	Ratsak 50 Waxblocks Kills Rats & Mice	Brodifacoum	Domestic	RB 0.05 g/kg or less in block formulation	5a
94350	Ratsak 50 Soft Bait Kills Rats & Mice	Brodifacoum	Domestic	RB 0.05 g/kg or less in sachet or place pack	7a
94918	No Rats & Mice One Feed Rodenticide Blocks	Brodifacoum	Commercial	RB 0.05 g/kg or less in block formulation	1b
39461	Rentokil Bromard	Bromadiolone	Commercial	RB 0.1 g/kg or less as a paste in caulking gun	9
48372	Contrac Blox	Bromadiolone	Commercial	RB 0.05 g/kg or less in block formulation	8a
48374	Contrac Rodenticide	Bromadiolone	Commercial	RB 0.05 g/kg or less in pellet formulation	10a

Registration number	Product name	Active Constituent(s)	Commercial or domestic product	Substance	Template Label
49776	Tomcat All-Weather Blox	Bromadiolone	Commercial	RB 0.05 g/kg or less in block formulation	8b
49782	Tomcat Rat and Mouse Bait	Bromadiolone	Commercial	RB 0.05 g/kg or less in pellet formulation	10a
62180	Maki Block Weather - Proof Rodenticide	Bromadiolone	Commercial	RB 0.05 g/kg or less in block formulation	8c
64849	Surefire Broma Blocks Rodenticide	Bromadiolone	Commercial	RB 0.05 g/kg or less in block formulation	8b
64850	Surefire Broma Pellets Rodenticide	Bromadiolone	Commercial	RB 0.05 g/kg or less in pellet formulation	10a
80379	Generation Green Rodenticide Pellet	Bromadiolone	Commercial	RB 0.05 g/kg or less in pellet formulation	10b
80388	Bromakil Power Block for Rats and Mice	Bromadiolone	Commercial	RB 0.05 g/kg or less in block formulation	8c
81205	Tomcat Bait Packs	Bromadiolone	Commercial	RB 0.05 g/kg or less in sachet or place pack	11c
81206	Tomcat All-Weather Rat & Mouse Block Baits	Bromadiolone	Commercial	RB 0.05 g/kg or less in block formulation	8d
86179	Resolv Soft Bait Rodenticide	Bromadiolone	Commercial	RB 0.05 g/kg or less in sachet or place pack	11a
86331	Contrac Soft Bait	Bromadiolone	Commercial	RB 0.05 g/kg or less in sachet or place pack	11b
69994	Muskil Dual Active Rodenticide Blocks with Fluo-Np Technology	Bromadiolone, Difenacoum	Commercial	RB 0.05 g/kg or less in block formulation	12
82450	Muskil Soft Bait with Two Actives for Faster Kill of Rats & Mice	Bromadiolone, Difenacoum	Commercial	RB 0.05 g/kg or less in sachet or place pack	13
84831	Ratsak Rapid Strike Dual Active Waxblocks	Bromadiolone, Difenacoum	Domestic	RB 0.05 g/kg or less in block formulation	14
84832	Ratsak Rapid Strike Advanced Dual Active Soft Bait	Bromadiolone, Difenacoum	Domestic	RB 0.05 g/kg or less in sachet or place pack	15
51508	Racumin Rat and Mouse Paste	Coumatetralyl	Commercial	RB 0.4 g/kg or less in sachet or place pack	17
52098	Racumin Rat and Mouse Blocks	Coumatetralyl	Commercial	RB 0.4 g/kg or less in block formulation	16
59284	Bayer Racumin Rat & Mouse Killer	Coumatetralyl	Domestic	RB 0.4 g/kg or less in sachet or place pack	18
82217	Surefire Couma All Weather Blocks Rodenticide	Coumatetralyl	Commercial	RB 0.4 g/kg or less in block formulation	16
65339	Roban Rodenticide Blocks	Difenacoum	Commercial	RB 0.05 g/kg or less in block formulation	19a
65358	Roban Rodenticide Paste	Difenacoum	Commercial	RB 0.05 g/kg or less in sachet or place pack	21
65528	Roban Rodenticide Pellets	Difenacoum	Commercial	RB 0.05 g/kg or less in pellet formulation	20
66399	Roban Rodenticide Placepacks	Difenacoum	Commercial	RB 0.05 g/kg or less in sachet or place pack	21
66587	Cougar Rodenticide Paste Sachets	Difenacoum	Commercial	RB 0.05 g/kg or less in sachet or place pack	21
66588	Cougar Rodenticide Wax Blocks	Difenacoum	Commercial	RB 0.05 g/kg or less in block formulation	19a
67484	Roban Rat And Mouse Killer Paste	Difenacoum	Domestic	RB 0.05 g/kg or less in sachet or place pack	23a
67644	Time's Up Rat & Mouse Killer Ready to Use Bait Packs	Difenacoum	Domestic	RB 0.05 g/kg or less in sachet or place pack	23a

Registration number	Product name	Active Constituent(s)	Commercial or domestic product	Substance	Template Label
67647	Time's Up All-Weather Block Bait Rodenticide	Difenacoum	Domestic	RB 0.05 g/kg or less in block formulation	22a
67681	Time's Up Baited Mouse Kill Station	Difenacoum	Domestic	RB 0.05 g/kg or less in block formulation	22b
68759	Ratshot Rodenticide Paste	Difenacoum	Commercial	RB 0.05 g/kg or less in sachet or place pack	21
68760	Ratshot Reusable Baited Rat Kill Station	Difenacoum	Domestic	RB 0.05 g/kg or less in block formulation	22a
68762	Ratshot Rodenticide Blocks	Difenacoum	Commercial	RB 0.05 g/kg or less in block formulation	19a
68763	Ratshot Rat And Mouse Killer Paste	Difenacoum	Domestic	RB 0.05 g/kg or less in sachet or place pack	23a
69347	Roban Rodenticide Grain Bait	Difenacoum	Commercial	RB 0.05 g/kg or less in pellet formulation	20
69911	Surefire Difenate All Weather Blocks Rodenticide	Difenacoum	Commercial	RB 0.05 g/kg or less in block formulation	19a
80124	All Weather PCT Pro Formula Blocks Rodenticide	Difenacoum	Commercial	RB 0.05 g/kg or less in block formulation	19a
80667	Ratshot-G Rodenticide Grain Bait	Difenacoum	Commercial	RB 0.05 g/kg or less in pellet formulation	20
85512	Amgrow Patrol All Weather Blocks Rodenticide	Difenacoum	Commercial	RB 0.05 g/kg or less in block formulation	19a
87869	The Big Cheese Home Choice All Weather Block Bait	Difenacoum	Domestic	RB 0.05 g/kg or less in block formulation	22d
87870	The Big Cheese Home Choice Rat & Mouse Kill Throw Packs	Difenacoum	Domestic	RB 0.05 g/kg or less in sachet or place pack	23b
89203	The Big Cheese Home Choice Rat & Mouse Killer Ready to Use Bait Station	Difenacoum	Domestic	RB 0.05 g/kg or less in sachet or place pack	23b
89204	The Big Cheese Home Choice Mouse Killer Bait Station	Difenacoum	Domestic	RB 0.05 g/kg or less in block formulation	22e
89206	The Big Cheese Home Choice Rat Killer Bait Station	Difenacoum	Domestic	RB 0.05 g/kg or less in block formulation	22c
89510	Surefire Difenate Paste Bait Rodenticide	Difenacoum	Commercial	RB 0.05 g/kg or less in sachet or place pack	21
89556	Raticate all-weather block - Difenacoum	Difenacoum	Commercial	RB 0.05 g/kg or less in block formulation	19a
91552	Titan Onza Blue Rodenticide Grain Bait	Difenacoum	Commercial	RB 0.05 g/kg or less in pellet formulation	20
91555	Titan Onza Blue Rodenticide Paste	Difenacoum	Commercial	RB 0.05 g/kg or less in sachet or place pack	21
91556	Titan Onza Blue Rodenticide Blocks	Difenacoum	Commercial	RB 0.05 g/kg or less in block formulation	19a
91657	Pestmaster Difenacoum Rat & Mouse Killer Blocks	Difenacoum	Commercial	RB 0.05 g/kg or less in block formulation	19a
92812	Roban 25 All Weather Block Bait	Difenacoum	Commercial	RB 0.05 g/kg or less in block formulation	19b
94917	No Mice Difend Rodenticide Blocks	Difenacoum	Domestic	RB 0.05 g/kg or less in block formulation	22b
62178	Generation Blue Max Block Single-Feed Rodenticide	Difethialone	Commercial	RB 0.025 g/kg or less in block formulation	24
62694	Generation Block Single-Feed Rodenticide	Difethialone	Commercial	RB 0.025 g/kg or less in block formulation	24

Registration number	Product name	Active Constituent(s)	Commercial or domestic product	Substance	Template Label
66889	Generation Firststrike Single-Feed Rodenticide	Difethialone	Commercial	RB 0.025 g/kg or less in sachet or place pack	26
69086	Rodilon Pro Rodenticide	Difethialone	Commercial	RB 0.025 g/kg or less in sachet or place pack	26
80381	Generation Blue Rodenticide Block	Difethialone	Commercial	RB 0.025 g/kg or less in block formulation	24
80382	Generation Blue Rodenticide Pellet	Difethialone	Commercial	RB 0.025 g/kg or less in pellet formulation	25
80386	Generation Blue Rodenticide Soft Bait	Difethialone	Commercial	RB 0.025 g/kg or less in sachet or place pack	26
89433	RAMIK Bars Rodenticide	Diphacinone	Commercial	RB 0.05 g/kg or less in block formulation	27
47768	Storm Wax Block Rodenticide	Flocoumafen	Commercial	RB 0.05 g/kg or less in block formulation	29
54191	Storm Secure Wax Block Rodenticide	Flocoumafen	Commercial	RB 0.05 g/kg or less in block formulation	29
80663	Storm Soft Bait Rodenticide	Flocoumafen	Commercial	RB 0.05 g/kg or less in sachet or place pack	28
90839	Stratagem Soft Bait Rodenticide	Flocoumafen	Commercial	RB 0.05 g/kg or less in sachet or place pack	28
90840	Stratagem Wax Block Rodenticide	Flocoumafen	Commercial	RB 0.05 g/kg or less in block formulation	29

Brodifacoum

Commercial pest-control product: RB 0.05 g/kg or less in block formulation

Template Label 1a

Label Name:	[INSERT LABEL NAME]
Signal Headings	POISON KEEP OUT OF REACH OF CHILDREN READ SAFETY DIRECTIONS BEFORE OPENING OR USING
Constituent Statements:	ACTIVE CONSTITUENT: 0.05 g/kg BRODIFACOUM
Mode of Action:	
Statement of Claims:	For control of mice in agricultural, commercial, domestic, industrial and public service buildings and for control of rats in and around agricultural, commercial, domestic, industrial and public service buildings.
Net Contents:	[INSERT NET CONTENTS]
Restraints:	<p>RESTRAINTS</p> <p>DO NOT use this product unless you have a current qualification in the nationally recognised training course for rodent pest management CPPUPM3006 - Manage pests by applying pesticides, or an equivalent unit of competency.</p> <p>DO NOT place baits in areas that are accessible to children. In child-accessible areas baits must be placed in tamper-proof bait stations. If bait can be dislodged from bait station, bait station must be secured in place.</p> <p>DO NOT place bait outdoors unless it is in a tamper-resistant bait station which is secured in place.</p> <p>DO NOT place bait stations more than 2 meters from buildings.</p> <p>DO NOT place bait stations outdoors around buildings for control of mice.</p> <p>DO NOT bait in areas where wildlife may be collected for human consumption.</p> <p>DO NOT place in animal or livestock housing unless used in tamper-resistant and weather resistant bait stations fixed to the ground or other structures.</p> <p>DO NOT place bait or bait stations above areas which would allow them to contaminate pig and poultry food or drinking water.</p> <p>DO NOT apply this product directly into burrows.</p>
Directions for Use:	[This section contains an attachment below]
Other Limitations:	
Withholding Periods:	

Trade Advice:	
General Directions:	<p>GENERAL INSTRUCTIONS</p> <p>Ensure wax blocks are inaccessible to children, pets, domestic animals and wildlife. Wax blocks are particularly suitable for use in damp situations and crop stores where the risk of contamination should be minimised.</p> <p>Most deaths occur 4 to 7 days after consumption of wax blocks.</p> <p>Note: One feed is sufficient to kill rats and mice. Rats and mice will continue to eat the wax blocks after a lethal dose has been eaten.</p>
Resistance Warning:	
Precautions:	<p>PRECAUTIONS</p> <p>Caution should be used when baiting near areas where hunting of wildlife may occur. Careful consideration of bait placement is necessary to avoid secondary exposure from contaminated wildlife that may be consumed.</p> <p>DO NOT place bait in areas where there is a possibility of contaminating food, livestock feed or surfaces that come in direct contact with food or livestock feed.</p>
Protection Statements:	<p>PROTECTION OF LIVESTOCK AND WILDLIFE</p> <p>Hazardous to livestock, poultry and wildlife. DO NOT place baits in locations that are accessible to domestic animals, livestock, non-target native animals or birds. Search for and dispose of dead rodents and slugs/snails in the infested area at each visit to prevent secondary poisoning. In case slugs/snails are present, move bait station to another location within the rodent infested site, away from slugs/snails. Dispose of slugs/snails in a way non-target animals are not exposed. Dispose of dead rodents and uneaten bait in compliance with local, state or territory government regulations.</p> <p>DO NOT allow livestock or poultry to consume dead or moribund mice and rats. All dead or moribund animals and rodent faeces from baited rodents MUST be removed from areas accessible to livestock or poultry.</p> <p>The use of this product for the control of protected native rodents and rodent like animals requires permission from wildlife authorities.</p> <p>PROTECTION OF FISH, CRUSTACEANS AND ENVIRONMENT</p> <p>Very toxic to aquatic life. DO NOT contaminate wetlands or watercourses with this product or used containers. Place the bait stations in areas not liable to flooding. When placing bait stations close to water drainage systems, ensure that bait contact with water is avoided.</p>
Storage and Disposal:	<p>STORAGE AND DISPOSAL</p> <p>Store in the closed original container in a cool, well ventilated area. DO NOT store for prolonged periods in direct sunlight.</p> <p>Triple rinse containers before disposal. Break, crush or puncture and deliver empty packaging to an approved waste management facility. If an approved waste management facility is not available, dispose of empty packaging in compliance with relevant local, state or territory government regulations. Dispose of unused product in</p>

	compliance with relevant local, state or territory government regulations. DO NOT burn empty containers or product.
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Safety Directions:	<p>SAFETY DIRECTIONS</p> <p>Repeated minor exposure may have a cumulative poisoning effect. Do not touch bait, use scoop or measure. When using the product wear disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water.</p> <p>During cleanup and disposal operations of bait and bait stations, wear a single layer of clothing and disposable gloves. Wear disposable gloves when handling rodent carcasses. Wash clothes after performing re-handling activities.</p>
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First Aid Instructions:	<p>FIRST AID</p> <p>If poisoning occurs, contact a doctor or Poisons Information Centre. Phone Australia 13 11 26, New Zealand 0800 764 766. Vitamin K1 (Phytomenadione) is antidotal.</p>
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First Aid Warnings:	
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DIRECTIONS FOR USE

SITUATION	PEST	RATE	CRITICAL COMMENTS
<p>Clean Out Treatments</p> <p>In and around (within 2 m) agricultural, commercial, domestic, industrial and public service buildings</p>	Rats (<i>Rattus rattus</i> , <i>R. norvegicus</i>)	1 to 3 wax blocks/bait station	<p><i>For rats:</i> Place bait stations at intervals of 5 to 9 m in infested areas.</p> <p><i>For mice:</i> Place bait stations at intervals of 2 to 3 m in infested areas.</p>
<p>Clean Out Treatments</p> <p>In agricultural, commercial, domestic industrial and public service buildings</p>	Mice (<i>Mus domesticus</i>)	1 wax block/bait station	<p>Use the greater number of blocks and shorter distance between bait placements when infestations are heavy</p> <p>See also baiting strategy for clean out treatments.</p>
<p>Monitoring and/or Maintenance Treatments</p> <p>In and around (within 2 m) agricultural, commercial, domestic, industrial and public service buildings</p>	Rats (<i>Rattus rattus</i> , <i>R. norvegicus</i>)	1 wax block/bait station	<p>Place bait stations in areas prone to rodent infestation at intervals of between 15 and 30 m.</p> <p>See also baiting strategy for monitoring and/or maintenance treatments.</p>
<p>Monitoring and/or Maintenance Treatments</p> <p>In agricultural, commercial, domestic, industrial and public service buildings</p>	Mice (<i>Mus domesticus</i>)		

Baiting Strategy

- Eliminate all alternative food sources as far as practical.
- When used in food producing animal housing situations careful consideration is necessary regarding the placement of bait stations to ensure any rodenticide contamination of water, feed or livestock is prevented.

Clean Out Treatments (Pulse Baiting)

- Clean out treatments are used to remove existing infestations of rats and mice
- Survey site prior to treatment, including assessment of the extent of infestation and identification of any indications of the presence of non-target animals.

- Always use tamper-resistant bait stations that are secured in place in child accessible areas, outdoors and in animal or livestock housing.
- Place wax blocks so as to prevent access to non-target animals.
- Always record the number and locations of wax blocks for the purpose of replacement and later removal.
- Conduct initial inspection of wax blocks after 3 or 4 days. Replace wax blocks that have been consumed. Repeat approximately 4 days later and then weekly. Replace contaminated or spoiled wax blocks.
- Baiting for at least 2 weeks (3 to 4 pulses) will be necessary to reduce rat/mouse numbers to a low level. Although heavy infestations may require longer treatments to achieve complete eradication.
- Discontinue the treatment when effective control has been achieved and remove all wax blocks and bait stations unless a maintenance treatment is to be undertaken.
- DO NOT use the product beyond 35 days without an evaluation of the state of the infestation and of the efficacy of the treatment.
- Remove all uneaten bait at the end of treatment.

Monitoring and/or Maintenance Treatments

- Monitoring and maintenance treatments are required at sensitive sites where there is no current rodent infestation but where the prevention of such infestation is essential to prevent significant risks to human health. Such treatments may be a condition for audit approval within food safety guidelines. However, use of this product must comply with the conditions of this label.
- Always use tamper-resistant bait stations for monitoring and maintenance treatments and fix the stations securely to the substrate.
- Place bait stations so as to prevent access to non-target animals.
- Use placebo or unpoisoned bait blocks if the placement of the bait presents a hazard to non-target animals.
- Always record the number and locations of bait stations for the purpose of wax block replacement and later removal.
- Bait stations should be inspected at regular intervals no more than 7 days apart according to an agreed and documented schedule.
- When a rodent infestation is detected revert to the directions for Clean Out Treatments.

**NOT TO BE USED FOR ANY PURPOSE, OR IN ANY MANNER, CONTRARY TO THIS LABEL UNLESS
AUTHORISED UNDER APPROPRIATE LEGISLATION**

Template Label 1b

Label Name:	[INSERT LABEL NAME]
Signal Headings	POISON KEEP OUT OF REACH OF CHILDREN READ SAFETY DIRECTIONS BEFORE OPENING OR USING
Constituent Statements:	ACTIVE CONSTITUENT: 0.05 g/kg BRODIFACOU
Mode of Action:	
Statement of Claims:	For control of mice in industrial, commercial, public services, agricultural and domestic buildings and rats in and around industrial, commercial, public services, agricultural and domestic buildings.
Net Contents:	[INSERT NET CONTENTS]
Restraints:	<p>RESTRAINTS</p> <p>DO NOT use this product unless you have a current qualification in the nationally recognised training course for rodent pest management CPPUPM3006 - Manage pests by applying pesticides, or an equivalent unit of competency.</p> <p>DO NOT place baits in areas that are accessible to children. In child-accessible areas baits must be placed in tamper-resistant bait stations. If bait can be dislodged from bait station, bait station must be secured in place.</p> <p>DO NOT place bait outdoors unless it is in a tamper-resistant bait station which is secured in place.</p> <p>DO NOT place bait stations more than 2 meters from buildings.</p> <p>DO NOT place bait stations outdoors around buildings for control of mice.</p> <p>DO NOT bait in areas where wildlife may be collected for human consumption.</p> <p>DO NOT place in animal or livestock housing unless used in tamper-resistant and weather-resistant bait stations fixed to the ground or other structures.</p> <p>DO NOT place bait or bait stations above areas which would allow them to contaminate pig and poultry food or drinking water.</p> <p>DO NOT apply this product directly into burrows.</p>
Directions for Use:	[This section contains an attachment below]
Other Limitations:	
Withholding Periods:	
Trade Advice:	
General Directions:	

Resistance Warning:	
Precautions:	<p>PRECAUTIONS</p> <p>Caution should be used when baiting near areas where hunting of wildlife may occur. Careful consideration of bait placement is necessary to avoid secondary exposure from contaminated wildlife that may be consumed.</p> <p>DO NOT place bait in areas where there is a possibility of contaminating food, livestock feed or surfaces that come in direct contact with food or livestock feed.</p>
Protection Statements:	<p>PROTECTION OF LIVESTOCK AND WILDLIFE</p> <p>Hazardous to livestock, poultry and wildlife. DO NOT place baits in locations that are accessible to domestic animals, livestock, non-target native animals or birds. Search for and dispose of dead rodents and slugs/snails in the infested area at each visit to prevent secondary poisoning. In case slugs/snails are present, move bait station to another location within the rodent infested site, away from slugs/snails. Dispose of slugs/snails in a way non-target animals are not exposed. Dispose of dead rodents and uneaten bait in compliance with local, state or territory government regulations.</p> <p>DO NOT allow livestock or poultry to consume dead or moribund mice and rats. All dead or moribund animals and rodent faeces from baited rodents MUST be removed from areas accessible to livestock or poultry.</p> <p>The use of this product for the control of protected native rodents and rodent like animals requires permission from wildlife authorities.</p> <p>PROTECTION OF FISH, CRUSTACEANS AND ENVIRONMENT</p> <p>Very toxic to aquatic life. DO NOT contaminate wetlands or watercourses with this product or used containers. Place the bait stations in areas not liable to flooding. When placing bait stations close to water drainage systems, ensure that bait contact with water is avoided.</p>
Storage and Disposal:	<p>STORAGE AND DISPOSAL</p> <p>Store in the closed original container in a cool, well-ventilated area. DO NOT store for prolonged periods in direct sunlight.</p> <p>Triple rinse containers before disposal. Break, crush or puncture and deliver empty packaging to an approved waste management facility. If an approved waste management facility is not available, dispose of empty packaging in compliance with relevant local, state or territory government regulations. Dispose of unused product in compliance with relevant local, state or territory government regulations. DO NOT burn empty containers or product.</p>
Safety Directions:	<p>SAFETY DIRECTION</p> <p>Repeated minor exposure may have a cumulative poisoning effect. Do not touch bait, use scoop or measure. When using the product wear disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water.</p> <p>During cleanup and disposal operations of bait and bait stations, wear a single layer of clothing and disposable gloves. Wear disposable gloves when handling rodent carcasses. Wash clothes after performing re-handling activities.</p>

First Aid Instructions:	FIRST AID If poisoning occurs, contact a doctor or Poisons Information Centre. Phone Australia 13 11 26, New Zealand 0800 764 766. Vitamin K1 (Phytomenadione) is antidotal.
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First Aid Warnings:	
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DIRECTIONS FOR USE

SITUATION	PEST	RATE	CRITICAL COMMENTS
In and around (within 2 meters) industrial, commercial, public services, agricultural and domestic buildings.	Rats (<i>Rattus norvegicus</i> , <i>Rattus rattus</i>)	1 to 3 blocks per bait station	Place bait stations in infested area, along walls or rafters and in dark sheltered spots where there are signs of rodent activity. DO NOT touch bait. For rats: Place bait stations at intervals of 5 to 9 m in infested areas. DO NOT exceed 9 m between bait stations.
In industrial, commercial, public services, agricultural and domestic buildings.	Mice (<i>Mus musculus</i>)	1 block per bait station	For mice: Place bait stations at intervals of 2 to 3 m in infested areas. DO NOT exceed 3 m between bait stations.

Baiting Strategy

Eliminate as far as practicable all alternative food sources.

Survey site prior to treatment, including assessment of the extent of infestation and identification of any indications of the presence of non-target animals.

Record the number and locations of bait stations for the purpose of inspection, replacement and later removal. Always use tamper-resistant bait stations that are secured in place in child accessible areas, outdoors and in animal or livestock housing. When used in food producing animal housing situations careful consideration is necessary regarding the placement of bait stations to ensure any rodenticide contamination of water, feed or livestock is prevented.

Inspect baits daily. Replace eaten baits. If quickly eaten, increase number of baits. Continue observation and replenish until no more baits are taken. Most rodent deaths occur 4 to 7 days after consumption of bait.

Baiting for at least two weeks is necessary to reduce rat/mouse numbers.

DO NOT use the product beyond 35 days without an evaluation of the state of the infestation and of the efficacy of the treatment. Remove all uneaten bait at the end of treatment.

NOT TO BE USED FOR ANY PURPOSE, OR IN ANY MANNER, CONTRARY TO THIS LABEL UNLESS AUTHORISED UNDER APPROPRIATE LEGISLATION.

Template Label 1c

Label Name:	[INSERT LABEL NAME]
Signal Headings	POISON KEEP OUT OF REACH OF CHILDREN READ SAFETY DIRECTIONS BEFORE OPENING OR USING
Constituent Statements:	ACTIVE CONSTITUENT: 0.05 g/kg BRODIFACOUM
Mode of Action:	
Statement of Claims:	For control of mice in industrial, commercial, agricultural and domestic buildings and rats in and around industrial, commercial, agricultural and domestic buildings.
Net Contents:	[INSERT NET CONTENTS]
Restraints:	<p>RESTRAINTS</p> <p>DO NOT use this product unless you have a current qualification in the nationally recognised training course for rodent pest management CPPUPM3006 - Manage pests by applying pesticides, or an equivalent unit of competency.</p> <p>DO NOT place baits in areas that are accessible to children. In child-accessible areas baits must be placed in tamper-resistant bait stations. If bait can be dislodged from bait station, bait station must be secured in place.</p> <p>DO NOT place bait outdoors unless it is in a tamper-resistant bait station which is secured in place.</p> <p>DO NOT place bait stations more than 2 meters from buildings.</p> <p>DO NOT place bait stations outdoors around buildings for control of mice.</p> <p>DO NOT bait in areas where wildlife may be collected for human consumption.</p> <p>DO NOT place in animal or livestock housing unless used in tamper-resistant and weather-resistant bait stations fixed to the ground or other structures.</p> <p>DO NOT place bait or bait stations above areas which would allow them to contaminate pig and poultry food or drinking water.</p> <p>DO NOT apply this product directly into burrows.</p>
Directions for Use:	[This section contains an attachment below]
Other Limitations:	
Withholding Periods:	
Trade Advice:	
General Directions:	
Resistance Warning:	

Precautions:	<p>PRECAUTIONS</p> <p>Caution should be used when baiting near areas where hunting of wildlife may occur. Careful consideration of bait placement is necessary to avoid secondary exposure from contaminated wildlife that may be consumed.</p> <p>DO NOT place bait in areas where there is a possibility of contaminating food, livestock feed or surfaces that come in direct contact with food or livestock feed.</p>
Protection Statements:	<p>PROTECTION OF LIVESTOCK AND WILDLIFE</p> <p>Hazardous to livestock, poultry and wildlife. DO NOT place baits in locations that are accessible to domestic animals, livestock, non-target native animals or birds. Search for and dispose of dead rodents and slugs/snails in the infested area at each visit to prevent secondary poisoning. In case slugs/snails are present, move bait station to another location within the rodent infested site, away from slugs/snails. Dispose of slugs/snails in a way non-target animals are not exposed. Dispose of dead rodents and uneaten bait in compliance with local, state or territory government regulations.</p> <p>DO NOT allow livestock or poultry to consume dead or moribund mice and rats. All dead or moribund animals and rodent faeces from baited rodents MUST be removed from areas accessible to livestock or poultry.</p> <p>The use of this product for the control of protected native rodents and rodent like animals requires permission from wildlife authorities.</p> <p>PROTECTION OF FISH, CRUSTACEANS AND ENVIRONMENT</p> <p>Very toxic to aquatic life. DO NOT contaminate wetlands or watercourses with this product or used containers. Place the bait stations in areas not liable to flooding. When placing bait stations close to water drainage systems, ensure that bait contact with water is avoided.</p>
Storage and Disposal:	<p>STORAGE AND DISPOSAL</p> <p>Store in the closed original container in a cool, well-ventilated area. DO NOT store for prolonged periods in direct sunlight.</p> <p>Triple rinse containers before disposal. Break, crush or puncture and deliver empty packaging to an approved waste management facility. If an approved waste management facility is not available, dispose of empty packaging in compliance with relevant local, state or territory government regulations. Dispose of unused product in compliance with relevant local, state or territory government regulations. DO NOT burn empty containers or product.</p>
Safety Directions:	<p>SAFETY DIRECTION</p> <p>Repeated minor exposure may have a cumulative poisoning effect. Do not touch bait, use scoop or measure. When using the product wear disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water.</p> <p>During cleanup and disposal operations of bait and bait stations, wear a single layer of clothing and disposable gloves. Wear disposable gloves when handling rodent carcasses. Wash clothes after performing re-handling activities.</p>
First Aid Instructions:	FIRST AID

	If poisoning occurs, contact a doctor or Poisons Information Centre. Phone Australia 13 11 26, New Zealand 0800 764 766. Vitamin K1 (Phytomenadione) is antidotal.
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First Aid Warnings:	
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DIRECTIONS FOR USE

SITUATION	PEST	RATE	CRITICAL COMMENTS
In and around (within 2 meters) industrial, commercial, public services, agricultural and domestic buildings.	Rats (<i>Rattus norvegicus</i> , <i>Rattus rattus</i>)	1 or more blocks per bait station depending on level of infestation	Place bait stations Bait areas where evidence of rodents can be observed, and/or areas where conditions might encourage rodent activity. For rats: Place bait stations at intervals of 5 to 9 m in infested areas. DO NOT exceed 9 m between bait stations.
In industrial, commercial, public services, agricultural and domestic buildings.	Mice (<i>Mus musculus</i>)		For mice: Place bait stations at intervals of 2 to 3 m in infested areas. DO NOT exceed 3 m between bait stations. For large infestations and when using larger bait stations, use more blocks per station and use a shorter distance between bait stations.

Baiting Strategy

Eliminate as far as practicable all alternative food sources.

Survey site prior to treatment, including assessment of the extent of infestation and identification of any indications of the presence of non-target animals.

Record the number and locations of bait stations for the purpose of inspection, replacement and later removal. Always use tamper-resistant bait stations that are secured in place in child accessible areas, outdoors and in animal or livestock housing. When used in food producing animal housing situations careful consideration is necessary regarding the placement of bait stations to ensure any rodenticide contamination of water, feed or livestock is prevented.

Inspect baits at intervals no more than 7 days apart, as determined by professional assessment. Replace eaten or old/deteriorated baits. If quickly eaten increase the number of baits in the bait station. Continue observation during routine inspections and replenish until no more baits are taken. Most deaths occur 4 to 7 days after consumption of bait. Baiting for at least two weeks is necessary to reduce rat/mouse numbers. DO NOT use the product beyond 35 days without an evaluation of the state of the infestation and of the efficacy of the treatment. Remove all uneaten bait at the end of treatment.

NOT TO BE USED FOR ANY PURPOSE, OR IN ANY MANNER, CONTRARY TO THIS LABEL UNLESS AUTHORISED UNDER APPROPRIATE LEGISLATION.

Template Label 1d

Label Name:	[INSERT LABEL NAME]
Signal Headings	POISON KEEP OUT OF REACH OF CHILDREN READ SAFETY DIRECTIONS BEFORE OPENING OR USING
Constituent Statements:	ACTIVE CONSTITUENT: 0.05 g/kg BRODIFACOU
Mode of Action:	
Statement of Claims:	For control of mice in industrial, commercial, public services and domestic buildings and rats in and around industrial, commercial, public services and domestic buildings.
Net Contents:	[INSERT NET CONTENTS]
Restraints:	<p>RESTRAINTS</p> <p>DO NOT use this product unless you have a current qualification in the nationally recognised training course for rodent pest management CPPUPM3006 - Manage pests by applying pesticides, or an equivalent unit of competency.</p> <p>DO NOT place baits in areas that are accessible to children. In child-accessible areas baits must be placed in tamper-resistant bait stations. If bait can be dislodged from bait station, bait station must be secured in place.</p> <p>DO NOT place bait outdoors unless it is in a tamper-resistant bait station which is secured in place.</p> <p>DO NOT place bait stations more than 2 meters from buildings.</p> <p>DO NOT place bait stations outdoors around buildings for control of mice.</p> <p>DO NOT bait in areas where wildlife may be collected for human consumption.</p> <p>DO NOT place in animal or livestock housing unless used in tamper-resistant and weather-resistant bait stations fixed to the ground or other structures.</p> <p>DO NOT place bait or bait stations above areas which would allow them to contaminate pig and poultry food or drinking water.</p> <p>DO NOT apply this product directly into burrows.</p>
Directions for Use:	[This section contains an attachment below]
Other Limitations:	
Withholding Periods:	
Trade Advice:	
General Directions:	

Resistance Warning:	
Precautions:	<p>PRECAUTIONS</p> <p>Caution should be used when baiting near areas where hunting of wildlife may occur. Careful consideration of bait placement is necessary to avoid secondary exposure from contaminated wildlife that may be consumed.</p> <p>DO NOT place bait in areas where there is a possibility of contaminating food, livestock feed or surfaces that come in direct contact with food or livestock feed.</p>
Protection Statements:	<p>PROTECTION OF LIVESTOCK AND WILDLIFE</p> <p>Hazardous to livestock, poultry and wildlife. DO NOT place baits in locations that are accessible to domestic animals, livestock, non-target native animals or birds. Search for and dispose of dead rodents and slugs/snails in the infested area at each visit to prevent secondary poisoning. In case slugs/snails are present, move bait station to another location within the rodent infested site, away from slugs/snails. Dispose of slugs/snails in a way non-target animals are not exposed. Dispose of dead rodents and uneaten bait in compliance with local, state or territory government regulations.</p> <p>DO NOT allow livestock or poultry to consume dead or moribund mice and rats. All dead or moribund animals and rodent faeces from baited rodents MUST be removed from areas accessible to livestock or poultry.</p> <p>PROTECTION OF FISH, CRUSTACEANS AND ENVIRONMENT</p> <p>Very toxic to aquatic life. DO NOT contaminate wetlands or watercourses with this product or used containers. Place the bait stations in areas not liable to flooding. When placing bait stations close to water drainage systems, ensure that bait contact with water is avoided.</p>
Storage and Disposal:	<p>STORAGE AND DISPOSAL</p> <p>Store in the closed original container in a cool, well-ventilated area. DO NOT store for prolonged periods in direct sunlight.</p> <p>Triple rinse containers before disposal. Break, crush or puncture and deliver empty packaging to an approved waste management facility. If an approved waste management facility is not available, dispose of empty packaging in compliance with relevant local, state or territory government regulations. Dispose of unused product in compliance with relevant local, state or territory government regulations. DO NOT burn empty containers or product.</p>
Safety Directions:	<p>SAFETY DIRECTION</p> <p>Repeated minor exposure may have a cumulative poisoning effect. Do not touch bait, use scoop or measure. When using the product wear disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water.</p> <p>During cleanup and disposal operations of bait and bait stations, wear a single layer of clothing and disposable gloves. Wear disposable gloves when handling rodent carcasses. Wash clothes after performing re-handling activities.</p>
First Aid Instructions:	<p>FIRST AID</p> <p>If poisoning occurs, contact a doctor or Poisons Information Centre. Phone Australia 13 11 26, New Zealand 0800 764 766. Vitamin K1 (Phytomenadione) is antidotal.</p>

First Aid Warnings:

DIRECTIONS FOR USE

SITUATION	PEST	RATE	CRITICAL COMMENTS
In and around (within 2 meters) industrial, commercial, public services and domestic buildings.	Rats (<i>Rattus norvegicus</i> , <i>Rattus rattus</i>)	2 or more blocks per bait station	Apply where pests occur, e.g. food processing factories, or stores, laundries, restaurants, ships, boiler houses, hotels-motels.
In industrial, commercial, public services and domestic buildings.	Mice (<i>Mus musculus</i>)		Place bait stations in infested areas, in sheltered positions near rodent entry points and other areas of rodent activity. Mice require bait stations in several locations whereas rats require large quantities of bait in one or 2 locations. DO NOT exceed 3 m between bait stations for mice or 9 m for rats.

Baiting Strategy

Eliminate as far as practicable all alternative food sources.

Survey site prior to treatment, including assessment of the extent of infestation and identification of any indications of the presence of non-target animals.

Record the number and locations of bait stations for the purpose of inspection, replacement and later removal. Always use tamper-resistant bait stations that are secured in place in child accessible areas, outdoors and in animal or livestock housing. When used in food producing animal housing situations careful consideration is necessary regarding the placement of bait stations to ensure any rodenticide contamination of water, feed or livestock is prevented.

Inspect bait stations regularly at intervals no more than 7 days apart. Ensure sufficient blocks are available. Continue observation and replenishment until no more baits are taken.

DO NOT use the product beyond 35 days without an evaluation of the state of the infestation and of the efficacy of the treatment. Remove all uneaten bait at the end of treatment.

NOT TO BE USED FOR ANY PURPOSE, OR IN ANY MANNER, CONTRARY TO THIS LABEL UNLESS AUTHORISED UNDER APPROPRIATE LEGISLATION.

Template Label 1e

Label Name:	[INSERT LABEL NAME]
Signal Headings	POISON KEEP OUT OF REACH OF CHILDREN READ SAFETY DIRECTIONS BEFORE OPENING OR USING
Constituent Statements:	0.025 g/kg BRODIFACOUM
Mode of Action:	
Statement of Claims:	For control of mice in industrial, commercial, public services, agricultural and domestic buildings and rats in and around industrial, commercial, public services, agricultural and domestic buildings.
Net Contents:	[INSERT NET CONTENTS]
Restraints:	<p>RESTRAINTS</p> <p>DO NOT use this product unless you have a current qualification in the nationally recognised training course for rodent pest management CPPUPM3006 - Manage pests by applying pesticides, or an equivalent unit of competency.</p> <p>DO NOT place baits in areas that are accessible to children. In child-accessible areas baits must be placed in tamper-resistant bait stations. If bait can be dislodged from bait station, bait station must be secured in place.</p> <p>DO NOT place bait outdoors unless it is in a tamper-resistant bait station which is secured in place.</p> <p>DO NOT place bait stations more than 2 meters from buildings.</p> <p>DO NOT place bait stations outdoors around buildings for control of mice.</p> <p>DO NOT bait in areas where wildlife may be collected for human consumption.</p> <p>DO NOT place in animal or livestock housing unless used in tamper-resistant and weather-resistant bait stations fixed to the ground or other structures.</p> <p>DO NOT place bait or bait stations above areas which would allow them to contaminate pig and poultry food or drinking water.</p> <p>DO NOT apply this product directly into burrows.</p>
Directions for Use:	[This section contains an attachment below]
Other Limitations:	
Withholding Periods:	
Trade Advice:	
General Directions:	

Resistance Warning:	
Precautions:	<p>PRECAUTIONS</p> <p>Caution should be used when baiting near areas where hunting of wildlife may occur. Careful consideration of bait placement is necessary to avoid secondary exposure from contaminated wildlife that may be consumed.</p> <p>DO NOT place bait in areas where there is a possibility of contaminating food, livestock feed or surfaces that come in direct contact with food or livestock feed.</p>
Protection Statements:	<p>PROTECTION OF LIVESTOCK AND WILDLIFE</p> <p>Hazardous to livestock, poultry and wildlife. DO NOT place baits in locations that are accessible to domestic animals, livestock, non-target native animals or birds. Search for and dispose of dead rodents and slugs/snails in the infested area at each visit to prevent secondary poisoning. In case slugs/snails are present, move bait station to another location within the rodent infested site, away from slugs/snails. Dispose of slugs/snails in a way non-target animals are not exposed. Dispose of dead rodents and uneaten bait in compliance with local, state or territory government regulations.</p> <p>DO NOT allow livestock or poultry to consume dead or moribund mice and rats. All dead or moribund animals and rodent faeces from baited rodents MUST be removed from areas accessible to livestock or poultry.</p> <p>The use of this product for the control of protected native rodents and rodent like animals requires permission from wildlife authorities.</p> <p>PROTECTION OF FISH, CRUSTACEANS AND ENVIRONMENT</p> <p>Very toxic to aquatic life. DO NOT contaminate wetlands or watercourses with this product or used containers. Place the bait stations in areas not liable to flooding. When placing bait stations close to water drainage systems, ensure that bait contact with water is avoided.</p>
Storage and Disposal:	<p>STORAGE AND DISPOSAL</p> <p>Store in the closed original container in a cool, well-ventilated area. DO NOT store for prolonged periods in direct sunlight.</p> <p>Triple rinse containers before disposal. Break, crush or puncture and deliver empty packaging to an approved waste management facility. If an approved waste management facility is not available, dispose of empty packaging in compliance with relevant local, state or territory government regulations. Dispose of unused product in compliance with relevant local, state or territory government regulations. DO NOT burn empty containers or product.</p>
Safety Directions:	<p>SAFETY DIRECTIONS</p> <p>Repeated minor exposure may have a cumulative poisoning effect. Do not touch bait, use scoop or measure. When using the product wear disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water.</p> <p>During cleanup and disposal operations of bait and bait stations, wear a single layer of clothing and disposable gloves. Wear disposable gloves when handling rodent carcasses. Wash clothes after performing re-handling activities.</p>

First Aid Instructions:	FIRST AID If poisoning occurs, contact a doctor or Poisons Information Centre. Phone Australia 13 11 26, New Zealand 0800 764 766. Vitamin K1 (Phytomenadione) is antidotal.
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First Aid Warnings:	
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DIRECTIONS FOR USE

SITUATION	PEST	RATE	CRITICAL COMMENTS
In and around (within 2 meters) industrial, commercial, public services, agricultural and domestic buildings.	Rats (<i>Rattus norvegicus</i> , <i>Rattus rattus</i>)	1-3 block/bait station	Place bait stations in infested area, along walls or rafters and in dark sheltered spots where there are signs of rodent activity. For rats: Place bait stations at intervals of 5 to 9 m in infested areas. DO NOT exceed 9 m between bait stations.
In industrial, commercial, public services, agricultural and domestic buildings.	Mice (<i>Mus musculus</i>)	1 block/bait station	For mice: Place bait stations at intervals of 2 to 3 m in infested areas. DO NOT exceed 3 m between bait stations.

Baiting Strategy

Eliminate as far as practicable all alternative food sources.

Survey site prior to treatment, including assessment of the extent of infestation and identification of any indications of the presence of non-target animals.

Record the number and locations of bait stations for the purpose of inspection, replacement and later removal. Always use tamper-resistant bait stations that are secured in place in child accessible areas, outdoors and in animal or livestock housing. When used in food producing animal housing situations careful consideration is necessary regarding the placement of bait stations to ensure any rodenticide contamination of water, feed or livestock is prevented.

Inspect baits daily. Replace eaten baits to establish control of rodent populations. If quickly eaten, increase number of baits as multiple rodents may be consuming bait placements. Continue observation and replenish until no more baits are taken. Most rodent deaths occur 4 to 7 days after consumption of bait. Baiting for at least two weeks is necessary to reduce rat/mouse numbers.

DO NOT use the product beyond 35 days without an evaluation of the state of the infestation and of the efficacy of the treatment. Remove all uneaten bait at the end of treatment.

NOT TO BE USED FOR ANY PURPOSE, OR IN ANY MANNER, CONTRARY TO THIS LABEL UNLESS AUTHORISED UNDER APPROPRIATE LEGISLATION.

Template Label 1f

Label Name:	[INSERT LABEL NAME]
Signal Headings	POISON KEEP OUT OF REACH OF CHILDREN READ SAFETY DIRECTIONS BEFORE OPENING OR USING
Constituent Statements:	0.025 g/kg BRODIFACOUM
Mode of Action:	
Statement of Claims:	For control of mice in industrial, commercial, public service buildings, agricultural and domestic buildings and rats in and around industrial, commercial, public service buildings, agricultural and domestic buildings.
Net Contents:	[INSERT NET CONTENTS]
Restraints:	<p>RESTRAINTS</p> <p>DO NOT use this product unless you have a current qualification in the nationally recognised training course for rodent pest management CPPUPM3006 - Manage pests by applying pesticides, or an equivalent unit of competency.</p> <p>DO NOT place baits in areas that are accessible to children. In child-accessible areas baits must be placed in tamper-resistant bait stations. If bait can be dislodged from bait station, bait station must be secured in place.</p> <p>DO NOT place bait outdoors unless it is in a tamper-resistant bait station which is secured in place.</p> <p>DO NOT place bait stations more than 2 meters from buildings.</p> <p>DO NOT place bait stations outdoors around buildings for control of mice.</p> <p>DO NOT bait in areas where wildlife may be collected for human consumption.</p> <p>DO NOT place in animal or livestock housing unless used in tamper-resistant and weather-resistant bait stations fixed to the ground or other structures.</p> <p>DO NOT place bait or bait stations above areas which would allow them to contaminate pig and poultry food or drinking water.</p> <p>DO NOT apply this product directly into burrows.</p>
Directions for Use:	[This section contains an attachment below]
Other Limitations:	
Withholding Periods:	
Trade Advice:	
General Directions:	

Resistance Warning:	
Precautions:	<p>PRECAUTIONS</p> <p>Caution should be used when baiting near areas where hunting of wildlife may occur. Careful consideration of bait placement is necessary to avoid secondary exposure from contaminated wildlife that may be consumed.</p> <p>DO NOT place bait in areas where there is a possibility of contaminating food, livestock feed or surfaces that come in direct contact with food or livestock feed.</p>
Protection Statements:	<p>PROTECTION OF LIVESTOCK AND WILDLIFE</p> <p>Hazardous to livestock, poultry and wildlife. DO NOT place baits in locations that are accessible to domestic animals, livestock, non-target native animals or birds. Search for and dispose of dead rodents and slugs/snails in the infested area at each visit to prevent secondary poisoning. In case slugs/snails are present, move bait station to another location within the rodent infested site, away from slugs/snails. Dispose of slugs/snails in a way non-target animals are not exposed. Dispose of dead rodents and uneaten bait in compliance with local, state or territory government regulations.</p> <p>DO NOT allow livestock or poultry to consume dead or moribund mice and rats. All dead or moribund animals and rodent faeces from baited rodents MUST be removed from areas accessible to livestock or poultry.</p> <p>The use of this product for the control of protected native rodents and rodent like animals requires permission from wildlife authorities.</p> <p>PROTECTION OF FISH, CRUSTACEANS AND ENVIRONMENT</p> <p>Very toxic to aquatic life. DO NOT contaminate wetlands or watercourses with this product or used containers. Place the bait stations in areas not liable to flooding. When placing bait stations close to water drainage systems, ensure that bait contact with water is avoided.</p>
Storage and Disposal:	<p>STORAGE AND DISPOSAL</p> <p>Store in the closed, original container in a well-ventilated area, as cool as possible. DO NOT store for prolonged periods in direct sunlight.</p> <p>Triple rinse containers before disposal. Break, crush or puncture and deliver empty packaging to an approved waste management facility. If an approved waste management facility is not available, dispose of empty packaging in compliance with relevant local, state or territory government regulations. Dispose of unused product in compliance with relevant local, state or territory government regulations. DO NOT burn empty containers or product.</p>
Safety Directions:	<p>SAFETY DIRECTIONS</p> <p>Repeated minor exposure may have a cumulative poisoning effect. Do not touch bait, use scoop or measure. When using the product wear disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water.</p> <p>During cleanup and disposal operations of bait and bait stations, wear a single layer of clothing and disposable gloves. Wear disposable gloves when handling rodent carcasses. Wash clothes after performing re-handling activities.</p>

First Aid Instructions:	FIRST AID If poisoning occurs, contact a doctor or Poisons Information Centre. Phone Australia 13 11 26, New Zealand 0800 764 766. Vitamin K1 (Phytomenadione) is antidotal.
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First Aid Warnings:	
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DIRECTIONS FOR USE

SITUATION	PEST	RATE	CRITICAL COMMENTS
In and around (within 2 meters) domestic homes, agricultural, industrial and commercial buildings, animal houses, farms, wharves, public service buildings, food factories and hospitals. Inside transport vehicles (including ships) and around (within 2 meters) grain terminals.	Rats (<i>Rattus norvegicus</i> , <i>Rattus rattus</i>)	[As per current approved label]	Place bait stations in infested area, along walls or rafters and in dark sheltered spots where there are signs of rodent activity. Bait areas where conditions might encourage rodent activity. For rats: Place bait stations at intervals of 5 to 9 m in infested areas. DO NOT exceed 9 m between bait stations. For mice: Place bait stations at intervals of 2 to 3 m in infested areas. DO NOT exceed 3 m between bait stations.
In domestic homes, agricultural, industrial and commercial buildings, animal houses, farms, wharves, public service buildings, food factories, hospitals, and transport vehicles (including ships).	Mice (<i>Mus musculus</i>)	[As per current approved label]	In very high infestations use more blocks per bait station and use the shorter distance between bait stations.

Baiting Strategy

Eliminate, as far as practicable, all alternative food sources.

Survey site prior to treatment, including assessment of the extent of infestation and identification of any indications of the presence of non-target animals.

Record the number and locations of bait stations for the purpose of inspection, replacement and later removal. Always use tamper-resistant bait stations that are secured in place in child accessible areas, outdoors and in animal or livestock housing. When used in food producing animal housing situations careful consideration is necessary regarding the placement of bait stations to ensure any rodenticide contamination of water, feed or livestock is prevented.

Inspect bait stations on a regular basis at intervals of no more than 7 days apart. Replace eaten or old/deteriorated baits. If eaten quickly, increase the number of placements. Continue observation and replenish until no more baits are taken. Most deaths occur 4 to 7 days after consumption of bait. Baiting for at least two weeks is necessary to reduce rat/mouse numbers.

DO NOT use the product beyond 35 days without an evaluation of the state of the infestation and of the efficacy of the treatment. Remove all uneaten bait at the end of treatment.

NOT TO BE USED FOR ANY PURPOSE, OR IN ANY MANNER, CONTRARY TO THIS LABEL UNLESS AUTHORISED UNDER APPROPRIATE LEGISLATION.

