



APVMA proposed declaring SGARs as Restricted Chemical Products

Australian Department of Agriculture, Fisheries and Forestry

Submission of the
Australian Veterinary Association Ltd
June 2026

About the Australian Veterinary Association (AVA)

The AVA is the peak professional body representing veterinary professionals and students across Australia. For more than 100 years we have been the united voice of the veterinary profession.

Veterinarians are among Australia's most trusted and respected professionals, dedicated to safeguarding animal health and welfare and supporting the communities they live in.

Our vision and purpose

Vision *A thriving veterinary profession*

Purpose *Building a vibrant future for veterinary professionals.*

At the AVA we champion the veterinary community, advance professional excellence, foster connectivity, and deliver exceptional member experiences to achieve our vision of a thriving profession.

Essential role of the veterinary profession

Veterinary services are essential to Australia's animal health, food security, and economy. They help secure Australia's animal health and livestock supply chain, protecting hundreds of thousands of jobs and easing cost of living pressures through a safe and reliable food supply.

Beyond agriculture, veterinarians support companion animals and their owners, strengthening the human-animal bond and promoting the associated mental and physical health benefits of pet ownership. Animals are not just a part of the Australian way of life; they are deeply embedded in it - socially, culturally, environmentally, and economically, and veterinarians are an essential part of every vibrant Australian community.

Veterinarians play a pivotal role in maintaining the social licence of animal industries, ensuring animal health and welfare meets community expectations