Commercial pest-control product: RB 0.05 g/kg or less as a paste in caulking gun

Template Label 2a

Label Name:	[INSERT LABEL NAME]
Signal Headings	POISON KEEP OUT OF REACH OF CHILDREN READ SAFETY DIRECTIONS BEFORE OPENING OR USING
Constituent Statements:	ACTIVE CONSTITUENT: 0.05 g/kg BRODIFACOUM
Mode of Action:	
Statement of Claims:	For control of mice in industrial, commercial, public services, agricultural and domestic buildings and rats in and around industrial, commercial, public services, agricultural and domestic buildings.
Net Contents:	[INSERT NET CONTENTS]
Restraints:	<p>RESTRAINTS</p> <p>DO NOT use this product unless you have a current qualification in the nationally recognised training course for rodent pest management CPPUPM3006 - Manage pests by applying pesticides, or an equivalent unit of competency.</p> <p>DO NOT place baits in areas that are accessible to children. In child-accessible areas baits must be placed in tamper-resistant bait stations. If bait can be dislodged from bait station, bait station must be secured in place.</p> <p>DO NOT place bait outdoors unless it is in a tamper-resistant bait station which is secured in place.</p> <p>DO NOT place bait stations more than 2 meters from buildings.</p> <p>DO NOT place bait stations outdoors around buildings for control of mice.</p> <p>DO NOT bait in areas where wildlife may be collected for human consumption.</p> <p>DO NOT place in animal or livestock housing unless used in tamper-resistant and weather-resistant bait stations fixed to the ground or other structures.</p> <p>DO NOT place bait or bait stations above areas which would allow them to contaminate pig and poultry food or drinking water.</p> <p>DO NOT apply this product directly into burrows.</p>
Directions for Use:	[This section contains an attachment below]
Other Limitations:	
Withholding Periods:	
Trade Advice:	

General Directions:	<p>GENERAL INSTRUCTIONS</p> <p>This product is intended for use only in rodent bait stations. DO NOT apply the gel out in the open.</p> <p>Insert the tube inside the caulking gun; cut a hole in the conical tip of the tube and insert the nozzle. Cut the nozzle above the screw thread taking care not to damage the thread itself, then dispense the product. Once finished, screw on the protecting cap and release the pressure of the caulking gun in order to prevent loss of the product. Keep the tube upside down.</p>
Resistance Warning:	
Precautions:	<p>PRECAUTIONS</p> <p>Caution should be used when baiting near areas where hunting of wildlife may occur. Careful consideration of bait placement is necessary to avoid secondary exposure from contaminated wildlife that may be consumed.</p> <p>DO NOT place bait in areas where there is a possibility of contaminating food, livestock feed or surfaces that come in direct contact with food or livestock feed.</p>
Protection Statements:	<p>PROTECTION OF LIVESTOCK AND WILDLIFE</p> <p>Hazardous to livestock, poultry and wildlife. DO NOT place baits in locations that are accessible to domestic animals, livestock, non-target native animals or birds.</p> <p>Search for and dispose of dead rodents and slugs/snails in the infested area at each visit to prevent secondary poisoning. In case slugs/snails are present, move bait station to another location within the rodent infested site, away from slugs/snails.</p> <p>Dispose of slugs/snails in a way non-target animals are not exposed. Dispose of dead rodents and uneaten bait in compliance with local, state or territory government regulations.</p> <p>DO NOT allow livestock or poultry to consume dead or moribund mice and rats. All dead or moribund animals and rodent faeces from baited rodents MUST be removed from areas accessible to livestock or poultry.</p> <p>PROTECTION OF FISH, CRUSTACEANS AND ENVIRONMENT</p> <p>Very toxic to aquatic life. DO NOT contaminate wetlands or watercourses with this product or used containers. Place the bait stations in areas not liable to flooding.</p> <p>When placing bait stations close to water drainage systems, ensure that bait contact with water is avoided.</p>
Storage and Disposal:	<p>STORAGE AND DISPOSAL</p> <p>Store in the closed, original container in a cool dry place out of reach of children. DO NOT store in direct sunlight. Triple rinse containers before disposal. Break, crush or puncture and deliver empty packaging to an approved waste management facility. If an approved waste management facility is not available, dispose of empty packaging in compliance with relevant local, state or territory government regulations. Dispose of unused product in compliance with relevant local, state or territory government regulations. DO NOT burn empty containers or product.</p>
Safety Directions:	SAFETY DIRECTIONS

	<p>Repeated minor exposure may have a cumulative poisoning effect. Do not touch bait. When using the product wear disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water.</p> <p>During cleanup and disposal operations of bait and bait stations, wear a single layer of clothing and disposable gloves. Wear disposable gloves when handling rodent carcasses. Wash clothes after performing re-handling activities.</p>
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First Aid Instructions:	<p>FIRST AID</p> <p>If poisoning occurs, contact a doctor or Poisons Information Centre. Phone Australia 13 11 26, New Zealand 0800 764 766. Vitamin K1 (Phytomenadione) is antidotal.</p>
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First Aid Warnings:	
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DIRECTIONS FOR USE

SITUATION	PEST	RATE	CRITICAL COMMENTS
Clean Out Treatments In and around (within 2 m) industrial, commercial, public services, agricultural and domestic buildings	Rats (<i>Rattus rattus</i> , <i>R. norvegicus</i>)	15 g to 30 g (15 to 30 mL) bait gel per bait station	Use only in caulking gun and apply directly into bait station. For rats: Place bait stations at intervals of 5 to 9 m in infested areas. DO NOT exceed 9 m between bait stations.
Clean Out Treatments In industrial, commercial, public services, agricultural and domestic buildings	Mice (<i>Mus domesticus</i>)	3 g to 4 g (3 to 4 mL) bait gel per bait station	For mice: Place bait stations at intervals of 2 to 3 m in infested areas. DO NOT exceed 3 m between bait stations. Use the greater number of baits and shorter distance between bait placements when infestations are heavy. See also baiting strategy for clean-out treatments.
Monitoring and/or Maintenance Treatments In and around (within 2 m) industrial, commercial, public services, agricultural and domestic buildings	Rats (<i>Rattus rattus</i> , <i>R. norvegicus</i>)	Up to 15 g (15 mL) bait gel per bait station	Use only in caulking gun and apply directly into bait station. Place bait stations in areas prone to rodent infestation at intervals of between 15 and 30 m. See also baiting strategy for monitoring and/or maintenance treatments.
Monitoring and/or Maintenance Treatments In industrial, commercial, public services, agricultural and domestic buildings	Mice (<i>Mus domesticus</i>)		

Baiting Strategy

- Eliminate all alternative food sources as far as practical.
- When used in food producing animal housing situations careful consideration is necessary regarding the placement of bait stations to ensure any rodenticide contamination of water, feed or livestock is prevented.

Clean-Out Treatments (Pulse Baiting)

- Clean-out treatments are used to remove existing infestations of rats and mice
- Survey site prior to treatment, including assessment of the extent of infestation and identification of any indications of the presence of non-target animals.

- Always use tamper-resistant bait stations that are secured in place in child accessible areas, outdoors and in animal or livestock housing.
- Place baits so as to prevent access to non-target animals.
- Record the number and locations of bait stations for the purpose of inspection, replacement and later removal.
- Conduct initial inspection of bait stations after 3 or 4 days. Replace any bait that has been consumed. Repeat approximately 4 days later and then weekly. Replace contaminated or spoiled baits.
- Baiting for at least 2 weeks (3 to 4 pulses) will be necessary to reduce rat/mouse numbers to a low level. Although heavy infestations may require longer treatments to achieve complete eradication.
- Discontinue the treatment when effective control has been achieved and remove all bait and bait stations unless a maintenance treatment is to be undertaken.
- DO NOT use the product beyond 35 days without an evaluation of the state of the infestation and of the efficacy of the treatment.
- Remove all uneaten bait at the end of treatment.

Monitoring and/or Maintenance Treatments

- Monitoring and maintenance treatments are required at sensitive sites where there is no current rodent infestation but where the prevention of such infestation is essential to prevent significant risks to human health. Such treatments may be a condition for audit approval within food safety guidelines. However, use of this product must comply with the conditions of this label.
- Always use tamper-resistant bait stations for monitoring and maintenance treatments and fix the stations securely to the substrate.
- Place bait stations so as to prevent access to non-target animals.
- Use placebo or unpoisoned bait if the placement of the bait presents a hazard to non-target animals.
- Always record the number and locations of bait stations for the purpose of bait replacement and later removal.
- Bait stations should be inspected at regular intervals no more than 7 days apart according to an agreed and documented schedule.
- When a rodent infestation is detected revert to the directions for Clean Out Treatments.

NOT TO BE USED FOR ANY PURPOSE, OR IN ANY MANNER, CONTRARY TO THIS LABEL UNLESS AUTHORISED UNDER APPROPRIATE LEGISLATION

Template Label 2b

Label Name:	[INSERT LABEL NAME]
Signal Headings	POISON KEEP OUT OF REACH OF CHILDREN READ SAFETY DIRECTIONS BEFORE OPENING OR USING
Constituent Statements:	ACTIVE CONSTITUENT: 0.05 g/kg BRODIFACOU
Mode of Action:	
Statement of Claims:	For control of mice in industrial, commercial, public services and domestic buildings.
Net Contents:	[INSERT NET CONTENTS]
Restraints:	<p>RESTRAINTS</p> <p>DO NOT use this product unless you have a current qualification in the nationally recognised training course for rodent pest management CPPUPM3006 - Manage pests by applying pesticides, or an equivalent unit of competency.</p> <p>DO NOT place baits in areas that are accessible to children. In child-accessible areas baits must be placed in tamper-resistant bait stations. If bait can be dislodged from bait station, bait station must be secured in place.</p> <p>DO NOT place bait stations outdoors around buildings for control of mice.</p> <p>DO NOT bait in areas where wildlife may be collected for human consumption.</p> <p>DO NOT place in animal or livestock housing unless used in tamper-resistant and weather resistant bait stations fixed to the ground or other structures.</p> <p>DO NOT place bait or bait stations above areas which would allow them to contaminate pig and poultry food or drinking water.</p>
Directions for Use:	[This section contains an attachment below]
Other Limitations:	
Withholding Periods:	
Trade Advice:	
General Directions:	
Resistance Warning:	
Precautions:	PRECAUTIONS

	<p>Caution should be used when baiting near areas where hunting of wildlife may occur. Careful consideration of bait placement is necessary to avoid secondary exposure from contaminated wildlife that may be consumed.</p> <p>DO NOT place bait in areas where there is a possibility of contaminating food, livestock feed or surfaces that come in direct contact with food or livestock feed.</p>
Protection Statements:	<p>PROTECTION OF LIVESTOCK AND WILDLIFE</p> <p>Hazardous to livestock, poultry and wildlife. DO NOT place baits in locations that are accessible to domestic animals, livestock, non-target native animals or birds. Search for and dispose of dead rodents and slugs/snails in the infested area at each visit to prevent secondary poisoning. In case slugs/snails are present, move bait station to another location within the rodent infested site, away from slugs/snails. Dispose of slugs/snails in a way non-target animals are not exposed. Dispose of dead rodents and uneaten bait in compliance with local, state or territory government regulations.</p> <p>DO NOT allow livestock or poultry to consume dead or moribund mice and rats. All dead or moribund animals and rodent faeces from baited rodents MUST be removed from areas accessible to livestock or poultry.</p> <p>The use of this product for the control of protected native rodents requires permission from wildlife authorities.</p> <p>PROTECTION OF FISH, CRUSTACEANS AND ENVIRONMENT</p> <p>Very toxic to aquatic life. DO NOT contaminate wetlands or watercourses with this product or used containers. Place the bait stations in areas not liable to flooding. When placing bait stations close to water drainage systems, ensure that bait contact with water is avoided.</p>
Storage and Disposal:	<p>STORAGE AND DISPOSAL</p> <p>Store in the closed, original container in a cool, well-ventilated area. Do not store for prolonged periods in direct sunlight. Triple rinse containers before disposal. Break, crush or puncture and deliver empty packaging to an approved waste management facility. If an approved waste management facility is not available, dispose of empty packaging in compliance with relevant local, state or territory government regulations. Dispose of unused product in compliance with relevant local, state or territory government regulations. DO NOT burn empty containers or product.</p>
Safety Directions:	<p>SAFETY DIRECTIONS</p> <p>Repeated minor exposure may have a cumulative poisoning effect. Do not touch bait. When using the product wear disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water.</p> <p>During cleanup and disposal operations of bait and bait stations, wear a single layer of clothing and disposable gloves. Wear disposable gloves when handling rodent carcasses. Wash clothes after performing re-handling activities.</p>
First Aid Instructions:	<p>FIRST AID</p> <p>If poisoning occurs, contact a doctor or Poisons Information Centre. Phone Australia 13 11 26, New Zealand 0800 764 766. Vitamin K1 (Phytomenadione) is antidotal.</p>
First Aid Warnings:	

DIRECTIONS FOR USE

SITUATION	PEST	RATE	CRITICAL COMMENTS
In industrial, commercial, public services and domestic buildings.	Mice	3 g to 4 g of bait (2 pumps of the gun) per bait station	Use only in caulking gun and apply bait directly into bait station. DO NOT exceed 3 m between bait stations for mice.

BAITING STRATEGY:

Eliminate as far as practicable, all alternative food sources.

Survey site prior to treatment, including assessment of the extent of infestation and identification of any indications of the presence of non-target animals.

Record the number and locations of bait stations for the purpose of inspection, replacement and later removal. Always use tamper-resistant bait stations that are secured in place in child accessible areas, outdoors and in animal or livestock housing. When used in food producing animal housing situations careful consideration is necessary regarding the placement of bait stations to ensure any rodenticide contamination of water, feed or livestock is prevented.

Inspect baits daily. Replace eaten baits. If eaten quickly, increase number of baits. Continue observation and replenishment until no more baits are taken. Baiting for at least 2 weeks is necessary to reduce mouse numbers.

DO NOT use the product beyond 35 days without an evaluation of the state of the infestation and of the efficacy of the treatment. Remove all uneaten bait at the end of treatment.

NOT TO BE USED FOR ANY PURPOSE, OR IN ANY MANNER, CONTRARY TO THIS LABEL UNLESS AUTHORISED UNDER APPROPRIATE LEGISLATION.

Commercial pest-control product: RB 0.05 g/kg or less in pellet formulation

Template Label 3a

Label Name:	[INSERT LABEL NAME]
Signal Headings	POISON KEEP OUT OF REACH OF CHILDREN READ SAFETY DIRECTIONS BEFORE OPENING OR USING
Constituent Statements:	ACTIVE CONSTITUENT: 0.05 g/kg BRODIFACOU
Mode of Action:	
Statement of Claims:	For the control of mice in agricultural, commercial, domestic, industrial and public service buildings and rats in and around agricultural, commercial, domestic, industrial and public service buildings.
Net Contents:	[INSERT NET CONTENTS]
Restraints:	<p>RESTRAINTS</p> <p>DO NOT use this product unless you have a current qualification in the nationally recognised training course for rodent pest management CPPUPM3006 - Manage pests by applying pesticides, or an equivalent unit of competency.</p> <p>DO NOT place baits in areas that are accessible to children. In child-accessible areas baits must be placed in tamper-resistant bait stations. If bait can be dislodged from bait station, bait station must be secured in place.</p> <p>DO NOT place bait outdoors unless it is in a tamper-resistant bait station which is secured in place.</p> <p>DO NOT place bait stations more than 2 meters from buildings.</p> <p>DO NOT place bait stations outdoors around buildings for control of mice.</p> <p>DO NOT bait in areas where wildlife may be collected for human consumption.</p> <p>DO NOT place baits in and around animal, livestock and poultry houses, associated equipment, and food and feed processing areas.</p> <p>DO NOT apply this product directly into burrows.</p>
Directions for Use:	[This section contains an attachment below]
Other Limitations:	
Withholding Periods:	
Trade Advice:	
General Directions:	

Resistance Warning:	
Precautions:	<p>PRECAUTIONS</p> <p>Caution should be used when baiting near areas where hunting of wildlife may occur. Careful consideration of bait placement is necessary to avoid secondary exposure from contaminated wildlife that may be consumed.</p> <p>DO NOT place bait in areas where there is a possibility of contaminating food, livestock feed or surfaces that come in direct contact with food or livestock feed.</p>
Protection Statements:	<p>PROTECTION OF LIVESTOCK AND WILDLIFE</p> <p>Hazardous to livestock, poultry and wildlife. DO NOT place baits in locations that are accessible to domestic animals, livestock, non-target native animals or birds. Search for and dispose of dead rodents and slugs/snails in the infested area at each visit to prevent secondary poisoning. In case slugs/snails are present, move bait station to another location within the rodent infested site, away from slugs/snails. Dispose of slugs/snails in a way non-target animals are not exposed. Dispose of dead rodents and uneaten bait in compliance with local, state or territory government regulations.</p> <p>DO NOT allow livestock or poultry to consume dead or moribund mice and rats. All dead or moribund animals and rodent faeces from baited rodents MUST be removed from areas accessible to livestock or poultry.</p> <p>The use of this product for the control of protected native rodents requires permission from wildlife authorities.</p> <p>PROTECTION OF FISH, CRUSTACEANS AND ENVIRONMENT</p> <p>Very toxic to aquatic life. DO NOT contaminate wetlands or watercourses with this product or used containers. Place the bait stations in areas not liable to flooding. When placing bait stations close to water drainage systems, ensure that bait contact with water is avoided.</p>
Storage and Disposal:	<p>STORAGE AND DISPOSAL</p> <p>Store in a tightly closed, original container in a dry, well-ventilated area as cool as possible out of direct sunlight. Triple rinse containers before disposal. Break, crush or puncture and deliver empty packaging to an approved waste management facility. If an approved waste management facility is not available, dispose of empty packaging in compliance with relevant local, state or territory government regulations. Dispose of unused product in compliance with relevant local, state or territory government regulations. DO NOT burn empty containers or product.</p>
Safety Directions:	<p>SAFETY DIRECTIONS</p> <p>Repeated minor exposure may have a cumulative poisoning effect. Avoid contact with eyes and skin. Do not inhale dust. Do not touch bait, use scoop or measure. When using the product wear disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water.</p> <p>During cleanup and disposal operations of bait and bait stations, wear a single layer of clothing and disposable gloves. Wear disposable gloves when handling rodent carcasses. Wash clothes after performing re-handling activities.</p>

First Aid Instructions:	FIRST AID If poisoning occurs, contact a doctor or Poisons Information Centre. Phone Australia 13 11 26, New Zealand 0800 764 766. Vitamin K1 (Phytomenadione) is antidotal.
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First Aid Warnings:	
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DIRECTIONS FOR USE

SITUATION	PEST	RATE	CRITICAL COMMENTS
Clean Out Treatments In and around (within 2 m) agricultural, commercial, domestic, industrial and public service buildings	Rats (<i>Rattus rattus</i> , <i>R. norvegicus</i>)	(As per current approved label)	For rats: Place bait stations at intervals of 5 to 9 m in infested areas. DO NOT exceed 9 m between bait stations. For mice: Place bait stations at intervals of 2 to 3 m in infested areas. DO NOT exceed 3 m between bait stations.
Clean Out Treatments In agricultural, commercial, domestic, industrial and public service buildings	Mice (<i>Mus domesticus</i>)	(As per current approved label)	Use the greater number of bait stations and shorter distance between bait placements when infestations are heavy See also baiting strategy for clean-out treatments.
Monitoring and/or Maintenance Treatments In and around (within 2 m) agricultural, commercial, domestic, industrial and public service buildings	Rats (<i>Rattus rattus</i> , <i>R. norvegicus</i>)	(As per current approved label)	Place bait stations in areas prone to rodent infestation at intervals of between 15 and 30 m. See also baiting strategy for monitoring and/or maintenance treatments.
Monitoring and/or Maintenance Treatments In agricultural, commercial, domestic, industrial and public service buildings	Mice (<i>Mus domesticus</i>)		

Baiting Strategy

- Eliminate all alternative food sources as far as practical.

Clean Out Treatments (Pulse Baiting)

- Clean out treatments are used to remove existing infestations of rats and mice
- Survey site prior to treatment, including assessment of the extent of infestation and identification of any indications of the presence of non-target animals.
- Place baits so as to prevent access to non-target animals. Always use tamper-resistant bait stations that are secured in place.
- Record the number and locations of bait stations for the purpose of inspection, replacement and later removal.
- Conduct initial inspection of bait stations after 3 or 4 days. Replace or refill bait stations where the pellets have been consumed. Repeat approximately 4 days later and then weekly. Replace contaminated or spoiled pellets.
- Baiting for at least 2 weeks (3 to 4 pulses) will be necessary to reduce rat/mouse numbers to a low level. Although heavy infestations may require longer treatments to achieve complete eradication.
- Discontinue the treatment when effective control has been achieved and remove all bait stations unless a maintenance treatment is to be undertaken.
- DO NOT use the product beyond 35 days without an evaluation of the state of the infestation and of the efficacy of the treatment.

- Remove all uneaten bait at the end of treatment.

Monitoring and/or Maintenance Treatments

- Monitoring and maintenance treatments are required at sensitive sites where there is no current rodent infestation but where the prevention of such infestation is essential to prevent significant risks to human health. Such treatments may be a condition for audit approval within food safety guidelines. However, use of this product must comply with the conditions of this label.
- Always use tamper-resistant bait stations for monitoring and maintenance treatments and fix the stations securely to the substrate.
- Place bait stations so as to prevent access to non-target animals.
- Use placebo or unpoisoned bait if the placement of the bait presents a hazard to non-target animals.
- Always record the number and locations of bait stations for the purpose of bait replacement and later removal.
- Bait stations should be inspected at regular intervals no more than 7 days apart according to an agreed and documented schedule.
- When a rodent infestation is detected revert to the directions for Clean Out Treatments.

**NOT TO BE USED FOR ANY PURPOSE, OR IN ANY MANNER, CONTRARY TO THIS LABEL UNLESS
AUTHORISED UNDER APPROPRIATE LEGISLATION**

Template Label 3b

Label Name:	[INSERT LABEL NAME]
Signal Headings	POISON KEEP OUT OF REACH OF CHILDREN READ SAFETY DIRECTIONS BEFORE OPENING OR USING
Constituent Statements:	ACTIVE CONSTITUENT: 0.05 g/kg BRODIFACOU
Mode of Action:	
Statement of Claims:	For control of mice in industrial, commercial, agricultural, and domestic buildings and rats in and around industrial, commercial, agricultural and domestic buildings.
Net Contents:	[INSERT NET CONTENTS]
Restraints:	<p>RESTRAINTS</p> <p>DO NOT use this product unless you have a current qualification in the nationally recognised training course for rodent pest management CPPUPM3006 - Manage pests by applying pesticides, or an equivalent unit of competency.</p> <p>DO NOT place baits in areas that are accessible to children. In child-accessible areas baits must be placed in tamper-resistant bait stations. If bait can be dislodged from bait station, bait station must be secured in place.</p> <p>DO NOT place bait outdoors unless it is in a tamper-resistant bait station which is secured in place.</p> <p>DO NOT place bait stations more than 2 meters from buildings.</p> <p>DO NOT place bait stations outdoors around buildings for control of mice.</p> <p>DO NOT bait in areas where wildlife may be collected for human consumption.</p> <p>DO NOT place baits in and around animal, livestock and poultry houses, associated equipment, and food and feed processing areas.</p> <p>DO NOT apply this product directly into burrows.</p>
Directions for Use:	[This section contains an attachment below]
Other Limitations:	
Withholding Periods:	
Trade Advice:	
General Directions:	
Resistance Warning:	

Precautions:	<p>PRECAUTIONS</p> <p>Caution should be used when baiting near areas where hunting of wildlife may occur. Careful consideration of bait placement is necessary to avoid secondary exposure from contaminated wildlife that may be consumed.</p> <p>DO NOT place bait in areas where there is a possibility of contaminating food, livestock feed or surfaces that come in direct contact with food or livestock feed.</p>
Protection Statements:	<p>PROTECTION OF LIVESTOCK AND WILDLIFE</p> <p>Hazardous to livestock, poultry and wildlife. DO NOT place baits in locations that are accessible to domestic animals, livestock, non-target native animals or birds. Search for and dispose of dead rodents and slugs/snails in the infested area at each visit to prevent secondary poisoning. In case slugs/snails are present, move bait station to another location within the rodent infested site, away from slugs/snails. Dispose of slugs/snails in a way non-target animals are not exposed. Dispose of dead rodents and uneaten bait in compliance with local, state or territory government regulations.</p> <p>DO NOT allow livestock or poultry to consume dead or moribund mice and rats. All dead or moribund animals and rodent faeces from baited rodents MUST be removed from areas accessible to livestock or poultry.</p> <p>The use of this product for the control of protected native rodents requires permission from wildlife authorities.</p> <p>PROTECTION OF FISH, CRUSTACEANS AND ENVIRONMENT</p> <p>Very toxic to aquatic life. DO NOT contaminate wetlands or watercourses with this product or used containers. Place the bait stations in areas not liable to flooding. When placing bait stations close to water drainage systems, ensure that bait contact with water is avoided.</p>
Storage and Disposal:	<p>Store in the closed, original container in a cool dry place out of reach of children. DO NOT store in direct sunlight. Triple rinse containers before disposal. Break, crush or puncture and deliver empty packaging to an approved waste management facility. If an approved waste management facility is not available, dispose of empty packaging in compliance with relevant local, state or territory government regulations. Dispose of unused product in compliance with relevant local, state or territory government regulations. DO NOT burn empty containers or product.</p>
Safety Directions:	<p>SAFETY DIRECTIONS</p> <p>Repeated minor exposure may have a cumulative poisoning effect. Avoid contact with eyes and skin. Do not inhale dust. Do not touch bait, use scoop or measure. When using the product wear disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water.</p> <p>During cleanup and disposal operations of bait and bait stations, wear a single layer of clothing and disposable gloves. Wear disposable gloves when handling rodent carcasses. Wash clothes after performing re-handling activities.</p>
First Aid Instructions:	<p>FIRST AID</p> <p>If poisoning occurs, contact a doctor or Poisons Information Centre. Phone Australia 13 11 26, New Zealand 0800 764 766. Vitamin K1 (Phytomenadione) is antidotal.</p>

First Aid Warnings:

DIRECTIONS FOR USE

SITUATION	PEST	RATE	CRITICAL COMMENTS
In and around (within 2 meters) industrial, commercial, agricultural and domestic buildings.	Rats	[As per current approved label]	Place bait stations in infested area along walls or rafters and in dark sheltered spots where there are signs of rodent activity. DO NOT touch bait.
In industrial, commercial, agricultural and domestic buildings.	Mice	[As per current approved label]	Mice require bait stations in several locations whereas rats require large quantities of bait in one or 2 locations. DO NOT exceed 3 m between bait stations for mice or 9 m for rats.

Baiting Strategy

Eliminate as far as practicable all alternative food sources.

Survey site prior to treatment, including assessment of the extent of infestation and identification of any indications of the presence of non-target animals. Record the number and locations of bait stations for the purpose of inspection, replacement and later removal.

Inspect baits daily. Replace eaten baits. If quickly eaten, increase number of baits. Continue observation and replenish until no more baits are taken. Most rodent deaths occur 4 to 7 days after consumption of bait.

Baiting for at least two weeks is necessary to reduce rat/mouse numbers.

DO NOT use the product beyond 35 days without an evaluation of the state of the infestation and of the efficacy of the treatment. Remove all uneaten bait at the end of treatment.

NOT TO BE USED FOR ANY PURPOSE, OR IN ANY MANNER, CONTRARY TO THIS LABEL UNLESS AUTHORISED UNDER APPROPRIATE LEGISLATION.

Commercial pest-control product: RB 0.05 g/kg or less in sachet or place pack

Template Label 4a

Label Name:	[INSERT LABEL NAME]
Signal Headings	POISON KEEP OUT OF REACH OF CHILDREN READ SAFETY DIRECTIONS BEFORE OPENING OR USING
Constituent Statements:	ACTIVE CONSTITUENT: 0.05 g/kg BRODIFACOU
Mode of Action:	
Statement of Claims:	For the control of mice in industrial, commercial, public services, agricultural and domestic buildings and rats in and around industrial, commercial, public services, agricultural and domestic buildings.
Net Contents:	[INSERT NET CONTENTS]
Restrains:	<p>RESTRAINTS</p> <p>DO NOT use this product unless you have a current qualification in the nationally recognised training course for rodent pest management CPPUPM3006 - Manage pests by applying pesticides, or an equivalent unit of competency.</p> <p>DO NOT place baits in areas that are accessible to children. In child-accessible areas baits must be placed in tamper-resistant bait stations. If bait can be dislodged from bait station, bait station must be secured in place.</p> <p>DO NOT place bait outdoors unless it is in a tamper-resistant bait station which is secured in place.</p> <p>DO NOT place bait stations more than 2 meters from buildings.</p> <p>DO NOT place bait stations outdoors around buildings for control of mice.</p> <p>DO NOT bait in areas where wildlife may be collected for human consumption.</p> <p>DO NOT place in animal or livestock housing unless used in tamper proof and weather resistant bait stations fixed to the ground or other structures.</p> <p>DO NOT place bait or bait stations above areas which would allow them to contaminate pig and poultry food or drinking water.</p> <p>DO NOT apply this product directly into burrows.</p>
Directions for Use:	[This section contains an attachment below]
Other Limitations:	
Withholding Periods:	
Trade Advice:	
General Directions:	GENERAL INSTRUCTIONS

	The baits are ready to use – do not unwrap individual baits. Rats and mice will chew through the wrapper.
Resistance Warning:	
Precautions:	<p>PRECAUTIONS</p> <p>Caution should be used when baiting near areas where hunting of wildlife may occur. Careful consideration of bait placement is necessary to avoid secondary exposure from contaminated wildlife that may be consumed.</p> <p>DO NOT place bait in areas where there is a possibility of contaminating food, livestock feed or surfaces that come in direct contact with food or livestock feed.</p>
Protection Statements:	<p>PROTECTION OF LIVESTOCK AND WILDLIFE</p> <p>Hazardous to livestock, poultry and wildlife. DO NOT place baits in locations that are accessible to domestic animals, livestock, non-target native animals or birds. Search for and dispose of dead rodents and slugs/snails in the infested area at each visit to prevent secondary poisoning. In case slugs/snails are present, move bait station to another location within the rodent infested site, away from slugs/snails. Dispose of slugs/snails in a way non-target animals are not exposed. Dispose of dead rodents and uneaten bait in compliance with local, state or territory government regulations.</p> <p>DO NOT allow livestock or poultry to consume dead or moribund mice and rats. All dead or moribund animals and rodent faeces from baited rodents MUST be removed from areas accessible to livestock or poultry.</p> <p>The use of this product for the control of protected native rodents requires permission from wildlife authorities.</p> <p>PROTECTION OF FISH, CRUSTACEANS AND ENVIRONMENT</p> <p>Very toxic to aquatic life. DO NOT contaminate wetlands or watercourses with this product or used containers. Place the bait stations in areas not liable to flooding. When placing bait stations close to water drainage systems, ensure that bait contact with water is avoided.</p>
Storage and Disposal:	<p>STORAGE AND DISPOSAL</p> <p>Store in the closed, original container in a cool, well-ventilated area. Do not store for prolong periods in direct sunlight. Triple rinse containers before disposal. Break, crush or puncture and deliver empty packaging to an approved waste management facility. If an approved waste management facility is not available, dispose of empty packaging in compliance with relevant local, state or territory government regulations. Dispose of unused product in compliance with relevant local, state or territory government regulations. DO NOT burn empty containers or product.</p>
Safety Directions:	<p>SAFETY DIRECTIONS</p> <p>Repeated minor exposure may have a cumulative poisoning effect. When using the product wear disposable gloves. During cleanup, disposal operations of bait and bait stations and when handling rodent carcasses wear single layer clothing and disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water. After each day's use wash contaminated clothing. Wash clothes after performing re-handling activities.</p>

First Aid Instructions:	FIRST AID If poisoning occurs, contact a doctor or Poisons Information Centre. Phone Australia 13 11 26, New Zealand 0800 764 766. Vitamin K1 (Phytomenadione) is antidotal.
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First Aid Warnings:	
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DIRECTIONS FOR USE

SITUATION	PEST	RATE	CRITICAL COMMENTS
Clean Out Treatments In and around (within 2 m) industrial, commercial, public services, agricultural and domestic buildings	Rats (<i>Rattus rattus</i> , <i>R. norvegicus</i>)	[As per current approved label]	For rats: Place bait stations at intervals of 5 to 9 m in infested areas. DO NOT exceed 9 m between bait stations. For mice: Place bait stations at intervals of 2 to 3 m in infested areas. DO NOT exceed 3 m between bait stations.
Clean Out Treatments In industrial, commercial, public services, agricultural and domestic buildings	Mice (<i>Mus domesticus</i>)	[As per current approved label]	Use the greater number of baits and shorter distance between bait placements when infestations are heavy See also baiting strategy for clean-out treatments.
Monitoring and/or Maintenance Treatments In and around (within 2 m) industrial, commercial, public services, agricultural and domestic buildings	Rats (<i>Rattus rattus</i> , <i>R. norvegicus</i>)	[As per current approved label: 1 bait/bait station or 1-2 baits/bait station]	Place bait stations in areas prone to rodent infestation at intervals of between 15 and 30 m. See also baiting strategy for monitoring and/or maintenance treatments.
Monitoring and/or Maintenance Treatments In industrial, commercial, public services, agricultural and domestic buildings	Mice (<i>Mus domesticus</i>)		

Baiting Strategy

- Eliminate all alternative food sources as far as practical.
- When used in food producing animal housing situations careful consideration is necessary regarding the placement of bait stations to ensure any rodenticide contamination of water, feed or livestock is prevented.

Clean-Out Treatments (Pulse Baiting)

- Clean-out treatments are used to remove existing infestations of rats and mice
- Survey site prior to treatment, including assessment of the extent of infestation and identification of any indications of the presence of non-target animals.
- Always use tamper-resistant bait stations that are secured in place in child accessible areas, outdoors and in animal or livestock housing.
- Place baits so as to prevent access to non-target animals.
- Record the number and locations of bait stations for the purpose of inspection, replacement and later removal.
- Conduct initial inspection of bait after 3 or 4 days. Replace any bait that has been consumed. Repeat approximately 4 days later and then weekly. Replace contaminated or spoiled baits.
- Baiting for at least 2 weeks (3 to 4 pulses) will be necessary to reduce rat/mouse numbers to a low level. Although heavy infestations may require longer treatments to achieve complete eradication.

- Discontinue the treatment when effective control has been achieved and remove all bait and bait stations unless a maintenance treatment is to be undertaken.
- DO NOT use the product beyond 35 days without an evaluation of the state of the infestation and of the efficacy of the treatment.
- Remove all uneaten bait at the end of treatment.

Monitoring and/or Maintenance Treatments

- Monitoring and maintenance treatments are required at sensitive sites where there is no current rodent infestation but where the prevention of such infestation is essential to prevent significant risks to human health. Such treatments may be a condition for audit approval within food safety guidelines. However, use of this product must comply with the conditions of this label.
- Always use tamper-resistant bait stations for monitoring and maintenance treatments and fix the stations securely to the substrate.
- Place bait stations so as to prevent access to non-target animals.
- Use placebo or unpoisoned bait if the placement of the bait presents a hazard to non-target animals.
- Always record the number and locations of bait stations for the purpose of bait replacement and later removal.
- Bait stations should be inspected at regular intervals no more than 7 days apart according to an agreed and documented schedule.
- When a rodent infestation is detected revert to the directions for clean-out treatments.

**NOT TO BE USED FOR ANY PURPOSE, OR IN ANY MANNER, CONTRARY TO THIS LABEL UNLESS
AUTHORISED UNDER APPROPRIATE LEGISLATION**

Template Label 4b

Label Name:	[INSERT LABEL NAME]
Signal Headings	POISON KEEP OUT OF REACH OF CHILDREN READ SAFETY DIRECTIONS BEFORE OPENING OR USING
Constituent Statements:	ACTIVE CONSTITUENT: 0.05 g/kg BRODIFACOUM
Mode of Action:	
Statement of Claims:	For the control of mice in industrial, commercial, public services, agricultural and domestic buildings and rats in and around industrial, commercial, public services, agricultural and domestic buildings.
Net Contents:	[INSERT NET CONTENTS]
Restraints:	<p>RESTRAINTS</p> <p>DO NOT use this product unless you have a current qualification in the nationally recognised training course for rodent pest management CPPUPM3006 - Manage pests by applying pesticides, or an equivalent unit of competency.</p> <p>DO NOT place baits in areas that are accessible to children. In child-accessible areas baits must be placed in tamper-resistant bait stations. If bait can be dislodged from bait station, bait station must be secured in place.</p> <p>DO NOT place bait outdoors unless it is in a tamper-resistant bait station which is secured in place.</p> <p>DO NOT place bait stations more than 2 meters from buildings.</p> <p>DO NOT place bait stations outdoors around buildings for control of mice.</p> <p>DO NOT bait in areas where wildlife may be collected for human consumption.</p> <p>DO NOT place in animal or livestock housing unless used in tamper-resistant and weather-resistant bait stations fixed to the ground or other structures.</p> <p>DO NOT place bait or bait stations above areas which would allow them to contaminate pig and poultry food or drinking water.</p> <p>DO NOT apply this product directly into burrows.</p>
Directions for Use:	[This section contains an attachment below]
Other Limitations:	
Withholding Periods:	
Trade Advice:	
General Directions:	<p>GENERAL INSTRUCTIONS</p> <p>The baits are ready to use - do not open individual baits. Rats and mice will chew through the bait packs.</p>

Resistance Warning:	
Precautions:	<p>PRECAUTIONS</p> <p>Caution should be used when baiting near areas where hunting of wildlife may occur. Careful consideration of bait placement is necessary to avoid secondary exposure from contaminated wildlife that may be consumed.</p> <p>DO NOT place bait in areas where there is a possibility of contaminating food, livestock feed or surfaces that come in direct contact with food or livestock feed.</p>
Protection Statements:	<p>PROTECTION OF LIVESTOCK AND WILDLIFE</p> <p>Hazardous to livestock, poultry and wildlife. DO NOT place baits in locations that are accessible to domestic animals, livestock, non-target native animals or birds. Search for and dispose of dead rodents and slugs/snails in the infested area at each visit to prevent secondary poisoning. In case slugs/snails are present, move bait station to another location within the rodent infested site, away from slugs/snails. Dispose of slugs/snails in a way non-target animals are not exposed. Dispose of dead rodents and uneaten bait in compliance with local, state or territory government regulations.</p> <p>DO NOT allow livestock or poultry to consume dead or moribund mice and rats. All dead or moribund animals and rodent faeces from baited rodents MUST be removed from areas accessible to livestock or poultry. DO NOT use this product to control native animals.</p> <p>DO NOT use this product to control native animals.</p> <p>PROTECTION OF FISH, CRUSTACEANS AND ENVIRONMENT</p> <p>Very toxic to aquatic life. DO NOT contaminate wetlands or watercourses with this product or used containers. Place the bait stations in areas not liable to flooding. When placing bait stations close to water drainage systems, ensure that bait contact with water is avoided.</p>
Storage and Disposal:	<p>STORAGE AND DISPOSAL</p> <p>Store in the closed, original container in a cool, well-ventilated area. Do not store for prolonged periods in direct sunlight. Triple rinse containers before disposal. Break, crush or puncture and deliver empty packaging to an approved waste management facility. If an approved waste management facility is not available, dispose of empty packaging in compliance with relevant local, state or territory government regulations. Dispose of unused product in compliance with relevant local, state or territory government regulations. DO NOT burn empty containers or product.</p>
Safety Directions:	<p>SAFETY DIRECTIONS</p> <p>Repeated minor exposure may have a cumulative poisoning effect. When using the product wear disposable gloves. During cleanup, disposal operations of bait and bait stations and when handling rodent carcasses wear single layer clothing and disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water. After each day's use wash contaminated clothing. Wash clothes after performing re-handling activities.</p>

First Aid Instructions:	FIRST AID If poisoning occurs, contact a doctor or Poisons Information Centre. Phone Australia 13 11 26, New Zealand 0800 764 766. Vitamin K1 (Phytomenadione) is antidotal.
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First Aid Warnings:	
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DIRECTIONS FOR USE

SITUATION	PEST	RATE	CRITICAL COMMENTS
In and around (within 2 meters) industrial, commercial, public services, agricultural and domestic buildings.	Rats (<i>Rattus norvegicus</i> , <i>Rattus rattus</i>)	As per current approved label: 1-3 baits/bait station or 2-4 baits/bait station]	Place bait stations in infested area wherever droppings, damage or other signs of rodent activity are seen. For rats: Place bait stations at intervals of 5 to 9 m in infested areas. DO NOT exceed 9 m between bait stations.
In industrial, commercial, public services, agricultural and domestic buildings.	Mice (<i>Mus musculus</i>)	[As per current approved label: 1 bait/bait station or 1-2 baits/bait station]	For mice: Place bait stations at intervals of 2 to 3 m in infested areas. DO NOT exceed 3 m between bait stations.

Baiting Strategy

Eliminate as far as practicable all alternative food sources.

Survey site prior to treatment, including assessment of the extent of infestation and identification of any indications of the presence of non-target animals.

Record the number and locations of bait stations for the purpose of inspection, replacement and later removal. Always use tamper-resistant bait stations that are secured in place in child accessible areas, outdoors and in animal or livestock housing. When used in food producing animal housing situations careful consideration is necessary regarding the placement of bait stations to ensure any rodenticide contamination of water, feed or livestock is prevented.

Inspect baits daily. Replace eaten baits. If quickly eaten, increase number of baits. Continue observation and replenish until no more baits are taken. Most rodent deaths occur 4 to 7 days after consumption of bait.

Baiting for at least two weeks is necessary to reduce rat/mouse numbers.

DO NOT use the product beyond 35 days without an evaluation of the state of the infestation and of the efficacy of the treatment. Remove all uneaten bait at the end of treatment.

NOT TO BE USED FOR ANY PURPOSE, OR IN ANY MANNER, CONTRARY TO THIS LABEL UNLESS AUTHORISED UNDER APPROPRIATE LEGISLATION.

Domestic pest-control product: RB 0.05 g/kg or less in block formulation

Template Label 5a

Label Name:	[INSERT LABEL NAME]
Signal Headings	POISON KEEP OUT OF REACH OF CHILDREN READ SAFETY DIRECTIONS
Constituent Statements:	ACTIVE CONSTITUENT: 0.05 g/kg BRODIFACOU
Statement of Claims:	For control of mice in domestic buildings and rats in and around domestic buildings.
Net Contents:	[INSERT NET CONTENTS – MAXIMUM 300g]
Restraints:	DO NOT place baits unless in tamper-resistant bait stations. DO NOT place bait stations outdoors around buildings for control of mice. DO NOT place bait stations more than 2 meters from buildings. DO NOT bait in areas where wildlife may be collected for human consumption. DO NOT place baits in and around animal, livestock and poultry houses, associated equipment, and food and feed processing areas. DO NOT apply this product directly into burrows. DO NOT use the product in pulsed baiting treatments.
How to Use	[This section contains an attachment below]
Withholding Periods:	
How to Prepare	
Resistance Warning:	
Precautions:	CAUTION Caution should be used when baiting near areas where hunting of wildlife may occur. Careful consideration of bait placement is necessary to avoid secondary exposure from contaminated wildlife that may be consumed. DO NOT place bait in areas where there is a possibility of contaminating food, livestock feed or surfaces that come in direct contact with food or livestock feed. PROTECTION OF LIVESTOCK AND WILDLIFE Hazardous to livestock, poultry and wildlife. DO NOT place baits in locations that are accessible to domestic animals, livestock, non-target native animals or birds. Search for and dispose of dead rodents and slugs/snails in the infested area at each visit to prevent secondary poisoning. In case slugs/snails are present, move bait station to another location within the rodent infested site, away from slugs/snails.

	<p>Dispose of slugs/snails, dead rodents and uneaten bait by wrapping in paper, placing in plastic bag and putting in garbage.</p> <p>DO NOT allow livestock or poultry to consume dead or moribund rats and mice. All dead or moribund animals and rodent faeces from baited rodents MUST be removed from areas accessible to livestock or poultry.</p> <p>DO NOT let cats, dogs, birds and other wildlife eat poisoned mice and rats.</p> <p>The use of this product for the control of protected native rodents and rodent-like animals requires permission from wildlife authorities.</p> <p>PROTECTION OF FISH, CRUSTACEANS AND ENVIRONMENT</p> <p>Very toxic to aquatic life. DO NOT contaminate wetlands or watercourses with this product or used containers. Place the bait stations in areas not liable to flooding.</p> <p>When placing bait stations close to water drainage systems, ensure that bait contact with water is avoided.</p>
Protections:	
Storage and Disposal:	<p>STORAGE AND DISPOSAL</p> <p>Store in the closed original container, in a cool, dry place out of the reach of children. Do not store in direct sunlight. Dispose of empty containers and unused product by wrapping in paper placing in plastic bag and putting in garbage.</p>
Safety Directions:	<p>SAFETY DIRECTIONS</p> <p>Repeated minor exposure may have a cumulative poisoning effect. Do not touch bait, use scoop or measure. When using the product wear disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water.</p> <p>During cleanup and disposal operations of bait and bait stations, wear a single layer of clothing and disposable gloves. Wear disposable gloves when handling rodent carcasses. Wash clothes after performing re-handling activities.</p>
First Aid Instructions:	<p>FIRST AID</p> <p>If poisoning occurs, contact a doctor or Poisons Information Centre. Phone Australia 13 11 26, New Zealand 0800 764 766. Vitamin K1 (Phytomenadione) is antidotal.</p>
First Aid Warnings:	

HOW TO USE

PEST	SITUATION	RATE	HOW TO APPLY
Rats (<i>Rattus rattus</i> , <i>Rattus norvegicus</i>)	In and around (within 2 meters) domestic buildings	[As per current approved label]	Place bait stations in infested area where there are signs of rodent activity, along walls or rafters and in dark, sheltered places. DO NOT touch bait. DO NOT exceed 3 m between bait stations for mice and 9 m between bait stations for rats.
Mice (<i>Mus musculus</i>)	In domestic buildings	[As per current approved label]	

General Information and baiting strategy for rats and mice:

Eliminate as far as practicable, all other food sources.

Always place bait where it is inaccessible to children, animals and birds. Use in tamper resistant bait stations only. If bait can be dislodged from bait station, fix tamper-resistant bait stations to the ground or other structures. It is recommended that weather-resistant bait stations be used where possible. Record the number and location of baits for later replenishment and or removal.

Inspect baits daily. Replace eaten bait. If eaten quickly, increase number of baits. Continue observation and replenishment until no more baits are taken. Most deaths occur 4 to 7 days after consumption of bait. Baiting for at least 2 weeks will be necessary to reduce mouse numbers.

Ensure baits are removed when rodent activity has ceased. DO NOT use the product for longer than 35 days. If rodent activity is still observed after 35 days, seek advice from the product supplier or call a pest control service.

NOT TO BE USED FOR ANY PURPOSE, OR IN ANY MANNER, CONTRARY TO THIS LABEL UNLESS AUTHORISED.

Template Label 5b

Label Name:	[INSERT LABEL NAME]
Signal Headings	POISON KEEP OUT OF REACH OF CHILDREN READ SAFETY DIRECTIONS
Constituent Statements:	ACTIVE CONSTITUENT: 0.05 g/kg BRODIFACOUM
Statement of Claims:	For control of mice in domestic buildings.
Net Contents:	[INSERT NET CONTENTS – MAXIMUM 300g]
Restraints:	DO NOT place baits unless in tamper-resistant bait stations. DO NOT place bait stations outdoors around buildings for control of mice. DO NOT place baits in animal, livestock and poultry houses, associated equipment, and food and feed processing areas. DO NOT use the product in pulsed baiting treatments.
How to Use	[This section contains an attachment below]
Withholding Periods:	
How to Prepare	
Resistance Warning:	
Precautions:	<p>CAUTION</p> <p>Caution should be used when baiting near areas where hunting of wildlife may occur. Careful consideration of bait placement is necessary to avoid secondary exposure from contaminated wildlife that may be consumed.</p> <p>DO NOT place bait in areas where there is a possibility of contaminating food, livestock feed or surfaces that come in direct contact with food or livestock feed.</p> <p>PROTECTION OF LIVESTOCK AND WILDLIFE</p> <p>Hazardous to livestock, poultry and wildlife. DO NOT place baits in locations that are accessible to domestic animals, livestock, non-target native animals or birds.</p> <p>Search for and dispose of dead rodents and slugs/snails in the infested area at each visit to prevent secondary poisoning. In case slugs/snails are present, move bait station to another location within the rodent infested site, away from slugs/snails.</p> <p>Dispose of slugs/snails, dead rodents and uneaten bait by wrapping in paper, placing in plastic bag and putting in garbage.</p> <p>DO NOT allow livestock or poultry to consume dead or moribund mice and rats. All dead or moribund animals and rodent faeces from baited rodents MUST be removed from areas accessible to livestock or poultry.</p> <p>DO NOT let cats, dogs or non-target animals eat poisoned mice.</p>

	<p>DO NOT use this product to control native animals.</p> <p>PROTECTION OF FISH, CRUSTACEANS AND ENVIRONMENT</p> <p>Very toxic to aquatic life. DO NOT contaminate wetlands or watercourses with this product or used containers. Place the bait stations in areas not liable to flooding. When placing bait stations close to water drainage systems, ensure that bait contact with water is avoided.</p>
Protections:	
Storage and Disposal:	<p>STORAGE AND DISPOSAL</p> <p>Store in the closed, original container in a cool, dry, place out of reach of children. Do not store in direct sunlight. Dispose of empty containers and unused product by wrapping in paper placing in plastic bag and putting in garbage.</p>
Safety Directions:	<p>SAFETY DIRECTIONS</p> <p>Repeated minor exposure may have a cumulative poisoning effect. Do not touch bait, use scoop or measure. When using the product wear disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water. During cleanup and disposal operations of bait and bait stations, wear a single layer of clothing and disposable gloves. Wear disposable gloves when handling rodent carcasses. Wash clothes after performing re-handling activities.</p>
First Aid Instructions:	<p>FIRST AID</p> <p>If poisoning occurs, contact a doctor or Poisons Information Centre. Phone Australia 13 11 26, New Zealand 0800 764 766. Vitamin K1 (Phytomenadione) is antidotal.</p>
First Aid Warnings:	

HOW TO USE

PEST	SITUATION	RATE	HOW TO APPLY
Mice	In domestic buildings	[As per current approved label]	Place bait stations in the infested area where there are signs of mouse activity, such as feeding evidence or droppings, along walls or rafters and in dark, sheltered places. DO NOT touch bait. Space bait stations 2-3 metres apart. DO NOT exceed 3 m between bait locations.

General Information and baiting strategy for mice:

Eliminate as far as practicable, all other food sources.

Use in tamper resistant bait stations only. If bait can be dislodged from bait station, fix tamper-resistant bait stations to the ground or other structures.

Inspect baits frequently, particularly in the first ten days. Replace eaten bait. If bait is eaten quickly, the number of bait stations should be increased. Continue observation and replacement until no more baits are taken. Most deaths occur 4 to 7 days after consumption of bait, however baiting for at least 2 weeks will be necessary to reduce mouse numbers.

Following treatment remove all remains of bait and bait stations. DO NOT use the product for longer than 35 days. If rodent activity is still observed after 35 days, seek advice from the product supplier or call a pest control service.

NOT TO BE USED FOR ANY PURPOSE, OR IN ANY MANNER, CONTRARY TO THIS LABEL UNLESS AUTHORISED.

Template Label 5c

Label Name:	[INSERT LABEL NAME]
Signal Headings	POISON KEEP OUT OF REACH OF CHILDREN READ SAFETY DIRECTIONS
Constituent Statements:	ACTIVE CONSTITUENT: 0.025 g/kg BRODIFACOUM
Statement of Claims:	For control of mice in domestic buildings and rats in and around domestic buildings.
Net Contents:	[INSERT NET CONTENTS – MAXIMUM 300g]
Restraints:	DO NOT place baits unless in tamper-resistant bait stations. DO NOT place bait stations outdoors around buildings for control of mice. DO NOT place bait stations more than 2 meters from buildings. DO NOT bait in areas where wildlife may be collected for human consumption. DO NOT place baits in and around animal, livestock and poultry houses, associated equipment, and food and feed processing areas. DO NOT apply this product directly into burrows. DO NOT use the product in pulsed baiting treatments.
How to Use	[This section contains an attachment below]
Withholding Periods:	
How to Prepare	
Resistance Warning:	
Precautions:	<p>CAUTION Caution should be used when baiting near areas where hunting of wildlife may occur. Careful consideration of bait placement is necessary to avoid secondary exposure from contaminated wildlife that may be consumed. DO NOT place bait in areas where there is a possibility of contaminating food, livestock feed or surfaces that come in direct contact with food or livestock feed.</p> <p>PROTECTION OF LIVESTOCK AND WILDLIFE Hazardous to livestock, poultry and wildlife. DO NOT place baits in locations that are accessible to domestic animals, livestock, non-target native animals or birds. Search for and dispose of dead rodents and slugs/snails in the infested area at each visit to prevent secondary poisoning. In case slugs/snails are present, move bait station to another location within the rodent infested site, away from slugs/snails. Dispose of slugs/snails, dead rodents and uneaten bait by wrapping in paper, placing in plastic bag and putting in garbage.</p>

	<p>DO NOT allow livestock or poultry to consume dead or moribund mice and rats. All dead or moribund animals and rodent faeces from baited rodents MUST be removed from areas accessible to livestock or poultry.</p> <p>DO NOT let cats, dogs or non-target animals eat poisoned mice and rats.</p> <p>DO NOT use this product to control native animals.</p> <p>PROTECTION OF FISH, CRUSTACEANS AND ENVIRONMENT</p> <p>Very toxic to aquatic life. DO NOT contaminate wetlands or watercourses with this product or used containers. Place the bait stations in areas not liable to flooding.</p> <p>When placing bait stations close to water drainage systems, ensure that bait contact with water is avoided.</p>
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Protections:	
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Storage and Disposal:	<p>STORAGE AND DISPOSAL</p> <p>Store in the closed, original container in a cool, dry, place out of reach of children. Do not store in direct sunlight. Dispose of empty containers and unused product by wrapping in paper placing in plastic bag and putting in garbage.</p>
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Safety Directions:	<p>SAFETY DIRECTIONS</p> <p>Repeated minor exposure may have a cumulative poisoning effect. Do not touch bait, use scoop or measure. When using the product wear disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water. During cleanup and disposal operations of bait and bait stations, wear a single layer of clothing and disposable gloves. Wear disposable gloves when handling rodent carcasses. Wash clothes after performing re-handling activities.</p>
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First Aid Instructions:	<p>FIRST AID</p> <p>If poisoning occurs, contact a doctor or Poisons Information Centre. Phone Australia 13 11 26, New Zealand 0800 764 766. Vitamin K1 (Phytomenadione) is antidotal.</p>
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First Aid Warnings:	
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HOW TO USE

PEST	SITUATION	RATE	HOW TO APPLY
Rats (<i>Rattus rattus</i> , <i>Rattus norvegicus</i>)	In and around (within 2 meters) domestic buildings	[As per current approved label]	Place bait stations in infested area, on dry locations on runs, near burrows and where droppings are seen. Do not touch bait.
Mice (<i>Mus musculus</i>)	In domestic buildings	[As per current approved label]	For Rats: Place bait stations at 5-9 m intervals. DO NOT exceed 9 m between bait stations. For Mice: Place bait stations at 2-3 m intervals. DO NOT exceed 3 m between bait stations.

General Information and baiting strategy for rats and mice:

Eliminate as far as practicable, all other food sources.

Always place bait where it is inaccessible to children, animals and birds. Use in tamper resistant bait stations only. If bait can be dislodged from bait station, fix tamper-resistant bait stations to the ground or other structures.

Inspect baits daily. Replace eaten bait. Continue observation and replenishment until no more baits are taken. Most deaths occur 4 to 7 days after consumption of bait. Baiting for at least 2 weeks will be necessary to reduce mouse numbers.

Following treatment remove all remains of bait and bait stations. DO NOT use the product for longer than 35 days. If rodent activity is still observed after 35 days, seek advice from the product supplier or call a pest control service.

NOT TO BE USED FOR ANY PURPOSE, OR IN ANY MANNER, CONTRARY TO THIS LABEL UNLESS AUTHORISED.

Template Label 5d

Label Name:	[INSERT LABEL NAME]
Signal Headings	POISON KEEP OUT OF REACH OF CHILDREN READ SAFETY DIRECTIONS
Constituent Statements:	ACTIVE CONSTITUENT: 0.025 g/kg BRODIFACOUM
Statement of Claims:	For control of mice in domestic buildings.
Net Contents:	[INSERT NET CONTENTS – MAXIMUM 300g]
Restraints:	DO NOT place baits unless in tamper-resistant bait stations. DO NOT place bait stations outdoors around buildings for control of mice. DO NOT place baits in animal, livestock and poultry houses, associated equipment, and food and feed processing areas. DO NOT use the product in pulsed baiting treatments.
How to Use	[This section contains an attachment below]
Withholding Periods:	
How to Prepare	GENERAL INSTRUCTIONS The Big Cheese Ultra Power Mouse Kill Bait Station Kit is a ready to use bait station specifically designed for the control of mice in household situations. The station is pre-baited with (one/two) Ultra Power Bait Blocks to kill mice. The bait station can be easily opened using the supplied key to check and refill with bait as required.
Resistance Warning:	
Precautions:	CAUTION Caution should be used when baiting near areas where hunting of wildlife may occur. Careful consideration of bait placement is necessary to avoid secondary exposure from contaminated wildlife that may be consumed. DO NOT place bait in areas where there is a possibility of contaminating food, livestock feed or surfaces that come in direct contact with food or livestock feed. PROTECTION OF LIVESTOCK AND WILDLIFE Hazardous to livestock, poultry and wildlife. DO NOT place baits in locations that are accessible to domestic animals, livestock, non-target native animals or birds. Search for and dispose of dead rodents and slugs/snails in the infested area at each visit to prevent secondary poisoning. In case slugs/snails are present, move bait station to another location within the rodent infested site, away from slugs/snails. Dispose of slugs/snails, dead rodents and uneaten bait by wrapping in paper, placing in plastic bag and putting in garbage.

	<p>DO NOT allow livestock or poultry to consume dead or moribund mice and rats. All dead or moribund animals and rodent faeces from baited rodents MUST be removed from areas accessible to livestock or poultry.</p> <p>DO NOT let cats, dogs or non-target animals eat poisoned mice.</p> <p>DO NOT use this product to control native animals.</p> <p>PROTECTION OF FISH, CRUSTACEANS AND ENVIRONMENT</p> <p>Very toxic to aquatic life. DO NOT contaminate wetlands or watercourses with this product or used containers. Place the bait stations in areas not liable to flooding.</p> <p>When placing bait stations close to water drainage systems, ensure that bait contact with water is avoided.</p>
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Protections:	
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Storage and Disposal:	<p>STORAGE AND DISPOSAL</p> <p>Store in the closed, original container in a cool, dry, place out of reach of children. Do not store in direct sunlight. Dispose of empty containers and unused product by wrapping in paper placing in plastic bag and putting in garbage.</p>
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Safety Directions:	<p>SAFETY DIRECTIONS</p> <p>Repeated minor exposure may have a cumulative poisoning effect. Do not touch bait, use scoop or measure. When using the product wear disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water. During cleanup and disposal operations of bait and bait stations, wear a single layer of clothing and disposable gloves. Wear disposable gloves when handling rodent carcasses. Wash clothes after performing re-handling activities.</p>
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First Aid Instructions:	<p>FIRST AID</p> <p>If poisoning occurs, contact a doctor or Poisons Information Centre. Phone Australia 13 11 26, New Zealand 0800 764 766. Vitamin K1 (Phytomenadione) is antidotal.</p>
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First Aid Warnings:	
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HOW TO USE

PEST	SITUATION	RATE	HOW TO APPLY
Mice	In indoor household situations	[As per current approved label]	Place bait stations in dry locations throughout the infested area, on runs, near burrows and where droppings are seen, not more than 3 m apart.

General Information and baiting strategy for mice:

Eliminate as far as practicable, all other food sources.

Always place bait where it is inaccessible to children, animals and birds. Use in tamper resistant bait stations only. If bait can be dislodged from bait station, fix tamper-resistant bait stations to the ground or other structures.

Inspect baits frequently, particularly in the first ten days. Replace eaten bait. If bait is completely consumed, the number of bait stations should be increased. Continue replenishing bait until left untouched. Baiting for at least 2 weeks will be necessary to reduce mouse numbers. Most deaths occur 4 to 7 days after consumption of bait, but deaths may occur for up to 2 weeks.

Following treatment remove all remains of bait and bait stations. DO NOT use the product for longer than 35 days. If rodent activity is still observed after 35 days, seek advice from the product supplier or call a pest control service.

NOT TO BE USED FOR ANY PURPOSE, OR IN ANY MANNER, CONTRARY TO THIS LABEL UNLESS AUTHORISED.

Domestic pest-control product: RB 0.05 g/kg or less in pellet formulation

Template Label 6

Label Name:	[INSERT LABEL NAME]
Signal Headings	POISON KEEP OUT OF REACH OF CHILDREN READ SAFETY DIRECTIONS
Constituent Statements:	ACTIVE CONSTITUENTS: 0.05 g/kg BRODIFACOUM 0.04 g/kg FIPRONIL
Statement of Claims:	For control of mice and the fleas and ticks they carry in domestic buildings, and for control of mice and the fleas and ticks they carry in and around domestic buildings.
Net Contents:	[INSERT NET CONTENTS – MAXIMUM 150 g]
Restrains:	DO NOT place baits unless in tamper-resistant bait stations. DO NOT place bait stations outdoors around buildings for control of mice. DO NOT place bait stations more than 2 meters from buildings. DO NOT bait in areas where wildlife may be collected for human consumption. DO NOT place baits in and around animal, livestock and poultry houses, associated equipment, and food and feed processing areas. DO NOT apply this product directly into burrows. DO NOT use the product in pulsed baiting treatments.
How to Use	[This section contains an attachment below]
Withholding Periods:	
How to Prepare	
Resistance Warning:	
Precautions:	CAUTION Caution should be used when baiting near areas where hunting of wildlife may occur. Careful consideration of bait placement is necessary to avoid secondary exposure from contaminated wildlife that may be consumed. DO NOT place bait in areas where there is a possibility of contaminating food, livestock feed or surfaces that come in direct contact with food or livestock feed. PROTECTION OF LIVESTOCK AND WILDLIFE Hazardous to livestock, poultry and wildlife. DO NOT place baits in locations that are accessible to domestic animals, livestock, non-target native animals or birds. Search for and dispose of dead rodents and slugs/snails in the infested area at each visit to prevent secondary poisoning. In case slugs/snails are present, move bait

	<p>station to another location within the rodent infested site, away from slugs/snails. Dispose of slugs/snails, dead rodents and uneaten bait by wrapping in paper, placing in plastic bag and putting in garbage.</p> <p>DO NOT allow livestock or poultry to consume dead or moribund rats and mice. All dead or moribund animals and rodent faeces from baited rodents MUST be removed from areas accessible to livestock or poultry.</p> <p>The use of this product for the control of protected native rodents requires permission from wildlife authorities.</p> <p>PROTECTION OF FISH, CRUSTACEANS AND ENVIRONMENT</p> <p>Very toxic to aquatic life. DO NOT contaminate wetlands or watercourses with this product or used containers. Place the bait stations in areas not liable to flooding. When placing bait stations close to water drainage systems, ensure that bait contact with water is avoided.</p>
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Protections:	
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Storage and Disposal:	<p>STORAGE AND DISPOSAL</p> <p>Store in original containers, tightly closed, in a safe place out of the reach of children. Dispose of empty containers and unused product by wrapping in paper placing in plastic bag and putting in garbage.</p>
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Safety Directions:	<p>SAFETY DIRECTIONS</p> <p>Repeated minor exposure may have a cumulative poisoning effect. Avoid contact with eyes and skin. Do not inhale dust. Do not touch bait, use scoop or measure. When using the product wear disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water.</p> <p>During cleanup and disposal operations of bait and bait stations, wear a single layer of clothing and disposable gloves. Wear disposable gloves when handling rodent carcasses. Wash clothes after performing re-handling activities.</p>
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First Aid Instructions:	<p>FIRST AID</p> <p>If poisoning occurs, contact a doctor or Poisons Information Centre. Phone Australia 13 11 26, New Zealand 0800 764 766. Vitamin K1 (Phytomenadione) is antidotal.</p>
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First Aid Warnings:	
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HOW TO USE

PEST	SITUATION	RATE	HOW TO APPLY
Rats	In and around (within 2 meters) domestic buildings	20 g bait/bait station	Place bait stations in infested area. Rats require large quantities of bait in one or two locations (2-4 bait stations per placement). DO NOT exceed 9 m between placements.
Mice	In domestic buildings		Place bait stations in infested area. Mice require small quantities in several locations (20 g bait per placement). Larger placements (2-3 bait stations) may be needed at points of very high mouse activity. DO NOT exceed 3 m between bait stations.

General Information and baiting strategy for and mice:

Determine areas where rats and/or mice will most likely find and consume the bait. These are areas such as along walls or rafters, in corners and concealed places or any other locations where rats and mice or their signs have been observed. Eliminate, as far as practicable, all alternative food sources from these areas.

Use in tamper resistant bait stations only. If bait can be dislodged from bait station, fix tamper-resistant bait stations to the ground or other structures. Record the number and locations of bait stations for the purpose of replenishment and later removal.

Inspect bait stations daily. Replace eaten baits and if they have been eaten quickly increase the number of bait stations. Continue observation and replenishment until no more bait has been taken. Most deaths occur 4 to 7 days after consumption of bait. Continue baiting for at least 2 weeks or until signs of rat or mouse activity cease.

DO NOT use the product for longer than 35 days. If rodent activity is still observed after 35 days, seek advice from the product supplier or call a pest control service.

To prevent reinfestation, eliminate food, water and housing as much as possible. Remove any unused baits after rat and mice activity has ceased. If reinfestation does occur, repeat treatment.

NOT TO BE USED FOR ANY PURPOSE, OR IN ANY MANNER, CONTRARY TO THIS LABEL UNLESS AUTHORISED.

Domestic pest-control product: RB 0.05 g/kg or less in sachet or place pack

Template Label 7a

Label Name:	[INSERT LABEL NAME]
Signal Headings	POISON KEEP OUT OF REACH OF CHILDREN READ SAFETY DIRECTIONS BEFORE OPENING OR USING
Constituent Statements:	ACTIVE CONSTITUENT: 0.05 g/kg BRODIFACOU
Statement of Claims:	For control of mice in domestic buildings and rats in and around domestic buildings
Net Contents:	[INSERT NET CONTENTS – MAXIMUM 150 g]
Restraints:	DO NOT place baits unless in tamper-resistant bait stations. DO NOT place bait stations outdoors around buildings for control of mice. DO NOT place bait stations more than 2 meters from buildings. DO NOT bait in areas where wildlife may be collected for human consumption. DO NOT place baits in and around animal, livestock and poultry houses, associated equipment, and food and feed processing areas. DO NOT apply this product directly into burrows. DO NOT use the product in pulsed baiting treatments.
How to Use	[This section contains an attachment below]
Withholding Periods:	
How to Prepare	
Resistance Warning:	
Precautions:	CAUTION Caution should be used when baiting near areas where hunting of wildlife may occur. Careful consideration of bait placement is necessary to avoid secondary exposure from contaminated wildlife that may be consumed. DO NOT place bait in areas where there is a possibility of contaminating food, livestock feed or surfaces that come in direct contact with food or livestock feed. PROTECTION OF LIVESTOCK AND WILDLIFE Hazardous to livestock, poultry and wildlife. DO NOT place baits in locations that are accessible to domestic animals, livestock, non-target native animals or birds. Search for and dispose of dead rodents and slugs/snails in the infested area at each visit to prevent secondary poisoning. In case slugs/snails are present, move bait station to another location within the rodent infested site, away from slugs/snails.

	<p>Dispose of slugs/snails, dead rodents and uneaten bait by wrapping in paper, placing in plastic bag and putting in garbage.</p> <p>DO NOT allow livestock or poultry to consume dead or moribund rats and mice. All dead or moribund animals and rodent faeces from baited rodents MUST be removed from areas accessible to livestock or poultry.</p> <p>DO NOT let cats and dogs eat poisoned rats & mice.</p> <p>The use of this product for the control of protected native rodents requires permission from wildlife authorities.</p> <p>PROTECTION OF FISH, CRUSTACEANS AND ENVIRONMENT</p> <p>Very toxic to aquatic life. DO NOT contaminate wetlands or watercourses with this product or used containers. Place the bait stations in areas not liable to flooding.</p> <p>When placing bait stations close to water drainage systems, ensure that bait contact with water is avoided.</p>
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Protections:	
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Storage and Disposal:	<p>STORAGE AND DISPOSAL</p> <p>Store in the closed, original container in a cool dry place out of reach of children. DO NOT store in direct sunlight. Dispose of empty containers and unused product by wrapping in paper placing in plastic bag and putting in garbage.</p>
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Safety Directions:	<p>SAFETY DIRECTIONS</p> <p>Repeated minor exposure may have a cumulative poisoning effect. When using the product wear disposable gloves. During cleanup, disposal operations of bait and bait stations and when handling rodent carcasses wear single layer clothing and disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water. After each day's use wash contaminated clothing. Wash clothes after performing re-handling activities.</p>
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First Aid Instructions:	<p>FIRST AID</p> <p>If poisoning occurs, contact a doctor or Poisons Information Centre. Phone Australia 13 11 26, New Zealand 0800 764 766. Vitamin K1 (Phytomenadione) is antidotal.</p>
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First Aid Warnings:	
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HOW TO USE

PEST	SITUATION	RATE	HOW TO APPLY
Rats (<i>Rattus rattus</i> , <i>Rattus norvegicus</i>)	In and around (within 2 meters) domestic buildings	[As per current approved label]	Place bait stations in infested area, where there are signs of rodent activity, along walls or rafters and in dark, sheltered places. DO NOT touch bait.
Mice (<i>Mus musculus</i>)	In domestic buildings	1 bait/bait station	The feeding behaviour of mice and rats differ. Mice require several feeding locations not more than 3 m apart. Rats require [as per current approved label, 1-2 or 2-4] baits in 1 or 2 locations not more than 9 m apart

General Information and baiting strategy for effective control:

Eliminate as far as practical, all alternative food sources.

Use in tamper resistant bait stations only. If bait can be dislodged from bait station, fix tamper-resistant bait stations to the ground or other structures. Record the number and location of baits for later replenishment and or removal.

Inspect baits daily. Replace eaten baits and increase number of bait stations if bait is being eaten quickly. Continue observation and replenishment until no more baits are taken. Most deaths occur 4 to 7 days after consumption of bait. Baiting for at least 2 weeks will be necessary to reduce rat/mouse numbers.

Ensure baits are removed when rodent activity has ceased. DO NOT use the product for longer than 35 days. If rodent activity is still observed after 35 days, seek advice from the product supplier or call a pest control service.

NOT TO BE USED FOR ANY PURPOSE, OR IN ANY MANNER, CONTRARY TO THIS LABEL UNLESS AUTHORISED.

Template Label 7b

Label Name:	[INSERT LABEL NAME]
Signal Headings	POISON KEEP OUT OF REACH OF CHILDREN READ SAFETY DIRECTIONS
Constituent Statements:	ACTIVE CONSTITUENTS: 0.05 g/kg BRODIFACOUM 0.04 g/kg FIPRONIL
Statement of Claims:	For control of mice and the fleas and ticks they carry in domestic buildings, and for control of mice and the fleas and ticks they carry in and around domestic buildings.
Net Contents:	[INSERT NET CONTENTS – MAXIMUM 150 g]
Restrains:	DO NOT place baits unless in tamper-resistant bait stations. DO NOT place bait stations outdoors around buildings for control of mice. DO NOT place bait stations more than 2 meters from buildings. DO NOT bait in areas where wildlife may be collected for human consumption. DO NOT place baits in and around animal, livestock and poultry houses, associated equipment, and food and feed processing areas. DO NOT apply this product directly into burrows. DO NOT use the product in pulsed baiting treatments.
How to Use	[This section contains an attachment below]
Withholding Periods:	
How to Prepare	
Resistance Warning:	
Precautions:	CAUTION Caution should be used when baiting near areas where hunting of wildlife may occur. Careful consideration of bait placement is necessary to avoid secondary exposure from contaminated wildlife that may be consumed. DO NOT place bait in areas where there is a possibility of contaminating food, livestock feed or surfaces that come in direct contact with food or livestock feed. PROTECTION OF LIVESTOCK AND WILDLIFE Hazardous to livestock, poultry and wildlife. DO NOT place baits in locations that are accessible to domestic animals, livestock, non-target native animals or birds. Search for and dispose of dead rodents and slugs/snails in the infested area at each visit to prevent secondary poisoning. In case slugs/snails are present, move bait station to another location within the rodent infested site, away from slugs/snails.

	<p>Dispose of slugs/snails, dead rodents and uneaten bait by wrapping in paper, placing in plastic bag and putting in garbage.</p> <p>DO NOT allow livestock or poultry to consume dead or moribund rats and mice. All dead or moribund animals and rodent faeces from baited rodents MUST be removed from areas accessible to livestock or poultry.</p> <p>DO NOT let cats and dogs eat poisoned rats & mice.</p> <p>The use of this product for the control of protected native rodents requires permission from wildlife authorities.</p> <p>PROTECTION OF FISH, CRUSTACEANS AND ENVIRONMENT</p> <p>Very toxic to aquatic life. DO NOT contaminate wetlands or watercourses with this product or used containers. Place the bait stations in areas not liable to flooding.</p> <p>When placing bait stations close to water drainage systems, ensure that bait contact with water is avoided.</p>
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Protections:	
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Storage and Disposal:	<p>STORAGE AND DISPOSAL</p> <p>Store in the closed, original container in a cool, dry place out of the reach of children. Do not store in direct sunlight. Dispose of empty containers and unused product by wrapping in paper placing in plastic bag and putting in garbage.</p>
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Safety Directions:	<p>SAFETY DIRECTIONS</p> <p>Repeated minor exposure may have a cumulative poisoning effect. When using the product wear disposable gloves. During cleanup, disposal operations of bait and bait stations and when handling rodent carcasses wear single layer clothing and disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water. After each day's use wash contaminated clothing. Wash clothes after performing re-handling activities.</p>
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First Aid Instructions:	<p>FIRST AID</p> <p>If poisoning occurs, contact a doctor or Poisons Information Centre. Phone Australia 13 11 26, New Zealand 0800 764 766. Vitamin K1 (Phytomenadione) is antidotal.</p>
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First Aid Warnings:	
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HOW TO USE

PEST	SITUATION	RATE	HOW TO APPLY
Rats	In and around (within 2 meters) domestic buildings	20 g bait/bait station	Place bait stations in infested area. Rats require large quantities of bait in one or two locations (2-4 bait stations per placement). DO NOT exceed 9 m between placements.
Mice	In domestic buildings		Place bait stations in infested area. Mice require small quantities in several locations (20 g bait per placement). Larger placements (2-3 bait stations) may be needed at points of very high mouse activity. DO NOT exceed 3 m between bait stations.

General Information and baiting strategy for rats and mice:

Determine areas where rats and/or mice will most likely find and consume the bait. These are areas such as along walls or rafters, in corners and concealed places or any other locations where rats and mice or their signs have been observed. Eliminate, as far as practicable, all alternative food sources from these areas.

Use in tamper resistant bait stations only. If bait can be dislodged from bait station, fix tamper-resistant bait stations to the ground or other structures. Record the number and locations of bait stations for the purpose of replenishment and later removal.

Inspect bait stations daily. Replace eaten baits and if they have been eaten quickly increase the number of bait stations. Continue observation and replenishment until no more bait has been taken. Most deaths occur 4 to 7 days after consumption of bait. Continue baiting for at least 2 weeks or until signs of rat or mouse activity cease.

DO NOT use the product for longer than 35 days. If rodent activity is still observed after 35 days, seek advice from the product supplier or call a pest control service.

To prevent reinfestation, eliminate food, water and housing as much as possible. Remove any unused baits after rat and mice activity has ceased. If reinfestation does occur, repeat treatment.

NOT TO BE USED FOR ANY PURPOSE, OR IN ANY MANNER, CONTRARY TO THIS LABEL UNLESS AUTHORISED.

Template Label 7c

Label Name:	[INSERT LABEL NAME]
Signal Headings	POISON KEEP OUT OF REACH OF CHILDREN READ SAFETY DIRECTIONS BEFORE OPENING OR USING
Constituent Statements:	ACTIVE CONSTITUENT: 0.025 g/kg BRODIFACOUM
Statement of Claims:	For control of mice in buildings and rats in and around domestic buildings
Net Contents:	[INSERT NET CONTENTS – MAXIMUM 150 g]
Restraints:	DO NOT place baits unless in tamper-resistant bait stations. DO NOT place bait stations outdoors around buildings for control of mice. DO NOT place bait stations more than 2 meters from buildings. DO NOT bait in areas where wildlife may be collected for human consumption. DO NOT place baits in and around animal, livestock and poultry houses, associated equipment, and food and feed processing areas. DO NOT apply this product directly into burrows. DO NOT use the product in pulsed baiting treatments.
How to Use	[This section contains an attachment below]
Withholding Periods:	
How to Prepare	GENERAL INSTRUCTIONS Do not open bait packs. Rats and mice will chew through the bait packs.
Resistance Warning:	
Precautions:	CAUTION Caution should be used when baiting near areas where hunting of wildlife may occur. Careful consideration of bait placement is necessary to avoid secondary exposure from contaminated wildlife that may be consumed. DO NOT place bait in areas where there is a possibility of contaminating food, livestock feed or surfaces that come in direct contact with food or livestock feed. PROTECTION OF LIVESTOCK AND WILDLIFE Hazardous to livestock, poultry and wildlife. DO NOT place baits in locations that are accessible to domestic animals, livestock, non-target native animals or birds. Search for and dispose of dead rodents and slugs/snails in the infested area at each visit to prevent secondary poisoning. In case slugs/snails are present, move bait station to another location within the rodent infested site, away from slugs/snails. Dispose of slugs/snails, dead rodents and uneaten bait by wrapping in paper, placing in plastic bag and putting in garbage.

	<p>DO NOT allow livestock or poultry to consume dead or moribund rats and mice. All dead or moribund animals and rodent faeces from baited rodents MUST be removed from areas accessible to livestock or poultry.</p> <p>DO NOT use this product to control native animals.</p> <p>PROTECTION OF FISH, CRUSTACEANS AND ENVIRONMENT</p> <p>Very toxic to aquatic life. DO NOT contaminate wetlands or watercourses with this product or used containers. Place the bait stations in areas not liable to flooding. When placing bait stations close to water drainage systems, ensure that bait contact with water is avoided.</p>
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Protections:	
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Storage and Disposal:	<p>STORAGE AND DISPOSAL</p> <p>Store in the closed, original container in a cool dry place out of reach of children. DO NOT store in direct sunlight. Dispose of empty containers and unused product by wrapping in paper placing in plastic bag and putting in garbage.</p>
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Safety Directions:	<p>SAFETY DIRECTIONS</p> <p>Repeated minor exposure may have a cumulative poisoning effect. When using the product wear disposable gloves. During cleanup, disposal operations of bait and bait stations and when handling rodent carcasses wear single layer clothing and disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water. After each day's use wash contaminated clothing. Wash clothes after performing re-handling activities.</p>
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First Aid Instructions:	<p>FIRST AID</p> <p>If poisoning occurs, contact a doctor or Poisons Information Centre. Phone Australia 13 11 26, New Zealand 0800 764 766. Vitamin K1 (Phytomenadione) is antidotal.</p>
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First Aid Warnings:	
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HOW TO USE

PEST	SITUATION	RATE	HOW TO APPLY
Rats (<i>Rattus rattus</i> , <i>Rattus norvegicus</i>)	In and around (within 2 meters) domestic buildings	2 to 4 baits/bait station	Place bait stations in infested area, where there are signs of rodent activity, along walls or rafters and in dark, sheltered places.
Mice (<i>Mus musculus</i>)	In domestic buildings	1 to 2 baits/bait station	For Rats: Place bait stations at intervals of 5-9 m in infested areas. DO NOT exceed 9 m between bait locations. For Mice: Place 1 to 2 bait stations at 2-3 m intervals in infested areas. DO NOT exceed 3 m between bait locations.

General Information and baiting strategy for effective control:

Eliminate as far as practical, all alternative food sources.

Use in tamper resistant bait stations only. If bait can be dislodged from bait station, fix tamper-resistant bait stations to the ground or other structures. It is also recommended that weather-resistant bait stations be used where possible. Record the number and location of baits for later replenishment and or removal.

Inspect baits daily. Replace eaten baits to establish control of rodent populations. If quickly eaten, increase number of baits as multiple rodents may be consuming bait placements. Continue observation and replenishment until no more baits are taken. Most deaths occur 4 to 7 days after consumption of bait. Baiting for at least 2 weeks will be necessary to reduce rat/mouse numbers.

Ensure baits are removed when rodent activity has ceased. DO NOT use the product for longer than 35 days. If rodent activity is still observed after 35 days, seek advice from the product supplier or call a pest control service.

NOT TO BE USED FOR ANY PURPOSE, OR IN ANY MANNER, CONTRARY TO THIS LABEL UNLESS AUTHORISED.

Bromadiolone

Commercial pest-control product: RB 0.05 g/kg or less in block formulation

Template Label 8a

Label Name:	[INSERT LABEL NAME]
Signal Headings	POISON KEEP OUT OF REACH OF CHILDREN READ SAFETY DIRECTIONS BEFORE OPENING OR USING
Constituent Statements:	ACTIVE CONSTITUENT: 0.05 g/kg BROMADIOLONE
Mode of Action:	
Statement of Claims:	For control of mice in domestic, commercial, public services, industrial and agricultural buildings and rats in and around domestic, commercial, public services, industrial and agricultural buildings.
Net Contents:	[INSERT NET CONTENTS]
Restraints:	<p>RESTRAINTS</p> <p>DO NOT use this product unless you have a current qualification in the nationally recognised training course for rodent pest management CPPUPM3006 - Manage pests by applying pesticides, or an equivalent unit of competency.</p> <p>DO NOT place baits in areas that are accessible to children. In child-accessible areas baits must be placed in tamper-resistant bait stations. If bait can be dislodged from bait station, bait station must be secured in place.</p> <p>DO NOT place bait outdoors unless it is in a tamper-resistant bait station which is secured in place.</p> <p>DO NOT place bait stations more than 2 meters from buildings.</p> <p>DO NOT place bait stations outdoors around buildings for control of mice.</p> <p>DO NOT bait in areas where wildlife may be collected for human consumption.</p> <p>DO NOT place in animal or livestock housing unless used in tamper-resistant and weather-resistant bait stations fixed to the ground or other structures.</p> <p>DO NOT place bait or bait stations above areas which would allow them to contaminate pig and poultry food or drinking water.</p> <p>DO NOT apply this product directly into burrows.</p>
Directions for Use:	[This section contains an attachment below]
Other Limitations:	
Withholding Periods:	
Trade Advice:	

General Directions:	
Resistance Warning:	
Precautions:	<p>PRECAUTIONS</p> <p>Caution should be used when baiting near areas where hunting of wildlife may occur. Careful consideration of bait placement is necessary to avoid secondary exposure from contaminated wildlife that may be consumed.</p> <p>DO NOT place bait in areas where there is a possibility of contaminating food, livestock feed or surfaces that come in direct contact with food or livestock feed.</p>
Protection Statements:	<p>PROTECTION OF LIVESTOCK AND WILDLIFE</p> <p>Hazardous to livestock, poultry and wildlife. DO NOT place baits in locations that are accessible to domestic animals, livestock, non-target native animals or birds. Search for and dispose of dead rodents and slugs/snails in the infested area at each visit to prevent secondary poisoning. In case slugs/snails are present, move bait station to another location within the rodent infested site, away from slugs/snails. Dispose of slugs/snails in a way non-target animals are not exposed. Dispose of dead rodents and uneaten bait in compliance with local, state or territory government regulations.</p> <p>DO NOT allow livestock or poultry to consume dead or moribund mice and rats. All dead or moribund animals and rodent faeces from baited rodents MUST be removed from areas accessible to livestock or poultry.</p> <p>The use of this product for the control of protected native rodents requires permission from wildlife authorities.</p> <p>PROTECTION OF FISH, CRUSTACEANS AND ENVIRONMENT</p> <p>Toxic to aquatic life. DO NOT contaminate wetlands or watercourses with this product or used containers. Place the bait stations in areas not liable to flooding. When placing bait stations close to water drainage systems, ensure that bait contact with water is avoided.</p>
Storage and Disposal:	<p>STORAGE AND DISPOSAL</p> <p>Store in the closed, original container in a well-ventilated area, as cool as possible. DO NOT store for prolonged periods in direct sunlight. Triple rinse containers before disposal. Break, crush or puncture and deliver empty packaging to an approved waste management facility. If an approved waste management facility is not available, dispose of empty packaging in compliance with relevant local, state or territory government regulations. Dispose of unused product in compliance with relevant local, state or territory government regulations. DO NOT burn empty containers or product.</p>
Safety Directions:	<p>SAFETY DIRECTIONS</p> <p>Repeated minor exposure may have a cumulative poisoning effect. Do not touch bait, use scoop or measure. When using the product wear disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water.</p>

	During cleanup and disposal operations of bait and bait stations, wear a single layer of clothing and disposable gloves. Wear disposable gloves when handling rodent carcasses. Wash clothes after performing re-handling activities.
First Aid Instructions:	FIRST AID If poisoning occurs, contact a doctor or Poisons Information Centre. Phone Australia 13 11 26, New Zealand 0800 764 766. Vitamin K1 (Phytomenadione) is antidotal.
First Aid Warnings:	

DIRECTIONS FOR USE

SITUATION	PEST	RATE	CRITICAL COMMENTS
Clean Out Treatments In and around (within 2 meters) domestic homes, industrial and commercial buildings, animal houses, farms, wharves, public service buildings, food factories, hospitals. Inside transport vehicles (including ships) and around (within 2 meters) grain terminals.	Rats (<i>Rattus rattus</i> , <i>R. norvegicus</i>)	2 – 8 28 g blocks/bait station OR one 450 g block/bait station	Determine areas where rats and/or mice will most likely find and consume bait. Generally, these areas are along walls, by gnawed openings or beside burrows, in corners and concealed places between floors and walls or in locations where rodents or their signs have been observed. Place bait stations in infested area, where evidence of rodent activity is observed or where conditions might encourage rodent activity.
Clean Out Treatments In domestic homes, industrial and commercial buildings, animal houses, farms, wharves, public service buildings, food factories, hospitals, and transport vehicles (including ships).	Mice (<i>Mus domesticus</i>)	1 – 2 28 g blocks/bait station OR one 450 g block in a bait station in infested area	DO NOT exceed 3 m between bait stations for mice, or 9 m between bait stations for rats. Use the greater number of baits and shorter distance between bait placements when infestations are heavy. See also baiting strategy for clean out treatments.
Monitoring and/or Maintenance Treatments In and around (within 2 meters) domestic homes, industrial and commercial buildings, animal houses, farms, wharves, public service buildings, food factories, hospitals. Inside transport vehicles (including ships) and around (within 2 meters) grain terminals.	Rats (<i>Rattus rattus</i> , <i>R. norvegicus</i>)	2 28 g blocks/bait station	Place bait stations at intervals of between 15 and 30 m in areas where a continuous risk of rat or mouse activity is present prone to rodent infestation. See also baiting strategy for monitoring and/or maintenance treatments.
Monitoring and/or Maintenance Treatments In domestic homes, industrial and commercial buildings, animal houses, farms, wharves, public service buildings, food factories, hospitals, and transport vehicles (including ships).	Mice (<i>Mus domesticus</i>)	one 28 g block/bait station	

Baiting Strategy

- Eliminate all alternative food sources as far as practical.
- When used in food producing animal housing situations careful consideration is necessary regarding the placement of bait stations to ensure any rodenticide contamination of water, feed or livestock is prevented.

Clean Out Treatments (Pulse Baiting)

- Survey site prior to treatment, including assessment of the extent of infestation and identification of any indications of the presence of non-target animals.
- Record the number and locations of bait stations for the purpose of inspection, replacement and later removal.
- Place secured bait blocks where inaccessible to non-target animals. Always use tamper-resistant bait stations that are secured in place in child accessible areas, outdoors and in animal or livestock housing.
- Inspect bait stations after 3 or 4 days after initial baiting and replace any bait that has been consumed. Repeat inspection 4 days later and then at least weekly, replacing any consumed, contaminated, or spoiled baits.
- Discontinue the treatment when effective control has been achieved and remove all bait and bait stations unless a maintenance treatment is to be undertaken.
- DO NOT use the product beyond 35 days without an evaluation of the state of the infestation and of the efficacy of the treatment.
- Remove all uneaten bait at the end of treatment.
- To prevent reinfestation, eliminate food, water and harbourage as much as possible. If reinfestation should occur, repeat treatment

Monitoring and/or Maintenance Treatments

- Monitoring and maintenance treatments are required at sensitive sites where there is no current rodent infestation but where the prevention of such infestation is essential to prevent significant risks to human health. Such treatments may be a condition for audit approval within food safety guidelines. However, use of this product must comply with the conditions of this label.
- Always record the number and locations of bait stations for the purpose of bait replacement and later removal.
- Always use tamper resistant bait stations for monitoring and maintenance programs to prevent access to the bait by non-target species. Fix the stations securely to the substrate.
- Bait stations should be inspected at regular intervals no more than 7 days apart according to an agreed and documented schedule. Replace contaminated or spoilt bait immediately.
- Use placebo or unpoisoned bait blocks if the placement of the bait presents a hazard to non-target animals.
- When a rodent infestation is detected, the operator should revert to the directions for active infestation/clean-out treatments.

**NOT TO BE USED FOR ANY PURPOSE, OR IN ANY MANNER, CONTRARY TO THIS LABEL UNLESS
AUTHORISED UNDER APPROPRIATE LEGISLATION**

Template Label 8b

Label Name:	[INSERT LABEL NAME]
Signal Headings	POISON KEEP OUT OF REACH OF CHILDREN READ SAFETY DIRECTIONS BEFORE OPENING OR USING
Constituent Statements:	ACTIVE CONSTITUENT: 0.05 g/kg BROMADIOLONE
Mode of Action:	
Statement of Claims:	For control of mice in domestic, commercial, public services, industrial and agricultural buildings and rats in and around domestic, commercial, public services. Industrial and agricultural buildings.
Net Contents:	[INSERT NET CONTENTS]
Restraints:	<p>RESTRAINTS</p> <p>DO NOT use this product unless you have a current qualification in the nationally recognised training course for rodent pest management CPPUPM3006 - Manage pests by applying pesticides, or an equivalent unit of competency.</p> <p>DO NOT place baits in areas that are accessible to children. In child-accessible areas baits must be placed in tamper-resistant bait stations. If bait can be dislodged from bait station, bait station must be secured in place.</p> <p>DO NOT place bait outdoors unless it is in a tamper-resistant bait station which is secured in place.</p> <p>DO NOT place bait stations more than 2 meters from buildings.</p> <p>DO NOT place bait stations outdoors around buildings for control of mice.</p> <p>DO NOT bait in areas where wildlife may be collected for human consumption.</p> <p>DO NOT place in animal or livestock housing unless used in tamper-resistant and weather-resistant bait stations fixed to the ground or other structures.</p> <p>DO NOT place bait or bait stations above areas which would allow them to contaminate pig and poultry food or drinking water.</p> <p>DO NOT apply this product directly into burrows.</p>
Directions for Use:	[This section contains an attachment below]
Other Limitations:	
Withholding Periods:	
Trade Advice:	
General Directions:	
Resistance Warning:	

Precautions:	<p>PRECAUTIONS</p> <p>Caution should be used when baiting near areas where hunting of wildlife may occur. Careful consideration of bait placement is necessary to avoid secondary exposure from contaminated wildlife that may be consumed.</p> <p>DO NOT place bait in areas where there is a possibility of contaminating food, livestock feed or surfaces that come in direct contact with food or livestock feed.</p>
Protection Statements:	<p>PROTECTION OF LIVESTOCK AND WILDLIFE</p> <p>Hazardous to livestock, poultry and wildlife. DO NOT place baits in locations that are accessible to domestic animals, livestock, non-target native animals or birds. Search for and dispose of dead rodents and slugs/snails in the infested area at each visit to prevent secondary poisoning. In case slugs/snails are present, move bait station to another location within the rodent infested site, away from slugs/snails. Dispose of slugs/snails in a way non-target animals are not exposed. Dispose of dead rodents and uneaten bait in compliance with local, state or territory government regulations.</p> <p>DO NOT allow livestock or poultry to consume dead or moribund mice and rats. All dead or moribund animals and rodent faeces from baited rodents MUST be removed from areas accessible to livestock or poultry.</p> <p>The use of this product for the control of protected native rodents requires permission from wildlife authorities.</p> <p>PROTECTION OF FISH, CRUSTACEANS AND ENVIRONMENT</p> <p>Toxic to aquatic life. DO NOT contaminate wetlands or watercourses with this product or used containers. Place the bait stations in areas not liable to flooding. When placing bait stations close to water drainage systems, ensure that bait contact with water is avoided.</p>
Storage and Disposal:	<p>STORAGE AND DISPOSAL</p> <p>Store in a tightly closed, original container in a dry well-ventilated area, as cool as possible out of direct sunlight. Triple rinse containers before disposal. Break, crush or puncture and deliver empty packaging to an approved waste management facility. If an approved waste management facility is not available, dispose of empty packaging in compliance with relevant local, state or territory government regulations. Dispose of unused product in compliance with relevant local, state or territory government regulations. DO NOT burn empty containers or product.</p>
Safety Directions:	<p>SAFETY DIRECTIONS</p> <p>Repeated minor exposure may have a cumulative poisoning effect. Do not touch bait, use scoop or measure. When using the product wear disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water.</p> <p>During cleanup and disposal operations of bait and bait stations, wear a single layer of clothing and disposable gloves. Wear disposable gloves when handling rodent carcasses. Wash clothes after performing re-handling activities.</p>
First Aid Instructions:	<p>FIRST AID</p> <p>If poisoning occurs, contact a doctor or Poisons Information Centre. Phone Australia 13 11 26, New Zealand 0800 764 766. Vitamin K1 (Phytomenadione) is antidotal.</p>

First Aid Warnings:

DIRECTIONS FOR USE

SITUATION	PEST	RATE	CRITICAL COMMENTS
In domestic homes, industrial and commercial buildings, animal houses, farms, wharves, public service buildings, food factories, hospitals, and transport vehicles (including ships).	Mice (<i>Mus musculus</i>)	[As per current approved label]	Determine areas where rats and/or mice will most likely find and consume bait. Generally, these areas are along walls, by gnawed openings, beside burrows, in corners and concealed places between floors and walls or in locations where rodents or their signs have been observed.
In and around (within 2 meters) domestic homes, industrial and commercial buildings, animal houses, farms, wharves, public service buildings, food factories and hospitals. Inside transport vehicles (including ships) and around (within 2 meters) grain terminals.	Rats (<i>Rattus norvegicus</i> , <i>Rattus rattus</i>)	[As per current approved label]	Place bait stations in infested areas. DO NOT exceed 3 m between bait stations for mice or 9 m between bait stations for rats.

Baiting strategy

Eliminate, as far as practicable, all other food sources.

Survey site prior to treatment, including assessment of the extent of infestation and identification of any indications of the presence of non-target animals. Record the number and locations of bait stations for the purpose of inspection, replacement and later removal.

Always use tamper-resistant bait stations that are secured in place in child accessible areas, outdoors and in animal or livestock housing. When used in food producing animal housing situations careful consideration is necessary regarding the placement of bait stations to ensure any rodenticide contamination of water, feed or livestock is prevented.

Inspect bait stations daily. Replace eaten, contaminated or spoiled baits. If eaten quickly, increase the number of bait stations. Continue observation and replenish until no more baits are taken. Baiting for at least two weeks is necessary to reduce rat/mouse numbers.

DO NOT use the product beyond 35 days without an evaluation of the state of the infestation and of the efficacy of the treatment. Remove all uneaten bait at the end of treatment

To prevent reinfestation, eliminate food, water and harbourage as much as possible. If reinfestation should occur, repeat treatment.

NOT TO BE USED FOR ANY PURPOSE, OR IN ANY MANNER, CONTRARY TO THIS LABEL UNLESS AUTHORISED UNDER APPROPRIATE LEGISLATION.

Template Label 8c

Label Name:	[INSERT LABEL NAME]
Signal Headings	POISON KEEP OUT OF REACH OF CHILDREN READ SAFETY DIRECTIONS BEFORE OPENING OR USING
Constituent Statements:	ACTIVE CONSTITUENT: 0.05 g/kg BROMADIOLONE
Mode of Action:	
Statement of Claims:	For control of mice in agricultural, commercial, domestic and industrial buildings and rats in and around agricultural, commercial, domestic and industrial buildings.
Net Contents:	[INSERT NET CONTENTS]
Restraints:	<p>RESTRAINTS</p> <p>DO NOT use this product unless you have a current qualification in the nationally recognised training course for rodent pest management CPPUPM3006 - Manage pests by applying pesticides, or an equivalent unit of competency.</p> <p>DO NOT place baits in areas that are accessible to children. In child-accessible areas baits must be placed in tamper-resistant bait stations. If bait can be dislodged from bait station, bait station must be secured in place.</p> <p>DO NOT place bait outdoors unless it is in a tamper-resistant bait station which is secured in place.</p> <p>DO NOT place bait stations more than 2 meters from buildings.</p> <p>DO NOT place bait stations outdoors around buildings for control of mice.</p> <p>DO NOT bait in areas where wildlife may be collected for human consumption.</p> <p>DO NOT place in animal or livestock housing unless used in tamper-resistant and weather-resistant bait stations fixed to the ground or other structures.</p> <p>DO NOT place bait or bait stations above areas which would allow them to contaminate pig and poultry food or drinking water.</p> <p>DO NOT apply this product directly into burrows.</p>
Directions for Use:	[This section contains an attachment below]
Other Limitations:	
Withholding Periods:	
Trade Advice:	
General Directions:	
Resistance Warning:	

Precautions:	<p>PRECAUTIONS</p> <p>Caution should be used when baiting near areas where hunting of wildlife may occur. Careful consideration of bait placement is necessary to avoid secondary exposure from contaminated wildlife that may be consumed.</p> <p>DO NOT place bait in areas where there is a possibility of contaminating food, livestock feed or surfaces that come in direct contact with food or livestock feed.</p>
Protection Statements:	<p>PROTECTION OF LIVESTOCK AND WILDLIFE</p> <p>Hazardous to livestock, poultry and wildlife. DO NOT place baits in locations that are accessible to domestic animals, livestock, non-target native animals or birds. Search for and dispose of dead rodents and slugs/snails in the infested area at each visit to prevent secondary poisoning. In case slugs/snails are present, move bait station to another location within the rodent infested site, away from slugs/snails. Dispose of slugs/snails in a way non-target animals are not exposed. Dispose of dead rodents and uneaten bait in compliance with local, state or territory government regulations.</p> <p>DO NOT allow livestock or poultry to consume dead or moribund mice and rats. All dead or moribund animals and rodent faeces from baited rodents MUST be removed from areas accessible to livestock or poultry.</p> <p>The use of this product for the control of protected native rodents requires permission from wildlife authorities.</p> <p>PROTECTION OF FISH, CRUSTACEANS AND ENVIRONMENT</p> <p>Toxic to aquatic life. DO NOT contaminate wetlands or watercourses with this product or used containers. Place the bait stations in areas not liable to flooding. When placing bait stations close to water drainage systems, ensure that bait contact with water is avoided.</p>
Storage and Disposal:	<p>STORAGE AND DISPOSAL</p> <p>Store in the closed, original container in a dry, cool, well-ventilated area out of direct sunlight. Do not store for prolonged periods in direct sunlight. Triple rinse containers before disposal. Break, crush or puncture and deliver empty packaging to an approved waste management facility. If an approved waste management facility is not available, dispose of empty packaging in compliance with relevant local, state or territory government regulations. Dispose of unused product in compliance with relevant local, state or territory government regulations. DO NOT burn empty containers or product.</p>
Safety Directions:	<p>SAFETY DIRECTIONS</p> <p>Repeated minor exposure may have a cumulative poisoning effect. Do not touch bait, use scoop or measure. When using the product wear disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water.</p> <p>During cleanup and disposal operations of bait and bait stations, wear a single layer of clothing and disposable gloves. Wear disposable gloves when handling rodent carcasses. Wash clothes after performing re-handling activities.</p>
First Aid Instructions:	<p>FIRST AID</p> <p>If poisoning occurs, contact a doctor or Poisons Information Centre. Phone Australia 13 11 26, New Zealand 0800 764 766. Vitamin K1 (Phytomenadione) is antidotal.</p>

First Aid Warnings:

DIRECTIONS FOR USE

SITUATION	PEST	RATE	CRITICAL COMMENTS
In and around (within 2 meters) agricultural, commercial, domestic and industrial buildings.	Rats (<i>Rattus norvegicus</i> , <i>Rattus rattus</i>)	[As per current approved label]	Place bait stations in the infested area. Where droppings are seen, inside ceiling cavities, along runs are locations more probably frequented by rodents. DO NOT touch bait.
In agricultural, commercial, domestic and industrial buildings.	Mice (<i>Mus musculus</i>)	[As per current approved label]	The feeding behaviour of rats and mice is slightly different. Rats feed in large quantities in few locations whereas mice are more erratic and tend to feed in different places at different times. DO NOT exceed 9 m between bait stations for rats or 3 m between bait stations for mice.

Baiting strategy

Remove as much alternate food as possible.

Survey site prior to treatment, including assessment of the extent of infestation and identification of any indications of the presence of non-target animals.

Record the number and locations of bait stations for the purpose of inspection, replacement and later removal. Always use tamper-resistant bait stations that are secured in place in child accessible areas, outdoors and in animal or livestock housing. When used in food producing animal housing situations careful consideration is necessary regarding the placement of bait stations to ensure any rodenticide contamination of water, feed or livestock is prevented.

Inspect bait stations after 3 days. Replace eaten baits. Where a high level of consumption is noticed, place more baits. Remove baits in new locations where there has been no take. Inspect again 3 days later and then once a week until feeding ceases. Usually rats and mice die within 3 to 5 days after eating the bait. Normally treatment takes 2 to 3 weeks.

DO NOT use the product beyond 35 days without an evaluation of the state of the infestation and of the efficacy of the treatment. Remove all uneaten bait at the end of treatment.

If reinfestation should occur, you can repeat treatment once. For further treatments, it is strongly advised to alternate with a product containing a different active ingredient to avoid the development of genetic resistance.

NOT TO BE USED FOR ANY PURPOSE, OR IN ANY MANNER, CONTRARY TO THIS LABEL UNLESS AUTHORISED UNDER APPROPRIATE LEGISLATION.

Template Label 8d

Label Name:	[INSERT LABEL NAME]
Signal Headings	POISON KEEP OUT OF REACH OF CHILDREN READ SAFETY DIRECTIONS BEFORE OPENING OR USING
Constituent Statements:	0.05 g/kg BROMADIOLONE
Mode of Action:	
Statement of Claims:	For control of mice in domestic homes and buildings and rats in and around domestic homes and buildings.
Net Contents:	[INSERT NET CONTENTS]
Restraints:	<p>RESTRAINTS</p> <p>DO NOT use this product unless you have a current qualification in the nationally recognised training course for rodent pest management CPPUPM3006 - Manage pests by applying pesticides, or an equivalent unit of competency.</p> <p>DO NOT place baits in areas that are accessible to children. In child-accessible areas baits must be placed in tamper-resistant bait stations. If bait can be dislodged from bait station, bait station must be secured in place.</p> <p>DO NOT place bait outdoors unless it is in a tamper-resistant bait station which is secured in place.</p> <p>DO NOT place bait stations more than 2 meters from buildings.</p> <p>DO NOT place bait stations outdoors around buildings for control of mice.</p> <p>DO NOT bait in areas where wildlife may be collected for human consumption.</p> <p>DO NOT place in animal or livestock housing unless used in tamper-resistant and weather-resistant bait stations fixed to the ground or other structures.</p> <p>DO NOT place bait or bait stations above areas which would allow them to contaminate pig and poultry food or drinking water.</p> <p>DO NOT apply this product directly into burrows.</p>
Directions for Use:	[This section contains an attachment below]
Other Limitations:	
Withholding Periods:	
Trade Advice:	
General Directions:	
Resistance Warning:	

Precautions:	<p>PRECAUTIONS</p> <p>Caution should be used when baiting near areas where hunting of wildlife may occur. Careful consideration of bait placement is necessary to avoid secondary exposure from contaminated wildlife that may be consumed.</p> <p>DO NOT place bait in areas where there is a possibility of contaminating food, livestock feed or surfaces that come in direct contact with food or livestock feed.</p>
Protection Statements:	<p>PROTECTION OF LIVESTOCK AND WILDLIFE</p> <p>Hazardous to livestock, poultry and wildlife. DO NOT place baits in locations that are accessible to domestic animals, livestock, non-target native animals or birds. Search for and dispose of dead rodents and slugs/snails in the infested area at each visit to prevent secondary poisoning. In case slugs/snails are present, move bait station to another location within the rodent infested site, away from slugs/snails. Dispose of slugs/snails in a way non-target animals are not exposed. Dispose of dead rodents and uneaten bait in compliance with local, state or territory government regulations.</p> <p>DO NOT allow livestock or poultry to consume dead or moribund mice and rats. All dead or moribund animals and rodent faeces from baited rodents MUST be removed from areas accessible to livestock or poultry.</p> <p>DO NOT let cats and dogs eat poisoned rats and mice.</p> <p>The use of this product for the control of protected native rodents requires permission from wildlife authorities.</p> <p>PROTECTION OF FISH, CRUSTACEANS AND ENVIRONMENT</p> <p>Toxic to aquatic life. DO NOT contaminate wetlands or watercourses with this product or used containers. Place the bait stations in areas not liable to flooding. When placing bait stations close to water drainage systems, ensure that bait contact with water is avoided.</p>
Storage and Disposal:	<p>STORAGE AND DISPOSAL</p> <p>Store in original containers, tightly closed in a cool, well-ventilated room. DO NOT store for prolonged periods in direct sunlight.</p> <p>Triple rinse containers before disposal. Break, crush or puncture and deliver empty packaging to an approved waste management facility. If an approved waste management facility is not available, dispose of empty packaging in compliance with relevant local, state or territory government regulations. Dispose of unused product in compliance with relevant local, state or territory government regulations. DO NOT burn empty containers or product.</p>
Safety Directions:	<p>SAFETY DIRECTIONS</p> <p>Repeated minor exposure may have a cumulative poisoning effect. Do not touch bait, use scoop or measure. When using the product wear disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water.</p> <p>During cleanup and disposal operations of bait and bait stations, wear a single layer of clothing and disposable gloves. Wear disposable gloves when handling rodent carcasses. Wash clothes after performing re-handling activities.</p>
First Aid Instructions:	FIRST AID

	If poisoning occurs, contact a doctor or Poisons Information Centre. Phone Australia 13 11 26, New Zealand 0800 764 766. Vitamin K1 (Phytomenadione) is antidotal.
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First Aid Warnings:	
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DIRECTIONS FOR USE

SITUATION	PEST	RATE	CRITICAL COMMENTS
In and around (within 2 meters) domestic homes and buildings.	Rats (<i>Rattus norvegicus</i> , <i>Rattus rattus</i>)	2 – 8 blocks /bait station	Determine areas where rats and/or mice will most likely find and consume bait. Generally, these areas are along walls, by gnawed openings, beside burrows, in corners and concealed places between floors and walls or in locations where rodents or their signs have been observed.
In domestic homes and buildings.	Mice (<i>Mus musculus</i>)	1 – 2 blocks/bait station	Place bait stations in infested areas. DO NOT touch bait. DO NOT exceed 9 m between bait stations for rats or 3 m between bait stations for mice.

Baiting strategy

Eliminate, as far as practicable, all other food sources.

Survey site prior to treatment, including assessment of the extent of infestation and identification of any indications of the presence of non-target animals. Record the number and locations of bait stations for the purpose of inspection, replacement and later removal.

Always use tamper-resistant bait stations that are secured in place in child accessible areas, outdoors and in animal or livestock housing. When using outdoors, it is best practice to use weather-resistant bait stations. When used in food producing animal housing situations careful consideration is necessary regarding the placement of bait stations to ensure any rodenticide contamination of water, feed or livestock is prevented.

Inspect baits daily. Replace eaten, contaminated or spoilt baits immediately. If eaten quickly increase the number of bait placements. Continue observation and replenishment until no more baits are taken.

DO NOT use the product beyond 35 days without an evaluation of the state of the infestation and of the efficacy of the treatment. Remove all uneaten bait at the end of treatment.

To prevent reinfestation, eliminate food, water and harbourage as much as possible. If reinfestation should occur, repeat treatment.

NOT TO BE USED FOR ANY PURPOSE, OR IN ANY MANNER, CONTRARY TO THIS LABEL UNLESS AUTHORISED UNDER APPROPRIATE LEGISLATION.

Commercial pest-control product: RB 0.1 g/kg or less as a paste in caulking gun

Template Label 9

Label Name:	[INSERT LABEL NAME]
Signal Headings	POISON KEEP OUT OF REACH OF CHILDREN READ SAFETY DIRECTIONS BEFORE OPENING OR USING
Constituent Statements:	ACTIVE CONSTITUENT: 0.1 g/kg BROMADIOLONE
Mode of Action:	
Statement of Claims:	For control of mice in industrial, commercial, public services and domestic buildings and rats in and around industrial, commercial, public services and domestic buildings.
Net Contents:	[INSERT NET CONTENTS]
Restraints:	<p>RESTRAINTS</p> <p>DO NOT use this product unless you have a current qualification in the nationally recognised training course for rodent pest management CPPUPM3006 - Manage pests by applying pesticides, or an equivalent unit of competency.</p> <p>DO NOT place baits in areas that are accessible to children. In child-accessible areas baits must be placed in tamper-resistant bait stations. If bait can be dislodged from bait station, bait station must be secured in place.</p> <p>DO NOT place bait outdoors unless it is in a tamper-resistant bait station which is secured in place.</p> <p>DO NOT place bait stations more than 2 meters from buildings.</p> <p>DO NOT place bait stations outdoors around buildings for control of mice.</p> <p>DO NOT bait in areas where wildlife may be collected for human consumption.</p> <p>DO NOT place in animal or livestock housing unless used in tamper-resistant and weather-resistant bait stations fixed to the ground or other structures.</p> <p>DO NOT place bait or bait stations above areas which would allow them to contaminate pig and poultry food or drinking water.</p> <p>DO NOT apply this product directly into burrows.</p>
Directions for Use:	[This section contains an attachment below]
Other Limitations:	
Withholding Periods:	
Trade Advice:	
General Directions:	

Resistance Warning:	
Precautions:	<p>PRECAUTIONS</p> <p>Caution should be used when baiting near areas where hunting of wildlife may occur. Careful consideration of bait placement is necessary to avoid secondary exposure from contaminated wildlife that may be consumed.</p> <p>DO NOT place bait in areas where there is a possibility of contaminating food, livestock feed or surfaces that come in direct contact with food or livestock feed.</p>
Protection Statements:	<p>PROTECTION OF LIVESTOCK AND WILDLIFE</p> <p>Hazardous to livestock, poultry and wildlife. DO NOT place baits in locations that are accessible to domestic animals, livestock, non-target native animals or birds. Search for and dispose of dead rodents and slugs/snails in the infested area at each visit to prevent secondary poisoning. In case slugs/snails are present, move bait station to another location within the rodent infested site, away from slugs/snails. Dispose of slugs/snails in a way non-target animals are not exposed. Dispose of dead rodents and uneaten bait in compliance with local, state or territory government regulations.</p> <p>DO NOT allow livestock or poultry to consume dead or moribund mice and rats. All dead or moribund animals and rodent faeces from baited rodents MUST be removed from areas accessible to livestock or poultry.</p> <p>The use of this product for the control of protected native rodents requires permission from wildlife authorities.</p> <p>PROTECTION OF FISH, CRUSTACEANS AND ENVIRONMENT</p> <p>Toxic to aquatic life. DO NOT contaminate wetlands or watercourses with this product or used containers. Place the bait stations in areas not liable to flooding. When placing bait stations close to water drainage systems, ensure that bait contact with water is avoided.</p>
Storage and Disposal:	<p>STORAGE AND DISPOSAL</p> <p>Store in the closed original container in a cool, well-ventilated area. Do not store for prolonged periods in direct sunlight. Triple rinse containers before disposal. Break, crush or puncture and deliver empty packaging to an approved waste management facility. If an approved waste management facility is not available, dispose of empty packaging in compliance with relevant local, state or territory government regulations. Dispose of unused product in compliance with relevant local, state or territory government regulations. DO NOT burn empty containers or product.</p>
Safety Directions:	<p>SAFETY DIRECTIONS</p> <p>Repeated minor exposure may have a cumulative poisoning effect. Do not touch bait. When using the product wear disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water.</p> <p>During cleanup and disposal operations of bait and bait stations, wear a single layer of clothing and disposable gloves. Wear disposable gloves when handling rodent carcasses. Wash clothes after performing re-handling activities.</p>

First Aid Instructions:	FIRST AID If poisoning occurs, contact a doctor or Poisons Information Centre. Phone Australia 13 11 26, New Zealand 0800 764 766. Vitamin K1 (Phytomenadione) is antidotal.
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First Aid Warnings:	
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DIRECTIONS FOR USE

SITUATION	PEST	RATE	CRITICAL COMMENTS
In and around (within 2 meters) industrial, commercial, public services and domestic buildings.	Rats (<i>Rattus norvegicus</i> , <i>Rattus rattus</i>)	3-4 grams of bait (two pumps of the gun) per bait station	Use only in caulking gun and apply directly into bait station.
In industrial, commercial, public services and domestic buildings	Mice (<i>Mus musculus</i>)		Place bait stations in infested areas. DO NOT exceed 3 m between bait stations for mice or 9 m for rats.

Baiting strategy

Eliminate, as far as practicable, all other food sources.

Survey site prior to treatment, including assessment of the extent of infestation and identification of any indications of the presence of non-target animals.

Record the number and locations of bait stations for the purpose of inspection, replacement and later removal. When used in food producing animal housing situations careful consideration is necessary regarding the placement of bait stations to ensure any rodenticide contamination of water, feed or livestock is prevented.

Inspect bait stations daily. Replace eaten baits. If eaten quickly, increase the number of baits. Continue observation and replenish until no more baits are taken. Baiting for at least two weeks is necessary to reduce rat/mouse numbers.

DO NOT use the product beyond 35 days without an evaluation of the state of the infestation and of the efficacy of the treatment. Remove all uneaten bait at the end of treatment

NOT TO BE USED FOR ANY PURPOSE, OR IN ANY MANNER, CONTRARY TO THIS LABEL UNLESS AUTHORISED UNDER APPROPRIATE LEGISLATION.

Commercial pest-control product: RB 0.05 g/kg or less in pellet formulation

Template Label 10a

Label Name:	[INSERT LABEL NAME]
Signal Headings	POISON KEEP OUT OF REACH OF CHILDREN READ SAFETY DIRECTIONS BEFORE OPENING OR USING
Constituent Statements:	ACTIVE CONSTITUENT: 0.05 g/kg BROMADIOLONE
Mode of Action:	
Statement of Claims:	For control of mice in domestic, commercial, public services, industrial and agricultural buildings and rats in and around domestic, commercial, public services, industrial and agricultural buildings.
Net Contents:	[INSERT NET CONTENTS]
Restraints:	<p>RESTRAINTS</p> <p>DO NOT use this product unless you have a current qualification in the nationally recognised training course for rodent pest management CPPUPM3006 - Manage pests by applying pesticides, or an equivalent unit of competency.</p> <p>DO NOT place baits in areas that are accessible to children. In child-accessible areas baits must be placed in tamper-resistant bait stations. If bait can be dislodged from bait station, bait station must be secured in place.</p> <p>DO NOT place bait outdoors unless it is in a tamper-resistant bait station which is secured in place.</p> <p>DO NOT place bait stations more than 2 meters from buildings.</p> <p>DO NOT place bait stations outdoors around buildings for control of mice.</p> <p>DO NOT bait in areas where wildlife may be collected for human consumption.</p> <p>DO NOT place baits in and around animal, livestock and poultry houses, associated equipment, and food and feed processing areas.</p> <p>DO NOT apply this product directly into burrows.</p>
Directions for Use:	[This section contains an attachment below]
Other Limitations:	
Withholding Periods:	
Trade Advice:	
General Directions:	
Resistance Warning:	

Precautions:	<p>PRECAUTIONS</p> <p>Caution should be used when baiting near areas where hunting of wildlife may occur. Careful consideration of bait placement is necessary to avoid secondary exposure from contaminated wildlife that may be consumed.</p> <p>DO NOT place bait in areas where there is a possibility of contaminating food, livestock feed or surfaces that come in direct contact with food or livestock feed.</p>
Protection Statements:	<p>PROTECTION OF LIVESTOCK AND WILDLIFE</p> <p>Hazardous to livestock, poultry and wildlife. DO NOT place baits in locations that are accessible to domestic animals, livestock, non-target native animals or birds. Search for and dispose of dead rodents and slugs/snails in the infested area at each visit to prevent secondary poisoning. In case slugs/snails are present, move bait station to another location within the rodent infested site, away from slugs/snails. Dispose of slugs/snails in a way non-target animals are not exposed. Dispose of dead rodents and uneaten bait in compliance with local, state or territory government regulations.</p> <p>DO NOT allow livestock or poultry to consume dead or moribund mice and rats. All dead or moribund animals and rodent faeces from baited rodents MUST be removed from areas accessible to livestock or poultry.</p> <p>The use of this product for the control of protected native rodents requires permission from wildlife authorities.</p> <p>PROTECTION OF FISH, CRUSTACEANS AND ENVIRONMENT</p> <p>Toxic to aquatic life. DO NOT contaminate wetlands or watercourses with this product or used containers. Place the bait stations in areas not liable to flooding. When placing bait stations close to water drainage systems, ensure that bait contact with water is avoided.</p>
Storage and Disposal:	<p>STORAGE AND DISPOSAL</p> <p>Store in the closed, original container in a well-ventilated area, as cool as possible. DO NOT store for prolonged periods in direct sunlight.</p> <p>Triple rinse containers before disposal. Break, crush or puncture and deliver empty packaging to an approved waste management facility. If an approved waste management facility is not available, dispose of empty packaging in compliance with relevant local, state or territory government regulations. Dispose of unused product in compliance with relevant local, state or territory government regulations. DO NOT burn empty containers or product.</p>
Safety Directions:	<p>SAFETY DIRECTIONS</p> <p>Repeated minor exposure may have a cumulative poisoning effect. Avoid contact with eyes and skin. Do not inhale dust. Do not touch bait, use scoop or measure. When using the product wear disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water.</p> <p>During cleanup and disposal operations of bait and bait stations, wear a single layer of clothing and disposable gloves. Wear disposable gloves when handling rodent carcasses. Wash clothes after performing re-handling activities.</p>
First Aid Instructions:	<p>FIRST AID</p>

	If poisoning occurs, contact a doctor or Poisons Information Centre. Phone Australia 13 11 26, New Zealand 0800 764 766. Vitamin K1 (Phytomenadione) is antidotal.
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First Aid Warnings:	
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DIRECTIONS FOR USE

SITUATION	PEST	RATE	CRITICAL COMMENTS
In domestic homes, industrial and commercial buildings, farms, wharves, public service buildings, food factories, hospitals, and transport vehicles (including ships).	Rats (<i>Rattus norvegicus</i> , <i>Rattus rattus</i>)	[As per current approved label]	Determine areas where rats and/or mice will most likely find and consume bait. Generally, these areas are along walls, by gnawed openings, beside burrows, in corners and concealed places between floors and walls or in locations where rodents or their signs have been observed.
In and around (within 2 meters) domestic homes, industrial and commercial buildings, farms, wharves, public service buildings, food factories and hospitals. Inside transport vehicles (including ships) and around (within 2 meters) grain terminals.	Mice (<i>Mus musculus</i>)	[As per current approved label]	Place bait in infested areas. Bait areas where conditions might encourage rodent activity. DO NOT exceed 9 m between bait stations for rats and 3 m for mice.

Baiting strategy

Eliminate, as far as practicable, all other food sources.

Survey site prior to treatment, including assessment of the extent of infestation and identification of any indications of the presence of non-target animals. Record the number and locations of bait stations for the purpose of inspection, replacement and later removal.

Inspect bait stations at intervals no more than 7 days apart. Replace eaten, contaminated or spoilt baits. If eaten quickly, increase the number of bait stations. Continue observation and replenish until no more baits are taken. Baiting for at least two weeks is necessary to reduce rat/mouse numbers.

DO NOT use the product beyond 35 days without an evaluation of the state of the infestation and of the efficacy of the treatment. Remove all uneaten bait at the end of treatment

To prevent reinfestation, eliminate food, water and harbourage as much as possible. If reinfestation should occur, repeat treatment.

NOT TO BE USED FOR ANY PURPOSE, OR IN ANY MANNER, CONTRARY TO THIS LABEL UNLESS AUTHORISED UNDER APPROPRIATE LEGISLATION.

Template Label 10b

Label Name:	[INSERT LABEL NAME]
Signal Headings	POISON KEEP OUT OF REACH OF CHILDREN READ SAFETY DIRECTIONS BEFORE OPENING OR USING
Constituent Statements:	ACTIVE CONSTITUENT: 0.05 g/kg BROMADIOLONE
Mode of Action:	
Statement of Claims:	For control of mice in agricultural, commercial, domestic and industrial buildings and rats in and around agricultural, commercial, domestic and industrial buildings.
Net Contents:	[INSERT NET CONTENTS]
Restraints:	<p>RESTRAINTS</p> <p>DO NOT use this product unless you have a current qualification in the nationally recognised training course for rodent pest management CPPUPM3006 - Manage pests by applying pesticides, or an equivalent unit of competency.</p> <p>DO NOT place baits in areas that are accessible to children. In child-accessible areas baits must be placed in tamper-resistant bait stations. If bait can be dislodged from bait station, bait station must be secured in place.</p> <p>DO NOT place bait outdoors unless it is in a tamper-resistant bait station which is secured in place.</p> <p>DO NOT place bait stations more than 2 meters from buildings.</p> <p>DO NOT place bait stations outdoors around buildings for control of mice.</p> <p>DO NOT bait in areas where wildlife may be collected for human consumption.</p> <p>DO NOT place baits in and around animal, livestock and poultry houses, associated equipment, and food and feed processing areas.</p> <p>DO NOT apply this product directly into burrows.</p>
Directions for Use:	[This section contains an attachment below]
Other Limitations:	
Withholding Periods:	
Trade Advice:	
General Directions:	
Resistance Warning:	
Precautions:	<p>PRECAUTIONS</p> <p>Caution should be used when baiting near areas where hunting of wildlife may occur.</p>

	<p>Careful consideration of bait placement is necessary to avoid secondary exposure from contaminated wildlife that may be consumed.</p> <p>DO NOT place bait in areas where there is a possibility of contaminating food, livestock feed or surfaces that come in direct contact with food or livestock feed.</p>
Protection Statements:	<p>PROTECTION OF LIVESTOCK AND WILDLIFE</p> <p>Hazardous to livestock, poultry and wildlife. DO NOT place baits in locations that are accessible to domestic animals, livestock, non-target native animals or birds. Search for and dispose of dead rodents and slugs/snails in the infested area at each visit to prevent secondary poisoning. In case slugs/snails are present, move bait station to another location within the rodent infested site, away from slugs/snails. Dispose of slugs/snails in a way non-target animals are not exposed. Dispose of dead rodents and uneaten bait in compliance with local, state or territory government regulations.</p> <p>DO NOT allow livestock or poultry to consume dead or moribund mice and rats. All dead or moribund animals and rodent faeces from baited rodents MUST be removed from areas accessible to livestock or poultry.</p> <p>The use of this product for the control of protected native rodents requires permission from wildlife authorities.</p> <p>PROTECTION OF FISH, CRUSTACEANS AND ENVIRONMENT</p> <p>Toxic to aquatic life. DO NOT contaminate wetlands or watercourses with this product or used containers. Place the bait stations in areas not liable to flooding. When placing bait stations close to water drainage systems, ensure that bait contact with water is avoided.</p>
Storage and Disposal:	<p>STORAGE AND DISPOSAL</p> <p>Store in the closed, original container in a dry, cool, well-ventilated area out of direct sunlight. Triple rinse containers before disposal. Break, crush or puncture and deliver empty packaging to an approved waste management facility. If an approved waste management facility is not available, dispose of empty packaging in compliance with relevant local, state or territory government regulations. Dispose of unused product in compliance with relevant local, state or territory government regulations. DO NOT burn empty containers or product.</p>
Safety Directions:	<p>SAFETY DIRECTIONS</p> <p>Repeated minor exposure may have a cumulative poisoning effect. Avoid contact with eyes and skin. Do not inhale dust. Do not touch bait, use scoop or measure. When using the product wear disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water.</p> <p>During cleanup and disposal operations of bait and bait stations, wear a single layer of clothing and disposable gloves. Wear disposable gloves when handling rodent carcasses. Wash clothes after performing re-handling activities.</p>
First Aid Instructions:	<p>FIRST AID</p> <p>If poisoning occurs, contact a doctor or Poisons Information Centre. Phone Australia 13 11 26, New Zealand 0800 764 766. Vitamin K1 (Phytomenadione) is antidotal.</p>
First Aid Warnings:	

DIRECTIONS FOR USE

SITUATION	PEST	RATE	CRITICAL COMMENTS
In and around (within 2 meters) agricultural, commercial, domestic and industrial buildings	Rats (<i>Rattus norvegicus</i> , <i>Rattus rattus</i>)	[As per current approved label]	Place bait stations in the infested area. Where droppings are seen, inside ceiling cavities, along runs are locations more probably frequented by rodents. DO NOT touch bait.
In agricultural, commercial, domestic and industrial buildings	Mice (<i>Mus musculus</i>)	[As per current approved label]	The feeding behaviour of rats and mice is slightly different. Rats feed in large quantities in few locations whereas mice are more erratic and tend to feed in different places at different times. DO NOT exceed 9 m between bait stations for rats and 3 m for mice.

Baiting strategy

Eliminate as far as practicable all alternative food sources.

Survey site prior to treatment, including assessment of the extent of infestation and identification of any indications of the presence of non-target animals. Record the number and locations of bait stations for the purpose of inspection, replacement and later removal.

Inspect bait stations after 3 days. Replace eaten baits. Where a high level of consumption is noticed, place more baits. Remove baits in new locations where there has been no take. Inspect again 3 days later and then once a week until feeding ceases. Normally treatment takes 2 to 3 weeks.

DO NOT use the product beyond 35 days without an evaluation of the state of the infestation and of the efficacy of the treatment. Remove all uneaten bait at the end of treatment.

If reinfestation should occur, you can repeat treatment once. For further treatments, it is strongly advised to alternate with a product containing a different active constituent to avoid the development of genetic resistance.

NOT TO BE USED FOR ANY PURPOSE, OR IN ANY MANNER, CONTRARY TO THIS LABEL UNLESS AUTHORISED UNDER APPROPRIATE LEGISLATION.

Commercial pest-control product: RB 0.05 g/kg or less in sachet or place pack

Template Label 11a

Label Name:	[INSERT LABEL NAME]
Signal Headings	POISON KEEP OUT OF REACH OF CHILDREN READ SAFETY DIRECTIONS BEFORE OPENING OR USING
Constituent Statements:	ACTIVE CONSTITUENT: 0.05 g/kg BROMADIOLONE
Mode of Action:	
Statement of Claims:	For control of mice in agricultural, commercial, domestic and industrial buildings and rats in and around agricultural, commercial, domestic and industrial buildings.
Net Contents:	[INSERT NET CONTENTS]
Restraints:	<p>RESTRAINTS</p> <p>DO NOT use this product unless you have a current qualification in the nationally recognised training course for rodent pest management CPPUPM3006 - Manage pests by applying pesticides, or an equivalent unit of competency.</p> <p>DO NOT place baits in areas that are accessible to children. In child-accessible areas baits must be placed in tamper-resistant bait stations. If bait can be dislodged from bait station, bait station must be secured in place.</p> <p>DO NOT place bait outdoors unless it is in a tamper-resistant bait station which is secured in place.</p> <p>DO NOT place bait stations more than 2 meters from buildings.</p> <p>DO NOT place bait stations outdoors around buildings for control of mice.</p> <p>DO NOT bait in areas where wildlife may be collected for human consumption.</p> <p>DO NOT place in animal or livestock housing unless used in tamper-resistant and weather-resistant bait stations fixed to the ground or other structures.</p> <p>DO NOT place bait or bait stations above areas which would allow them to contaminate pig and poultry food or drinking water.</p> <p>DO NOT apply this product directly into burrows.</p>
Directions for Use:	[This section contains an attachment below]
Other Limitations:	
Withholding Periods:	
Trade Advice:	
General Directions:	

Resistance Warning:	
Precautions:	<p>PRECAUTIONS</p> <p>Caution should be used when baiting near areas where hunting of wildlife may occur. Careful consideration of bait placement is necessary to avoid secondary exposure from contaminated wildlife that may be consumed.</p> <p>DO NOT place bait in areas where there is a possibility of contaminating food, livestock feed or surfaces that come in direct contact with food or livestock feed.</p>
Protection Statements:	<p>PROTECTION OF LIVESTOCK AND WILDLIFE</p> <p>Hazardous to livestock, poultry and wildlife. DO NOT place baits in locations that are accessible to domestic animals, livestock, non-target native animals or birds. Search for and dispose of dead rodents and slugs/snails in the infested area at each visit to prevent secondary poisoning. In case slugs/snails are present, move bait station to another location within the rodent infested site, away from slugs/snails. Dispose of slugs/snails in a way non-target animals are not exposed. Dispose of dead rodents and uneaten bait in compliance with local, state or territory government regulations.</p> <p>DO NOT allow livestock or poultry to consume dead or moribund mice and rats. All dead or moribund animals and rodent faeces from baited rodents MUST be removed from areas accessible to livestock or poultry.</p> <p>The use of this product for the control of protected native rodents requires permission from wildlife authorities.</p> <p>PROTECTION OF FISH, CRUSTACEANS AND ENVIRONMENT</p> <p>Toxic to aquatic life. DO NOT contaminate wetlands or watercourses with this product or used containers. Place the bait stations in areas not liable to flooding. When placing bait stations close to water drainage systems, ensure that bait contact with water is avoided.</p>
Storage and Disposal:	<p>STORAGE AND DISPOSAL</p> <p>Store in the closed, original container in a dry, cool, well-ventilated area out of direct sunlight. Do not store for prolonged periods in direct sunlight.</p> <p>Triple rinse containers before disposal. Break, crush or puncture and deliver empty packaging to an approved waste management facility. If an approved waste management facility is not available, dispose of empty packaging in compliance with relevant local, state or territory government regulations. Dispose of unused product in compliance with relevant local, state or territory government regulations. DO NOT burn empty containers or product.</p>
Safety Directions:	<p>SAFETY DIRECTIONS</p> <p>Repeated minor exposure may have a cumulative poisoning effect. When using the product wear disposable gloves. During cleanup, disposal operations of bait and bait stations and when handling rodent carcasses wear single layer clothing and disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water. After each day's use wash contaminated clothing. Wash clothes after performing re-handling activities.</p>

First Aid Instructions:	FIRST AID If poisoning occurs, contact a doctor or Poisons Information Centre. Phone Australia 13 11 26, New Zealand 0800 764 766. Vitamin K1 (Phytomenadione) is antidotal.
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First Aid Warnings:	
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DIRECTIONS FOR USE

Sachets and sachets in bait stations for rats and mice

SITUATION	PEST	RATE	CRITICAL COMMENTS
Clean Out Treatments In and around (within 2 m) agricultural, commercial domestic and industrial buildings	Rats <i>(Rattus rattus, R. norvegicus)</i>	[as per current label]	The feeding behaviour of rats and mice is slightly different. Rats feed in large quantities in few locations whereas mice are more erratic and tend to feed in different places at different times.
Clean Out Treatments In agricultural, commercial domestic and industrial buildings	Mice <i>(Mus domesticus)</i>	[as per current label]	First determine the infested areas. Where droppings are seen, inside ceiling cavities, along runs are locations more probably frequented by rats and mice. Place baits in infested area. DO NOT touch bait. <i>For rats:</i> Place bait stations at intervals of 5 to 9 m in infested areas. DO NOT exceed 9 m between bait stations for rats. <i>For mice:</i> Place bait stations at intervals of 2 to 3 m in infested areas. DO NOT exceed 3 m between bait stations for mice. Use the greater number of baits and shorter distance between bait placements when infestations are heavy. See also baiting strategy for clean out treatments.
Monitoring and/or Maintenance Treatments In and around (within 2 m) agricultural, commercial domestic and industrial buildings	Rats <i>(Rattus rattus, R. norvegicus)</i>	[as per current label]	Place bait stations in areas prone to rodent infestation at intervals of between 15 and 30 m. See also baiting strategy for monitoring and/or maintenance treatments.
Monitoring and/or Maintenance Treatments In agricultural, commercial domestic and industrial buildings	Mice <i>(Mus domesticus)</i>		

Sachets in bait stations for mice only

SITUATION	PEST	RATE	CRITICAL COMMENTS
Clean Out Treatments In agricultural, commercial domestic and industrial buildings	Mice (<i>Mus domesticus</i>)	[as per current label]	First determine the infested areas. Where droppings are seen, inside ceiling cavities, along runs are locations more probably frequented by mice. Place baits in infested area. DO NOT touch bait. <i>For mice:</i> Place bait stations at intervals of 2 to 3 m in infested areas. DO NOT exceed 3 m between bait stations for mice. Use the greater number of baits and shorter distance between bait placements when infestations are heavy. See also baiting strategy for clean out treatments.
Monitoring and/or Maintenance Treatments In agricultural, commercial domestic and industrial buildings	Mice (<i>Mus domesticus</i>)	[as per current label]	Place bait stations in areas prone to rodent infestation at intervals of between 15 and 30 m. See also baiting strategy for monitoring and/or maintenance treatments.

Baiting Strategy

- Eliminate all alternative food sources as far as practical.
- When used in food producing animal housing situations careful consideration is necessary regarding the placement of bait stations to ensure any rodenticide contamination of water, feed or livestock is prevented.

Clean Out Treatments (Pulse Baiting)

- Clean out treatments are used to remove existing infestations.
- Survey site prior to treatment, including assessment of the extent of infestation and identification of any indications of the presence of non-target animals.
- Record the number and locations of bait stations for the purpose of inspection, replacement and later removal.
- Place bait stations so as to prevent access to non-target animals. Always use tamper-resistant bait stations that are secured in place in child accessible areas, outdoors and in animal or livestock housing.
- Conduct initial inspection of bait points after 3 or 4 days. Replace any bait that has been consumed. Repeat approximately 4 days later and then weekly. Replace contaminated or spoiled baits.
- Baiting for at least 2 weeks (3 to 4 pulses) will be necessary to reduce rat/mouse numbers to a low level. Although heavy infestations may require longer treatments to achieve complete eradication. Usually, rodents will die within 3 to 5 days after eating the bait.
- Discontinue the treatment when effective control has been achieved and remove all bait and bait stations unless a maintenance treatment is to be undertaken.
- DO NOT use the product beyond 35 days without an evaluation of the state of the infestation and of the efficacy of the treatment.
- Remove all uneaten bait at the end of treatment.
- If reinfestation should occur, you can repeat treatment once. For further treatments, it is strongly advised to alternate with a product containing a different active ingredient to avoid the development of genetic resistance.

Monitoring and/or Maintenance Treatments

- Monitoring and maintenance treatments are required at sensitive sites where there is no current rodent infestation but where the prevention of such infestation is essential to prevent significant risks to human health. Such treatments may be a condition for audit approval within food safety guidelines. However, use of this product must comply with the conditions of this label.
- Always record the number and locations of bait stations for the purpose of bait replacement and later removal.
- Place bait stations so as to prevent access to non-target animals. Always use tamper-resistant bait stations for monitoring and maintenance treatments and fix the stations securely to the substrate.
- Bait stations should be inspected at regular intervals no more than 7 days apart according to an agreed and documented schedule.
- Use placebo or unpoisoned bait if the placement of the bait presents a hazard to non-target animals.
- When a rodent infestation is detected, the operator should revert to the directions for Clean-Out Treatments.

**NOT TO BE USED FOR ANY PURPOSE, OR IN ANY MANNER, CONTRARY TO THIS LABEL UNLESS
AUTHORISED UNDER APPROPRIATE LEGISLATION**

Template Label 11b

Label Name:	[INSERT LABEL NAME]
Signal Headings	POISON KEEP OUT OF REACH OF CHILDREN READ SAFETY DIRECTIONS BEFORE OPENING OR USING
Constituent Statements:	ACTIVE CONSTITUENT: 0.05 g/kg BROMADIOLONE
Mode of Action:	
Statement of Claims:	For control of mice in domestic, commercial, public services, industrial and agricultural buildings and rats in and around domestic, commercial, public services. Industrial and agricultural buildings.
Net Contents:	[INSERT NET CONTENTS]
Restraints:	<p>RESTRAINTS</p> <p>DO NOT use this product unless you have a current qualification in the nationally recognised training course for rodent pest management CPPUPM3006 - Manage pests by applying pesticides, or an equivalent unit of competency.</p> <p>DO NOT place baits in areas that are accessible to children. In child-accessible areas baits must be placed in tamper-resistant bait stations. If bait can be dislodged from bait station, bait station must be secured in place.</p> <p>DO NOT place bait outdoors unless it is in a tamper-resistant bait station which is secured in place.</p> <p>DO NOT place bait stations more than 2 meters from buildings.</p> <p>DO NOT place bait stations outdoors around buildings for control of mice.</p> <p>DO NOT bait in areas where wildlife may be collected for human consumption.</p> <p>DO NOT place in animal or livestock housing unless used in tamper-resistant and weather-resistant bait stations fixed to the ground or other structures.</p> <p>DO NOT place bait or bait stations above areas which would allow them to contaminate pig and poultry food or drinking water.</p> <p>DO NOT apply this product directly into burrows.</p>
Directions for Use:	[This section contains an attachment below]
Other Limitations:	
Withholding Periods:	
Trade Advice:	
General Directions:	
Resistance Warning:	

Precautions:	<p>PRECAUTIONS</p> <p>Caution should be used when baiting near areas where hunting of wildlife may occur. Careful consideration of bait placement is necessary to avoid secondary exposure from contaminated wildlife that may be consumed.</p> <p>DO NOT place bait in areas where there is a possibility of contaminating food, livestock feed or surfaces that come in direct contact with food or livestock feed.</p>
Protection Statements:	<p>PROTECTION OF LIVESTOCK AND WILDLIFE</p> <p>Hazardous to livestock, poultry and wildlife. DO NOT place baits in locations that are accessible to domestic animals, livestock, non-target native animals or birds. Search for and dispose of dead rodents and slugs/snails in the infested area at each visit to prevent secondary poisoning. In case slugs/snails are present, move bait station to another location within the rodent infested site, away from slugs/snails. Dispose of slugs/snails in a way non-target animals are not exposed. Dispose of dead rodents and uneaten bait in compliance with local, state or territory government regulations.</p> <p>DO NOT allow livestock or poultry to consume dead or moribund mice and rats. All dead or moribund animals and rodent faeces from baited rodents MUST be removed from areas accessible to livestock or poultry.</p> <p>The use of this product for the control of protected native rodents requires permission from wildlife authorities.</p> <p>PROTECTION OF FISH, CRUSTACEANS AND ENVIRONMENT</p> <p>Toxic to aquatic life. DO NOT contaminate wetlands or watercourses with this product or used containers. Place the bait stations in areas not liable to flooding. When placing bait stations close to water drainage systems, ensure that bait contact with water is avoided.</p>
Storage and Disposal:	<p>STORAGE AND DISPOSAL</p> <p>Store in the closed, original container in a well-ventilated area, as cool as possible. DO NOT store for prolonged periods in direct sunlight. Triple rinse containers before disposal. Break, crush or puncture and deliver empty packaging to an approved waste management facility. If an approved waste management facility is not available, dispose of empty packaging in compliance with relevant local, state or territory government regulations. Dispose of unused product in compliance with relevant local, state or territory government regulations. DO NOT burn empty containers or product.</p>
Safety Directions:	<p>SAFETY DIRECTIONS</p> <p>Repeated minor exposure may have a cumulative poisoning effect. When using the product wear disposable gloves. During cleanup, disposal operations of bait and bait stations and when handling rodent carcasses wear single layer clothing and disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water. After each day's use wash contaminated clothing. Wash clothes after performing re-handling activities.</p>
First Aid Instructions:	<p>FIRST AID</p>

If poisoning occurs, contact a doctor or Poisons Information Centre. Phone Australia 13 11 26, New Zealand 0800 764 766. Vitamin K1 (Phytomenadione) is antidotal.
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First Aid Warnings:	
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DIRECTIONS FOR USE

SITUATION	PEST	RATE	CRITICAL COMMENTS
In domestic homes, agricultural, industrial and commercial buildings, animal houses, farms, wharves, public service buildings, food factories, hospitals, and transport vehicles (including ships).	Mice (<i>Mus musculus</i>)	1 – 4 baits/bait station	Determine areas where rats and/or mice will most likely find and consume bait. Generally, these areas are along walls, by gnawed openings, beside burrows, in corners and concealed places between floors and walls or in locations where rodents or their signs have been observed.
In and around (within 2 meters) domestic homes, agricultural, industrial and commercial buildings, animal houses, farms, wharves, public service buildings, food factories and hospitals. Inside transport vehicles (including ships) and around (within 2 meters) grain terminals.	Rats (<i>Rattus norvegicus</i> , <i>Rattus rattus</i>)	2 – 20 baits/bait station	Place bait stations in infested areas. Bait areas where conditions might encourage rodent activity. DO NOT remove bait from sachet. DO NOT exceed 9 m between bait stations for rats and 3 m for mice.

Baiting strategy

Eliminate, as far as practicable, all other food sources.

Survey site prior to treatment, including assessment of the extent of infestation and identification of any indications of the presence of non-target animals. Record the number and locations of bait stations for the purpose of inspection, replacement and later removal.

Place baits so as to prevent access to non-target animals. Always use tamper-resistant bait stations that are secured in place in child accessible areas, outdoors and in animal or livestock housing. When used in food producing animal housing situations careful consideration is necessary regarding the placement of bait stations to ensure any rodenticide contamination of water, feed or livestock is prevented.

Inspect bait stations at intervals no more than 7 days apart. Replace eaten, contaminated or spoilt baits. If eaten quickly, increase the number of bait stations. Continue observation and replenish until no more baits are taken. Baiting for at least two weeks is necessary to reduce rat/mouse numbers.

DO NOT use the product beyond 35 days without an evaluation of the state of the infestation and of the efficacy of the treatment. Remove all uneaten bait at the end of treatment.

To prevent reinfestation, eliminate food, water and harbourage as much as possible. If reinfestation should occur, repeat treatment.

NOT TO BE USED FOR ANY PURPOSE, OR IN ANY MANNER, CONTRARY TO THIS LABEL UNLESS AUTHORISED UNDER APPROPRIATE LEGISLATION.

Template Label 11c

Label Name:	[INSERT LABEL NAME]
Signal Headings	POISON KEEP OUT OF REACH OF CHILDREN READ SAFETY DIRECTIONS BEFORE OPENING OR USING
Constituent Statements:	ACTIVE CONSTITUENT: 0.05 g/kg BROMADIOLONE
Mode of Action:	
Statement of Claims:	For control of mice in domestic buildings and rats in and around domestic buildings.
Net Contents:	[INSERT NET CONTENTS]
Restraints:	<p>RESTRAINTS</p> <p>DO NOT use this product unless you have a current qualification in the nationally recognised training course for rodent pest management CPPUPM3006 - Manage pests by applying pesticides, or an equivalent unit of competency.</p> <p>DO NOT place baits in areas that are accessible to children. In child-accessible areas baits must be placed in tamper-resistant bait stations. If bait can be dislodged from bait station, bait station must be secured in place.</p> <p>DO NOT place bait outdoors unless it is in a tamper-resistant bait station which is secured in place.</p> <p>DO NOT place bait stations more than 2 meters from buildings.</p> <p>DO NOT place bait stations outdoors around buildings for control of mice.</p> <p>DO NOT bait in areas where wildlife may be collected for human consumption.</p> <p>DO NOT place in animal or livestock housing unless used in tamper-resistant and weather-resistant bait stations fixed to the ground or other structures.</p> <p>DO NOT place bait or bait stations above areas which would allow them to contaminate pig and poultry food or drinking water.</p> <p>DO NOT apply this product directly into burrows.</p>
Directions for Use:	[This section contains an attachment below]
Other Limitations:	
Withholding Periods:	
Trade Advice:	
General Directions:	
Resistance Warning:	

Precautions:	<p>PRECAUTIONS</p> <p>Caution should be used when baiting near areas where hunting of wildlife may occur. Careful consideration of bait placement is necessary to avoid secondary exposure from contaminated wildlife that may be consumed.</p> <p>DO NOT place bait in areas where there is a possibility of contaminating food, livestock feed or surfaces that come in direct contact with food or livestock feed.</p>
Protection Statements:	<p>PROTECTION OF LIVESTOCK AND WILDLIFE</p> <p>Hazardous to livestock, poultry and wildlife. DO NOT place baits in locations that are accessible to domestic animals, livestock, non-target native animals or birds. Search for and dispose of dead rodents and slugs/snails in the infested area at each visit to prevent secondary poisoning. In case slugs/snails are present, move bait station to another location within the rodent infested site, away from slugs/snails. Dispose of slugs/snails in a way non-target animals are not exposed. Dispose of dead rodents and uneaten bait in compliance with local, state or territory government regulations.</p> <p>DO NOT allow livestock or poultry to consume dead or moribund mice and rats. All dead or moribund animals and rodent faeces from baited rodents MUST be removed from areas accessible to livestock or poultry.</p> <p>DO NOT let cats and dogs eat poisoned rats and mice.</p> <p>The use of this product for the control of protected native rodents requires permission from wildlife authorities.</p> <p>PROTECTION OF FISH, CRUSTACEANS AND ENVIRONMENT</p> <p>Toxic to aquatic life. DO NOT contaminate wetlands or watercourses with this product or used containers. Place the bait stations in areas not liable to flooding. When placing bait stations close to water drainage systems, ensure that bait contact with water is avoided.</p>
Storage and Disposal:	<p>STORAGE AND DISPOSAL</p> <p>Store in original containers, tightly closed in a cool, well-ventilated room. DO NOT store for prolonged periods in direct sunlight.</p> <p>Triple rinse containers before disposal. Break, crush or puncture and deliver empty packaging to an approved waste management facility. If an approved waste management facility is not available, dispose of empty packaging in compliance with relevant local, state or territory government regulations. Dispose of unused product in compliance with relevant local, state or territory government regulations. DO NOT burn empty containers or product.</p>
Safety Directions:	<p>SAFETY DIRECTIONS</p> <p>Repeated minor exposure may have a cumulative poisoning effect. When using the product wear disposable gloves. During cleanup, disposal operations of bait and bait stations and when handling rodent carcasses wear single layer clothing and disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water. After each day's use wash contaminated clothing. Wash clothes after performing re-handling activities.</p>
First Aid Instructions:	FIRST AID

	If poisoning occurs, contact a doctor or Poisons Information Centre. Phone Australia 13 11 26, New Zealand 0800 764 766. Vitamin K1 (Phytomenadione) is antidotal.
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First Aid Warnings:	
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DIRECTIONS FOR USE

SITUATION	PEST	RATE	CRITICAL COMMENTS
In domestic homes.	Rats (<i>Rattus norvegicus</i> , <i>Rattus rattus</i>)	1 – 5 baits/bait station	Determine areas where rats and/or mice will most likely find and consume bait. Generally, these areas are along walls, by gnawed openings, beside burrows, in corners and concealed places between floors and walls or in locations where rodents or their signs have been observed. Place bait stations in infested areas. DO NOT open place packs. DO NOT exceed 9 m between bait stations for rats or 3 m between bait stations for mice.
In and around (within 2 meters) domestic homes.	Mice (<i>Mus musculus</i>)	1 bait/bait station	

Baiting strategy

Eliminate, as far as practicable, all other food sources.

Survey site prior to treatment, including assessment of the extent of infestation and identification of any indications of the presence of non-target animals. Record the number and locations of bait stations for the purpose of inspection, replacement and later removal.

Always use tamper-resistant bait stations that are secured in place in child accessible areas, outdoors and in animal or livestock housing. When used in food producing animal housing situations careful consideration is necessary regarding the placement of bait stations to ensure any rodenticide contamination of water, feed or livestock is prevented.

Inspect place packs daily. Replace eaten, contaminated or spoilt baits immediately. If eaten quickly increase the number of bait placements. Continue observation and replenishment until no more baits are taken. Most deaths occur 4 to 7 days after consumption of bait. Baiting for at least 2 weeks is necessary to reduce rat/mouse numbers.

DO NOT use the product beyond 35 days without an evaluation of the state of the infestation and of the efficacy of the treatment. Remove all uneaten bait at the end of treatment.

To prevent reinfestation, eliminate food, water and harbourage as much as possible. If reinfestation should occur, repeat treatment.

NOT TO BE USED FOR ANY PURPOSE, OR IN ANY MANNER, CONTRARY TO THIS LABEL UNLESS AUTHORISED UNDER APPROPRIATE LEGISLATION.

Bromadiolone and difenacoum

Commercial pest-control product: RB 0.05 g/kg or less in block formulation

Template Label 12

Label Name:	[INSERT LABEL NAME]
Signal Headings	POISON KEEP OUT OF REACH OF CHILDREN READ SAFETY DIRECTIONS BEFORE OPENING OR USING
Constituent Statements:	ACTIVE CONSTITUENTS: 0.025 g/kg BROMADIOLONE 0.025 g/kg DIFENACOUM
Mode of Action:	
Statement of Claims:	For control of mice in industrial, commercial, public services, agricultural and domestic buildings and rats in and around industrial, commercial, public services, agricultural and domestic buildings.
Net Contents:	[INSERT NET CONTENTS]
Restrains:	<p>RESTRAINTS</p> <p>DO NOT use this product unless you have a current qualification in the nationally recognised training course for rodent pest management CPPUPM3006 - Manage pests by applying pesticides, or an equivalent unit of competency.</p> <p>DO NOT place baits in areas that are accessible to children. In child-accessible areas baits must be placed in tamper-resistant bait stations. If bait can be dislodged from bait station, bait station must be secured in place.</p> <p>DO NOT place bait outdoors unless it is in a tamper-resistant bait station which is secured in place.</p> <p>DO NOT place bait stations more than 2 meters from buildings.</p> <p>DO NOT place bait stations outdoors around buildings for control of mice.</p> <p>DO NOT bait in areas where wildlife may be collected for human consumption.</p> <p>DO NOT place in animal or livestock housing unless used in tamper-resistant and weather-resistant bait stations fixed to the ground or other structures.</p> <p>DO NOT place bait or bait stations above areas which would allow them to contaminate pig and poultry food or drinking water.</p> <p>DO NOT apply this product directly into burrows.</p>
Directions for Use:	[This section contains an attachment below]
Other Limitations:	
Withholding Periods:	

Trade Advice:	
General Directions:	<p>GENERAL INSTRUCTIONS</p> <p>This product contains FLUO-NP, a special additive that makes bait and rodent droppings glow bright red under UV light. By shining a handheld UV lamp (black light) on the rodent droppings it is easy to identify and track rodent movement. When used as a perimeter bait, one can more accurately determine if rodents are gaining access to a building's interior and, if so, where the access points are located. Identifying rodent's movement gives valuable insight for establishing additional bait placements or determining where exclusionary or sanitation measures are needed. FLUONP also helps in tracking rodent activity in drop ceilings, sub-floors, wall voids and other dark, hard-to-access areas where the droppings might not normally be visible. The addition of FLUO-NP also helps confirm security of bait placements.</p>
Resistance Warning:	
Precautions:	<p>PRECAUTIONS</p> <p>Caution should be used when baiting near areas where hunting of wildlife may occur. Careful consideration of bait placement is necessary to avoid secondary exposure from contaminated wildlife that may be consumed.</p> <p>DO NOT place bait in areas where there is a possibility of contaminating food, livestock feed or surfaces that come in direct contact with food or livestock feed.</p>
Protection Statements:	<p>PROTECTION OF LIVESTOCK AND WILDLIFE</p> <p>Hazardous to livestock, poultry and wildlife. DO NOT place baits in locations that are accessible to domestic animals, livestock, non-target native animals or birds. Search for and dispose of dead rodents and slugs/snails in the infested area at each visit to prevent secondary poisoning. In case slugs/snails are present, move bait station to another location within the rodent infested site, away from slugs/snails. Dispose of slugs/snails in a way non-target animals are not exposed. Dispose of dead rodents and uneaten bait in compliance with local, state or territory government regulations.</p> <p>DO NOT allow livestock or poultry to consume dead or moribund mice and rats. All dead or moribund animals and rodent faeces from baited rodents MUST be removed from areas accessible to livestock or poultry.</p> <p>The use of this product for the control of protected native rodents and rodent like animals requires permission from wildlife authorities.</p> <p>PROTECTION OF FISH, CRUSTACEANS AND ENVIRONMENT</p> <p>Very toxic to aquatic life. DO NOT contaminate wetlands or watercourses with this product or used containers. Place the bait stations in areas not liable to flooding. When placing bait stations close to water drainage systems, ensure that bait contact with water is avoided</p>
Storage and Disposal:	<p>STORAGE AND DISPOSAL</p> <p>Store in the closed, original container in a cool dry place out of reach of children. DO NOT store in direct sunlight. Triple rinse containers before disposal. Break, crush or</p>

	puncture and deliver empty packaging to an approved waste management facility. If an approved waste management facility is not available, dispose of empty packaging in compliance with relevant local, state or territory government regulations. Dispose of unused product in compliance with relevant local, state or territory government regulations. DO NOT burn empty containers or product.
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Safety Directions:	<p>SAFETY DIRECTIONS</p> <p>Repeated minor exposure may have a cumulative poisoning effect. Will irritate the skin. May irritate eyes. Avoid contact with eyes and skin. Do not touch bait, use scoop or measure. When using the product wear disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water.</p> <p>During cleanup and disposal operations of bait and bait stations, wear a single layer of clothing and disposable gloves. Wear disposable gloves when handling rodent carcasses. Wash clothes after performing re-handling activities.</p>
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First Aid Instructions:	<p>FIRST AID</p> <p>If poisoning occurs, contact a doctor or Poisons Information Centre. Phone Australia 13 11 26, New Zealand 0800 764 766. Vitamin K1 (Phytomenadione) is antidotal.</p>
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First Aid Warnings:	
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DIRECTIONS FOR USE

SITUATION	PEST	RATE	CRITICAL COMMENTS
Clean Out Treatments In and around (within 2 m) industrial commercial, public service, agricultural and domestic buildings	Rats (<i>Rattus rattus</i> , <i>R. norvegicus</i>)	1 to 3 blocks/bait station	Place baits in infested area. <i>For rats:</i> Place bait stations at intervals of 5 to 9 m in infested areas. <i>For mice:</i> Place bait stations at intervals of 2 to 3 m in infested areas.
Clean Out Treatments In industrial commercial, public service, agricultural and domestic buildings	Mice (<i>Mus domesticus</i>)	1 block/bait station	Use the greater number of blocks and shorter distance between bait placements when infestations are heavy See also baiting strategy for clean out treatments.
Monitoring and/or Maintenance Treatments In and around (within 2 m) industrial commercial, public service, agricultural and domestic buildings	Rats (<i>Rattus rattus</i> , <i>R. norvegicus</i>)	1 block/bait station	Place bait stations in areas prone to rodent infestation at intervals of between 15 and 30 m. See also baiting strategy for monitoring and/or maintenance treatments.
Monitoring and/or Maintenance Treatments In industrial commercial, public service, agricultural and domestic buildings	Mice (<i>Mus domesticus</i>)		

Baiting Strategy

- Eliminate all alternative food sources as far as practical.

- When used in food producing animal housing situations careful consideration is necessary regarding the placement of bait stations to ensure any rodenticide contamination of water, feed or livestock is prevented.

Clean Out Treatments (Pulse Baiting)

- Clean out treatments are used to remove existing infestations of rats and mice
- Survey site prior to treatment, including assessment of the extent of infestation and identification of any indications of the presence of non-target animals.
- Always use tamper-resistant bait stations that are secured in place in child accessible areas, outdoors and in animal or livestock housing.
- Place wax blocks so as to prevent access to non-target animals. Securely fasten bait and bait stations to minimise risk of consumption by other animals or of being dragged away.
- Record the number and locations of bait stations for the purpose of inspection, replacement and later removal.
- Inspect baits frequently, particularly in the first ten days. UV (black light) can be used to increase visibility of the fluorescent baits. Replace any bait that has been consumed. Repeat approximately 4 days later and then weekly. Replace contaminated or spoiled baits.
- Baiting for at least 2 weeks (3 to 4 pulses) will be necessary to reduce rat/mouse numbers to a low level. Although heavy infestations may require longer treatments to achieve complete eradication. Most deaths occur 4 to 7 days after consumption of bait.
- Discontinue the treatment when effective control has been achieved and remove all bait and bait stations unless a maintenance treatment is to be undertaken.
- DO NOT use the product beyond 35 days without an evaluation of the state of the infestation and of the efficacy of the treatment.
- Remove all uneaten bait at the end of treatment.

Monitoring and/or Maintenance Treatments

- Monitoring and maintenance treatments are required at sensitive sites where there is no current rodent infestation but where the prevention of such infestation is essential to prevent significant risks to human health. Such treatments may be a condition for audit approval within food safety guidelines. However, use of this product must comply with the conditions of this label.
- Always use tamper-resistant bait stations for monitoring and maintenance treatments and fix the stations securely to the substrate.
- Place bait stations so as to prevent access to non-target animals.
- Use placebo or unpoisoned bait blocks if the placement of the bait presents a hazard to non-target animals.
- Always map location and number of bait blocks to assist in retrieval and ongoing surveillance.
- Bait stations should be inspected at regular intervals no more than 7 days apart according to an agreed and documented schedule.
- When a rodent infestation is detected, the operator should revert to the directions for Clean-Out Treatments.

NOT TO BE USED FOR ANY PURPOSE, OR IN ANY MANNER, CONTRARY TO THIS LABEL UNLESS AUTHORISED UNDER APPROPRIATE LEGISLATION

Commercial pest-control product: RB 0.05 g/kg or less in sachet or place pack

Template Label 13

Label Name:	[INSERT LABEL NAME]
Signal Headings	POISON KEEP OUT OF REACH OF CHILDREN READ SAFETY DIRECTIONS BEFORE OPENING OR USING
Constituent Statements:	ACTIVE CONSTITUENTS: 0.025 g/kg BROMADIOLONE 0.025 g/kg DIFENACOU
Mode of Action:	
Statement of Claims:	For control of mice in industrial, commercial, public services, agricultural, and domestic buildings and rats in and around industrial, commercial, public services, agricultural and domestic buildings.
Net Contents:	[INSERT NET CONTENTS]
Restraints:	<p>RESTRAINTS</p> <p>DO NOT use this product unless you have a current qualification in the nationally recognised training course for rodent pest management CPPUPM3006 - Manage pests by applying pesticides, or an equivalent unit of competency.</p> <p>DO NOT place baits in areas that are accessible to children. In child-accessible areas baits must be placed in tamper-resistant bait stations. If bait can be dislodged from bait station, bait station must be secured in place.</p> <p>DO NOT place bait outdoors unless it is in a tamper-resistant bait station which is secured in place.</p> <p>DO NOT place bait stations more than 2 meters from buildings.</p> <p>DO NOT place bait stations outdoors around buildings for control of mice.</p> <p>DO NOT bait in areas where wildlife may be collected for human consumption.</p> <p>DO NOT place in animal or livestock housing unless used in tamper-resistant and weather-resistant bait stations fixed to the ground or other structures.</p> <p>DO NOT place bait or bait stations above areas which would allow them to contaminate pig and poultry food or drinking water.</p> <p>DO NOT apply this product directly into burrows.</p>
Directions for Use:	[This section contains an attachment below]
Other Limitations:	
Withholding Periods:	
Trade Advice:	

General Directions:	<p>GENERAL INSTRUCTIONS</p> <p>This bait contains FLUO-NP, a special additive that makes bait and rodent droppings glow bright red under UV light. By shining a handheld UV lamp (black light) on the rodent droppings it is easy to identify and track rodent movement. When used as a perimeter bait, one can more accurately determine if rodents are gaining access to a building's interior and, if so, where the access points are located.</p> <p>Identifying rodent's movement gives valuable insight for establishing additional bait placements or determining where exclusionary or sanitation measures are needed. FLUONP also helps in tracking rodent activity in drop ceilings, sub-floors, wall voids and other dark, hard-to-access areas where the droppings might not normally be visible. The addition of FLUO-NP also helps confirm security of bait placements.</p>
Resistance Warning:	
Precautions:	<p>PRECAUTIONS</p> <p>Caution should be used when baiting near areas where hunting of wildlife may occur. Careful consideration of bait placement is necessary to avoid secondary exposure from contaminated wildlife that may be consumed.</p> <p>DO NOT place bait in areas where there is a possibility of contaminating food, livestock feed or surfaces that come in direct contact with food or livestock feed.</p>
Protection Statements:	<p>PROTECTION OF LIVESTOCK AND WILDLIFE</p> <p>Hazardous to livestock, poultry and wildlife. DO NOT place baits in locations that are accessible to domestic animals, livestock, non-target native animals or birds.</p> <p>Search for and dispose of dead rodents and slugs/snails in the infested area at each visit to prevent secondary poisoning. In case slugs/snails are present, move bait station to another location within the rodent infested site, away from slugs/snails.</p> <p>Dispose of slugs/snails in a way non-target animals are not exposed. Dispose of dead rodents and uneaten bait in compliance with local, state or territory government regulations.</p> <p>DO NOT allow livestock or poultry to consume dead or moribund mice and rats. All dead or moribund animals and rodent faeces from baited rodents MUST be removed from areas accessible to livestock or poultry.</p> <p>The use of this product for the control of protected native rodents requires permission from wildlife authorities.</p> <p>PROTECTION OF FISH, CRUSTACEANS AND ENVIRONMENT</p> <p>Very toxic to aquatic life. DO NOT contaminate wetlands or watercourses with this product or used containers. Place the bait stations in areas not liable to flooding.</p> <p>When placing bait stations close to water drainage systems, ensure that bait contact with water is avoided</p>
Storage and Disposal:	<p>STORAGE AND DISPOSAL</p> <p>Store in the closed, original container in a cool dry place out of reach of children. DO NOT store in direct sunlight. Triple rinse containers before disposal. Break, crush or puncture and deliver empty packaging to an approved waste management facility. If an approved waste management facility is not available, dispose of empty packaging in compliance with relevant local, state or territory government regulations. Dispose</p>

	of unused product in compliance with relevant local, state or territory government regulations. DO NOT burn empty containers or product.
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Safety Directions:	SAFETY DIRECTIONS Repeated minor exposure may have a cumulative poisoning effect. Will irritate the skin. May irritate eyes. Avoid contact with eyes and skin. When using the product wear disposable gloves. During cleanup, disposal operations of bait and bait stations and when handling rodent carcasses wear single layer clothing and disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water. After each day's use wash contaminated clothing. Wash clothes after performing re-handling activities.
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First Aid Instructions:	FIRST AID If poisoning occurs, contact a doctor or Poisons Information Centre. Phone Australia 13 11 26, New Zealand 0800 764 766. Vitamin K1 (Phytomenadione) is antidotal.
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First Aid Warnings:	
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DIRECTIONS FOR USE

SITUATION	PEST	RATE	CRITICAL COMMENTS
Clean Out Treatments In and around (within 2 m) industrial commercial, public service, agricultural and domestic buildings	Rats (<i>Rattus rattus</i> , <i>R. norvegicus</i>)	1 to 3 baits/bait station	Place baits in infested area. <i>For rats:</i> Place bait stations at intervals of 5 to 9 m in infested areas. <i>For mice:</i> Place bait stations at intervals of 2 to 3 m in infested areas.
Clean Out Treatments In industrial commercial, public service, agricultural and domestic buildings	Mice (<i>Mus domesticus</i>)	1 baits/bait station	Use the greater number of baits and shorter distance between bait placements when infestations are heavy. See also baiting strategy for clean out treatments.
Monitoring and/or Maintenance Treatments In and around (within 2 m) industrial commercial, public service, agricultural and domestic buildings	Rats (<i>Rattus rattus</i> , <i>R. norvegicus</i>)	1 baits/bait station	Place bait stations in areas prone to rodent infestation at intervals of between 15 and 30 m. See also baiting strategy for monitoring and/or maintenance treatments.
Monitoring and/or Maintenance Treatments In industrial commercial, public service, agricultural and domestic buildings	Mice (<i>Mus domesticus</i>)		

Baiting Strategy

- Eliminate all alternative food sources as far as practical.
- When used in food producing animal housing situations careful consideration is necessary regarding the placement of bait stations to ensure any rodenticide contamination of water, feed or livestock is prevented.

Clean Out Treatments (Pulse Baiting)

- Clean out treatments are used to remove existing infestations of rats and mice

- Survey site prior to treatment, including assessment of the extent of infestation and identification of any indications of the presence of non-target animals.
- Always use tamper-resistant bait stations that are secured in place in child accessible areas, outdoors and in animal or livestock housing.
- Place baits so as to prevent access to non-target animals. Securely fasten bait and bait stations to minimise risk of consumption by other animals or of being dragged away.
- Record the number and locations of bait stations for the purpose of inspection, replacement and later removal.
- Conduct initial inspection of bait points after 3 or 4 days. UV (black light) can be used to increase visibility of the fluorescent baits. Replace any bait that has been consumed. Repeat approximately 4 days later and then weekly. Replace contaminated or spoiled baits.
- Baiting for at least 2 weeks (3 to 4 pulses) will be necessary to reduce rat/mouse numbers to a low level. Although heavy infestations may require longer treatments to achieve complete eradication. Most deaths occur 4 to 7 days after consumption of bait.
- Discontinue the treatment when effective control has been achieved and remove all bait and bait stations unless a maintenance treatment is to be undertaken.
- DO NOT use the product beyond 35 days without an evaluation of the state of the infestation and of the efficacy of the treatment.
- Remove all uneaten bait at the end of treatment.

Monitoring and/or Maintenance Treatments

- Monitoring and maintenance treatments are required at sensitive sites where there is no current rodent infestation but where the prevention of such infestation is essential to prevent significant risks to human health. Such treatments may be a condition for audit approval within food safety guidelines. However, use of this product must comply with the conditions of this label.
- Always use tamper-resistant bait stations for monitoring and maintenance treatments and fix the stations securely to the substrate.
- Place bait stations so as to prevent access to non-target animals.
- Use placebo or unpoisoned baits if the placement of the bait presents a hazard to non-target animals.
- Always map location and number of baits to assist in retrieval and ongoing surveillance.
- Bait stations should be inspected at regular intervals no more than 7 days apart according to an agreed and documented schedule.
- When a rodent infestation is detected, the operator should revert to the directions for Clean-Out Treatments.

NOT TO BE USED FOR ANY PURPOSE, OR IN ANY MANNER, CONTRARY TO THIS LABEL UNLESS AUTHORISED UNDER APPROPRIATE LEGISLATION

Domestic pest-control product: RB 0.05 g/kg or less in block formulation

Template Label 14

Label Name:	[INSERT LABEL NAME]
Signal Headings	POISON KEEP OUT OF REACH OF CHILDREN READ SAFETY DIRECTIONS
Constituent Statements:	ACTIVE CONSTITUENTS: 0.025 g/kg BROMADIOLONE 0.025 g/kg DIFENACOU
Statement of Claims:	For control of mice in domestic and commercial buildings and rats in and around domestic and commercial buildings.
Net Contents:	[INSERT NET CONTENTS – MAXIMUM 300 g]
Restraints:	DO NOT place baits unless in tamper-resistant bait stations. DO NOT place bait stations outdoors around buildings for control of mice. DO NOT place bait stations more than 2 meters from buildings. DO NOT bait in areas where wildlife may be collected for human consumption. DO NOT place baits in and around animal, livestock and poultry houses, associated equipment, and food and feed processing areas. DO NOT apply this product directly into burrows. DO NOT use the product in pulsed baiting treatments.
How to Use	[This section contains an attachment below]
Withholding Periods:	
How to Prepare	GENERAL INSTRUCTIONS The baits are ready to use. This product contains FLUO-NP, a special additive that makes bait and rodent droppings glow bright red under UV light. By shining a handheld UV lamp (black light) on the rodent droppings it is easy to identify and track rodent movement. When used as a perimeter bait, one can more accurately determine if rodents are gaining access to a building's interior and, if so, where the access points are located.
Resistance Warning:	
Precautions:	CAUTION Caution should be used when baiting near areas where hunting of wildlife may occur. Careful consideration of bait placement is necessary to avoid secondary exposure from contaminated wildlife that may be consumed. DO NOT place bait in areas where there is a possibility of contaminating food, livestock feed or surfaces that come in direct contact with food or livestock feed.

	<p>PROTECTION OF LIVESTOCK AND WILDLIFE</p> <p>Hazardous to livestock, poultry and wildlife. DO NOT place baits in locations that are accessible to domestic animals, livestock, non-target native animals or birds.</p> <p>Search for and dispose of dead rodents and slugs/snails in the infested area at each visit to prevent secondary poisoning. In case slugs/snails are present, move bait station to another location within the rodent infested site, away from slugs/snails.</p> <p>Dispose of slugs/snails, dead rodents and uneaten bait by wrapping in paper, placing in plastic bag and putting in garbage.</p> <p>DO NOT allow livestock or poultry to consume dead or moribund mice and rats. All dead or moribund animals and rodent faeces from baited rodents MUST be removed from areas accessible to livestock or poultry.</p> <p>DO NOT let cats, dogs or non-target animals eat poisoned mice and rats.</p> <p>DO NOT use this product to control native animals.</p> <p>PROTECTION OF FISH, CRUSTACEANS AND ENVIRONMENT</p> <p>Very toxic to aquatic life. DO NOT contaminate wetlands or watercourses with this product or used containers. Place the bait stations in areas not liable to flooding.</p> <p>When placing bait stations close to water drainage systems, ensure that bait contact with water is avoided.</p>
Protections:	
Storage and Disposal:	<p>STORAGE AND DISPOSAL</p> <p>Store in the closed, original container in a cool dry place out of reach of children. DO NOT store in direct sunlight. Dispose of empty containers and unused product by wrapping in paper placing in plastic bag and putting in garbage.</p>
Safety Directions:	<p>SAFETY DIRECTIONS</p> <p>Repeated minor exposure may have a cumulative poisoning effect. Will irritate the skin. May irritate eyes. Avoid contact with eyes and skin. DO NOT touch bait, use scoop or measure. When using the product wear disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water.</p> <p>During cleanup and disposal operations of bait and bait stations, wear a single layer of clothing and disposable gloves. Wear disposable gloves when handling rodent carcasses. Wash clothes after performing re-handling activities.</p>
First Aid Instructions:	<p>FIRST AID</p> <p>If poisoning occurs, contact a doctor or Poisons Information Centre. Phone Australia 13 11 26, New Zealand 0800 764 766. Vitamin K1 (Phytomenadione) is antidotal.</p>
First Aid Warnings:	

HOW TO USE

PEST	SITUATION	RATE	HOW TO APPLY
Mice	In domestic buildings and commercial premises	1 bait per bait station	Place bait stations at 2 to 3 m intervals throughout the infested area in places frequented by mice in buildings.
Rats	In and around (within 2 metres) domestic buildings and commercial premises	1 to 3 baits per bait station	Place 1 to 3 bait stations at intervals of 5 to 9 m in infested areas wherever droppings, damage or other signs of rodent activity are seen.

BAITING STRATEGY FOR EFFECTIVE CONTROL

Eliminate as far as practical, all alternative food sources.

Always place bait where it is inaccessible to children, animals and birds. Use in tamper resistant bait stations only. If bait can be dislodged from bait station, fix tamper-resistant bait stations to the ground or other structures. When using outdoors, it is best practice to use weather resistant bait stations. DO NOT touch bait.

Inspect baits frequently, particularly in the first ten days. Replace eaten bait. If bait is completely consumed, the quantity should be increased. Continue replenishing bait until left untouched. Baiting for at least 2 weeks will be necessary to reduce rat/mouse numbers. Most deaths occur 4 to 7 days after consumption of bait, but deaths may occur for up to 2 weeks.

Following treatment remove all remains of bait and bait containers. DO NOT use the product beyond 35 days. If rodent activity is still observed after 35 days, seek advice from the product supplier or call a pest control service.

NOT TO BE USED FOR ANY PURPOSE, OR IN ANY MANNER, CONTRARY TO THIS LABEL UNLESS AUTHORISED.

Domestic pest-control product: RB 0.05 g/kg or less in sachet or place pack

Template Label 15

Label Name:	[INSERT LABEL NAME]
Signal Headings	POISON KEEP OUT OF REACH OF CHILDREN READ SAFETY DIRECTIONS
Constituent Statements:	ACTIVE CONSTITUENTS: 0.025 g/kg BROMADIOLONE 0.025 g/kg DIFENACOU
Statement of Claims:	For control of mice in domestic buildings and commercial premises and rats in and around domestic buildings and commercial premises.
Net Contents:	[INSERT NET CONTENTS – MAXIMUM 150 g]
Restraints:	DO NOT place baits unless in tamper-resistant bait stations. DO NOT place bait stations outdoors around buildings for control of mice. DO NOT place bait stations more than 2 meters from buildings. DO NOT bait in areas where wildlife may be collected for human consumption. DO NOT place baits in and around animal, livestock and poultry houses, associated equipment, and food and feed processing areas. DO NOT apply this product directly into burrows. DO NOT use the product in pulsed baiting treatments.
How to Use	[This section contains an attachment below]
Withholding Periods:	
How to Prepare	GENERAL INSTRUCTIONS The baits are ready to use - do not unwrap individual baits. Rats and mice will chew through the wrapper This product contains FLUO-NP, a special additive that makes bait and rodent droppings glow bright red under UV light. By shining a handheld UV lamp (black light) on the rodent droppings it is easy to identify and track rodent movement. When used as a perimeter bait, one can more accurately determine if rodents are gaining access to a building's interior and, if so, where the access points are located.
Resistance Warning:	
Precautions:	CAUTION Caution should be used when baiting near areas where hunting of wildlife may occur. Careful consideration of bait placement is necessary to avoid secondary exposure from contaminated wildlife that may be consumed.

	<p>DO NOT place bait in areas where there is a possibility of contaminating food, livestock feed or surfaces that come in direct contact with food or livestock feed.</p> <p>PROTECTION OF LIVESTOCK AND WILDLIFE Hazardous to livestock, poultry and wildlife. DO NOT place baits in locations that are accessible to domestic animals, livestock, non-target native animals or birds. Search for and dispose of dead rodents and slugs/snails in the infested area at each visit to prevent secondary poisoning. In case slugs/snails are present, move bait station to another location within the rodent infested site, away from slugs/snails. Dispose of slugs/snails, dead rodents and uneaten bait by wrapping in paper, placing in plastic bag and putting in garbage. DO NOT allow livestock or poultry to consume dead or moribund mice and rats. All dead or moribund animals and rodent faeces from baited rodents MUST be removed from areas accessible to livestock or poultry. DO NOT let cats, dogs or non-target animals eat poisoned mice and rats. DO NOT use this product to control native animals.</p> <p>PROTECTION OF FISH, CRUSTACEANS AND ENVIRONMENT Very toxic to aquatic life. DO NOT contaminate wetlands or watercourses with this product or used containers. Place the bait stations in areas not liable to flooding. When placing bait stations close to water drainage systems, ensure that bait contact with water is avoided</p>
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Protections:	
Storage and Disposal:	<p>STORAGE AND DISPOSAL Store in the closed, original container in a cool dry place out of reach of children. DO NOT store in direct sunlight. Dispose of empty containers and unused product by wrapping in paper placing in plastic bag and putting in garbage.</p>
Safety Directions:	<p>SAFETY DIRECTIONS Repeated minor exposure may have a cumulative poisoning effect. Will irritate the skin. May irritate eyes. Avoid contact with eyes and skin. When using the product wear disposable gloves. During cleanup, disposal operations of bait and bait stations and when handling rodent carcasses wear single layer clothing and disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water. After each day's use wash contaminated clothing. Wash clothes after performing re-handling activities.</p>
First Aid Instructions:	<p>FIRST AID If poisoning occurs, contact a doctor or Poisons Information Centre. Phone Australia 13 11 26, New Zealand 0800 764 766. Vitamin K1 (Phytomenadione) is antidotal.</p>
First Aid Warnings:	

HOW TO USE

PEST	SITUATION	RATE	HOW TO APPLY
Mice	In domestic buildings and commercial premises	1 bait per bait station	Place bait stations at 2 to 3 m intervals throughout the infested area in places frequented by mice in buildings.
Rats	In and around (within 2 metres) domestic buildings and commercial premises	1 to 3 baits per bait station	Place 1 to 3 bait stations at intervals of 5 to 9 m in infested areas wherever droppings, damage or other signs of rodent activity are seen.

BAITING STRATEGY FOR EFFECTIVE CONTROL

Eliminate as far as practical, all alternative food sources.

Always place bait where it is inaccessible to children, animals and birds. Use in tamper resistant bait stations only. If bait can be dislodged from bait station, fix tamper-resistant bait stations to the ground or other structures. When using outdoors, it is best practice to use weather resistant bait stations. DO NOT touch bait.

Inspect baits frequently, particularly in the first ten days. Replace eaten bait. If bait is completely consumed, the quantity should be increased. Continue replenishing bait until left untouched. Baiting for at least 2 weeks will be necessary to reduce rat/mouse numbers. Most deaths occur 4 to 7 days after consumption of bait, but deaths may occur for up to 2 weeks.

Following treatment remove all remains of bait and bait containers. DO NOT use the product beyond 35 days. If rodent activity is still observed after 35 days, seek advice from the product supplier or call a pest control service.

NOT TO BE USED FOR ANY PURPOSE, OR IN ANY MANNER, CONTRARY TO THIS LABEL UNLESS AUTHORISED.

Coumatetralyl

Commercial pest-control product: RB 0.4 g/kg or less in block formulation

Template Label 16

Label Name:	[INSERT LABEL NAME]
Signal Headings	CAUTION KEEP OUT OF REACH OF CHILDREN READ SAFETY DIRECTIONS BEFORE OPENING OR USING
Constituent Statements:	ACTIVE CONSTITUENT: 0.37 g/kg COUMATETRALYL
Mode of Action:	
Statement of Claims:	For control of mice in domestic and industrial buildings and for control of rats in and around various buildings and around field crops as per the 'Directions for use' table.
Net Contents:	[INSERT NET CONTENTS]
Restraints:	<p>RESTRAINTS</p> <p>DO NOT use this product unless you have a current qualification in the nationally recognised training course for rodent pest management CPPUPM3006 - Manage pests by applying pesticides, or an equivalent unit of competency.</p> <p>DO NOT place baits in areas that are accessible to children. In child-accessible areas baits must be placed in tamper-resistant bait stations. If bait can be dislodged from bait station, bait station must be secured in place.</p> <p>DO NOT place bait outdoors unless it is in a tamper-resistant bait station which is secured in place.</p> <p>DO NOT place bait in food crop situations unless in tamper-resistant and weather resistant bait stations. DO NOT graze or feed livestock near treated areas whilst bait is present.</p> <p>DO NOT place bait stations outdoors around buildings for control of mice.</p> <p>DO NOT bait in areas where wildlife may be collected for human consumption.</p> <p>DO NOT place in animal or livestock housing unless used in tamper-resistant and weather resistant bait stations fixed to the ground or other structures.</p> <p>DO NOT place bait or bait stations above areas which would allow them to contaminate pig and poultry food or drinking water.</p> <p>DO NOT apply this product directly into burrows.</p> <p>DO NOT use product in pulse baiting treatments</p>
Directions for Use:	[This section contains an attachment below]
Other Limitations:	
Withholding Periods:	

Trade Advice:	
General Directions:	
Resistance Warning:	
Precautions:	<p>PRECAUTION</p> <p>Caution should be used when baiting near areas where hunting of wildlife may occur. Careful consideration of bait placement is necessary to avoid secondary exposure from contaminated wildlife that may be consumed.</p> <p>DO NOT place bait in areas where there is a possibility of contaminating food, livestock feed or surfaces that come in direct contact with food or livestock feed.</p>
Protection Statements:	<p>PROTECTION OF LIVESTOCK AND WILDLIFE</p> <p>Hazardous to livestock, poultry and wildlife. DO NOT place baits in locations that are accessible to domestic animals, livestock, non-target native animals or birds. Search for and dispose of dead rodents and slugs/snails in the infested area at each visit to prevent secondary poisoning. In case slugs/snails are present, move bait station to another location within the rodent infested site, away from slugs/snails. Dispose of slugs/snails in a way non-target animals are not exposed. Dispose of dead rodents and uneaten bait in compliance with local, state or territory government regulations.</p> <p>DO NOT allow livestock or poultry to consume dead or moribund mice and rats. All dead or moribund animals and rodent faeces from baited rodents MUST be removed from areas accessible to livestock or poultry.</p> <p>The use of this product for the control of protected native rodents and rodent like animals requires permission from wildlife authorities.</p> <p>PROTECTION OF FISH, CRUSTACEANS AND ENVIRONMENT</p> <p>DO NOT contaminate wetlands or watercourses with this product or used containers. Place the bait stations in areas not liable to flooding. When placing bait stations close to water drainage systems, ensure that bait contact with water is avoided.</p>
Storage and Disposal:	<p>STORAGE AND DISPOSAL</p> <p>Store in original container, tightly closed, in a safe place. DO NOT store for prolonged periods in direct sunlight. Triple rinse containers before disposal. Break, crush or puncture and deliver empty packaging to an approved waste management facility. If an approved waste management facility is not available, dispose of empty packaging in compliance with relevant local, state or territory government regulations. Dispose of unused product in compliance with relevant local, state or territory government regulations. DO NOT burn empty containers or product.</p>
Safety Directions:	<p>SAFETY DIRECTIONS</p> <p>Repeated minor exposure may have a cumulative poisoning effect. DO NOT touch bait, use scoop or measure. When using the product wear disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water.</p>

	During cleanup and disposal operations of bait and bait stations, wear a single layer of clothing and disposable gloves. Wear disposable gloves when handling rodent carcasses. Wash clothes after performing re-handling activities.
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First Aid Instructions:	FIRST AID If poisoning occurs, contact a doctor or Poisons Information Centre. Phone Australia 13 11 26, New Zealand 0800 764 766. Vitamin K1 (Phytomenadione) is antidotal.
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First Aid Warnings:	
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DIRECTIONS FOR USE

PEST	SITUATION	RATE	CRITICAL COMMENTS
Mice	In domestic and industrial buildings.	30-60 g (1 to 2 blocks) per bait station	Place bait stations in infested area. DO NOT exceed 3 metres between baits for mice, or 9 metres for rats.
Rats	In and around (within 2 m) domestic and industrial buildings. External areas may include wharf areas and around farm buildings, dairies, meatworks (non-product areas).		Follow the Baiting Strategies for non-crop situations detailed below.
	Field crops as below:	60 g (2 blocks) per bait station	Follow the Baiting Strategies for in crop situations detailed below. Clear gullies, weeds and scrub. Keep headlands well slashed or bare to discourage rats and to expose them to predators.
	Sugar cane		Practice in-crop grass and weed control. Obtain rat population monitoring data from district organisations and bait according to local recommendations. Strategic baiting is best carried out in December and January.
	Macadamias		If not possible to clear orchard boundaries, rehabilitate to rain forest. Monitor rodent damage levels prior to baiting. Locate bait stations around crop perimeters or in the outer 3 rows for macadamia cropping (particularly between the crop and grassy or bush habitats), near obvious rat runs, and/or close to known rat hiding spots such as stumps, rocks, logs or burrows.
	Pineapples		Place bait stations at 9 metre intervals, 1 metre inside the block on all sides where rats are entering the block. Bait should be added to bait stations when fruit begins to form and bait replenished until after harvest.

Baiting Strategies

Eliminate, as far as practicable, all alternative food sources.

Non-crop situations:

Survey site prior to treatment, including assessment of the extent of infestation and identification of any indications of the presence of non-target animals.

Place baits so only accessible by rats and mice. Record the number and locations of bait stations for the purpose of inspection, replacement and later removal. Always use tamper-resistant bait stations that are secured in place in child accessible areas, outdoors and in animal or livestock housing. When used in food producing animal housing situations careful consideration is necessary regarding the placement of bait stations to ensure any rodenticide contamination of water, feed or livestock is prevented.

Inspect bait sites at least every few days and replace eaten baits. If baits are eaten quickly, increase the number of baits. Baiting for at least 2 weeks is necessary to reduce mouse or rat numbers but continue observation and bait replenishment until no more baits are taken.

DO NOT use the product beyond 35 days without an evaluation of the state of the infestation and of the efficacy of the treatment. Remove all uneaten bait at the end of treatment.

In-crop situations:

Baiting must be used as part of a comprehensive rodent control program. This includes encouragement of natural predators, annual field clean-up, weed control, clearance of adjacent scrubland and strategically timed baiting. Obtain and practice crop management and rodent control strategies recommended by the appropriate local advisory bodies.

Survey site prior to treatment, including assessment of the extent of infestation and identification of any indications of the presence of non-target animals.

Locate bait stations around crop perimeters (particularly between the crop and grassy or bush habitats), near obvious rat runs, and/or close to known rat hiding spots such as stumps, rocks, logs or burrows. Record the number and locations of bait stations for the purpose of inspection, replacement and later removal. Bait stations must be put down several days before the start of the control program to give rats time to become acquainted with the station. During the first week offer free feed to attract the rats.

Use in tamper-resistant and weather resistant bait stations only. Bait stations must be fixed to the ground or other structures to prevent movement. The bait material must be placed in bait station where it is not accessible to birds and other wildlife. Bait must not come into direct contact with the crops, food products or soil where crops are grown.

Bait sites should be inspected every 3 days and baits replenished until no more baits are taken. If baits are eaten quickly, increase the number of baits. Baiting for at least 2 weeks is necessary to reduce mouse or rat numbers but continue observation and bait replenishment until no more baits are taken.

DO NOT use the product beyond 35 days without an evaluation of the state of the infestation and of the efficacy of the treatment. Remove all uneaten bait at the end of treatment.

NOT TO BE USED FOR ANY PURPOSE, OR IN ANY MANNER, CONTRARY TO THIS LABEL UNLESS AUTHORISED UNDER APPROPRIATE LEGISLATION.

Commercial pest-control product: RB 0.4 g/kg or less in sachet or place pack

Template Label 17

Label Name:	[INSERT LABEL NAME]
Signal Headings	CAUTION KEEP OUT OF REACH OF CHILDREN READ SAFETY DIRECTIONS BEFORE OPENING OR USING
Constituent Statements:	ACTIVE CONSTITUENT: 0.37 g/kg COUMATETRALYL
Mode of Action:	
Statement of Claims:	For control of mice in industrial, commercial, agricultural, public services and domestic buildings and rats in and around industrial, commercial, agricultural, public services and domestic buildings.
Net Contents:	[INSERT NET CONTENTS]
Restraints:	<p>RESTRAINTS</p> <p>DO NOT use this product unless you have a current qualification in the nationally recognised training course for rodent pest management CPPUPM3006 - Manage pests by applying pesticides, or an equivalent unit of competency.</p> <p>DO NOT place baits in areas that are accessible to children. In child-accessible areas baits must be placed in tamper-resistant bait stations. If bait can be dislodged from bait station, bait station must be secured in place.</p> <p>DO NOT place bait outdoors unless it is in a tamper-resistant bait station which is secured in place.</p> <p>DO NOT place bait stations more than 2 meters from buildings.</p> <p>DO NOT place bait stations outdoors around buildings for control of mice.</p> <p>DO NOT bait in areas where wildlife may be collected for human consumption.</p> <p>DO NOT place in animal or livestock housing unless used in tamper-resistant and weather-resistant bait stations fixed to the ground or other structures.</p> <p>DO NOT place bait or bait stations above areas which would allow them to contaminate pig and poultry food or drinking water.</p> <p>DO NOT apply this product directly into burrows.</p> <p>DO NOT use product in pulse baiting treatments</p>
Directions for Use:	[This section contains an attachment below]
Other Limitations:	
Withholding Periods:	
Trade Advice:	

General Directions:	
Resistance Warning:	
Precautions:	<p>PRECAUTIONS</p> <p>Caution should be used when baiting near areas where hunting of wildlife may occur. Careful consideration of bait placement is necessary to avoid secondary exposure from contaminated wildlife that may be consumed.</p> <p>DO NOT place bait in areas where there is a possibility of contaminating food, livestock feed or surfaces that come in direct contact with food or livestock feed.</p>
Protection Statements:	<p>PROTECTION OF POULTRY, LIVESTOCK AND WILDLIFE</p> <p>Hazardous to livestock, poultry and wildlife. DO NOT place baits in locations that are accessible to domestic animals, livestock, non-target native animals or birds. Search for and dispose of dead rodents and slugs/snails in the infested area at each visit to prevent secondary poisoning. In case slugs/snails are present, move bait station to another location within the rodent infested site, away from slugs/snails. Dispose of slugs/snails in a way non-target animals are not exposed. Dispose of dead rodents and uneaten bait in compliance with local, state or territory government regulations.</p> <p>DO NOT allow livestock or poultry to consume dead or moribund mice and rats. All dead or moribund animals and rodent faeces from baited rodents MUST be removed from areas accessible to livestock or poultry.</p> <p>The use of this product for the control of protected native rodents requires permission from wildlife authorities.</p> <p>PROTECTION OF FISH, CRUSTACEANS AND ENVIRONMENT</p> <p>DO NOT contaminate wetlands or watercourses with this product or used containers. Place the bait stations in areas not liable to flooding. When placing bait stations close to water drainage systems, ensure that bait contact with water is avoided.</p>
Storage and Disposal:	<p>STORAGE AND DISPOSAL</p> <p>Store in the tightly closed, original container in a dry, well-ventilated area, as cool as possible out of direct sunlight. Triple rinse containers before disposal. Break, crush or puncture and deliver empty packaging to an approved waste management facility. If an approved waste management facility is not available, dispose of empty packaging in compliance with relevant local, state or territory government regulations. Dispose of unused product in compliance with relevant local, state or territory government regulations. DO NOT burn empty containers or product.</p>
Safety Directions:	<p>SAFETY DIRECTIONS</p> <p>Repeated minor exposure may have a cumulative poisoning effect. When using the product wear disposable gloves. During cleanup, disposal operations of bait and bait stations and when handling rodent carcasses wear single layer clothing and disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water. After each day's use wash contaminated clothing. Wash clothes after performing re-handling activities.</p>

First Aid Instructions:	FIRST AID If poisoning occurs, contact a doctor or Poisons Information Centre. Phone Australia 13 11 26, New Zealand 0800 764 766. Vitamin K1 (Phytomenadione) is antidotal.
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First Aid Warnings:	
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DIRECTIONS FOR USE

SITUATION	PEST	RATE	CRITICAL COMMENTS
In domestic industrial buildings, dairies, and meatworks (non-product areas)	Mice	<u>10 g sachets:</u> 3 – 6 sachets (30 – 60 g) per bait stations	Place bait stations in areas of known rodent activity. DO NOT exceed 3 metres between baits for mice, or 9 metres for rats.
In and around (within 2 meters) domestic, industrial buildings, wharf areas, dairies and meatworks (non-product areas)	Rats	<u>100 g sachets:</u> 1 sachet per bait station	Follow the Baiting Strategies for non-crop situations detailed below.

Baiting Strategies

Eliminate, as far as practicable, all alternative food sources.

Survey site prior to treatment, including assessment of the extent of infestation and identification of any indications of the presence of non-target animals.

Record the number and locations of bait stations for the purpose of inspection, replacement and later removal. Always use tamper-resistant bait stations that are secured in place in child accessible areas, outdoors and in animal or livestock housing. When used in food producing animal housing situations careful consideration is necessary regarding the placement of bait stations to ensure any rodenticide contamination of water, feed or livestock is prevented.

Inspect baits daily. If eaten quickly increase the number of bait sachets. Continue observation and replenishment until no more bait is taken. Baiting for at least 2 weeks is necessary to reduce mouse or rat numbers.

DO NOT use the product beyond 35 days without an evaluation of the state of the infestation and of the efficacy of the treatment. Remove all uneaten bait at the end of treatment.

NOT TO BE USED FOR ANY PURPOSE, OR IN ANY MANNER, CONTRARY TO THIS LABEL UNLESS AUTHORISED UNDER APPROPRIATE LEGISLATION.

Domestic pest-control product: RB 0.4 g/kg or less in sachet or place pack

Template Label 18

Label Name:	[INSERT LABEL NAME]
Signal Headings	CAUTION KEEP OUT OF REACH OF CHILDREN READ SAFETY DIRECTIONS
Constituent Statements:	ACTIVE CONSTITUENT: 0.37 g/kg COUMATETRALYL
Statement of Claims:	For control of mice in domestic buildings and rats in and around domestic buildings.
Net Contents:	[INSERT NET CONTENTS – MAXIMUM 150 g]
Restraints:	DO NOT place baits unless in tamper-resistant bait stations. DO NOT place bait stations outdoors around buildings for control of mice. DO NOT place bait stations more than 2 meters from buildings. DO NOT bait in areas where wildlife may be collected for human consumption. DO NOT place baits in and around animal, livestock and poultry houses, associated equipment, and food and feed processing areas. DO NOT apply this product directly into burrows. DO NOT use the product in pulsed baiting treatments.
How to Use	[This section contains an attachment below]
Withholding Periods:	
How to Prepare	
Resistance Warning:	
Precautions:	CAUTION Caution should be used when baiting near areas where hunting of wildlife may occur. Careful consideration of bait placement is necessary to avoid secondary exposure from contaminated wildlife that may be consumed. DO NOT place bait in areas where there is a possibility of contaminating food, livestock feed or surfaces that come in direct contact with food or livestock feed. PROTECTION OF LIVESTOCK AND WILDLIFE Hazardous to livestock, poultry and wildlife. DO NOT place baits in locations that are accessible to domestic animals, livestock, non-target native animals or birds. Search for and dispose of dead rodents and slugs/snails in the infested area at each visit to prevent secondary poisoning. In case slugs/snails are present, move bait station to another location within the rodent infested site, away from slugs/snails.

	<p>Dispose of slugs/snails, dead rodents and uneaten bait by wrapping in paper, placing in plastic bag and putting in garbage.</p> <p>DO NOT allow livestock or poultry to consume dead or moribund mice and rats. All dead or moribund animals and rodent faeces from baited rodents MUST be removed from areas accessible to livestock or poultry.</p> <p>DO NOT allow cats and dogs to eat poisoned rats or mice.</p> <p>The use of this product for the control of protected native rodents requires permission from wildlife authorities.</p> <p>PROTECTION OF FISH, CRUSTACEANS AND ENVIRONMENT</p> <p>DO NOT contaminate wetlands or watercourses with this product or used containers. Place the bait stations in areas not liable to flooding. When placing bait stations close to water drainage systems, ensure that bait contact with water is avoided</p>
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Protections:	
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Storage and Disposal:	<p>STORAGE AND DISPOSAL</p> <p>Store in the closed, original container in a cool, dry place out of the reach of children. DO NOT store in direct sunlight. Dispose of empty container and unused product by wrapping in paper, placing in plastic bag and putting in garbage.</p>
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Safety Directions:	<p>STORAGE AND DISPOSAL</p> <p>Repeated minor exposure may have a cumulative poisoning effect. When using the product wear disposable gloves. During cleanup, disposal operations of bait and bait stations and when handling rodent carcasses wear single layer clothing and disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water. After each day's use wash contaminated clothing. Wash clothes after performing re-handling activities.</p>
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First Aid Instructions:	<p>FIRST AID</p> <p>If poisoning occurs, contact a doctor or Poisons Information Centre. Phone Australia 13 11 26, New Zealand 0800 764 766. Vitamin K1 (Phytomenadione) is antidotal.</p>
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First Aid Warnings:	
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HOW TO USE

PEST	SITUATION	RATE	HOW TO APPLY
Mice	In domestic buildings	One bait sachet (10 g) per bait station	Place the bait stations in areas of known rodent activity and under cover (e.g. behind appliances and furniture, in ceiling voids etc.). Mice require several feeding locations. DO NOT exceed 3 metres between bait stations.
Rats	In and around (within 2 meters) domestic buildings	Minimum 3 bait sachets (30 g) per bait station.	Place the bait stations in areas of known rodent activity and under cover (e.g. behind appliances and furniture, in ceiling voids etc.). Rats require larger quantities of baits at fewer locations. DO NOT exceed 9 meters between bait stations.

BAITING STRATEGY

Eliminate, as far as practicable, all alternative rodent food sources.

DO NOT remove bait from the paper sachet. Use in tamper resistant bait stations only. If bait can be dislodged from bait station, fix tamper-resistant bait stations to the ground or other structures.

Inspect baits regularly (daily). If bait is eaten up quickly then increase the number of bait sachets at each location. Continue observation and replenishment until no more bait is taken.

Baiting for at least 2 weeks is necessary to reduce mouse or rat numbers.

DO NOT use the product beyond 35 days. If rodent activity is still observed after 35 days, seek advice from the product supplier or call a pest control service.

NOT TO BE USED FOR ANY PURPOSE, OR IN ANY MANNER, CONTRARY TO THIS LABEL UNLESS AUTHORISED.

Difenacoum

Commercial pest-control product: RB 0.05 g/kg or less in block formulation

Template Label 19a

Label Name:	[INSERT LABEL NAME]
Signal Headings	POISON KEEP OUT OF REACH OF CHILDREN READ SAFETY DIRECTIONS BEFORE OPENING OR USING
Constituent Statements:	ACTIVE CONSTITUENTS: 0.05 g/kg DIFENACOUM
Mode of Action:	
Statement of Claims:	For control of mice in industrial, commercial, agricultural, public services and domestic buildings and rats in and around industrial, commercial, agricultural, public services and domestic buildings.
Net Contents:	[INSERT NET CONTENTS]
Restraints:	<p>RESTRAINTS</p> <p>DO NOT use this product unless you have a current qualification in the nationally recognised training course for rodent pest management CPPUPM3006 - Manage pests by applying pesticides, or an equivalent unit of competency.</p> <p>DO NOT place baits in areas that are accessible to children. In child-accessible areas baits must be placed in tamper-resistant bait stations. If bait can be dislodged from bait station, bait station must be secured in place.</p> <p>DO NOT place bait outdoors unless it is in a tamper-resistant bait station which is secured in place.</p> <p>DO NOT place bait stations more than 2 meters from buildings.</p> <p>DO NOT place bait stations outdoors around buildings for control of mice.</p> <p>DO NOT bait in areas where wildlife may be collected for human consumption.</p> <p>DO NOT place in animal or livestock housing unless used in tamper-resistant and weather-resistant bait stations fixed to the ground or other structures.</p> <p>DO NOT place bait or bait stations above areas which would allow them to contaminate pig and poultry food or drinking water.</p> <p>DO NOT apply this product directly into burrows.</p>
Directions for Use:	[This section contains an attachment below]
Other Limitations:	
Withholding Periods:	
Trade Advice:	

General Directions:	<p>GENERAL INSTRUCTIONS</p> <p>This product especially suited for use outdoors and in damp situations. The central hole in the block allows for fixing in bait stations, and for nailing or wiring in place to help prevent block carriage by rodents.</p>
Resistance Warning:	
Precautions:	<p>PRECAUTIONS</p> <p>Caution should be used when baiting near areas where hunting of wildlife may occur. Careful consideration of bait placement is necessary to avoid secondary exposure from contaminated wildlife that may be consumed.</p> <p>DO NOT place bait in areas where there is a possibility of contaminating food, livestock feed or surfaces that come in direct contact with food or livestock feed.</p>
Protection Statements:	<p>PROTECTION OF LIVESTOCK AND WILDLIFE</p> <p>Hazardous to livestock, poultry and wildlife. DO NOT place baits in locations that are accessible to domestic animals, livestock, non-target native animals or birds. Search for and dispose of dead rodents and slugs/snails in the infested area at each visit to prevent secondary poisoning. In case slugs/snails are present, move bait station to another location within the rodent infested site, away from slugs/snails. Dispose of slugs/snails in a way non-target animals are not exposed. Dispose of dead rodents and uneaten bait in compliance with local, state or territory government regulations.</p> <p>DO NOT allow livestock or poultry to consume dead or moribund mice and rats. All dead or moribund animals and rodent faeces from baited rodents MUST be removed from areas accessible to livestock or poultry.</p> <p>DO NOT use this product to control native animals.</p> <p>PROTECTION OF FISH, CRUSTACEANS AND ENVIRONMENT</p> <p>Very toxic to aquatic life. DO NOT contaminate wetlands or watercourses with this product or used containers. Place the bait stations in areas not liable to flooding. When placing bait stations close to water drainage systems, ensure that bait contact with water is avoided.</p>
Storage and Disposal:	<p>STORAGE AND DISPOSAL</p> <p>Store in the closed, original container in a cool dry place out of reach of children. DO NOT store in direct sunlight. Triple rinse containers before disposal. Break, crush or puncture and deliver empty packaging to an approved waste management facility. If an approved waste management facility is not available, dispose of empty packaging in compliance with relevant local, state or territory government regulations. Dispose of unused product in compliance with relevant local, state or territory government regulations. DO NOT burn empty containers or product.</p>
Safety Directions:	<p>SAFETY DIRECTIONS</p> <p>Repeated minor exposure may have a cumulative poisoning effect. Will irritate the skin. May irritate eyes. Avoid contact with eyes and skin. Do not touch bait, use scoop or measure. When using the product wear disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water.</p>

	During cleanup and disposal operations of bait and bait stations, wear a single layer of clothing and disposable gloves. Wear disposable gloves when handling rodent carcasses. Wash clothes after performing re-handling activities.
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First Aid Instructions:	FIRST AID If poisoning occurs, contact a doctor or Poisons Information Centre. Phone Australia 13 11 26, New Zealand 0800 764 766. Vitamin K1 (Phytomenadione) is antidotal.
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First Aid Warnings:	
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DIRECTIONS FOR USE

PEST	SITUATION	RATE	CRITICAL COMMENTS
Mice	In industrial, commercial, public services, domestic and agricultural buildings (machinery sheds, etc.)	[As per current approved label]	Explore the site and locate runs, nests, droppings and signs of damage. Place bait stations in infested area. As mice are sporadic feeders use many bait points, not more than 3m apart.
Brown or Norway rat (<i>Rattus norvegicus</i>)	For use in and around (within 2 metres) industrial, commercial, public services, domestic and agricultural buildings (machinery sheds, etc.)	[As per current approved label]	Explore the site and locate runs, burrows, droppings and signs of damage. Place a number of bait points in dry locations throughout the infested area, not more than 9m apart.

Baiting strategy

Eliminate, as far as practicable, all other food sources.

Survey site prior to treatment, including assessment of the extent of infestation and identification of any indications of the presence of non-target animals. Record the number and locations of bait stations for the purpose of inspection, replacement and later removal.

Always use tamper-resistant bait stations that are secured in place in child accessible areas, outdoors and in animal or livestock housing. When used in food producing animal housing situations careful consideration is necessary regarding the placement of bait stations to ensure any rodenticide contamination of water, feed or livestock is prevented. When using outdoors, it is best practice to use weather-resistant bait stations. DO NOT touch bait.

Inspect baits frequently, particularly in the first ten days. Replace eaten bait. If bait is completely consumed, the quantity should be increased. Continue inspecting bait sites at intervals of no longer than 7 days, replenishing baits until they are left untouched. Baiting for at least two weeks will be necessary to reduce rat/mouse numbers. Most deaths occur 4 to 7 days after consumption of bait, but deaths may occur for up to 2 weeks.

DO NOT use the product beyond 35 days without an evaluation of the state of the infestation and of the efficacy of the treatment. Remove all uneaten bait at the end of treatment

NOT TO BE USED FOR ANY PURPOSE, OR IN ANY MANNER, CONTRARY TO THIS LABEL UNLESS AUTHORISED UNDER APPROPRIATE LEGISLATION.

Template Label 19b

Label Name:	[INSERT LABEL NAME]
Signal Headings	POISON KEEP OUT OF REACH OF CHILDREN READ SAFETY DIRECTIONS BEFORE OPENING OR USING
Constituent Statements:	ACTIVE CONSTITUENT: 0.025 g/kg DIFENACOU
Mode of Action:	
Statement of Claims:	For control of mice in commercial and domestic buildings and rats in and around commercial and domestic buildings.
Net Contents:	[INSERT NET CONTENTS]
Restraints:	<p>RESTRAINTS</p> <p>DO NOT use this product unless you have a current qualification in the nationally recognised training course for rodent pest management CPPUPM3006 - Manage pests by applying pesticides, or an equivalent unit of competency.</p> <p>DO NOT place baits in areas that are accessible to children. In child-accessible areas baits must be placed in tamper- resistant bait stations. If bait can be dislodged from bait station, bait station must be secured in place.</p> <p>DO NOT place bait outdoors unless it is in a tamper- resistant bait station which is secured in place.</p> <p>DO NOT place bait stations more than 2 meters from buildings.</p> <p>DO NOT place bait stations outdoors around buildings for control of mice.</p> <p>DO NOT bait in areas where wildlife may be collected for human consumption.</p> <p>DO NOT place in animal or livestock housing unless used in tamper-resistant and weather-resistant bait stations fixed to the ground or other structures.</p> <p>DO NOT place bait or bait stations above areas which would allow them to contaminate pig and poultry food or drinking water.</p> <p>DO NOT apply this product directly into burrows.</p>
Directions for Use:	[This section contains an attachment below]
Other Limitations:	
Withholding Periods:	
Trade Advice:	
General Directions:	
Resistance Warning:	

Precautions:	<p>PRECAUTIONS</p> <p>Caution should be used when baiting near areas where hunting of wildlife may occur. Careful consideration of bait placement is necessary to avoid secondary exposure from contaminated wildlife that may be consumed.</p> <p>DO NOT place bait in areas where there is a possibility of contaminating food, livestock feed or surfaces that come in direct contact with food or livestock feed.</p>
Protection Statements:	<p>PROTECTION OF LIVESTOCK AND WILDLIFE</p> <p>Hazardous to livestock, poultry and wildlife. DO NOT place baits in locations that are accessible to domestic animals, livestock, non-target native animals or birds. Search for and dispose of dead rodents and slugs/snails in the infested area at each visit to prevent secondary poisoning. In case slugs/snails are present, move bait station to another location within the rodent infested site, away from slugs/snails. Dispose of slugs/snails in a way non-target animals are not exposed. Dispose of dead rodents and uneaten bait in compliance with local, state or territory government regulations.</p> <p>DO NOT allow livestock or poultry to consume dead or moribund mice and rats. All dead or moribund animals and rodent faeces from baited rodents MUST be removed from areas accessible to livestock or poultry.</p> <p>DO NOT use this product to control native animals.</p> <p>PROTECTION OF FISH, CRUSTACEANS AND ENVIRONMENT</p> <p>Very toxic to aquatic life. DO NOT contaminate wetlands or watercourses with this product or used containers. Place the bait stations in areas not liable to flooding. When placing bait stations close to water drainage systems, ensure that bait contact with water is avoided.</p>
Storage and Disposal:	<p>STORAGE AND DISPOSAL</p> <p>Store in the closed, original container in a dry, cool, well-ventilated area out of direct sunlight. Triple rinse containers before disposal. Break, crush or puncture and deliver empty packaging to an approved waste management facility. If an approved waste management facility is not available, dispose of empty packaging in compliance with relevant local, state or territory government regulations. Dispose of unused product in compliance with relevant local, state or territory government regulations. DO NOT burn empty containers or product.</p>
Safety Directions:	<p>SAFETY DIRECTIONS</p> <p>Repeated minor exposure may have a cumulative poisoning effect. Will irritate the skin. May irritate eyes. Avoid contact with eyes and skin. Do not touch bait, use scoop or measure. When using the product wear disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water.</p> <p>During cleanup and disposal operations of bait and bait stations, wear a single layer of clothing and disposable gloves. Wear disposable gloves when handling rodent carcasses. Wash clothes after performing re-handling activities.</p>
First Aid Instructions:	<p>FIRST AID</p> <p>If poisoning occurs, contact a doctor or Poisons Information Centre. Phone Australia 13 11 26, New Zealand 0800 764 766. Vitamin K1 (Phytomenadione) is antidotal.</p>

First Aid Warnings:

DIRECTIONS FOR USE

PEST	SITUATION	RATE	CRITICAL COMMENTS
Mice	In commercial and domestic buildings and commercial premises	Use one 20 g block per bait station	Place bait stations in infested area, where droppings, damage or other signs of activity are seen. Use multiple bait stations, not more than 3m apart.
Brown or Norway rat (<i>Rattus norvegicus</i>)	For use in and around (within 2 metres) domestic buildings and commercial premises	Use five 20 g blocks per bait station	Place a number of bait stations in dry locations throughout the infested area, on runs, near burrows and where droppings are seen, not more than 9m apart.

Baiting strategy

Eliminate, as far as practicable, all other food sources.

Survey site prior to treatment, including assessment of the extent of infestation and identification of any indications of the presence of non-target animals. Record the number and locations of bait stations for the purpose of inspection, replacement and later removal.

Always use tamper-resistant bait stations that are secured in place in child accessible areas, outdoors and in animal or livestock housing. When used in food producing animal housing situations careful consideration is necessary regarding the placement of bait stations to ensure any rodenticide contamination of water, feed or livestock is prevented. When using outdoors, it is best practice to use weather-resistant bait stations. DO NOT touch bait.

Inspect baits frequently, particularly in the first ten days. Replace eaten bait. If bait is completely consumed, the quantity should be increased. Continue inspecting bait sites at intervals of no longer than 7 days, replenishing baits until they are left untouched. Baiting for at least two weeks will be necessary to reduce rat/mouse numbers. Most deaths occur 4 to 7 days after consumption of bait, but deaths may occur for up to 2 weeks.

DO NOT use the product beyond 35 days without an evaluation of the state of the infestation and of the efficacy of the treatment. Remove all uneaten bait at the end of treatment

NOT TO BE USED FOR ANY PURPOSE, OR IN ANY MANNER, CONTRARY TO THIS LABEL UNLESS AUTHORISED UNDER APPROPRIATE LEGISLATION.

Commercial pest-control product: RB 0.05 g/kg or less in pellet formulation

Template Label 20

Label Name:	[INSERT LABEL NAME]
Signal Headings	POISON KEEP OUT OF REACH OF CHILDREN READ SAFETY DIRECTIONS BEFORE OPENING OR USING
Constituent Statements:	ACTIVE CONSTITUENT: 0.05 g/kg DIFENACOU
Mode of Action:	
Statement of Claims:	For control of mice in industrial, commercial, agricultural, public services and domestic buildings and rats in and around industrial, commercial, agricultural, public services and domestic buildings.
Net Contents:	[INSERT NET CONTENTS]
Restraints:	<p>RESTRAINTS</p> <p>DO NOT use this product unless you have a current qualification in the nationally recognised training course for rodent pest management CPPUPM3006 - Manage pests by applying pesticides, or an equivalent unit of competency.</p> <p>DO NOT place baits in areas that are accessible to children. In child-accessible areas baits must be placed in tamper-resistant bait stations. If bait can be dislodged from bait station, bait station must be secured in place.</p> <p>DO NOT place bait outdoors unless it is in a tamper-resistant bait station which is secured in place.</p> <p>DO NOT place bait stations more than 2 meters from buildings.</p> <p>DO NOT place bait stations outdoors around buildings for control of mice.</p> <p>DO NOT bait in areas where wildlife may be collected for human consumption.</p> <p>DO NOT place baits in and around animal, livestock and poultry houses, associated equipment, and food and feed processing areas.</p> <p>DO NOT apply this product directly into burrows.</p>
Directions for Use:	[This section contains an attachment below]
Other Limitations:	
Withholding Periods:	
Trade Advice:	
General Directions:	
Resistance Warning:	

Precautions:	<p>PRECAUTIONS</p> <p>Caution should be used when baiting near areas where hunting of wildlife may occur. Careful consideration of bait placement is necessary to avoid secondary exposure from contaminated wildlife that may be consumed.</p> <p>DO NOT place bait in areas where there is a possibility of contaminating food, livestock feed or surfaces that come in direct contact with food or livestock feed.</p>
Protection Statements:	<p>PROTECTION OF LIVESTOCK AND WILDLIFE</p> <p>Hazardous to livestock, poultry and wildlife. DO NOT place baits in locations that are accessible to domestic animals, livestock, non-target native animals or birds. Search for and dispose of dead rodents and slugs/snails in the infested area at each visit to prevent secondary poisoning. In case slugs/snails are present, move bait station to another location within the rodent infested site, away from slugs/snails. Dispose of slugs/snails in a way non-target animals are not exposed. Dispose of dead rodents and uneaten bait in compliance with local, state or territory government regulations.</p> <p>DO NOT allow livestock or poultry to consume dead or moribund mice and rats. All dead or moribund animals and rodent faeces from baited rodents MUST be removed from areas accessible to livestock or poultry.</p> <p>DO NOT use this product to control native animals.</p> <p>PROTECTION OF FISH, CRUSTACEANS AND ENVIRONMENT</p> <p>Very toxic to aquatic life. DO NOT contaminate wetlands or watercourses with this product or used containers. Place the bait stations in areas not liable to flooding. When placing bait stations close to water drainage systems, ensure that bait contact with water is avoided.</p>
Storage and Disposal:	<p>STORAGE AND DISPOSAL</p> <p>Store in original container, tightly closed, in a safe place. Triple rinse containers before disposal. Break, crush or puncture and deliver empty packaging to an approved waste management facility. If an approved waste management facility is not available, dispose of empty packaging in compliance with relevant local, state or territory government regulations. Dispose of unused product in compliance with relevant local, state or territory government regulations. DO NOT burn empty containers or product.</p>
Safety Directions:	<p>SAFETY DIRECTIONS</p> <p>Repeated minor exposure may have a cumulative poisoning effect. May irritate the eyes. Avoid contact with eyes and skin. Do not inhale dust. Do not touch bait, use scoop or measure. When using the product wear disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water.</p> <p>During cleanup and disposal operations of bait and bait stations, wear a single layer of clothing and disposable gloves. Wear disposable gloves when handling rodent carcasses. Wash clothes after performing re-handling activities.</p>
First Aid Instructions:	<p>FIRST AID</p> <p>If poisoning occurs, contact a doctor or Poisons Information Centre. Phone Australia 13 11 26, New Zealand 0800 764 766. Vitamin K1 (Phytomenadione) is antidotal.</p>

First Aid Warnings:

DIRECTIONS FOR USE

PEST	SITUATION	RATE	CRITICAL COMMENTS
Mice	In industrial, commercial, public services, domestic and agricultural buildings (machinery sheds, etc.)	[As per current approved label]	Explore the site and locate runs, nests, droppings and signs of damage. Place bait stations in infested area. As mice are sporadic feeders use many bait points, not more than 3m apart.
Brown or Norway rat (<i>Rattus norvegicus</i>)	For use in and around (within 2 metres) industrial, commercial, public services, domestic and agricultural buildings (machinery sheds, etc.)	[As per current approved label]	Explore the site and locate runs, burrows, droppings and signs of damage. Place a number of bait points in dry locations throughout the infested area, not more than 9m apart.

Baiting strategy

Eliminate, as far as practicable, all other food sources.

Survey site prior to treatment, including assessment of the extent of infestation and identification of any indications of the presence of non-target animals. Record the number and locations of bait stations for the purpose of inspection, replacement and later removal.

Always use tamper-resistant bait stations that are secured in place in child accessible areas, outdoors and in animal or livestock housing. When using outdoors, it is best practice to use weather-resistant bait stations. DO NOT touch bait.

Inspect baits frequently, particularly in the first ten days. Replace eaten bait. If bait is completely consumed, the quantity should be increased. Continue inspecting bait sites at intervals of no longer than 7 days, replenishing baits until they are left untouched. Baiting for at least two weeks will be necessary to reduce rat/mouse numbers. Most deaths occur 4 to 7 days after consumption of bait, but deaths may occur for up to 2 weeks.

DO NOT use the product beyond 35 days without an evaluation of the state of the infestation and of the efficacy of the treatment. Remove all uneaten bait at the end of treatment

NOT TO BE USED FOR ANY PURPOSE, OR IN ANY MANNER, CONTRARY TO THIS LABEL UNLESS AUTHORISED UNDER APPROPRIATE LEGISLATION.

Commercial pest-control product: RB 0.05 g/kg or less in sachet or place pack

Template Label 21

Label Name:	[INSERT LABEL NAME]
Signal Headings	POISON KEEP OUT OF REACH OF CHILDREN READ SAFETY DIRECTIONS BEFORE OPENING OR USING
Constituent Statements:	ACTIVE CONSTITUENT: 0.05 g/kg DIFENACOU
Mode of Action:	
Statement of Claims:	For control of mice in industrial, commercial, agricultural, public services and domestic buildings and rats in and around industrial, commercial, agricultural, public services and domestic buildings.
Net Contents:	[INSERT NET CONTENTS]
Restraints:	<p>RESTRAINTS</p> <p>DO NOT use this product unless you have a current qualification in the nationally recognised training course for rodent pest management CPPUPM3006 - Manage pests by applying pesticides, or an equivalent unit of competency.</p> <p>DO NOT place baits in areas that are accessible to children. In child-accessible areas baits must be placed in tamper-resistant bait stations. If bait can be dislodged from bait station, bait station must be secured in place.</p> <p>DO NOT place bait outdoors unless it is in a tamper-resistant bait station which is secured in place.</p> <p>DO NOT place bait stations more than 2 meters from buildings.</p> <p>DO NOT place bait stations outdoors around buildings for control of mice.</p> <p>DO NOT bait in areas where wildlife may be collected for human consumption.</p> <p>DO NOT place in animal or livestock housing unless used in tamper-resistant and weather-resistant bait stations fixed to the ground or other structures.</p> <p>DO NOT place bait or bait stations above areas which would allow them to contaminate pig and poultry food or drinking water.</p> <p>DO NOT apply this product directly into burrows.</p>
Directions for Use:	[This section contains an attachment below]
Other Limitations:	
Withholding Periods:	
Trade Advice:	
General Directions:	GENERAL INSTRUCTIONS

	The baits are ready to use-do not unwrap individual baits. Rats and mice will chew through the wrapper.
Resistance Warning:	
Precautions:	<p>PRECAUTIONS</p> <p>Caution should be used when baiting near areas where hunting of wildlife may occur. Careful consideration of bait placement is necessary to avoid secondary exposure from contaminated wildlife that may be consumed.</p> <p>DO NOT place bait in areas where there is a possibility of contaminating food, livestock feed or surfaces that come in direct contact with food or livestock feed.</p>
Protection Statements:	<p>PROTECTION OF LIVESTOCK AND WILDLIFE</p> <p>Hazardous to livestock, poultry and wildlife. DO NOT place baits in locations that are accessible to domestic animals, livestock, non-target native animals or birds. Search for and dispose of dead rodents and slugs/snails in the infested area at each visit to prevent secondary poisoning. In case slugs/snails are present, move bait station to another location within the rodent infested site, away from slugs/snails. Dispose of slugs/snails in a way non-target animals are not exposed. Dispose of dead rodents and uneaten bait in compliance with local, state or territory government regulations.</p> <p>DO NOT allow livestock or poultry to consume dead or moribund mice and rats. All dead or moribund animals and rodent faeces from baited rodents MUST be removed from areas accessible to livestock or poultry.</p> <p>DO NOT use this product to control native animals.</p> <p>PROTECTION OF FISH, CRUSTACEANS AND ENVIRONMENT</p> <p>Very toxic to aquatic life. DO NOT contaminate wetlands or watercourses with this product or used containers. Place the bait stations in areas not liable to flooding. When placing bait stations close to water drainage systems, ensure that bait contact with water is avoided.</p>
Storage and Disposal:	<p>STORAGE AND DISPOSAL</p> <p>Store in the closed, original container in a dry, cool, well-ventilated area out of direct sunlight. Triple rinse containers before disposal. Break, crush or puncture and deliver empty packaging to an approved waste management facility. If an approved waste management facility is not available, dispose of empty packaging in compliance with relevant local, state or territory government regulations. Dispose of unused product in compliance with relevant local, state or territory government regulations. DO NOT burn empty containers or product.</p>
Safety Directions:	<p>SAFETY DIRECTIONS</p> <p>Repeated minor exposure may have a cumulative poisoning effect. Will irritate the skin. May irritate eyes. Avoid contact with eyes and skin. When using the product wear disposable gloves. During cleanup, disposal operations of bait and bait stations and when handling rodent carcasses wear single layer clothing and disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water. After</p>

	each day's use wash contaminated clothing. Wash clothes after performing re-handling activities.
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First Aid Instructions:	FIRST AID If poisoning occurs, contact a doctor or Poisons Information Centre. Phone Australia 13 11 26, New Zealand 0800 764 766. Vitamin K1 (Phytomenadione) is antidotal.
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First Aid Warnings:	
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DIRECTIONS FOR USE

SITUATION	PEST	RATE	CRITICAL COMMENTS
In industrial, commercial, public services domestic and agricultural buildings	Mice	[As per current approved label]	Explore the site and locate runs, nests, droppings and signs of damage. Place bait stations in infested area. Mice: use many bait points.
In and around (within 2 meters) industrial, commercial, public services domestic and agricultural buildings	[As per current approved label: Brown or Norway rat (<i>Rattus norvegicus</i>) OR Brown or Norway rat (<i>Rattus norvegicus</i>) Roof Rat (<i>Rattus rattus</i>)]	[As per current approved label]	Rats: place a number of bait points in dry locations throughout the infested area. DO NOT exceed 9 m between bait stations for rats and 3 m for mice. Follow the baiting strategies detailed below.

Baiting strategy

Eliminate, as far as practicable, all other food sources.

Survey site prior to treatment, including assessment of the extent of infestation and identification of any indications of the presence of non-target animals. Record the number and locations of bait stations for the purpose of inspection, replacement and later removal.

Always use tamper-resistant bait stations that are secured in place in child accessible areas, outdoors and in animal or livestock housing. When used in food producing animal housing situations careful consideration is necessary regarding the placement of bait stations to ensure any rodenticide contamination of water, feed or livestock is prevented. When using outdoors, it is best practice to use weather-resistant bait stations. DO NOT touch bait.

Inspect baits frequently, particularly in the first ten days. Replace eaten bait. If bait is completely consumed, the quantity should be increased. Continue inspecting bait sites at intervals of no longer than 7 days, replenishing baits until they are left untouched. Baiting for at least two weeks will be necessary to reduce rat/mouse numbers. Two or more feeds are required to produce a delayed mortality. Most deaths occur 4 to 10 days after consumption of bait, but deaths may occur for up to 2 weeks.

DO NOT use the product beyond 35 days without an evaluation of the state of the infestation and of the efficacy of the treatment. Remove all uneaten bait at the end of treatment

NOT TO BE USED FOR ANY PURPOSE, OR IN ANY MANNER, CONTRARY TO THIS LABEL UNLESS AUTHORISED UNDER APPROPRIATE LEGISLATION.

Domestic pest-control product: RB 0.05 g/kg or less in block formulation

Template Label 22a

Label Name:	[INSERT LABEL NAME]
Signal Headings	POISON KEEP OUT OF REACH OF CHILDREN READ SAFETY DIRECTIONS
Constituent Statements:	ACTIVE CONSTITUENT: 0.05 g/kg DIFENACOU
Statement of Claims:	For control of mice in domestic and commercial buildings and rats in and around domestic and commercial buildings.
Net Contents:	[INSERT NET CONTENTS – MAXIMUM 300 g]
Restraints:	DO NOT place baits unless in tamper-resistant bait stations. DO NOT place bait stations outdoors around buildings for control of mice. DO NOT place bait stations more than 2 meters from buildings. DO NOT bait in areas where wildlife may be collected for human consumption. DO NOT place baits in and around animal, livestock and poultry houses, associated equipment, and food and feed processing areas. DO NOT apply this product directly into burrows. DO NOT use the product in pulsed baiting treatments.
How to Use	[This section contains an attachment below]
Withholding Periods:	
How to Prepare	
Resistance Warning:	
Precautions:	CAUTION Caution should be used when baiting near areas where hunting of wildlife may occur. Careful consideration of bait placement is necessary to avoid secondary exposure from contaminated wildlife that may be consumed. DO NOT place bait in areas where there is a possibility of contaminating food, livestock feed or surfaces that come in direct contact with food or livestock feed. PROTECTION OF LIVESTOCK AND WILDLIFE Hazardous to livestock, poultry and wildlife. DO NOT place baits in locations that are accessible to domestic animals, livestock, non-target native animals or birds. Search for and dispose of dead rodents and slugs/snails in the infested area at each visit to prevent secondary poisoning. In case slugs/snails are present, move bait station to another location within the rodent infested site, away from slugs/snails.

	<p>Dispose of slugs/snails, dead rodents and uneaten bait by wrapping in paper, placing in plastic bag and putting in garbage.</p> <p>DO NOT allow livestock or poultry to consume dead or moribund mice and rats. All dead or moribund animals and rodent faeces from baited rodents MUST be removed from areas accessible to livestock or poultry.</p> <p>DO NOT let cats, dogs or non-target animals eat poisoned mice and rats.</p> <p>DO NOT use this product to control native animals.</p> <p>PROTECTION OF FISH, CRUSTACEANS AND ENVIRONMENT</p> <p>Very toxic to aquatic life. DO NOT contaminate wetlands or watercourses with this product or used containers. Place the bait stations in areas not liable to flooding.</p> <p>When placing bait stations close to water drainage systems, ensure that bait contact with water is avoided.</p>
Protections:	
Storage and Disposal:	<p>STORAGE AND DISPOSAL</p> <p>Store in the closed, original container in a cool, dry, place out of reach of children. DO NOT store in direct sunlight. Dispose of empty containers and unused product by wrapping in paper placing in plastic bag and putting in garbage.</p>
Safety Directions:	<p>SAFETY DIRECTIONS</p> <p>Repeated minor exposure may have a cumulative poisoning effect. Will irritate the skin. May irritate eyes. Avoid contact with eyes and skin. Do not touch bait, use scoop or measure. When using the product wear disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water.</p> <p>During cleanup and disposal operations of bait and bait stations, wear a single layer of clothing and disposable gloves. Wear disposable gloves when handling rodent carcasses. Wash clothes after performing re-handling activities.</p>
First Aid Instructions:	<p>FIRST AID</p> <p>If poisoning occurs, contact a doctor or Poisons Information Centre. Phone Australia 13 11 26, New Zealand 0800 764 766. Vitamin K1 (Phytomenadione) is antidotal.</p>
First Aid Warnings:	

HOW TO USE

PEST	SITUATION	RATE	HOW TO APPLY
Mice	In domestic buildings and commercial premises	[as per current approved label]	Place bait stations in the infested area, wherever droppings, damage or other signs of activity are seen, not more than 3 m apart.
Rats	In and around (within 2 meters) domestic buildings and commercial premises	[as per current approved label]	Place a number of bait stations in dry locations throughout the infested area, on runs, near burrows and where droppings are seen, not more than 9 m apart.

General Information and baiting strategy for and mice:

Eliminate as far as practicable, all other food sources.

Always place bait where it is inaccessible to children, animals and birds. Use in tamper resistant bait stations only. If bait can be dislodged from bait station, fix tamper-resistant bait stations to the ground or other structures.

Inspect baits frequently, particularly in the first ten days. Replace eaten bait. If bait is completely consumed, the number of bait stations should be increased. Continue replenishing bait until left untouched. Baiting for at least 2 weeks will be necessary to reduce mouse numbers. Most deaths occur 4 to 7 days after consumption of bait, but deaths may occur for up to 2 weeks.

Following treatment remove all remains of bait and bait stations. DO NOT use the product for longer than 35 days. If rodent activity is still observed after 35 days, seek advice from the product supplier or call a pest control service.

NOT TO BE USED FOR ANY PURPOSE, OR IN ANY MANNER, CONTRARY TO THIS LABEL UNLESS AUTHORISED.

Template Label 22b

Label Name:	[INSERT LABEL NAME]
Signal Headings	POISON KEEP OUT OF REACH OF CHILDREN READ SAFETY DIRECTIONS
Constituent Statements:	ACTIVE CONSTITUENT: 0.05 g/kg DIFENACOU
Statement of Claims:	For control of mice in domestic and commercial buildings.
Net Contents:	[INSERT NET CONTENTS – MAXIMUM 300 g]
Restraints:	DO NOT place baits unless in tamper-resistant bait stations. DO NOT place bait stations outdoors around buildings for control of mice. DO NOT bait in areas where wildlife may be collected for human consumption. DO NOT place baits in animal, livestock and poultry houses, associated equipment, and food and feed processing areas. DO NOT use the product in pulsed baiting treatments.
How to Use	[This section contains an attachment below]
Withholding Periods:	
How to Prepare	
Resistance Warning:	
Precautions:	<p>CAUTION Caution should be used when baiting near areas where hunting of wildlife may occur. Careful consideration of bait placement is necessary to avoid secondary exposure from contaminated wildlife that may be consumed. DO NOT place bait in areas where there is a possibility of contaminating food, livestock feed or surfaces that come in direct contact with food or livestock feed.</p> <p>PROTECTION OF LIVESTOCK AND WILDLIFE Hazardous to livestock, poultry and wildlife. DO NOT place baits in locations that are accessible to domestic animals, livestock, non-target native animals or birds. Search for and dispose of dead rodents and slugs/snails in the infested area at each visit to prevent secondary poisoning. In case slugs/snails are present, move bait station to another location within the rodent infested site, away from slugs/snails. Dispose of slugs/snails, dead rodents and uneaten bait by wrapping in paper, placing in plastic bag and putting in garbage. DO NOT allow livestock or poultry to consume dead or moribund mice and rats. All dead or moribund animals and rodent faeces from baited rodents MUST be removed from areas accessible to livestock or poultry.</p>

	<p>DO NOT let cats, dogs or non-target animals eat poisoned mice. DO NOT use this product to control native animals.</p> <p>PROTECTION OF FISH, CRUSTACEANS AND ENVIRONMENT Very toxic to aquatic life. DO NOT contaminate wetlands or watercourses with this product or used containers. Place the bait stations in areas not liable to flooding. When placing bait stations close to water drainage systems, ensure that bait contact with water is avoided.</p>
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Protections:	
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Storage and Disposal:	<p>STORAGE AND DISPOSAL Store in the closed, original container in a cool, dry, place out of reach of children. DO NOT store in direct sunlight. Dispose of empty containers and unused product by wrapping in paper placing in plastic bag and putting in garbage.</p>
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Safety Directions:	<p>SAFETY DIRECTIONS Repeated minor exposure may have a cumulative poisoning effect. Will irritate the skin. May irritate eyes. Avoid contact with eyes and skin. DO NOT touch bait, use scoop or measure. When using the product wear disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water. During cleanup and disposal operations of bait and bait stations, wear a single layer of clothing and disposable gloves. Wear disposable gloves when handling rodent carcasses. Wash clothes after performing re-handling activities.</p>
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First Aid Instructions:	<p>FIRST AID INSTRUCTIONS If poisoning occurs, contact a doctor or Poisons Information Centre. Phone Australia 13 11 26, New Zealand 0800 764 766. Vitamin K1 (Phytomenadione) is antidotal.</p>
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First Aid Warnings:	
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HOW TO USE

PEST	SITUATION	RATE	HOW TO APPLY
Mice	In domestic buildings and commercial premises	Use one bait per bait station	Place bait stations in dry locations throughout the infested area, on runs, near burrows and where droppings are seen, not more than 3 m apart.

General Information and baiting strategy for and mice:

Eliminate as far as practicable, all other food sources.

Always place bait where it is inaccessible to children, animals and birds. Use in tamper resistant bait stations only. If bait can be dislodged from bait station, fix tamper-resistant bait stations to the ground or other structures. DO NOT touch bait.

Inspect baits frequently, particularly in the first ten days. Replace eaten bait. If bait is completely consumed, the number of bait stations should be increased. Continue replenishing bait until left untouched. Baiting for at least 2 weeks will be necessary to reduce mouse numbers. Most deaths occur 4 to 7 days after consumption of bait, but deaths may occur for up to 2 weeks.

Following treatment remove all remains of bait and bait stations. DO NOT use the product for longer than 35 days. If rodent activity is still observed after 35 days, seek advice from the product supplier or call a pest control service.

NOT TO BE USED FOR ANY PURPOSE, OR IN ANY MANNER, CONTRARY TO THIS LABEL UNLESS AUTHORISED.

Template Label 22c

Label Name:	[INSERT LABEL NAME]
Signal Headings	POISON KEEP OUT OF REACH OF CHILDREN READ SAFETY DIRECTIONS
Constituent Statements:	ACTIVE CONSTITUENT: 0.025 g/kg DIFENACOU
Statement of Claims:	For control of rats in and around domestic and commercial buildings.
Net Contents:	[INSERT NET CONTENTS – MAXIMUM 300 g]
Restraints:	DO NOT place baits unless in tamper-resistant bait stations. DO NOT place bait stations more than 2 meters from buildings. DO NOT bait in areas where wildlife may be collected for human consumption. DO NOT place baits in and around animal, livestock and poultry houses, associated equipment, and food and feed processing areas. DO NOT apply this product directly into burrows. DO NOT use the product in pulsed baiting treatments.
How to Use	[This section contains an attachment below]
Withholding Periods:	
How to Prepare	
Resistance Warning:	
Precautions:	<p>CAUTION</p> <p>Caution should be used when baiting near areas where hunting of wildlife may occur. Careful consideration of bait placement is necessary to avoid secondary exposure from contaminated wildlife that may be consumed.</p> <p>DO NOT place bait in areas where there is a possibility of contaminating food, livestock feed or surfaces that come in direct contact with food or livestock feed.</p> <p>PROTECTION OF LIVESTOCK AND WILDLIFE</p> <p>Hazardous to livestock, poultry and wildlife. DO NOT place baits in locations that are accessible to domestic animals, livestock, non-target native animals or birds.</p> <p>Search for and dispose of dead rodents and slugs/snails in the infested area at each visit to prevent secondary poisoning. In case slugs/snails are present, move bait station to another location within the rodent infested site, away from slugs/snails.</p> <p>Dispose of slugs/snails, dead rodents and uneaten bait by wrapping in paper, placing in plastic bag and putting in garbage.</p>

	<p>DO NOT allow livestock or poultry to consume dead or moribund mice and rats. All dead or moribund animals and rodent faeces from baited rodents MUST be removed from areas accessible to livestock or poultry.</p> <p>DO NOT let cats, dogs or non-target animals eat poisoned rats.</p> <p>DO NOT use this product to control native animals.</p> <p>PROTECTION OF FISH, CRUSTACEANS AND ENVIRONMENT</p> <p>Very toxic to aquatic life. DO NOT contaminate wetlands or watercourses with this product or used containers. Place the bait stations in areas not liable to flooding.</p> <p>When placing bait stations close to water drainage systems, ensure that bait contact with water is avoided.</p>
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Protections:	
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Storage and Disposal:	<p>STORAGE AND DISPOSAL</p> <p>Store in the closed, original container in a cool, dry, place out of reach of children. DO NOT store in direct sunlight. Dispose of empty containers and unused product by wrapping in paper placing in plastic bag and putting in garbage.</p>
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Safety Directions:	<p>SAFETY DIRECTIONS</p> <p>Repeated minor exposure may have a cumulative poisoning effect. Will irritate the skin. May irritate eyes. Avoid contact with eyes and skin. Do not touch bait, use scoop or measure. When using the product wear disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water.</p> <p>During cleanup and disposal operations of bait and bait stations, wear a single layer of clothing and disposable gloves. Wear disposable gloves when handling rodent carcasses. Wash clothes after performing re-handling activities.</p>
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First Aid Instructions:	<p>FIRST AID</p> <p>If poisoning occurs, contact a doctor or Poisons Information Centre. Phone Australia 13 11 26, New Zealand 0800 764 766. Vitamin K1 (Phytomenadione) is antidotal.</p>
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First Aid Warnings:	
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HOW TO USE

PEST	SITUATION	RATE	HOW TO APPLY
Rats	In and around (within 2 meters) domestic buildings and commercial premises	Five 20 g blocks per bait station	Place bait stations in dry locations throughout the infested area, on runs, near burrows and where droppings are seen, not more than 9 m apart.

General Information and baiting strategy for rats:

Eliminate as far as practicable, all other food sources.

Always place bait where it is inaccessible to children, animals and birds. Use in tamper resistant bait stations only. If bait can be dislodged from bait station, fix tamper-resistant bait stations to the ground or other structures.

Inspect baits frequently, particularly in the first ten days. Replace eaten bait. If bait is completely consumed, the number of bait stations should be increased. Continue replenishing bait until left untouched. Baiting for at least 2 weeks will be necessary to reduce mouse numbers. Most deaths occur 4 to 7 days after consumption of bait, but deaths may occur for up to 2 weeks.

Following treatment remove all remains of bait and bait stations. DO NOT use the product for longer than 35 days. If rodent activity is still observed after 35 days, seek advice from the product supplier or call a pest control service.

NOT TO BE USED FOR ANY PURPOSE, OR IN ANY MANNER, CONTRARY TO THIS LABEL UNLESS AUTHORISED.

Template Label 22d

Label Name:	[INSERT LABEL NAME]
Signal Headings	POISON KEEP OUT OF REACH OF CHILDREN READ SAFETY DIRECTIONS
Constituent Statements:	ACTIVE CONSTITUENT: 0.025 g/kg DIFENACOU
Statement of Claims:	For control of mice in domestic and commercial buildings and rats in and around domestic and commercial buildings.
Net Contents:	[INSERT NET CONTENTS – MAXIMUM 300 g]
Restraints:	DO NOT place baits unless in tamper-resistant bait stations. DO NOT place bait stations outdoors around buildings for control of mice. DO NOT place bait stations more than 2 meters from buildings. DO NOT bait in areas where wildlife may be collected for human consumption. DO NOT place baits in and around animal, livestock and poultry houses, associated equipment, and food and feed processing areas. DO NOT apply this product directly into burrows. DO NOT use the product in pulsed baiting treatments.
How to Use	[This section contains an attachment below]
Withholding Periods:	
How to Prepare	
Resistance Warning:	
Precautions:	CAUTION Caution should be used when baiting near areas where hunting of wildlife may occur. Careful consideration of bait placement is necessary to avoid secondary exposure from contaminated wildlife that may be consumed. DO NOT place bait in areas where there is a possibility of contaminating food, livestock feed or surfaces that come in direct contact with food or livestock feed. PROTECTION OF LIVESTOCK AND WILDLIFE Hazardous to livestock, poultry and wildlife. DO NOT place baits in locations that are accessible to domestic animals, livestock, non-target native animals or birds. Search for and dispose of dead rodents and slugs/snails in the infested area at each visit to prevent secondary poisoning. In case slugs/snails are present, move bait station to another location within the rodent infested site, away from slugs/snails. Dispose of slugs/snails, dead rodents and uneaten bait by wrapping in paper, placing in plastic bag and putting in garbage.

	<p>DO NOT allow livestock or poultry to consume dead or moribund mice and rats. All dead or moribund animals and rodent faeces from baited rodents MUST be removed from areas accessible to livestock or poultry.</p> <p>DO NOT let cats, dogs or non-target animals eat poisoned mice and rats.</p> <p>DO NOT use this product to control native animals.</p> <p>PROTECTION OF FISH, CRUSTACEANS AND ENVIRONMENT</p> <p>Very toxic to aquatic life. DO NOT contaminate wetlands or watercourses with this product or used containers. Place the bait stations in areas not liable to flooding.</p> <p>When placing bait stations close to water drainage systems, ensure that bait contact with water is avoided.</p>
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Protections:	
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Storage and Disposal:	<p>STORAGE AND DISPOSAL</p> <p>Store in the closed, original container in a cool, dry, place out of reach of children. Do not store in direct sunlight. Dispose of empty containers and unused product by wrapping in paper placing in plastic bag and putting in garbage.</p>
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Safety Directions:	<p>SAFETY DIRECTIONS</p> <p>Repeated minor exposure may have a cumulative poisoning effect. Will irritate the skin. May irritate eyes. Avoid contact with eyes and skin. Do not touch bait, use scoop or measure. When using the product wear disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water. During cleanup and disposal operations of bait and bait stations, wear a single layer of clothing and disposable gloves. Wear disposable gloves when handling rodent carcasses. Wash clothes after performing re-handling activities.</p>
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First Aid Instructions:	<p>FIRST AID</p> <p>If poisoning occurs, contact a doctor or Poisons Information Centre. Phone Australia 13 11 26, New Zealand 0800 764 766. Vitamin K1 (Phytomenadione) is antidotal.</p>
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First Aid Warnings:	
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HOW TO USE

PEST	SITUATION	RATE	HOW TO APPLY
Mice	In domestic buildings and commercial premises	Use one 20 g block per bait station	Place bait stations wherever droppings, damage or other signs of activity are seen. Use multiple bait stations, not more than 3 m apart.
Rats	In and around (within 2 meters) domestic buildings and commercial premises	Use five 20 g blocks per bait station	Place a number of bait stations in dry locations throughout the infested area, on runs, near burrows and where droppings are seen, not more than 9 m apart.

General Information and baiting strategy for rats and mice:

Eliminate as far as practicable, all other food sources.

Always place bait where it is inaccessible to children, animals and birds. Use in tamper resistant bait stations only. If bait can be dislodged from bait station, fix tamper-resistant bait stations to the ground or other structures. When using outdoors, it is best practice to use weather resistant bait stations. DO NOT touch bait.

Inspect baits frequently, particularly in the first ten days. Replace eaten bait. If bait is completely consumed, the number of bait stations should be increased. Continue replenishing bait until left untouched. Baiting for at least 2 weeks will be necessary to reduce mouse numbers. Most deaths occur 4 to 7 days after consumption of bait, but deaths may occur for up to 2 weeks.

Following treatment remove all remains of bait and bait stations. DO NOT use the product for longer than 35 days. If rodent activity is still observed after 35 days, seek advice from the product supplier or call a pest control service.

NOT TO BE USED FOR ANY PURPOSE, OR IN ANY MANNER, CONTRARY TO THIS LABEL UNLESS AUTHORISED.

Template Label 22e

Label Name:	[INSERT LABEL NAME]
Signal Headings	POISON KEEP OUT OF REACH OF CHILDREN READ SAFETY DIRECTIONS
Constituent Statements:	ACTIVE CONSTITUENT: 0.025 g/kg DIFENACOU
Statement of Claims:	For control of mice in domestic buildings.
Net Contents:	[INSERT NET CONTENTS – MAXIMUM 300 g]
Restraints:	DO NOT place baits unless in tamper-resistant bait stations. DO NOT place bait stations outdoors around buildings for control of mice. DO NOT bait in areas where wildlife may be collected for human consumption. DO NOT place baits in animal, livestock and poultry houses, associated equipment, and food and feed processing areas. DO NOT use the product in pulsed baiting treatments.
How to Use	[This section contains an attachment below]
Withholding Periods:	
How to Prepare	
Resistance Warning:	
Precautions:	<p>CAUTION</p> <p>Caution should be used when baiting near areas where hunting of wildlife may occur. Careful consideration of bait placement is necessary to avoid secondary exposure from contaminated wildlife that may be consumed.</p> <p>DO NOT place bait in areas where there is a possibility of contaminating food, livestock feed or surfaces that come in direct contact with food or livestock feed.</p> <p>PROTECTION OF LIVESTOCK AND WILDLIFE</p> <p>Hazardous to livestock, poultry and wildlife. DO NOT place baits in locations that are accessible to domestic animals, livestock, non-target native animals or birds.</p> <p>Search for and dispose of dead rodents and slugs/snails in the infested area at each visit to prevent secondary poisoning. In case slugs/snails are present, move bait station to another location within the rodent infested site, away from slugs/snails.</p> <p>Dispose of slugs/snails, dead rodents and uneaten bait by wrapping in paper, placing in plastic bag and putting in garbage.</p> <p>DO NOT allow livestock or poultry to consume dead or moribund mice and rats. All dead or moribund animals and rodent faeces from baited rodents MUST be removed from areas accessible to livestock or poultry.</p>

	<p>DO NOT let cats, dogs or non-target animals eat poisoned mice. DO NOT use this product to control native animals.</p> <p>PROTECTION OF FISH, CRUSTACEANS AND ENVIRONMENT Very toxic to aquatic life. DO NOT contaminate wetlands or watercourses with this product or used containers. Place the bait stations in areas not liable to flooding. When placing bait stations close to water drainage systems, ensure that bait contact with water is avoided.</p>
Protections:	
Storage and Disposal:	<p>STORAGE AND DISPOSAL Store in the closed, original container in a cool, dry, place out of reach of children. Do not store in direct sunlight. Dispose of empty containers and unused product by wrapping in paper placing in plastic bag and putting in garbage.</p>
Safety Directions:	<p>SAFETY DIRECTIONS Repeated minor exposure may have a cumulative poisoning effect. Will irritate the skin. May irritate eyes. Avoid contact with eyes and skin. Do not touch bait, use scoop or measure. When using the product wear disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water. During cleanup and disposal operations of bait and bait stations, wear a single layer of clothing and disposable gloves. Wear disposable gloves when handling rodent carcasses. Wash clothes after performing re-handling activities.</p>
First Aid Instructions:	<p>FIRST AID If poisoning occurs, contact a doctor or Poisons Information Centre. Phone Australia 13 11 26, New Zealand 0800 764 766. Vitamin K1 (Phytomenadione) is antidotal.</p>
First Aid Warnings:	

HOW TO USE

PEST	SITUATION	RATE	HOW TO APPLY
Mice	In domestic buildings and commercial premises	Use one bait per bait station	Place bait stations in dry locations throughout the infested area, on runs, near burrows and where droppings are seen, not more than 3 m apart.

General Information and baiting strategy for mice:

Eliminate as far as practicable, all other food sources.

Always place bait where it is inaccessible to children, animals and birds. Use in tamper resistant bait stations only. If bait can be dislodged from bait station, fix tamper-resistant bait stations to the ground or other structures. DO NOT touch bait.

Inspect baits frequently, particularly in the first ten days. Replace eaten bait. If bait is completely consumed, the number of bait stations should be increased. Continue replenishing bait until left untouched. Baiting for at least 2 weeks will be necessary to reduce mouse numbers. Most deaths occur 4 to 7 days after consumption of bait, but deaths may occur for up to 2 weeks.

Following treatment remove all remains of bait and bait stations. DO NOT use the product for longer than 35 days. If rodent activity is still observed after 35 days, seek advice from the product supplier or call a pest control service.

NOT TO BE USED FOR ANY PURPOSE, OR IN ANY MANNER, CONTRARY TO THIS LABEL UNLESS AUTHORISED.

Domestic pest-control product: RB 0.05 g/kg or less in sachet or place pack

Template Label 23a

Label Name:	[INSERT LABEL NAME]
Signal Headings	POISON KEEP OUT OF REACH OF CHILDREN READ SAFETY DIRECTIONS
Constituent Statements:	ACTIVE CONSTITUENT: 0.05 g/kg DIFENACOU
Statement of Claims:	For control of mice in domestic and commercial buildings and rats in and around domestic and commercial buildings.
Net Contents:	[INSERT NET CONTENTS – MAXIMUM 150 g]
Restrains:	DO NOT place baits unless in tamper-resistant bait stations. DO NOT place bait stations outdoors around buildings for control of mice. DO NOT place bait stations more than 2 meters from buildings. DO NOT bait in areas where wildlife may be collected for human consumption. DO NOT place baits in and around animal, livestock and poultry houses, associated equipment, and food and feed processing areas. DO NOT apply this product directly into burrows. DO NOT use the product in pulsed baiting treatments.
How to Use	[This section contains an attachment below]
Withholding Periods:	
How to Prepare	GENERAL INSTRUCTIONS These baits are ready to use – do not open individual baits. Rats and mice will chew through the wrapper.
Resistance Warning:	
Precautions:	CAUTION Caution should be used when baiting near areas where hunting of wildlife may occur. Careful consideration of bait placement is necessary to avoid secondary exposure from contaminated wildlife that may be consumed. DO NOT place bait in areas where there is a possibility of contaminating food, livestock feed or surfaces that come in direct contact with food or livestock feed. PROTECTION OF LIVESTOCK AND WILDLIFE Hazardous to livestock, poultry and wildlife. DO NOT place baits in locations that are accessible to domestic animals, livestock, non-target native animals or birds. Search for and dispose of dead rodents and slugs/snails in the infested area at each visit to prevent secondary poisoning. In case slugs/snails are present, move bait

	<p>station to another location within the rodent infested site, away from slugs/snails. Dispose of slugs/snails, dead rodents and uneaten bait by wrapping in paper, placing in plastic bag and putting in garbage.</p> <p>DO NOT allow livestock or poultry to consume dead or moribund mice and rats. All dead or moribund animals and rodent faeces from baited rodents MUST be removed from areas accessible to livestock or poultry.</p> <p>DO NOT let cats, dogs or non-target animals eat poisoned mice and rats.</p> <p>DO NOT use this product to control native animals.</p> <p>PROTECTION OF FISH, CRUSTACEANS AND ENVIRONMENT</p> <p>Very toxic to aquatic life. DO NOT contaminate wetlands or watercourses with this product or used containers. Place the bait stations in areas not liable to flooding. When placing bait stations close to water drainage systems, ensure that bait contact with water is avoided.</p>
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Protections:	
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Storage and Disposal:	<p>STORAGE AND DISPOSAL</p> <p>Store in the closed, original container in a cool, dry, place out of reach of children. Do not store in direct sunlight. Dispose of empty containers and unused product by wrapping in paper placing in plastic bag and putting in garbage.</p>
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Safety Directions:	<p>SAFETY DIRECTIONS</p> <p>Repeated minor exposure may have a cumulative poisoning effect. Will irritate the skin. May irritate eyes. Avoid contact with eyes and skin. When using the product wear disposable gloves. During cleanup, disposal operations of bait and bait stations and when handling rodent carcasses wear single layer clothing and disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water. After each day's use wash contaminated clothing. Wash clothes after performing re-handling activities.</p>
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First Aid Instructions:	<p>FIRST AID</p> <p>If poisoning occurs, contact a doctor or Poisons Information Centre. Phone Australia 13 11 26, New Zealand 0800 764 766. Vitamin K1 (Phytomenadione) is antidotal.</p>
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First Aid Warnings:	
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HOW TO USE

PEST	SITUATION	RATE	HOW TO APPLY
Mice	In domestic buildings and commercial premises	[as per current approved label]	Place bait stations wherever droppings, damage or other signs of activity are seen. Use multiple bait stations, not more than 3 m apart.
Rats	In and around (within 2 meters) domestic buildings and commercial premises	[as per current approved label]	Place a number of bait stations in dry locations throughout the infested area, on runs, near burrows and where droppings are seen, not more than 9 m apart.

General Information and baiting strategy for and mice:

Eliminate as far as practicable, all other food sources.

Always place bait where it is inaccessible to children, animals and birds. Use in tamper resistant bait stations only. If bait can be dislodged from bait station, fix tamper-resistant bait stations to the ground or other structures. When using outdoors, use weather resistant bait stations. DO NOT touch bait.

Inspect baits frequently, particularly in the first ten days. Replace eaten bait. If bait is completely consumed, the number of bait stations should be increased. Continue replenishing bait until left untouched. Baiting for at least 2 weeks will be necessary to reduce mouse numbers. Most deaths occur 4 to 7 days after consumption of bait, but deaths may occur for up to 2 weeks.

Following treatment remove all remains of bait and bait stations. DO NOT use the product for longer than 35 days. If rodent activity is still observed after 35 days, seek advice from the product supplier or call a pest control service.

NOT TO BE USED FOR ANY PURPOSE, OR IN ANY MANNER, CONTRARY TO THIS LABEL UNLESS AUTHORISED.

Template Label 23b

Label Name:	[INSERT LABEL NAME]
Signal Headings	POISON KEEP OUT OF REACH OF CHILDREN READ SAFETY DIRECTIONS
Constituent Statements:	ACTIVE CONSTITUENT: 0.025 g/kg DIFENACOU
Statement of Claims:	For control of mice in domestic and commercial buildings and rats in and around domestic and commercial buildings.
Net Contents:	[INSERT NET CONTENTS – MAXIMUM 150 g]
Restraints:	DO NOT place baits unless in tamper-resistant bait stations. DO NOT place bait stations outdoors around buildings for control of mice. DO NOT place bait stations more than 2 meters from buildings. DO NOT bait in areas where wildlife may be collected for human consumption. DO NOT place baits in and around animal, livestock and poultry houses, associated equipment, and food and feed processing areas. DO NOT apply this product directly into burrows. DO NOT use the product in pulsed baiting treatments.
How to Use	[This section contains an attachment below]
Withholding Periods:	
How to Prepare	GENERAL INSTRUCTIONS Do not open sachets. Rats and mice will chew through the wrapper.
Resistance Warning:	
Precautions:	CAUTION Caution should be used when baiting near areas where hunting of wildlife may occur. Careful consideration of bait placement is necessary to avoid secondary exposure from contaminated wildlife that may be consumed. DO NOT place bait in areas where there is a possibility of contaminating food, livestock feed or surfaces that come in direct contact with food or livestock feed. PROTECTION OF LIVESTOCK AND WILDLIFE Hazardous to livestock, poultry and wildlife. DO NOT place baits in locations that are accessible to domestic animals, livestock, non-target native animals or birds. Search for and dispose of dead rodents and slugs/snails in the infested area at each visit to prevent secondary poisoning. In case slugs/snails are present, move bait station to another location within the rodent infested site, away from slugs/snails. Dispose of slugs/snails, dead rodents and uneaten bait by wrapping in paper, placing in plastic bag and putting in garbage.

	<p>DO NOT allow livestock or poultry to consume dead or moribund mice and rats. All dead or moribund animals and rodent faeces from baited rodents MUST be removed from areas accessible to livestock or poultry.</p> <p>DO NOT let cats, dogs or non-target animals eat poisoned mice and rats.</p> <p>DO NOT use this product to control native animals.</p> <p>PROTECTION OF FISH, CRUSTACEANS AND ENVIRONMENT</p> <p>Very toxic to aquatic life. DO NOT contaminate wetlands or watercourses with this product or used containers. Place the bait stations in areas not liable to flooding. When placing bait stations close to water drainage systems, ensure that bait contact with water is avoided.</p>
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Protections:	
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Storage and Disposal:	<p>STORAGE AND DISPOSAL</p> <p>Store in the closed, original container in a cool, dry, place out of reach of children. Do not store in direct sunlight. Dispose of empty containers and unused product by wrapping in paper placing in plastic bag and putting in garbage.</p>
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Safety Directions:	<p>SAFETY DIRECTIONS</p> <p>Repeated minor exposure may have a cumulative poisoning effect. Will irritate the skin. May irritate eyes. Avoid contact with eyes and skin. When using the product wear disposable gloves. During cleanup, disposal operations of bait and bait stations and when handling rodent carcasses wear single layer clothing and disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water. After each day's use wash contaminated clothing. Wash clothes after performing re-handling activities.</p>
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First Aid Instructions:	<p>FIRST AID</p> <p>If poisoning occurs, contact a doctor or Poisons Information Centre. Phone Australia 13 11 26, New Zealand 0800 764 766. Vitamin K1 (Phytomenadione) is antidotal.</p>
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First Aid Warnings:	
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HOW TO USE

PEST	SITUATION	RATE	HOW TO APPLY
Mice	In domestic buildings and commercial premises	[as per current approved label]	Place bait stations wherever droppings, damage or other signs of activity are seen. Use multiple bait stations, not more than 3 m apart.
Rats	In and around (within 2 meters) domestic buildings and commercial premises	[as per current approved label]	Place a number of bait stations in dry locations throughout the infested area, on runs, near burrows and where droppings are seen, not more than 9 m apart.

General Information and baiting strategy for and mice:

Eliminate as far as practicable, all other food sources.

Always place bait where it is inaccessible to children, animals and birds. Use in tamper resistant bait stations only. If bait can be dislodged from bait station, fix tamper-resistant bait stations to the ground or other structures. When using outdoors, use weather resistant bait stations. DO NOT touch bait.

Inspect baits frequently, particularly in the first ten days. Replace eaten bait. If bait is completely consumed, the number of bait stations should be increased. Continue replenishing bait until left untouched. Baiting for at least 2 weeks will be necessary to reduce mouse numbers. Most deaths occur 4 to 7 days after consumption of bait, but deaths may occur for up to 2 weeks.

Following treatment remove all remains of bait and bait stations. DO NOT use the product for longer than 35 days. If rodent activity is still observed after 35 days, seek advice from the product supplier or call a pest control service.

NOT TO BE USED FOR ANY PURPOSE, OR IN ANY MANNER, CONTRARY TO THIS LABEL UNLESS AUTHORISED.

Difethialone

Commercial pest-control product: RB 0.025 g/kg or less in block formulation

Template Label 24

Label Name:	[INSERT LABEL NAME]
Signal Headings	POISON KEEP OUT OF REACH OF CHILDREN READ SAFETY DIRECTIONS BEFORE OPENING OR USING
Constituent Statements:	ACTIVE CONSTITUENT: 0.025 g/kg DIFETHIALONE
Mode of Action:	
Statement of Claims:	For control of mice in industrial, commercial, agricultural and domestic buildings and rats in and around industrial, commercial, agricultural and domestic buildings.
Net Contents:	[INSERT NET CONTENTS]
Restraints:	<p>RESTRAINTS</p> <p>DO NOT use this product unless you have a current qualification in the nationally recognised training course for rodent pest management CPPUPM3006 - Manage pests by applying pesticides, or an equivalent unit of competency.</p> <p>DO NOT place baits in areas that are accessible to children. In child-accessible areas baits must be placed in tamper-resistant bait stations. If bait can be dislodged from bait station, bait station must be secured in place.</p> <p>DO NOT place bait outdoors unless it is in a tamper-resistant bait station which is secured in place.</p> <p>DO NOT place bait stations more than 2 meters from buildings.</p> <p>DO NOT place bait stations outdoors around buildings for control of mice.</p> <p>DO NOT bait in areas where wildlife may be collected for human consumption.</p> <p>DO NOT place in animal or livestock housing unless used in tamper-resistant and weather-resistant bait stations fixed to the ground or other structures.</p> <p>DO NOT place bait or bait stations above areas which would allow them to contaminate pig and poultry food or drinking water.</p> <p>DO NOT apply this product directly into burrows.</p>
Directions for Use:	[This section contains an attachment below]
Other Limitations:	
Withholding Periods:	
Trade Advice:	

General Directions:	<p>GENERAL INSTRUCTIONS</p> <p>Blocks are intended for use within an integrated rodent management program as the initial "clean out" bait treatment for rodent infestations. Usually, rodents die within 3 to 5 days after eating the bait.</p> <p>Implement rodent proofing measures to limit or restrict rodent access to indoor areas or other areas where infestation is identified as a problem. Manage weeds and other vegetation around buildings to minimise the number of available or potential rodent harbourages.</p>
Resistance Warning:	
Precautions:	<p>PRECAUTIONS</p> <p>Caution should be used when baiting near areas where hunting of wildlife may occur. Careful consideration of bait placement is necessary to avoid secondary exposure from contaminated wildlife that may be consumed.</p> <p>DO NOT place bait in areas where there is a possibility of contaminating food, livestock feed or surfaces that come in direct contact with food or livestock feed.</p>
Protection Statements:	<p>PROTECTION OF LIVESTOCK AND WILDLIFE</p> <p>Hazardous to livestock, poultry and wildlife. DO NOT place baits in locations that are accessible to domestic animals, livestock, non-target native animals or birds.</p> <p>Search for and dispose of dead rodents and slugs/snails in the infested area at each visit to prevent secondary poisoning. In case slugs/snails are present, move bait station to another location within the rodent infested site, away from slugs/snails.</p> <p>Dispose of slugs/snails in a way non-target animals are not exposed. Dispose of dead rodents and uneaten bait in compliance with local, state or territory government regulations.</p> <p>DO NOT allow livestock or poultry to consume dead or moribund mice and rats. All dead or moribund animals and rodent faeces from baited rodents MUST be removed from areas accessible to livestock or poultry.</p> <p>DO NOT use this product to control native animals.</p> <p>PROTECTION OF FISH, CRUSTACEANS AND ENVIRONMENT</p> <p>Very toxic to aquatic life. DO NOT contaminate wetlands or watercourses with this product or used containers. Place the bait stations in areas not liable to flooding.</p> <p>When placing bait stations close to water drainage systems, ensure that bait contact with water is avoided.</p>
Storage and Disposal:	<p>STORAGE AND DISPOSAL</p> <p>Store in the closed, original container in a dry, cool, well-ventilated area out of direct sunlight. Triple rinse containers before disposal. Break, crush or puncture and deliver empty packaging to an approved waste management facility. If an approved waste management facility is not available, dispose of empty packaging in compliance with relevant local, state or territory government regulations. Dispose of unused product in compliance with relevant local, state or territory government regulations. DO NOT burn empty containers or product.</p>
Safety Directions:	<p>SAFETY DIRECTIONS</p> <p>Repeated minor exposure may have a cumulative poisoning effect. May irritate eyes.</p>

	<p>Avoid contact with eyes. Do not touch bait, use scoop or measure. When using the product wear disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water.</p> <p>During cleanup and disposal operations of bait and bait stations, wear a single layer of clothing and disposable gloves. Wear disposable gloves when handling rodent carcasses. Wash clothes after performing re-handling activities.</p>
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First Aid Instructions:	<p>FIRST AID</p> <p>If poisoning occurs, contact a doctor or Poisons Information Centre. Phone Australia 13 11 26, New Zealand 0800 764 766. Vitamin K1 (Phytomenadione) is antidotal.</p>
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First Aid Warnings:	
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DIRECTIONS FOR USE

Blocks and sachets:

SITUATION	PEST	RATE	CRITICAL COMMENTS
In and around (within 2 m) agricultural, commercial, domestic and industrial buildings	Rats (<i>Rattus rattus</i> , <i>Rattus norvegicus</i>)	[as per current approved label]	Place bait stations in the infested area. Where droppings are seen, inside ceiling cavities, along runs are locations more probably frequented by rodents. DO NOT touch bait.
In agricultural, commercial, domestic and industrial buildings.	Mice (<i>Mus musculus</i>)	[as per current approved label]	The feeding behaviour of rats and mice is slightly different. Rats feed in large quantities in few locations whereas mice are more erratic and tend to feed in different places at different times. DO NOT exceed 9 m between bait stations for rats and 3 m for mice.

Ready-to-use bait stations:

SITUATION	PEST	RATE	CRITICAL COMMENTS
In agricultural, commercial, domestic and industrial buildings.	Mice (<i>Mus musculus</i>)	[as per current approved label]	Place pre-baited bait stations in the infested area. Where droppings are seen, inside ceiling cavities, along runs are locations more probably frequented by rodents. DO NOT touch bait. DO NOT exceed 3 m between bait stations for mice.

Baiting strategy

Eliminate as far as practicable all alternative food sources.

Survey site prior to treatment, including assessment of the extent of infestation and identification of any indications of the presence of non-target animals.

Record the number and locations of bait stations for the purpose of inspection, replacement and later removal. Always use tamper-resistant bait stations that are secured in place in child accessible areas, outdoors and in animal or livestock housing. When used in food producing animal housing situations careful consideration is necessary regarding the placement of bait stations to ensure any rodenticide contamination of water, feed or livestock is prevented.

Inspect bait stations after 3 days. Replace eaten baits. Where a high level of consumption is noticed, place more baits. Remove baits in new locations where there has been no take. Inspect again 3 days later and then once a week until feeding ceases. Normally treatment takes 2 to 3 weeks.

DO NOT use the product beyond 35 days without an evaluation of the state of the infestation and of the efficacy of the treatment. Extended use should not be necessary and is not recommended because of

possible resistance development and secondary poisoning of rodent predators such as owls. Remove all uneaten bait at the end of treatment.

If reinfestation should occur, you can repeat treatment once. For further treatments, it is strongly advised to alternate with a product containing a different active constituent to avoid the development of genetic resistance.

NOT TO BE USED FOR ANY PURPOSE, OR IN ANY MANNER, CONTRARY TO THIS LABEL UNLESS AUTHORISED UNDER APPROPRIATE LEGISLATION.

Commercial pest-control product: RB 0.025 g/kg or less in pellet formulation

Template Label 25

Label Name:	[INSERT LABEL NAME]
Signal Headings	POISON KEEP OUT OF REACH OF CHILDREN READ SAFETY DIRECTIONS BEFORE OPENING OR USING
Constituent Statements:	ACTIVE CONSTITUENT: 0.025 g/kg DIFETHIALONE
Mode of Action:	
Statement of Claims:	For control of mice in industrial, commercial, agricultural and domestic buildings and rats in and around industrial, commercial, agricultural and domestic buildings.
Net Contents:	[INSERT NET CONTENTS]
Restrains:	<p>RESTRAINTS</p> <p>DO NOT use this product unless you have a current qualification in the nationally recognised training course for rodent pest management CPPUPM3006 - Manage pests by applying pesticides, or an equivalent unit of competency.</p> <p>DO NOT place baits in areas that are accessible to children. In child-accessible areas baits must be placed in tamper-resistant bait stations. If bait can be dislodged from bait station, bait station must be secured in place.</p> <p>DO NOT place bait outdoors unless it is in a tamper-resistant bait station which is secured in place.</p> <p>DO NOT place bait stations more than 2 meters from buildings.</p> <p>DO NOT place bait stations outdoors around buildings for control of mice.</p> <p>DO NOT bait in areas where wildlife may be collected for human consumption.</p> <p>DO NOT place baits in and around animal, livestock and poultry houses, associated equipment, and food and feed processing areas.</p> <p>DO NOT apply this product directly into burrows.</p>
Directions for Use:	[This section contains an attachment below]
Other Limitations:	
Withholding Periods:	
Trade Advice:	
General Directions:	<p>GENERAL INSTRUCTIONS</p> <p>Pellets are intended for use within an integrated rodent management program as the initial "clean out" bait treatment for rodent infestations. Usually, rats die within 3 to 5 days after eating the bait.</p>

	Implement rodent proofing measures to limit or restrict rodent access to indoor areas or other areas where infestation is identified as a problem. Manage weeds and other vegetation around buildings to minimise the number of available or potential rodent harbourages.
Resistance Warning:	
Precautions:	<p>PRECAUTIONS</p> <p>Caution should be used when baiting near areas where hunting of wildlife may occur. Careful consideration of bait placement is necessary to avoid secondary exposure from contaminated wildlife that may be consumed.</p> <p>DO NOT place bait in areas where there is a possibility of contaminating food, livestock feed or surfaces that come in direct contact with food or livestock feed.</p>
Protection Statements:	<p>PROTECTION OF LIVESTOCK AND WILDLIFE</p> <p>Hazardous to livestock, poultry and wildlife. DO NOT place baits in locations that are accessible to domestic animals, livestock, non-target native animals or birds. Search for and dispose of dead rodents and slugs/snails in the infested area at each visit to prevent secondary poisoning. In case slugs/snails are present, move bait station to another location within the rodent infested site, away from slugs/snails. Dispose of slugs/snails in a way non-target animals are not exposed. Dispose of dead rodents and uneaten bait in compliance with local, state or territory government regulations.</p> <p>DO NOT allow livestock or poultry to consume dead or moribund mice and rats. All dead or moribund animals and rodent faeces from baited rodents MUST be removed from areas accessible to livestock or poultry.</p> <p>DO NOT use this product to control native animals.</p> <p>PROTECTION OF FISH, CRUSTACEANS AND ENVIRONMENT</p> <p>Very toxic to aquatic life. DO NOT contaminate wetlands or watercourses with this product or used containers. Place the bait stations in areas not liable to flooding. When placing bait stations close to water drainage systems, ensure that bait contact with water is avoided.</p>
Storage and Disposal:	<p>STORAGE AND DISPOSAL</p> <p>Store in the closed, original container in a dry, cool, well-ventilated area out of direct sunlight. Triple rinse containers before disposal. Break, crush or puncture and deliver empty packaging to an approved waste management facility. If an approved waste management facility is not available, dispose of empty packaging in compliance with relevant local, state or territory government regulations. Dispose of unused product in compliance with relevant local, state or territory government regulations. DO NOT burn empty containers or product.</p>
Safety Directions:	<p>SAFETY DIRECTIONS</p> <p>Repeated minor exposure may have a cumulative poisoning effect. May irritate the eyes. Avoid contact with eyes and skin. Do not inhale dust. Do not touch bait, use scoop or measure. When using the product wear disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water.</p>

	During cleanup and disposal operations of bait and bait stations, wear a single layer of clothing and disposable gloves. Wear disposable gloves when handling rodent carcasses. Wash clothes after performing re-handling activities.
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First Aid Instructions:	FIRST AID If poisoning occurs, contact a doctor or Poisons Information Centre. Phone Australia 13 11 26, New Zealand 0800 764 766. Vitamin K1 (Phytomenadione) is antidotal.
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First Aid Warnings:	
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DIRECTIONS FOR USE

SITUATION	PEST	RATE	CRITICAL COMMENTS
In and around (within 2 m) agricultural, commercial, domestic and industrial buildings	Rats (<i>Rattus rattus</i> , <i>Rattus norvegicus</i>)	[as per current approved label]	Place bait stations with measured quantity of bait in the infested area. Where droppings are seen, inside ceiling cavities, along runs are locations more probably frequented by rodents. DO NOT touch bait. The feeding behaviour of rats and mice is slightly different. Rats feed in large quantities in few locations whereas mice are more erratic and tend to feed in different places at different times.
In agricultural, commercial, domestic and industrial buildings.	Mice (<i>Mus musculus</i>)	[as per current approved label]	DO NOT exceed 9 m between bait stations for rats and 3 m for mice.

Baiting strategy

Eliminate as far as practicable all alternative food sources.

Survey site prior to treatment, including assessment of the extent of infestation and identification of any indications of the presence of non-target animals. Record the number and locations of bait stations for the purpose of inspection, replacement and later removal.

Inspect bait stations after 3 days. Replace eaten baits. Where a high level of consumption is noticed, place more baits. Remove baits in new locations where there has been no take. Inspect again 3 days later and then once a week until feeding ceases. Normally treatment takes 2 to 3 weeks.

DO NOT use the product beyond 35 days without an evaluation of the state of the infestation and of the efficacy of the treatment. Extended use should not be necessary and is not recommended because of possible resistance development and secondary poisoning of rodent predators such as owls. Remove all uneaten bait at the end of treatment.

If reinfestation should occur, you can repeat treatment once. For further treatments, it is strongly advised to alternate with a product containing a different active constituent to avoid the development of genetic resistance.

NOT TO BE USED FOR ANY PURPOSE, OR IN ANY MANNER, CONTRARY TO THIS LABEL UNLESS AUTHORISED UNDER APPROPRIATE LEGISLATION.

Commercial pest-control product: RB 0.025 g/kg or less in sachet or place pack

Template Label 26

Label Name:	[INSERT LABEL NAME]
Signal Headings	POISON KEEP OUT OF REACH OF CHILDREN READ SAFETY DIRECTIONS BEFORE OPENING OR USING
Constituent Statements:	ACTIVE CONSTITUENT: 0.025 g/kg DIFETHIALONE
Mode of Action:	
Statement of Claims:	For control of mice in industrial, commercial, agricultural and domestic buildings and for control of rats in and around industrial, commercial, agricultural and domestic buildings and control of mice and rats in sewers.
Net Contents:	[INSERT NET CONTENTS]
Restraints:	<p>RESTRAINTS</p> <p>DO NOT use this product unless you have a current qualification in the nationally recognised training course for rodent pest management CPPUPM3006 - Manage pests by applying pesticides, or an equivalent unit of competency.</p> <p>DO NOT place baits in areas that are accessible to children. In child-accessible areas baits must be placed in tamper-resistant bait stations. If bait can be dislodged from bait station, bait station must be secured in place.</p> <p>DO NOT place bait outdoors unless it is in a tamper-resistant bait station which is secured in place.</p> <p>DO NOT place bait stations more than 2 meters from buildings.</p> <p>DO NOT place bait stations outdoors around buildings for control of mice.</p> <p>DO NOT bait in areas where wildlife may be collected for human consumption.</p> <p>DO NOT place in animal or livestock housing unless used in tamper-resistant and weather-resistant bait stations fixed to the ground or other structures.</p> <p>DO NOT place bait or bait stations above areas which would allow them to contaminate pig and poultry food or drinking water.</p> <p>DO NOT apply this product directly into burrows.</p>
Directions for Use:	[This section contains an attachment below]
Other Limitations:	
Withholding Periods:	
Trade Advice:	
General Directions:	GENERAL INSTRUCTIONS

	<p>The soft-blocks within the paper sachets are ready to use — DO NOT attempt to open the sachets. This product is intended for use within an integrated rodent management program as the initial "clean out" bait treatment for rodent infestations. Rodents usually die within 3 to 5 days after eating the bait.</p> <p>Implement rodent proofing measures to limit or restrict rodent access to indoor areas or other areas where infestation is identified as a problem. Manage weeds and other vegetation around buildings to minimise the number of available or potential rodent harbourages.</p>
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Resistance Warning:	
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Precautions:	<p>PRECAUTIONS</p> <p>Caution should be used when baiting near areas where hunting of wildlife may occur. Careful consideration of bait placement is necessary to avoid secondary exposure from contaminated wildlife that may be consumed.</p> <p>DO NOT place bait in areas where there is a possibility of contaminating food, livestock feed or surfaces that come in direct contact with food or livestock feed.</p>
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Protection Statements:	<p>PROTECTION OF LIVESTOCK AND WILDLIFE</p> <p>Hazardous to livestock, poultry and wildlife. DO NOT place baits in locations that are accessible to domestic animals, livestock, non-target native animals or birds. Search for and dispose of dead rodents and slugs/snails in the infested area at each visit to prevent secondary poisoning. In case slugs/snails are present, move bait station to another location within the rodent infested site, away from slugs/snails. Dispose of slugs/snails in a way non-target animals are not exposed. Dispose of dead rodents and uneaten bait in compliance with local, state or territory government regulations.</p> <p>DO NOT allow livestock or poultry to consume dead or moribund mice and rats. All dead or moribund animals and rodent faeces from baited rodents MUST be removed from areas accessible to livestock or poultry.</p> <p>DO NOT use this product to control native animals.</p> <p>PROTECTION OF FISH, CRUSTACEANS AND ENVIRONMENT</p> <p>Very toxic to aquatic life. DO NOT contaminate wetlands or watercourses with this product or used containers. Place the bait stations in areas not liable to flooding. When placing bait stations close to water drainage systems, ensure that bait contact with water is avoided.</p>
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Storage and Disposal:	<p>STORAGE AND DISPOSAL</p> <p>Store in the closed, original container in a dry, cool, well-ventilated area out of direct sunlight. Triple rinse containers before disposal. Break, crush or puncture and deliver empty packaging to an approved waste management facility. If an approved waste management facility is not available, dispose of empty packaging in compliance with relevant local, state or territory government regulations. Dispose of unused product in compliance with relevant local, state or territory government regulations. DO NOT burn empty containers or product.</p>
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Safety Directions:	SAFETY DIRECTIONS
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	Repeated minor exposure may have a cumulative poisoning effect. May irritate eyes. Avoid contact with eyes. When using the product wear disposable gloves. During cleanup, disposal operations of bait and bait stations and when handling rodent carcasses wear single layer clothing and disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water. After each day's use wash contaminated clothing. Wash clothes after performing re-handling activities.
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First Aid Instructions:	FIRST AID If poisoning occurs, contact a doctor or Poisons Information Centre. Phone Australia 13 11 26, New Zealand 0800 764 766. Vitamin K1 (Phytomenadione) is antidotal
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First Aid Warnings:	
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DIRECTIONS FOR USE

Sachets:

SITUATION	PEST	RATE	CRITICAL COMMENTS
In and around (within 2 m) agricultural, commercial, domestic, industrial and public services buildings. In sewers.	Rats (<i>Rattus rattus</i> , <i>Rattus norvegicus</i>)	[as per current approved label]	Place bait stations in the infested area. DO NOT touch bait. DO NOT exceed 9 m between bait stations for rats and 3 m for mice. The quantity of bait depends on the estimated pest population. For low activity, place 1 to 2 baits per bait station at regular intervals. For high activity, place more baits per bait station at more frequent intervals. It is essential to locate the baits close to where the rodents nest and feed, and also along their pathways. Generally mice will nest close to their feeding source, so place the baits in various locations near the nest. Rats are more likely to nest further away from their food source which means it is also important to bait on their pathways.
In agricultural, commercial, domestic, industrial and public services buildings and in sewers.	Mice (<i>Mus musculus</i>)	[as per current approved label]	In sewers and storm-water drains, suspend baits from manholes by wire or place in such a manner so that baits will not be washed into water supplies.

Ready-to-use bait stations for mice:

SITUATION	PEST	RATE	CRITICAL COMMENTS
In agricultural, commercial, domestic, industrial and public services buildings and in sewers.	Mice (<i>Mus musculus</i>)	[as per current approved label]	Place pre-baited bait stations in the infested area. DO NOT exceed 3 m between bait stations for mice. The quantity of bait depends on the estimated pest population. For low activity, place 1 to 2 pre-baited stations around the nest. For high activity, place more pre-baited stations at more frequent intervals. It is essential to locate the baits close to where the mice nest and feed, and also along their pathways. Generally mice will nest close to their feeding source, so place the baits in various locations near the nest. In sewers and storm-water drains, suspend pre-baited stations from manholes by wire or place in such a manner so that baits will not be washed into water supplies.

Ready-to-use bait stations for rats:

SITUATION	PEST	RATE	CRITICAL COMMENTS
In and around (within 2 m) agricultural, commercial, domestic, industrial and public services buildings. In sewers.	Rats (<i>Rattus rattus</i> , <i>Rattus norvegicus</i>)	[as per current approved label]	Place pre-baited bait stations in the infested area. DO NOT exceed 9 m between bait stations for rats. The quantity of bait depends on the estimated pest population. For low activity, place 1 to 2 pre-baited stations around the nest. For high activity, place more pre-baited stations at more frequent intervals. It is essential to locate the baits close to where the rodents nest and feed, and also along their pathways. In sewers and storm-water drains, suspend pre-baited stations from manholes by wire or place in such a manner so that baits will not be washed into water supplies.

Inspection

Survey site prior to treatment, including assessment of the extent of infestation and identification of any indications of the presence of non-target animals. Signs of rodent activity need to be looked for to determine the pest species and the size of the population. Their identification is essential to ensure control methods are placed in relevant places (see below 'Baiting strategy').

Those signs include: droppings, rub marks (eg against walls), gnawing marks (eg. on cables), tracks, burrows, odours, sightings of rodents, etc. This is an important step since Black rats, Norway rats and mice have some behavioural differences which will affect how the treatment is done.

It is also important to know the history and geography of the building and its neighbourhood. A building with frequent rodent infestations will for instance be quite likely to be re-infested in the future. The structure of the building and its location can also give an indication of the potential for rodent problems (likely points of entry, proximity of waterways, vegetation, etc.)

Baiting strategy

Eliminate as far as practicable all alternative food sources.

Record the number and locations of bait stations for the purpose of inspection, replacement and later removal. Always use tamper-resistant bait stations that are secured in place in child accessible areas, outdoors and in animal or livestock housing. When used in food producing animal housing situations careful consideration is necessary regarding the placement of bait stations to ensure any rodenticide contamination of water, feed or livestock is prevented.

Check bait consumption after 3 days. Replace eaten baits. Where a high level of consumption is noticed, place more baits (up to double the quantity of the first application). Remove baits in new locations where there has been no take. Inspect again 3 days later and then once a week until feeding ceases. Normally treatment takes 2 to 3 weeks.

DO NOT use the product beyond 35 days without an evaluation of the state of the infestation and of the efficacy of the treatment. Extended use should not be necessary and is not recommended because of possible resistance development and secondary poisoning of rodent predators such as owls. Remove all uneaten bait at the end of treatment.

If reinfestation should occur, you can repeat treatment once. For further treatments, it is strongly advised to alternate with a product containing a different active constituent to avoid the development of genetic resistance.

NOT TO BE USED FOR ANY PURPOSE, OR IN ANY MANNER, CONTRARY TO THIS LABEL UNLESS AUTHORISED UNDER APPROPRIATE LEGISLATION.

Diphacinone

Commercial pest-control product: RB 0.05 g/kg or less in block formulation

Template Label 27

Label Name:	[INSERT LABEL NAME]
Signal Headings	POISON KEEP OUT OF REACH OF CHILDREN READ SAFETY DIRECTIONS BEFORE OPENING OR USING
Constituent Statements:	ACTIVE CONSTITUENT: 0.05 g/kg DIPHACINONE
Mode of Action:	
Statement of Claims:	For control of mice in industrial, commercial, agricultural and domestic buildings and rats in and around industrial, commercial, agricultural and domestic buildings.
Net Contents:	[INSERT LABEL CONTENT]
Restraints:	<p>RESTRAINTS</p> <p>DO NOT use this product unless you have a current qualification in the nationally recognised training course for rodent pest management CPPUPM3006 - Manage pests by applying pesticides, or an equivalent unit of competency.</p> <p>DO NOT place baits in areas that are accessible to children. In child-accessible areas baits must be placed in tamper-resistant bait stations. If bait can be dislodged from bait station, bait station must be secured in place.</p> <p>DO NOT place bait outdoors unless it is in a tamper-resistant bait station which is secured in place.</p> <p>DO NOT place bait stations more than 2 meters from buildings.</p> <p>DO NOT place bait stations outdoors around buildings for control of mice.</p> <p>DO NOT bait in areas where wildlife may be collected for human consumption.</p> <p>DO NOT place in animal or livestock housing unless used in tamper-resistant and weather-resistant bait stations fixed to the ground or other structures.</p> <p>DO NOT place bait or bait stations above areas which would allow them to contaminate pig and poultry food or drinking water.</p> <p>DO NOT apply this product directly into burrows.</p> <p>DO NOT use product in pulse baiting treatments</p>
Directions for Use:	[This section contains an attachment below]
Other Limitations:	
Withholding Periods:	

Trade Advice:	
General Directions:	
Resistance Warning:	
Precautions:	<p>PRECAUTIONS</p> <p>Caution should be used when baiting near areas where hunting of wildlife may occur. Careful consideration of bait placement is necessary to avoid secondary exposure from contaminated wildlife that may be consumed.</p> <p>DO NOT place bait in areas where there is a possibility of contaminating food, livestock feed or surfaces that come in direct contact with food or livestock feed.</p>
Protection Statements:	<p>PROTECTION OF LIVESTOCK AND WILDLIFE</p> <p>Hazardous to livestock, poultry and wildlife. DO NOT place baits in locations that are accessible to domestic animals, livestock, non-target native animals or birds. Search for and dispose of dead rodents and slugs/snails in the infested area at each visit to prevent secondary poisoning. In case slugs/snails are present, move bait station to another location within the rodent infested site, away from slugs/snails. Dispose of slugs/snails in a way non-target animals are not exposed. Dispose of dead rodents and uneaten bait in compliance with local, state or territory government regulations.</p> <p>DO NOT allow livestock or poultry to consume dead or moribund mice and rats. All dead or moribund animals and rodent faeces from baited rodents MUST be removed from areas accessible to livestock or poultry.</p> <p>PROTECTION OF FISH, CRUSTACEANS AND ENVIRONMENT</p> <p>Toxic to aquatic life. DO NOT contaminate wetlands or watercourses with this product or used containers. Place the bait stations in areas not liable to flooding. When placing bait stations close to water drainage systems, ensure that bait contact with water is avoided.</p>
Storage and Disposal:	<p>STORAGE AND DISPOSAL</p> <p>Store in the closed original container in a cool, well-ventilated area out of direct sunlight. Triple rinse containers before disposal. Break, crush or puncture and deliver empty packaging to an approved waste management facility. If an approved waste management facility is not available, dispose of empty packaging in compliance with relevant local, state or territory government regulations. Dispose of unused product in compliance with relevant local, state or territory government regulations. DO NOT burn empty containers or product.</p>
Safety Directions:	<p>SAFETY DIRECTIONS</p> <p>Repeated minor exposure may have a cumulative poisoning effect. Do not touch bait, use scoop or measure. When using the product wear disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water.</p> <p>During cleanup and disposal operations of bait and bait stations, wear a single layer of clothing and disposable gloves. Wear disposable gloves when handling rodent carcasses. Wash clothes after performing re-handling activities.</p>

First Aid Instructions:	FIRST AID If poisoning occurs, contact a doctor or Poisons Information Centre. Phone Australia 13 11 26, New Zealand 0800 764 766. Vitamin K1 (Phytomenadione) is antidotal.
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First Aid Warnings:	
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DIRECTIONS FOR USE

SITUATION	PEST	RATE	CRITICAL COMMENTS
In and around (within 2 m) industrial, commercial, agricultural and domestic buildings.	Mice (<i>Mus musculus</i>)	30 to 60 g per bait station	Place one 30 g bait in a bait station at each placement location. Placement of two 30 g baits each may be needed at points of very high house mouse activity. Space placements at 2.5m to 3.5m intervals.
In industrial, commercial, agricultural and domestic buildings.	Rats (<i>Rattus rattus</i> , <i>Rattus norvegicus</i>)	100 to 450 g per bait station	Use high rate of 450 g per bait station at points of very high rat activity. Placement locations should be at intervals of 4.5 to 9 metres.

Baiting strategy

Remove as much alternative food as possible.

Survey site prior to treatment, including assessment of the extent of infestation and identification of any indications of the presence of non-target animals.

Record the number and locations of bait stations for the purpose of inspection, replacement and later removal. Always use tamper-resistant bait stations that are secured in place in child accessible areas, outdoors and in animal or livestock housing. When used in food producing animal housing situations careful consideration is necessary regarding the placement of bait stations to ensure any rodenticide contamination of water, feed or livestock is prevented.

Inspect bait sites at intervals no more than 7 days apart. Replace contaminated or spoiled bait immediately. For mice, maintain an uninterrupted supply of fresh bait for at least 15 days or until there no longer are signs of new feeding by house mice. For rats, maintain an uninterrupted supply of fresh bait until signs of rat activity cease

DO NOT use the product beyond 35 days without an evaluation of the state of the infestation and of the efficacy of the treatment. Remove all uneaten bait at the end of treatment.

To prevent reinfestation, limit sources of rodent food, water, and harbourage as much as possible. If reinfestation does occur, repeat treatment.

NOT TO BE USED FOR ANY PURPOSE, OR IN ANY MANNER, CONTRARY TO THIS LABEL UNLESS AUTHORISED UNDER APPROPRIATE LEGISLATION.

Flocoumafen

Commercial pest-control product: RB 0.05 g/kg or less in sachet or place pack

Template Label 28

Label Name:	[INSERT LABEL NAME]
Signal Headings	POISON KEEP OUT OF REACH OF CHILDREN READ SAFETY DIRECTIONS BEFORE OPENING OR USING
Constituent Statements:	ACTIVE CONSTITUENT: 0.05 g/kg FLOCOUMAFEN
Mode of Action:	
Statement of Claims:	For control of mice in industrial, commercial, agricultural and domestic buildings and for control of rats in and around industrial, commercial, agricultural and domestic buildings and control of mice and rats in sewers.
Net Contents:	[INSERT NET CONTENTS]
Restrains:	<p>RESTRAINTS</p> <p>DO NOT use this product unless you have a current qualification in the nationally recognised training course for rodent pest management CPPUPM3006 - Manage pests by applying pesticides, or an equivalent unit of competency.</p> <p>DO NOT place baits in areas that are accessible to children. In child-accessible areas baits must be placed in tamper-resistant bait stations. If bait can be dislodged from bait station, bait station must be secured in place.</p> <p>DO NOT place bait outdoors unless it is in a tamper-resistant bait station which is secured in place.</p> <p>DO NOT place bait stations more than 2 meters from buildings.</p> <p>DO NOT place bait stations outdoors around buildings for control of mice.</p> <p>DO NOT bait in areas where wildlife may be collected for human consumption.</p> <p>DO NOT place in animal or livestock housing unless used in tamper-resistant and weather-resistant bait stations fixed to the ground or other structures.</p> <p>DO NOT place bait or bait stations above areas which would allow them to contaminate pig and poultry food or drinking water.</p> <p>DO NOT apply this product directly into burrows.</p>
Directions for Use:	[This section contains an attachment below]
Other Limitations:	
Withholding Periods:	

Trade Advice:	
General Directions:	<p>GENERAL INSTRUCTIONS</p> <p>Alternative food sources should be removed or reduced as much as possible. A lethal dose is readily consumed in a single feed but death may not occur for up to seven days.</p>
Resistance Warning:	
Precautions:	<p>PRECAUTIONS</p> <p>Caution should be used when baiting near areas where hunting of wildlife may occur. Careful consideration of bait placement is necessary to avoid secondary exposure from contaminated wildlife that may be consumed.</p> <p>DO NOT place bait in areas where there is a possibility of contaminating food, livestock feed or surfaces that come in direct contact with food or livestock feed.</p>
Protection Statements	<p>PROTECTION OF LIVESTOCK AND WILDLIFE</p> <p>Hazardous to livestock, poultry and wildlife. DO NOT place baits in locations that are accessible to domestic animals, livestock, non-target native animals or birds. Search for and dispose of dead rodents and slugs/snails in the infested area at each visit to prevent secondary poisoning. In case slugs/snails are present, move bait station to another location within the rodent infested site, away from slugs/snails. Dispose of slugs/snails in a way non-target animals are not exposed. Dispose of dead rodents and uneaten bait in compliance with local, state or territory government regulations.</p> <p>DO NOT allow livestock or poultry to consume dead or moribund mice and rats. All dead or moribund animals and rodent faeces from baited rodents MUST be removed from areas accessible to livestock or poultry.</p> <p>The use of this product for the control of protected native rodents requires permission from wildlife authorities.</p> <p>PROTECTION OF FISH, CRUSTACEANS AND ENVIRONMENT</p> <p>Very toxic to aquatic life. DO NOT contaminate wetlands or watercourses with this product or used containers. Place the bait stations in areas not liable to flooding. When placing bait stations close to water drainage systems, ensure that bait contact with water is avoided.</p>
Storage and Disposal:	<p>STORAGE AND DISPOSAL</p> <p>Store in the closed original container in a safe place. DO NOT store for prolonged periods in direct sunlight. Triple rinse containers before disposal. Break, crush or puncture and deliver empty packaging to an approved waste management facility. If an approved waste management facility is not available, dispose of empty packaging in compliance with relevant local, state or territory government regulations. Dispose of unused product in compliance with relevant local, state or territory government regulations. DO NOT burn empty containers or product.</p>
Safety Directions:	SAFETY DIRECTIONS

	Repeated minor exposure may have a cumulative poisoning effect. When using the product wear disposable gloves. During cleanup, disposal operations of bait and bait stations and when handling rodent carcasses wear single layer clothing and disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water. After each day's use wash contaminated clothing. Wash clothes after performing re-handling activities.
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First Aid Instructions:	FIRST AID If poisoning occurs, contact a doctor or Poisons Information Centre. Phone Australia 13 11 26, New Zealand 0800 764 766. Vitamin K1 (Phytomenadione) is antidotal.
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First Aid Warnings:	
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DIRECTIONS FOR USE

SITUATION	PEST	RATE	CRITICAL COMMENTS
In and around (within 2 m) industrial, commercial, agricultural, domestic, and public service buildings. In sewers, animal houses and wharves. Around (within 2 m) grain terminals	Rats – <i>Rattus rattus</i> also known as Black rat, Roof rat, Ship rat or Fruit rat and <i>Rattus norvegicus</i> also known as the Brown rat or Norway rat	3 – 5 baits per bait station	Place baits in areas frequently by rats. Baits should be placed in areas inaccessible to non-target species. Select suitable bait locations, such as along rat runs and under rubbish. Try to establish a barrier of bait locations between living and feeding areas. See baiting strategy instructions below.
In industrial, commercial, agricultural, domestic, and public service buildings. In sewers, animal houses and wharves	Mice – <i>Mus musculus</i> also known as the House mouse	1 – 3 baits per bait station	Place baits in areas frequently by mice. Secure soft baits in areas inaccessible to non-target species, spaced 2 - 3 meters apart. Bait locations should be in areas where activity is obvious, particularly where droppings are seen. Mice have very limited home ranges and do not need to drink. They are more difficult to control than rats because their feeding patterns are more erratic. Selection of bait locations is therefore even more important than for rats. See baiting strategy instructions below.

Baiting Strategy

Survey site prior to treatment, including assessment of the extent of infestation and identification of any indications of the presence of non-target animals.

Record the number and locations of bait stations for the purpose of inspection, replacement and later removal. Always use tamper-resistant bait stations that are secured in place in child accessible areas, outdoors and in animal or livestock housing. When used in food producing animal housing situations careful consideration is necessary regarding the placement of bait stations to ensure any rodenticide contamination of water, feed or livestock is prevented.

Inspect bait sites at intervals no more than 7 days apart. On initial application, an inspection of bait locations after 3 days may be undertaken to determine activity in bait locations and new locations may be selected if necessary. A subsequent inspection may also be undertaken again after 4 days to replace any soft baits which have been eaten.

For severe infestations, it is recommended to repeat inspections of all bait locations, replacing fresh soft baits only when soft baits have been eaten and until all sign of rat or mouse activity has disappeared. Normally only 3 to 4 baiting rounds (pulses) are required for control.

DO NOT use the product beyond 35 days without an evaluation of the state of the infestation and of the efficacy of the treatment. Remove all uneaten bait at the end of treatment.

**NOT TO BE USED FOR ANY PURPOSE, OR IN ANY MANNER, CONTRARY TO THIS LABEL UNLESS
AUTHORISED UNDER APPROPRIATE LEGISLATION.**

Commercial pest-control product: RB 0.05 g/kg or less in block formulation

Template Label 29

Label Name:	[INSERT LABEL NAME]
Signal Headings	POISON KEEP OUT OF REACH OF CHILDREN READ SAFETY DIRECTIONS BEFORE OPENING OR USING
Constituent Statements:	ACTIVE CONSTITUENT: 0.05 g/kg FLOCOUMAFEN
Mode of Action:	
Statement of Claims:	For control of mice in industrial, commercial, agricultural and domestic buildings and for control of rats in and around industrial, commercial, agricultural and domestic buildings
Net Contents:	[INSERT NET CONTENTS]
Restraints:	<p>RESTRAINTS</p> <p>DO NOT use this product unless you have a current qualification in the nationally recognised training course for rodent pest management CPPUPM3006 - Manage pests by applying pesticides, or an equivalent unit of competency.</p> <p>DO NOT place baits in areas that are accessible to children. In child-accessible areas baits must be placed in tamper-resistant bait stations. If bait can be dislodged from bait station, bait station must be secured in place.</p> <p>DO NOT place bait outdoors unless it is in a tamper-resistant bait station which is secured in place.</p> <p>DO NOT place bait stations more than 2 meters from buildings.</p> <p>DO NOT place bait stations outdoors around buildings for control of mice.</p> <p>DO NOT bait in areas where wildlife may be collected for human consumption.</p> <p>DO NOT place in animal or livestock housing unless used in tamper-resistant and weather-resistant bait stations fixed to the ground or other structures.</p> <p>DO NOT place bait or bait stations above areas which would allow them to contaminate pig and poultry food or drinking water.</p> <p>DO NOT apply this product directly into burrows.</p>
Directions for Use:	[This section contains an attachment below]
Other Limitations:	
Withholding Periods:	
Trade Advice:	
General Directions:	GENERAL INSTRUCTIONS

	Alternative food sources should be removed or reduced as much as possible. A lethal dose is readily consumed in a single feed but death may not occur for up to seven days.
Resistance Warning:	
Precautions:	<p>PRECAUTIONS</p> <p>Caution should be used when baiting near areas where hunting of wildlife may occur. Careful consideration of bait placement is necessary to avoid secondary exposure from contaminated wildlife that may be consumed.</p> <p>DO NOT place bait in areas where there is a possibility of contaminating food, livestock feed or surfaces that come in direct contact with food or livestock feed.</p>
Protection Statements:	<p>PROTECTION OF LIVESTOCK AND WILDLIFE</p> <p>Hazardous to livestock, poultry and wildlife. DO NOT place baits in locations that are accessible to domestic animals, livestock, non-target native animals or birds. Search for and dispose of dead rodents and slugs/snails in the infested area at each visit to prevent secondary poisoning. In case slugs/snails are present, move bait station to another location within the rodent infested site, away from slugs/snails. Dispose of slugs/snails in a way non-target animals are not exposed. Dispose of dead rodents and uneaten bait in compliance with local, state or territory government regulations.</p> <p>DO NOT allow livestock or poultry to consume dead or moribund mice and rats. All dead or moribund animals and rodent faeces from baited rodents MUST be removed from areas accessible to livestock or poultry.</p> <p>The use of this product for the control of protected native rodents requires permission from wildlife authorities.</p> <p>PROTECTION OF FISH, CRUSTACEANS AND ENVIRONMENT</p> <p>Very toxic to aquatic life. DO NOT contaminate wetlands or watercourses with this product or used containers. Place the bait stations in areas not liable to flooding. When placing bait stations close to water drainage systems, ensure that bait contact with water is avoided.</p>
Storage and Disposal:	<p>STORAGE AND DISPOSAL</p> <p>Store in the closed original container in a safe place. DO NOT store for prolonged periods in direct sunlight. Triple rinse containers before disposal. Break, crush or puncture and deliver empty packaging to an approved waste management facility. If an approved waste management facility is not available, dispose of empty packaging in compliance with relevant local, state or territory government regulations. Dispose of unused product in compliance with relevant local, state or territory government regulations. DO NOT burn empty containers or product.</p>
Safety Directions:	<p>SAFETY DIRECTIONS</p> <p>Repeated minor exposure may have a cumulative poisoning effect. Do not touch bait, use scoop or measure. When using the product wear disposable gloves. If on skin and after each baiting, wash thoroughly with soap and water.</p>

	During cleanup and disposal operations of bait and bait stations, wear a single layer of clothing and disposable gloves. Wear disposable gloves when handling rodent carcasses. Wash clothes after performing re-handling activities.
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First Aid Instructions:	FIRST AID If poisoning occurs, contact a doctor or Poisons Information Centre. Phone Australia 13 11 26, New Zealand 0800 764 766. Vitamin K1 (Phytomenadione) is antidotal.
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First Aid Warnings:	
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DIRECTIONS FOR USE

SITUATION	PEST	RATE	CRITICAL COMMENTS
In and around (within 2 m) industrial, commercial, agricultural and domestic buildings.	Rats	3 – 4 blocks per bait station	Baits must only be placed in areas frequented by the rats. Select suitable bait locations, such as along rat runs and under rubbish. Try to establish a barrier of bait locations between living and feeding areas. See baiting strategy instructions below.
In industrial, commercial, agricultural and domestic buildings.	Mice	1 – 2 blocks per bait station	Baits must only be placed in areas frequented by the mice. Place bait stations 2 metres apart in areas where activity is obvious, particularly where droppings are seen. Mice have very limited home ranges and do not need to drink. They are more difficult to control than rats because their feeding patterns are more erratic. Selection of bait locations is therefore even more important than for rats. See baiting strategy instructions below.

Baiting Strategy

Survey site prior to treatment, including assessment of the extent of infestation and identification of any indications of the presence of non-target animals.

Record the number and locations of bait stations for the purpose of inspection, replacement and later removal. Always use tamper-resistant bait stations that are secured in place in child accessible areas, outdoors and in animal or livestock housing. When used in food producing animal housing situations careful consideration is necessary regarding the placement of bait stations to ensure any rodenticide contamination of water, feed or livestock is prevented.

Inspect the bait locations after 3 days and select new locations where there has been no take. Inspect again 4 days later and replace eaten blocks. Repeat bait station inspections at 7 day intervals, replacing fresh blocks only when blocks have been eaten, until all signs of rodent activity have disappeared. Normally only 3 to 4 baiting rounds (pulses) are required.

DO NOT use the product beyond 35 days without an evaluation of the state of the infestation and of the efficacy of the treatment. Remove all uneaten bait at the end of treatment.

NOT TO BE USED FOR ANY PURPOSE, OR IN ANY MANNER, CONTRARY TO THIS LABEL UNLESS AUTHORISED UNDER APPROPRIATE LEGISLATION.

Notice under sections 34AB of the Agricultural and Veterinary Chemicals Code scheduled to the *Agricultural and Veterinary Chemicals Code Act 1994*: anticoagulant rodenticides reconsideration - proposed decision to cancel certain chemical product registrations and label approvals

- 1) I, Maria Trainer, Executive Director Science and Assurance, as the delegate of the Australian Pesticides and Veterinary Medicines Authority (APVMA) have reconsidered the registrations of certain anticoagulant rodenticides, and their associated label approvals under Part 2, Division 4 of the Agricultural and Veterinary Chemicals Code scheduled to the Agricultural and Veterinary Chemicals Code Act 1994 (Agvet Code). The chemical product registrations and label approvals subject to the proposed cancellation decisions included in this notice are set out in Attachment A, and the reasons for my decision are set out in Attachment B
- 2) This notice is issued under sections 34AB of the Agvet Code and sets out my proposed decisions in relation to the anticoagulant rodenticides product registrations and label approvals listed in Attachment A of this notice.
- 3) Pursuant to section 34AA(1) of the Agvet Code, I propose to:
 - a. cancel the anticoagulant rodenticide chemical product registrations listed in Attachment A of this notice as I am not satisfied that the products meet the safety criteria and I am also not satisfied that the relevant particulars or conditions of the registrations could be varied in such a way to allow affirmation.
 - b. cancel the anticoagulant rodenticide label approvals listed in Attachment A of this notice as I am not satisfied that the labels meet the labelling criteria and I am not satisfied that the relevant particulars or conditions of the approvals could be varied in such a way to allow affirmation.
- 4) The information on which the reasons are based is set out in Attachment C of this notice.

Written submissions are invited

- 5) I invite written submissions on the proposed cancellation of the chemical product registrations and label approvals listed in Attachment A of this notice. All submissions will be considered by the APVMA prior to finalisation of this reconsideration.
- 6) Submissions or requests for further information can be sent to:

Chemical Review
Australian Pesticides and Veterinary Medicines Authority
GPO Box 574
Canberra ACT 2601, Australia

Phone: +61 2 6770 2400

Email: chemicalreview@apvma.gov.au

Please note: Submissions will be published on the APVMA website, unless you have asked for the submission to remain confidential (see [public submission coversheet](#)).

- Please lodge your submission with a public submission coversheet, which provides options for how your submission will be published.
- Note that all submissions received are subject to legislative requirements, including the Freedom of Information Act 1982, the Privacy Act 1988 and the Agvet Code. In providing your submission to the APVMA, you agree to the APVMA publicly disclosing your submission in whole or summary form. The APVMA confirms that if your submission includes confidential commercial information or protected

information as defined in the Agvet Code, such information will be subject to the relevant provisions of the Agvet Code including relevant limitations on use and disclosure by the APVMA.

7) The closing date for submissions is 16 March 2026.

Maria Trainer

Executive Director Science and Assurance

With the delegated authority under sections 11, 32 and 44 of the Agricultural and Veterinary Chemicals (Administration) Act 1992.

Attachments:

Note: The below Attachments form part of this Notice.

Attachment A: Anticoagulant rodenticide product registrations and label approvals under reconsideration that the APVMA is proposing to cancel

Attachment B: Draft statement of reasons for the proposed decision to cancel certain anticoagulant rodenticide products and labels

Attachment C: Information on which the reasons are based

Contact information

For any enquiries or further information about this matter, please contact:

Chemical Review

Australian Pesticides and Veterinary Medicines Authority
GPO Box 574
Canberra ACT 2601, Australia

Phone: +61 2 6770 2400

Email: chemicalreview@apvma.gov.au

Attachment A: Anticoagulant rodenticide product registrations and label approvals under reconsideration that the APVMA is proposing to cancel

Agricultural chemical	Registration number	Product name	Holder	Label approval number(s) associated with the product	Summary of reasons for safety concerns and cancellation
Brodifacoum	48332	Oztec Ratal Rodenticide Pellets	Oztec Rural Pty Limited	48332/01	Formulation does not contain a bittering agent (paras. 41 – 44)
Brodifacoum	57805	Raticide Mouse And Rat Bait	Parafarm Pty Ltd	57805/54399	Formulation does not contain a bittering agent or dye (paras. 41 – 44)
Brodifacoum	63625	X-Verminator Single Feed, Lethal Dose Rodent Pellets	Animal Control Products Ltd	63625/1009, 63625/116935	Formulation does not contain a bittering agent (paras. 41 – 44)
Brodifacoum	65423	4Farmers Rat and Mouse Bait Pellets	4 Farmers Australia Pty Ltd	65423/50888	Formulation does not contain a dye (paras. 41 – 44)
Brodifacoum	69942	Farmalinx Rodi Wax Blocks	Farmalinx Pty Ltd	69942/62105	Formulation does not contain a bittering agent (paras. 41 – 44)
Brodifacoum	87657	Bainbridge Bait Blocks Rodenticide	Bainbridge Pty Ltd	87657/118892	Formulation does not contain a bittering agent (paras. 41 – 44)
Brodifacoum	87659	Bainbridge Bait Pellets Rodenticide	Bainbridge Pty Ltd	87659/118895	Formulation does not contain a bittering agent (paras. 41 – 44)
Brodifacoum	94213	4Farmers Rat and Mouse Blocks	4 Farmers Australia Pty Ltd	94213/141828	Formulation does not contain a bittering agent (paras. 41 – 44)
Bromadiolone	33908	Bromakil Block Bait for Rats and Mice	De Sangosse Australia Pty. Ltd.	33908/01, 33908/0403, 33908/56728, 33908/107570	Formulation does not contain a bittering agent (paras. 41 – 44)
Bromadiolone	33911	Bromakil Pellet Bait for Rats and Mice	De Sangosse Australia Pty. Ltd.	33911/01, 33911/0202, 33911/0402, 33911/0901, 33911/54503, 33911/56726, 33911/107568	Formulation does not contain a bittering agent (paras. 41 – 44)
Bromadiolone	47484	Bromakil Super Rat Drink	De Sangosse Australia Pty. Ltd.	47484/107572, 47484/0901, 47484/01	Bait concentrate – liquid product (paras. 45 – 47) Formulation does not contain a bittering agent (paras. 41 – 44)
Bromadiolone	48145	Bromakil Grain Bait for Rats and Mice	De Sangosse Australia Pty. Ltd.	48145/01, 48145/1201, 48145/54504, 48145/56729, 48145/107571	Formulation does not contain a bittering agent (paras. 41 – 44)
Bromadiolone	51245	Mouseoff Bromadiolone Rodent Bait	Animal Control Technologies (Australia) Pty Ltd	51245/0499, 51245/0603, 51245/0604, 51245/0701, 51245/0800, 51245/0999, 51245/106952	Formulation does not contain a bittering agent (paras. 41 – 44)

Agricultural chemical	Registration number	Product name	Holder	Label approval number(s) associated with the product	Summary of reasons for safety concerns and cancellation
Bromadiolone	61668	Bromakil Kills Rats and Mice!	De Sangosse Australia Pty. Ltd.	61668/0407, 61668/107586	Formulation does not contain a bittering agent (paras. 41 – 44)
Bromadiolone	64931	Rodemise Bromadiolone Rodent Block	Animal Control Technologies (Australia) Pty Ltd	64931/49617, 64931/101539, 64931/102579, 64931/104910	Formulation does not contain a bittering agent (paras. 41 – 44)
Bromadiolone	65675	Imtrade Alley Cat Rodenticide Wax Blocks	Imtrade Australia Pty Ltd	65675/102999, 65675/51544	Formulation does not contain a bittering agent (paras. 41 – 44)
Bromadiolone	67142	Surefire Broma Grain Bait Rodenticide	PCT Holdings Pty Ltd	67142/55303	Formulation does not contain a bittering agent (paras. 41 – 44)
Bromadiolone	67578	Rodemise Super Bromadiolone Rodent Block	Animal Control Technologies (Australia) Pty Ltd	67578/56393, 67578/101717	Formulation does not contain a bittering agent (paras. 41 – 44)
Bromadiolone	69641	Rat Stop Grain Bait	Oztec Rural Pty Limited	69641/61306	Formulation does not contain a bittering agent (paras. 41 – 44)
Bromadiolone	93518	Surefire Broma Liquid Rodenticide	PCT Holdings Pty Ltd	93518/139416	Bait concentrate – liquid product (paras. 45 – 47)
Coumatetralyl	42040	Readi Rac Rat & Mouse Killer	David Gray & Co. Pty Limited	42040/0702	Formulation does not contain a bittering agent (paras. 41 – 44)
Coumatetralyl	49256	Ratex Mouse and Rat Bait	Parafarm Pty Ltd	49256/01, 49256/0101, 49256/0402, 49256/0206, 49256/52077	Formulation does not contain a bittering agent (paras. 41 – 44)
Coumatetralyl	52182	Racumin 8 Rat and Mouse Rodenticide	2022 Environmental Science Au Pty Ltd	52182/148185, 52182/0704, 52182/1099	Bait concentrate – powder product (paras. 45 – 47) Formulation does not contain a bittering agent (paras. 41 – 44)
Coumatetralyl	86417	Racumin TP Rat and Mouse Rodenticide	2022 Environmental Science Au Pty Ltd	86417/115726	Bait concentrate – powder product (paras. 45 – 47) Formulation does not contain a bittering agent (paras. 41 – 44)
Difenacoum	65672	Rodemise Difenacoum Rodent Bait Blocks	Animal Control Technologies (Australia) Pty Ltd	65672/51541	Formulation does not contain a bittering agent (paras. 41 – 44)
Difenacoum	85513	Amgrow Patrol Rat & Mouse Soft Bait Rodenticide	Australian Agribusiness (Holdings) Pty Ltd	85513/113487, 85513/115837	Formulation does not contain a dye (paras. 41 – 44)
Diphacinone	54756	RAMIK Green Bait Bits Rodenticide	Neogen Australasia Pty Limited	54756/0106, 54756/0606, 54756/109643	Formulation does not contain a bittering agent (paras. 41 – 44)

Agricultural chemical	Registration number	Product name	Holder	Label approval number(s) associated with the product	Summary of reasons for safety concerns and cancellation
Warfarin	33942	David Grays Rat 'N' Mouse Killer	David Gray & Co. Pty Limited	33942/0802	Formulation does not contain a bittering agent or dye (paras. 41 – 44)
Warfarin	33945	RCI Ratblitz Bait	Ruth Consolidated Industries Pty Ltd	33945/0899	Formulation does not contain a bittering agent or dye (paras. 41 – 44)
Warfarin	42368	Rat Kill	Omega Pest Control Pty. Ltd.	42368/45031	Formulation does not contain a bittering agent or dye (paras. 41 – 44)
Warfarin	60285	Double Strength Ratsak Kills Rats & Mice	Duluxgroup (Australia) Pty Ltd	60285/0609, 60285/0905	Formulation does not contain a bittering agent (paras. 41 – 44)

Attachment B: Draft statement of reasons for the proposed decision to cancel certain anticoagulant rodenticide products and labels

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Background

Reconsideration of anticoagulant rodenticide chemical products and labels

- On 2 November 2021, the APVMA provided notices under section 32 of the Agvet Code that the APVMA was reconsidering the registration of chemical products containing anticoagulant rodenticides and the approval of labels for containers for these chemical products. This reconsideration is being undertaken in accordance with the provisions of Division 4 of Part 2 of the Code.
- The notices issued under section 32 of the Agvet Code stated that the matters the APVMA proposed to deal with in the reconsideration included assessment of chemistry, toxicology, worker and public exposure, residues (including trade) and environment aspects of anticoagulant rodenticide active constituent approvals, product registrations and label approvals. Further, in relation to chemical products and labels, the basis of the reconsideration was whether the products continue to meet the safety criteria set out in section 5A of the Agvet Code, the products continue to meet the trade criteria as set out in section 5C of the Agvet Code, the labels

continue to meet the labelling criteria set out in section 5D of the Agvet Code, and the product and label complies with any requirement prescribed by the Agricultural and Veterinary Chemicals Code Regulations 1995 (Agvet Regulations).

3. In those notices while the APVMA did have concerns about whether:

- 3.1. the products continue to meet the safety criteria set out in section 5A of the Agvet Code,
- 3.2. the products continue to meet the trade criteria as set out in section 5C of the Agvet Code, and
- 3.3. the labels continue to meet the labelling criteria set out in section 5D of the Agvet Code,

no concerns were raised about whether the use of products in accordance with current instructions for use are not effective. Therefore, whether the products continue to meet the efficacy criteria as set out in section 5B of the Agvet Code was not included as a matter to be dealt with as part of the anticoagulant rodenticide reconsideration in notices issued under section 32 of the Agvet Code and the APVMA has not decided to deal with this matter during the reconsideration.

- 4. Section 32(2B) of the Agvet Code provides that nothing in subsections (1)(2) or (2A) requires the APVMA to deal with a particular matter as part of the reconsideration. During the reconsideration, the APVMA decided not to deal with whether chemical products continue to meet the trade criteria as part of the reconsideration. The basis for deciding not to deal with these trade aspects is that if chemical products are used in accordance with instructions for use necessary to ensure they meet the safety criteria, any product that is the subject of trade between Australia and places outside of Australia should not contain any anticoagulant rodenticide residues.
- 5. Therefore, the reconsideration of the chemical products containing anticoagulant rodenticides was limited to consideration of whether the APVMA is satisfied that the relevant chemical products met the safety criteria and comply with any requirements prescribed by the Agvet Regulations.
- 6. The reconsideration of anticoagulant rodenticide label approvals considered whether the labels meet the labelling criteria, with respect to whether a label contains adequate instructions to ensure, as far as reasonably practicable, that the product meets the safety criteria.
- 7. The APVMA has finalised the technical assessments for this reconsideration. These assessments took into account information provided in response to the notices under section 32 of the Agvet Code issued on 2 November 2021, information provided in response to additional notices under section 32 of the Agvet Code issued on 17 March 2025 and notices under section 33 of the Agvet Code issued on 28 November 2022, 27 June 2024 and 4 July 2024, information in the APVMA records submitted for the registration of relevant products and approval of relevant labels, and any relevant information in the public domain identified by the APVMA (Attachment C).
- 8. I have had regard to the technical assessments before proposing to make this decision. I agree with their conclusions (except where I indicate to the contrary in this statement of reasons).
- 9. I am now giving notice under section 34AB of the Agvet Code of my proposed decision to cancel the chemical product registrations and associates label approvals listed in Attachment A of this notice.

Legal framework

Affirmation

10. Section 34(1) of the Agvet Code provides that the APVMA must affirm an approval or registration if, and only if, it is satisfied that:
 - 10.1. for a chemical product registration – that the product meets the safety criteria, the trade criteria and the efficacy criteria, and the product complies with any requirement prescribed by the Agvet Regulations.
 - 10.2. for a label – that the label meets the labelling criteria and the label complies with any requirement prescribed by the Agvet Regulations.
11. Subsection 34(2) of the Agvet Code provides that subsection (1) applies only to the extent that the APVMA decides to reconsider matters covered by the subsection.

Variation required to satisfy requirements for affirmation

12. Section 34A(1) of the Agvet Code provides that if the APVMA is not satisfied under section 34(1) but is satisfied that the relevant particulars or conditions of the approval or registration can be varied in such a way as to allow the approval to be affirmed, the APVMA must vary the relevant particulars or conditions.
13. Section 34A(2) of the Agvet Code specifies the information that the APVMA may have regard to in making a decision to vary the relevant particulars or conditions. It provides that, the APVMA may have regard only to the following:
 - 13.1. submissions, information, reports, results or samples that it had regard to under section 34;
 - 13.2. submissions made to the APVMA in response to the invitation under paragraph 34AB(2)(f).

Cancellation or suspension

14. Section 34AA(1) of the Agvet Code provides that if the APVMA does not affirm the approval or registration, it must suspend or cancel the approval or registration.

Statutory criteria

15. The statutory criteria to which reference was made in paragraph 10 above in relation to the affirmation of the registration of a chemical product and approval of a label are set out below.

Safety criteria

16. The definition of '*meets the safety criteria*' with respect to an active constituent and a chemical product is set out in section 5A of the Agvet Code. In relation to chemical products, subsections 5A(1) and (3) of the Agvet Code provides:

5A Definition of *meets the safety criteria*

- (4) An active constituent or chemical product ***meets the safety criteria*** if use of the constituent or product, in accordance with any instructions approved, or to be approved, by the APVMA for the constituent or product or contained in an established standard:

- (g) is not, or would not be, an undue hazard to the safety of people exposed to it during its handling or people using anything containing its residues; and
 - (h) is not, or would not be, likely to have an effect that is harmful to human beings; and
 - (i) is not, or would not be, likely to have an unintended effect that is harmful to animals, plants or things or to the environment.
- (3) For the purposes of being satisfied as to whether a chemical product meets the safety criteria, the APVMA:
 - (c) must have regard to the following:
 - (viii) the toxicity of the product and its residues, including metabolites and degradation products, in relation to relevant organisms and ecosystems, including human beings;
 - (ix) the relevant poison classification of the product under the law in force in this jurisdiction;
 - (x) how the product is formulated;
 - (xi) the composition and form of the constituents of the product;
 - (xii) any conditions to which its registration is, or would be, subject;
 - (xiii) any relevant particulars that are, or would be, entered in the Register for the product;
 - (via) whether the product conforms, or would conform, to any standard made for the product under section 6E to the extent that the standard relates to matters covered by subsection (1);
 - (xiv) any matters prescribed by the regulations; and
 - (d) may have regard to one or more of the following:
 - (vii) the acceptable daily intake of each constituent contained in the product;
 - (viii) any dietary exposure assessment prepared under subsection 82(4) of the *Food Standards Australia New Zealand Act 1991* as a result of any proposed variation notified under subsection 82(3) of that Act in relation to the product, and any comments on the assessment given to the APVMA under subsection 82(4) of that Act;
 - (ix) whether any trials or laboratory experiments have been carried out to determine the residues of the product and, if so, the results of those trials or experiments and whether those results show that the residues of the product will not be greater than limits that the APVMA has approved or approves;
 - (x) the stability of the product;
 - (xi) the specifications for containers for the product;
 - (xii) such other matters as it thinks relevant.

17. In regard to matters in which the APVMA must have regard to for the purposes of being satisfied as to whether a chemical product meets the safety criteria, regulation 8AB of the Agvet Regulations prescribes the following:

8AB Safety criteria—chemical products

- (3) For subparagraph 5A(3)(a)(vii) of the Code, the following are prescribed matters for a chemical product:
 - (g) for all chemical products—the method of analysis (if any) of the chemical composition and form of the constituents of the chemical product;
 - (h) for a product manufactured in Australia—whether each step in the manufacture of the product complies, or will comply, with the manufacturing principles and the Australian GMP Code;

- (i) for a product manufactured outside Australia—whether each step in the manufacture of the product complies, or will comply, with a standard that the APVMA has determined is comparable to the manufacturing principles and the Australian GMP Code;
 - (j) for a molluscicide in the form of a bait and of which the active constituent is metaldehyde:
 - (iii) whether the product contains sufficient green pigment or dye to colour the bait a distinctive green colour; and
 - (iv) whether the product contains, in the bait, any bone meal or other product of animal origin;
 - (k) for a molluscicide in the form of a bait and of which the active constituent is methiocarb:
 - (iii) whether the product contains sufficient blue pigment or dye to colour the bait a distinctive blue colour; and
 - (iv) whether the product contains, in the bait, any bone meal or other product of animal origin;
 - (l) for an agricultural chemical product to be applied to seeds to be stored before planting or sowing—whether the product contains sufficient pigment or dye to colour the seed to enable the seed to be readily distinguished from seed to which the product has not been applied.
- (4) However, paragraphs (1)(b) and (c) do not apply if the product is prescribed under subregulation 59(1) for the purposes of section 120A of the Code.

18. In relation to subregulation 8AB(2), there are a number of chemical products prescribed under subregulation 59(1) for the purposes of section 120A of the Code. In relation to the reconsideration of anticoagulant rodenticide chemical products, I note that 'any agricultural chemical product' is prescribed in paragraph 59(1)(a) for the purposes of section 120A of the Code.

Efficacy criteria

19. The definition of '*meets the efficacy criteria*' with respect to a chemical product is set out in section 5B of the Agvet Code. As outlined in paragraph 3 above, the APVMA did not consider the efficacy criteria as part of this reconsideration.

Trade criteria

20. The definition of '*meets the trade criteria*' with respect to a chemical product is set out in section 5C of the Agvet Code. As outlined in paragraph 4 above, the APVMA did not consider the trade criteria as part of this reconsideration.

Labelling criteria

21. The definition of '*meets the labelling criteria*' with respect to a label for containers for a chemical product is set out in section 5D of the Agvet Code. This provides:

5D Definition of meets the labelling criteria

- (1) A label for containers for a chemical product *meets the labelling criteria* if the label contains adequate instructions relating to such of the following as are appropriate:
- (a) the circumstances in which the product should be used;
 - (b) how the product should be used;
 - (c) the times when the product should be used;
 - (d) the frequency of the use of the product;
 - (e) the withholding period after the use of the product;

- (f) the re-entry period after the use of the product;
 - (g) the disposal of the product when it is no longer required;
 - (h) the disposal of containers of the product;
 - (i) the safe handling of the product and first aid in the event of an accident caused by the handling of the product;
 - (j) any matters prescribed by the regulations.
- (2) For the purposes of being satisfied as to whether a label meets the labelling criteria, the APVMA must have regard to the following:
- (e) any conditions to which its approval is, or would be, subject;
 - (f) any relevant particulars and instructions that are, or would be, entered in the relevant APVMA file for the label;
 - (g) whether the label conforms, or would conform, to any standard made for the label under section 6E to the extent that the standard relates to matters covered by subsection (1);
 - (h) any matters prescribed by the regulations.

22. In regard to adequate instructions to be contained on a label for containers for a chemical product, regulation 8AE of the Agvet Regulations prescribes the following:

8AE Labelling criteria

- (1) For paragraph 5D(1)(j) of the Code, the following are prescribed matters:
- (a) for a chemical product that is a veterinary chemical product—the duration of any treatment using the product;
 - (b) the prevention of undue prejudice to trade or commerce between Australia and places outside of Australia;
 - (c) the appropriate signal words (if any) required by the current Poisons Standard;
 - (d) for a chemical product that is a date controlled chemical product—the storage of containers for the product;
 - (e) any other matter determined by the APVMA CEO under subregulation (2).
- (2) For paragraph 6(2)(c) of the Act, the APVMA CEO may determine matters in relation to which a label must contain adequate instructions.

23. As defined in section 3 of the Agvet Code, “**adequate**”, in relation to instructions on a label, ‘means adequate to ensure, as far as reasonably practicable, that the product meets the safety criteria and the trade criteria.’ These criteria are set out above, at paragraphs 16 and 19, respectively.

24. There are no matters prescribed by the regulations with respect to section 5D(2)(d) of the Agvet Code.

Relevant particulars

25. As defined in section 3 of the Agvet Code, in relation to the registration of a chemical product, the “**relevant particulars**” means the distinguishing number, any instructions for use and any other particulars required by paragraph 20(1)(c) to be entered in the Register. The particulars prescribed by the regulations for the purposes of paragraph 20(1)(c) of the Agvet Code are detailed in regulation 16 of the Agvet Regulations, as follows:

16 Particulars of registered chemical products to be recorded

For paragraph 20(1)(c) of the Code, the following particulars are prescribed:

- (a) the distinguishing name of the chemical product;
- (b) the constituents of the chemical product;

- (c) the concentration of each constituent of the chemical product;
- (d) if possible, the composition and purity of each active constituent of the chemical product;
- (da) the formulation type for the chemical product;
- (db) the net contents for the chemical product;
- (e) identifying information for the holder of the registration of the chemical product;
- (g) the name of each manufacturer of the chemical product;
- (h) the address of each site at which the chemical product is manufactured by the manufacturer;
- (j) the date of entry of these particulars in the Register of Chemical Products;
- (k) identifying information for any nominated agent for the registration.

26. As defined in section 3 of the Agvet Code, in relation to the approval of a label, the **“relevant particulars”** means the information required to be recorded in the relevant APVMA file by subparagraphs 21(c)(i) to (iva). Section 21 of the Agvet Code details how the approval of a label takes place, including the information to be recorded in the relevant APVMA file, as follows:

21 How approval of label takes place

Approval of a label takes place when the APVMA:

- (a) determines the particulars prescribed by the regulations that are appropriate to be contained on the label; and
- (b) gives a distinguishing number to the label; and
- (c) records the following information in the relevant APVMA file:
 - (vi) the name of the person who applied for the approval as the holder of the approval;
 - (vii) the name of any nominated agent for the approval;
 - (viii) the distinguishing number;
 - (ix) the instructions and any particulars that are to be contained on the label;
 - (iva) any other particulars prescribed by the regulations;
 - (x) any conditions of the approval imposed by the APVMA.

27. The particulars prescribed for the purposes of paragraph 21(a) and subparagraph 21(c)(iva) of the Agvet Code are set out in regulation 17 of the Agvet Regulations, as detailed below. The particulars prescribed in subregulation 17(1) of the Agvet Regulations are also the particulars that are to be contained on the label and recorded in the relevant APVMA for the purposes of subparagraph 21(c)(iv) of the Agvet Code.

17 Particulars for label

- (4) For paragraph 21(a) of the Code, the following particulars are prescribed:
 - (g) the appropriate signal words required by the current Poisons Standard;
 - (h) the name of the chemical product that is to appear on a label for containers of the chemical product;
 - (i) the name of each active constituent of the product;
 - (j) the proportion of each active constituent of the product;
 - (k) the name of each constituent for the product that is:
 - (iii) not an active constituent; and
 - (iv) classified as a poison in the current Poisons Standard;
 - (l) the proportion of each constituent referred to in paragraph (e);
 - (h) the net contents of the product;
 - (j) particulars determined by the APVMA CEO under subregulation (2).

- (5) For paragraph 6(2)(c) of the Act, the APVMA CEO may determine additional particulars to be placed on a label for a product.
- (6) For subparagraph 21(c)(iva) of the Code, the following information is prescribed in relation to the approval of a label for a chemical product, unless the information has already been recorded for the approval of the label as part of the registration of the chemical product:
 - (e) identifying information for the holder of the approval;
 - (f) identifying information for any nominated agent for the approval;
 - (g) the distinguishing name of the chemical product that is prescribed under paragraph 16(a) and entered in the Register;
 - (h) the distinguishing number of the chemical product that is entered in the Register.

Phase-out provisions

28. The provisions of the Agvet Code which relate to “phase-out” of cancelled products or products bearing cancelled labels are set out below.

Phase-out of cancelled products and labels

29. If the APVMA cancels the registration of a product or approval of the label, it must give notice in accordance with the provisions in Division 5 of Part 2 of the Code. Relevantly, section 45B of the Code provides in effect that the APVMA may cause a permit to be deemed to have been granted to persons which would permit the possession, custody or use of a product which has been cancelled (or a product bearing a label whose approval has been cancelled). As set out in subsection 45B(2) of the Agvet code, this deemed permit (be it taken to have been issued under subsection 45B(1) or subsection 45B(3) of the Code) remains in force until whichever of the following events first occurs:
- 29.1. the expiration of a period of 1 year after the day of the cancellation; or
 - 29.2. the revocation of the cancellation by the APVMA;
 - 29.3. the publication, by APVMA, of a notice in the Gazette, declaring that subsection 45B(2) of the Code ceases to apply in respect of the product.
30. While the Code does not prescribe matters to be taken into account in the making of decisions in relation to the phase-out of cancelled products and labels, it is clear that such decisions are to be made based on considerations of risk.

Findings on material questions of fact

31. In relation to the anticoagulant rodenticide chemical products listed in Attachment A of this notice:
- 31.1. I am **not satisfied** that the chemical products meet the safety criteria, nor that the relevant particulars or conditions of the chemical product registrations could be varied in such a way so that the products meet the safety criteria so as to allow the registrations to be affirmed. This is due to an unacceptable likelihood of an effect that is harmful to human beings and/or an unintended effect that is harmful to non-target terrestrial vertebrates.
 - 31.2. Under section 34AA of the Agvet Code, I propose to **cancel** these chemical product registrations on the basis that I have not affirmed the chemical products registrations, and I do not consider that suspension for

a stated period of time is a viable pathway to resolve the potential safety risks to human beings and/or non-target terrestrial vertebrates.

32. In relation to the labels for anticoagulant rodenticide chemical products listed in Attachment A of this notice:
- 32.1. I am **not satisfied** that the labels meet the labelling criteria, nor that the relevant particulars or conditions of the label approvals could be varied in such a way so that the labels meet the labelling criteria so as to allow the approvals to be affirmed.
- 32.2. Under section 34AA of the Agvet Code, I propose to **cancel** the label approvals on the basis that I have not affirmed the label approvals, and I do not consider that suspension for a stated period of time is a viable pathway to resolve the inadequacy of instructions on labels.

Reasons

Chemical products

33. For the purposes of proposing a course of action in relation to the chemical product registrations listed in Attachment A of this notice, I must determine whether I can affirm the registration of these chemical products or whether I can vary the relevant particulars and conditions in such a way as to allow the registrations to be affirmed. If I do not affirm the registration of the chemical products listed in Attachment A of this notice, I must cancel or suspend the registration of the chemical products.

Consideration of the safety criteria

34. In determining whether I am satisfied that the chemical products listed in Attachment A of this notice meet the safety criteria, I note that anticoagulant rodenticides are not listed chemical products and no established standard containing instructions has been made in accordance with section 8U(7) of the Agvet Code. Therefore, I have considered whether the products listed in Attachment A of this notice meet the safety criteria with respect to the use of the product in accordance with any instructions approved, or to be approved, by the APVMA.
35. Further, in relation to whether the chemical products listed in Attachment A of this notice meet the safety criteria, I have considered the following matters set out in section 5A(3)(a) of the Agvet Code:
- 35.1. The toxicity of the product and its residues, including metabolites and degradation products, in relation to relevant organisms and ecosystems, including human beings (s 5A(3)(a)(i) of the Agvet Code). This consideration has been specifically limited to the toxicity of the chemical products to human beings and non-target terrestrial vertebrates, noting that anticoagulant rodenticides are vertebrate poisons that pose the greatest risk to non-target vertebrate species, rather than insects or other invertebrates.
- 35.2. How the product is formulated (s 5A(3)(a)(iii) of the Agvet Code). Specifically, whether the product is formulated to contain a bittering agent and dye as constituents, and whether the product is formulated as a liquid bait concentrate or powder bait concentrate that contains a relatively high concentration of the anticoagulant rodenticide active constituent.
- 35.3. The following relevant particulars that are, or would be, entered into the Register for the product (s 5A(3)(a)(vi) of the Agvet Code): 'any instructions for use', 'the constituents of the chemical product (r 16(b) of the Agvet Regulations)', 'the concentration of each constituent (r 16(c) of the Agvet Regulations)' and 'the formulation type' (r 16(da) of the Agvet Regulations).

36. My considerations of these matters are detailed in the *'Toxicity of anticoagulant rodenticides to human beings and non-target terrestrial vertebrates'* (paragraphs 39 – 40), *'How the product is formulated: bittering agents and dyes'* (paragraphs 41 – 44) and *'How the product is formulated: liquid and powder bait concentrates'* (paragraphs 45 – 47) sections of these reasons below. Having considered these matters, I have formed the view that chemical products **cannot** meet the safety criteria if:
- 36.1. The chemical product does not contain a bittering agent and dye as formulation constituents, due to an **unacceptable** likelihood of an effect that is harmful to human beings (section 5A(1)(b) of the Agvet Code) and an unintended effect that is harmful to non-target terrestrial vertebrates (component of section 5A(1)(c) of the Agvet Code).
- 36.2. The chemical product is formulated as either a liquid bait concentrate or a powder bait concentrate, due to an **unacceptable** likelihood of an unintended effect that is harmful to non-target terrestrial vertebrates (component of section 5A(1)(c) of the Agvet Code).
37. Given that the chemical products listed in Attachment A of this notice are subject to a determination listed in paragraph 36 of the reasons, I am **not satisfied** that the chemical product meets the safety criteria. I am also **not satisfied** that any variation to the relevant particulars or conditions of the registration by the APVMA would sufficiently lower the risks to an acceptable margin, noting that it is inappropriate for the APVMA to independently vary the details on how a chemical product is formulated and/or that the formulation type is an intrinsic property of these chemical products.
38. Further, given that I have determined that I **cannot affirm** the registrations of the chemical products listed in Attachment A of this notice based only on consideration of the matters set out in paragraph 35 and 36 of these reasons, I have not had further regard to the legislative criteria listed in section 5A(1) of the Agvet Code related to whether a chemical product meets the safety criteria, the remaining matters set out in section 5A(3) of the Agvet Code, or whether a chemical product complies with any requirement prescribed by the regulations.

Toxicity of anticoagulant rodenticides to human beings and non-target terrestrial vertebrates

39. I have considered and relied on the scientific expert assessment of the toxicity of brodifacoum, bromadiolone, coumatetralyl, difenacoum, diphacinone and warfarin (**relevant active constituents**), as summarised in the section *'4.2 Summary of available toxicological studies'* of the *Anticoagulant Rodenticides Review Technical Report*, and I note the following with respect to oral toxicity:
- 39.1. The relevant active constituents are all considered to have a high acute oral toxicity based on acute toxicity studies using rats. In regard to other test animal species, brodifacoum still has a high acute toxicity to dogs, whereas diphacinone has a moderate acute oral toxicity in mice and coumatetralyl has a low acute oral toxicity in rabbits. The acute oral toxicological potential of chemical products containing low levels of these active constituents is reduced, with chemical products containing 0.25% w/w brodifacoum, 0.005% w/w bromadiolone, 0.75% w/w coumatetralyl, 0.005% w/w difenacoum and 0.05% w/w diphacinone considered to have a low acute oral toxicity based on studies using mice and/or rats.
- 39.2. In relation to the active constituent warfarin, I note that the APVMA does not have access to the standard acute oral toxicity studies typically used for quantitative risk assessments. However, I note that the warfarin (as the sodium salt) has been used extensively as a human anticoagulant therapeutic drug for many years and the potential hazards associated with exposure are well understood from a toxicological perspective. Given the mode of action of warfarin as a vitamin K antagonist, it is evident that warfarin has hazardous acute oral potential for human beings and that risks of unintended oral exposure should be mitigated.

40. I have considered and relied on the scientific expert assessment of the environmental toxicology of the **relevant active constituents** to terrestrial vertebrates, as summarised in section '3.2.1 Effects on terrestrial vertebrates' of the *Anticoagulant Rodenticides Review Technical Report*, and I note that:
 - 40.1. The anticoagulant rodenticides brodifacoum, bromadiolone, coumatetralyl, difenacoum, diphacinone and warfarin have a high toxicity to mammals via acute exposure (i.e. gavage administration) and/or dietary exposure when rodents are considered the representative species (LD_{50} or $LC_{50} < 100$ mg/kg bw or mg/kg food; $LDD_{50} < 10$ mg/kg bw/day). Most anticoagulant rodenticides where acute and/or dietary toxicity has been studied in non-rodent mammalian species, brodifacoum (rabbits), bromadiolone (dogs and ferrets), difenacoum (dogs), diphacinone (ferrets) and warfarin (minks) were still determined to have a high toxicity to mammals. However, warfarin only had a moderate toxicity to dogs with acute exposure (LD_{50} 100 – 2000 mg/kg bw).
 - 40.2. Anticoagulant rodenticides also pose a secondary poisoning risk to mammals if they consume poisoned rats or mice, poisoned non-target animals or insects. Secondary poisoning studies with mammals indicate that mortality of the test animal is possible if they consume prey with a high body burden (i.e. high levels of the anticoagulant rodenticide are present within the prey animal), and that mortality of mammals generally occurred after a feeding period of 3 days onwards with no clear distinction between first-generation and second-generation anticoagulant rodenticides.
 - 40.3. The toxicity of anticoagulant rodenticides to birds ranged from low to high dependant on the active constituent, type of exposure and species of bird involved in the study. Based on acute exposure studies (i.e. gavage administration), brodifacoum and difenacoum were determined to have a high toxicity to birds ($LD_{50} < 100$ mg/kg bw), bromadiolone was determined to have a moderate toxicity to birds (LD_{50} 100 – 2000 mg/kg bw), and the first-generation anticoagulant rodenticides coumatetralyl, diphacinone and warfarin were found to have a low toxicity to birds ($LD_{50} > 2000$ mg/kg bw). Alternatively, based on dietary exposure studies, brodifacoum, bromadiolone, coumatetralyl and difenacoum were all determined to have a high toxicity to birds ($LC_{50} < 100$ mg/kg food; $LDD_{50} < 10$ mg/kg bw/d) and diphacinone was determined to have a moderate toxicity to birds (LC_{50} 100 – 2000 mg/kg food). Further, in a reproductive study with coumatetralyl, parental death was observed in birds with low dietary concentrations of 60 mg/kg feed.
 - 40.4. In relation to secondary poisoning of birds, only second-generation anticoagulant rodenticides appear to pose a significant risk. Secondary poisoning studies with the first-generation anticoagulant rodenticides coumatetralyl, diphacinone and warfarin indicate that mortality of the test bird is unlikely if they consume poisoned animals. However, secondary poisoning studies with second-generation anticoagulant rodenticides indicate that mortality of the test bird is possible if they consume animals with high body burdens, with the secondary poisoning hazard potential being the highest for the active constituents brodifacoum and difenacoum.
 - 40.5. A number of sub-lethal effects have also been observed in primary and secondary poisoning studies with mammals and birds. This includes sub-lethal effects that appear to directly relate to vitamin K antagonism (the mode of action of anticoagulant rodenticides) such as bleeding around body orifices, metrorrhagia, blood clots and internal hematomas. Further, in reproductive toxicity studies, possible effects on the ovarian function of rats were observed with long-term exposure to difenacoum, and a decreased numbers of surviving 14-day old chicks was observed with long-term exposure of birds to difenacoum or bromadiolone in drinking water.
 - 40.6. The limited reptile toxicity studies support the position that reptiles have a high tolerance to anticoagulant rodenticides poisoning. Coumatetralyl, diphacinone and brodifacoum were determined to have low toxicity to fence lizards with acute exposure. Turtles and boas have exhibited a relative insensitivity to diphacinone

and brodifacoum, while lizards appeared to be somewhat more sensitive. Further, in relation to the effects of diphacinone and warfarin on the brown tree snake, respective lowest lethal doses of 10 and 40 mg/kg bw were determined.

How the product is formulated: bittering agents and dyes

41. Based on my review and consideration of human health and environment scientific assessment reports, I consider that a bittering agent and dye are critical formulation components of anticoagulant rodenticide chemical products to reduce the likelihood of an effect that is harmful to human beings or an unintended effect that is harmful to non-target terrestrial vertebrates.
 - 41.1. As summarised in sections '4.3 Human adverse events involving anticoagulant rodenticide exposure in Australia' and '4.8.3 Bystander exposure' of the *Anticoagulant Rodenticides Review Technical Report*, I note that there is the potential for human bystanders to be exposed to anticoagulant rodenticide chemical products once the baits have been applied in either indoor or outdoor areas, and that information on accidental exposures of human beings to anticoagulant chemical products indicates that the majority of incidents have involved young children inadvertently accessing the baits. Further, I note that inclusion of a bittering agent as a constituent of a chemical product is intended to reduce the likelihood of ingestion of a bait by a human being, as they are likely to stop consuming an unpalatable item if accidentally accessed, and inclusion of a dye as a constituent of a chemical product is intended to provide a visual reference to indicate a human being may have ingested some of the bait. While I note most accidental exposure incidents in children reviewed as part of this reconsideration have resulted in either no adverse effects or relatively minor effects, exposure to anticoagulant rodenticides has the potential to result in the need for medical care. Therefore, I consider that inclusion of a bittering agent and dye as constituents in an anticoagulant rodenticide chemical product formulation is critical to reduce the potential for poisoning incidents and the likelihood that use of chemical products may have an effect that is harmful to human beings.
 - 41.2. As summarised in sections '3.3.2 Risk to terrestrial vertebrates' and '3.4.1 Products and uses not supported' of the *Anticoagulant Rodenticides Review Technical Report*, I note that bittering agents are well-known repellents to a number of non-target terrestrial vertebrate species such as cats, dogs, horses and birds, but do not change the efficacy of baits against target rodent species. Further, I note that the colouring of baits (in particular, yellow and green) has been shown to have a consumption deterrent effect for certain species of birds, which is important for outdoor baiting situations where small non-target species may be able to enter bait stations and/or bait may be spilled or expelled from bait stations by the target species. Therefore, I also consider that inclusion of a bittering agent and dye as constituents in an anticoagulant rodenticide chemical product formulation is critical to reduce the likelihood that use of the chemical products may have an unintended effect that is harmful to non-target terrestrial vertebrates.
42. Based on a review of the details of the constituents of the chemical products that are entered into the Register for the chemical products listed in Attachment A, I note:
 - 42.1. a number of chemical products containing the anticoagulant rodenticide brodifacoum (48332, 57805, 63625, 69942, 87657, 87659 and 94213), bromadiolone (33908, 33911, 47484, 48145, 51245, 61668, 64931, 65675, 67142, 67578 and 69641), coumatetralyl (42040, 49256, 52182 and 86417), difenacoum (65672), diphacinone (54756) or warfarin (33942, 33945, 42368 and 60285) do not appear to contain a bittering agent that is required to reduce the likelihood of an effect that is harmful to human beings or an unintended effect that is harmful to terrestrial vertebrates; and

- 42.2. a number of chemical products containing the anticoagulant rodenticide brodifacoum (57805 and 65423), difenacoum (85513) or warfarin (33942, 33945 and 42368) do not contain a dye that is required to reduce the likelihood of an effect that is harmful to human beings or an unintended effect that is harmful to terrestrial vertebrates; and
- 42.3. one chemical product formulated as a liquid bait concentrate (93518) contains both the requisite bittering agent and dye.
43. Based on the toxicity of anticoagulant rodenticides and potential exposure pathways for human beings and non-target terrestrial vertebrates from use of chemical products, as detailed above, I consider that the use of anticoagulant chemical products that do not contain the requisite dye and/or bittering agent in accordance with any instructions approved, or to be approved, by the APVMA have an **unacceptable** likelihood of an effect that is harmful to human beings and an unintended effect that is harmful to non-target terrestrial vertebrates. Further, I am **not satisfied** that any variation to the relevant particulars or conditions of relevant chemical products made as part of this reconsideration would reduce the likelihood of an effect that is harmful to human beings and an unintended effect that is harmful to non-target terrestrial vertebrates to an acceptable margin.
44. As such, I am **not satisfied** that chemical products that do not contain a dye and/or bittering agent as a formulation constituent (33908, 33911, 33942, 33945, 42040, 42368, 47484, 48145, 48332, 49256, 51245, 52182, 54756, 57805, 60285, 61668, 63625, 64931, 65423, 65672, 65675, 67142, 67578, 69641, 69942, 85513, 86417, 87657, 87659 and 94213) meet the safety criteria. I am also **not satisfied** that the relevant particulars or conditions of the chemical products could be varied in such a way so that the products meet the safety criteria, noting that it is inappropriate for the APVMA to independently vary the details on how a chemical product is formulated.

How the product is formulated: liquid and powder bait concentrates

45. Based on my review and consideration of the environment scientific assessment, summarised in sections '3.3.2 Risks to terrestrial vertebrates' and '3.4.1 Products and uses not supported' of the *Anticoagulant Rodenticides Review Technical Report*:
- 45.1. I note that powder bait concentrates with a relatively high concentration of coumatetralyl have the potential to become airborne, and that there is a high risk of unintentional environmental exposure and misuse associated with use of bait concentrate chemical products formulated as either a liquid or powder. Further, I consider that the potential for unintentional environmental exposure stems from the fact that anticoagulant rodenticide liquids and powders are unlikely to be effectively contained during their use due to their easily spreadable nature. This can result in significant contamination of the treatment site and further widespread environmental contamination through both primary and secondary exposure pathways for non-target terrestrial vertebrates.
- 45.2. I note that primary and secondary exposure of non-target terrestrial vertebrates to the anticoagulant rodenticides bromadiolone and coumatetralyl has the potential to result in death or harmful sub-lethal effects. I also note that anticoagulant rodenticide residue burdens in wildlife can accumulate over time with repeat exposures, which may result in the accumulation of sufficient levels of anticoagulant rodenticide residues to cause death or morbidity resulting in death by other means. Further, I consider that an appreciable mortality of wildlife from use of anticoagulant rodenticide chemical products is an unintended effect that is harmful to non-target terrestrial vertebrates, even if potential population level effects have not been established.

46. Based on the toxicity of anticoagulant rodenticides and the potential for widespread environmental contamination from use of chemical products formulated as a liquid or powder bait concentrate, as detailed above, I consider that the use anticoagulant chemical products formulated as a bait concentrate in accordance with any instructions approved, or to be approved, by the APVMA have an **unacceptable** likelihood of an unintended effect that is harmful to non-target terrestrial vertebrates. Further, I am **not satisfied** that any variation to the relevant particulars or conditions of relevant chemical products would reduce the likelihood of an unintended effect that is harmful to non-target terrestrial vertebrates to an acceptable margin.
47. As such, I am **not satisfied** that chemical products formulated as a liquid bait concentration containing bromadiolone (47484 and 93518) and as a powder bait concentrate containing coumatetralyl (52182 and 86417) meet the safety criteria. I am also **not satisfied** that the relevant particulars or conditions of the chemical products could be varied in such as way so that the products meet the safety criteria, noting that the formulation type is an intrinsic property of these chemical products.

Safety criteria conclusions

48. I am **not satisfied** that the anticoagulant rodenticide chemical products listed in Attachment A of this notice meet the safety criteria, nor that the relevant particulars or conditions of the chemical products could be varied in such as way so that the products meet the safety criteria, due to an unacceptable likelihood of an effect that is harmful to human beings and/or an unintended effect that is harmful to non-target terrestrial vertebrates.

Label approvals

49. For the purposes of proposing a course of action in relation to the label approvals listed in Attachment A of this notice, I must determine whether I can affirm the approval of these labels or whether I can vary the relevant particulars and conditions in such a way as to allow the approvals to be affirmed. If I do not affirm the affirm the approval for the labels listed in Attachment A of this notice, I must cancel or suspend the approval of the labels.
50. In making a determination on the proposed course of action, I have considered whether each label meets the labelling criteria. Specifically, whether each label contains adequate instructions on the appropriate matters listed in sections 5D(1) of the Agvet Code to ensure, as far as reasonably practicable, that the product meets the safety criteria (further discussed above in paragraph 6 of these reasons).
- 50.1. As set out in the '*Chemical products*' (paragraphs 33 – 48) section of these reasons above, I am **not satisfied** that the anticoagulant chemical products listed an Attachment A of this notice meet the safety criteria, nor that the relevant particulars (including any instruction for use) or conditions of the products could be varied in such as way so that the products meet the safety criteria. This is because I consider that the use of the product in accordance with any instructions approved, or to be approved, by the APVMA has an **unacceptable** likelihood of an effect that is harmful to human beings and/or an unintended effect that is harmful to non-target terrestrial vertebrates.
- 50.2. Based on these chemical product determinations, I consider that adequate label instructions related to the circumstances in which the product should be used (section 5D(1)(a) of the Agvet Code) and how the product should be used (section 5D(1)(b) of the Agvet Code) **cannot** be established to ensure, as far as reasonably practicable, that the product would not be likely to have an effect that is harmful to human beings and/or would not be likely to have an unintended effect that is harmful to non-target terrestrial vertebrates.
51. Therefore, for the label approvals listed in Attachment A of these reasons, I am **not satisfied** that the labels meet the labelling criteria as I am **not satisfied** that the current instructions on the label are adequate to ensure, as far

as reasonably practicable, that the product meets the safety criteria. Further, as I consider that adequate label instructions related to the circumstances in which the product should be used (section 5D(1)(a) of the Agvet Code) and how the product should be used (section 5D(1)(b) of the Agvet Code) **cannot** be established, I am **not satisfied** that relevant particulars or conditions of the label approvals can be varied so the labels meet the labelling criteria.

52. Finally, given that I have determined that I **cannot affirm** the approval of the labels listed in Attachment A of these reasons based on only my consideration of instructions related to the circumstances in which the product should be used (section 5D(1)(a) of the Agvet Code) and how the product should be used (section 5D(1)(b) of the Agvet Code), I have not had further regard to whether a label contains adequate instructions related to remaining matters listed in sections 5D(1) of the Agvet Code, nor whether the label complies with any requirement prescribed by the regulations.

Conclusions

53. I am **not satisfied** that the chemical products listed in Attachment A of this notice meet the safety criteria, nor that the relevant particulars or conditions of the product registrations could be varied in such a way so that the products meet the safety criteria so as to allow the registrations to be affirmed. This is due to an unacceptable likelihood of an effect that is harmful to human beings and/or an unintended effect that is harmful to non-target terrestrial vertebrates.
54. I am **not satisfied** that the labels listed in Attachment A of this notice meet the labelling criteria, nor that the relevant particulars or conditions of the label approvals could be varied in such a way so that the labels meet the labelling criteria so as to allow the approvals to be affirmed.
55. Therefore, pursuant to section 34AA of the Agvet Code, I propose to:
- 55.1. **cancel** the chemical product registrations listed in Attachment A of this notice on the basis that I have not affirmed the chemical products registrations, and I do not consider that the that suspension for a stated period of time is a viable pathway to resolve the potential safety risks to human beings and/or non-target terrestrial vertebrates.
- 55.2. **cancel** the label approvals listed in Attachment A of this notice on the basis that I have not affirmed the label approvals, and I do not consider that suspension for a stated period of time is a viable pathway to resolve the inadequacy of instructions on labels.

Attachment C: Information on which the reasons are based

The information on which the reasons in the draft statement of reasons for proposed course of action are set out below.

- 1) Information provided to the APVMA in response to notices as listed in the [Anticoagulant Rodenticides Data List](#) and cited in the Review Technical Report, noting that Confidential Commercial Information restrictions limit access to some of these data:
 - a. Issued to holders of anticoagulant rodenticide approvals and registrations on 21 November 2021 and 17 March 2025 under section 32 of the Agvet Code.
 - b. Published in the APVMA Gazette on 21 November 2021 under section 32 of the Agvet Code.
 - c. Issued to holders of anticoagulant rodenticide approvals and registrations under section 33 of the Agvet Code on 28 November 2022, 27 June 2024 and 4 July 2024.
- 2) The APVMA records for the registration of relevant products and approval of relevant labels, including information submitted and assessed at the time of registration and approval.
- 3) Information assessed by the APVMA and summarised in the following published report:
 - a. Anticoagulant Rodenticides [Review Technical Report](#)
- 4) Information assessed by the APVMA in the following unpublished reports (these are internal APVMA reports which include confidential commercial information belonging to multiple parties):
 - a. Anticoagulant rodenticides – chemistry and manufacture risk assessment (Ref: A3652378, A3537438)
 - b. Anticoagulant rodenticides – human health risk assessment (Ref: A3429050)
 - c. Anticoagulant rodenticides – fate and behaviour in the environment (Ref: A3217354)
 - d. Anticoagulant rodenticides – effects on non-target species (Ref: A3218224)
 - e. Anticoagulant rodenticides – environment assessment report (Ref: A2913026)
- 5) The relevant provisions of the Agvet Code and instruments under that Code, in particular those set out in the tables below:

Table C7: Agricultural and Veterinary Chemicals Code Act 1994

Section	Section Heading
3	Definitions
5A	Definition of <i>meets the safety criteria</i>
5B	Definition of <i>meets the efficacy criteria</i>
5C	Definition of <i>meets the trade criteria</i>
5D	Definition of <i>meets the labelling criteria</i>
6E	The APVMA may make standards
20	How registration of chemical product takes place
21	How approval of label takes place
23	Conditions of approval or registration

Section	Section Heading
31	APVMA may reconsider an approval or registration
33	APVMA may require information, reports, results or samples
34	Reconsideration by APVMA
34A	Varying relevant particulars or conditions to allow affirmation
34AA	Suspension or cancellation
34AB	Notice of proposed decision

Table C8: *Agricultural and Veterinary Chemicals Code Regulations 1995*

Section	Section Heading
8AB	Safety Criteria – chemical products
16	Particulars of registered chemical products to be recorded
17	Particulars for label
17C	Conditions of approval or registration – active constituents and chemical products
18	Conditions of registration of chemical products – containers
18E	Labelling standards and requirements

6) Relevant APVMA risk assessment manuals, as published on the APVMA website:

- a. Chemistry and manufacture (<https://www.apvma.gov.au/registrations-and-permits/data-guidelines/risk-assessment-manuals/chemistry-manufacture>)
- b. Environment (<https://www.apvma.gov.au/registrations-and-permits/data-guidelines/risk-assessment-manuals/environment>)
- c. Human health (<https://www.apvma.gov.au/registrations-and-permits/data-guidelines/risk-assessment-manuals/human-health>)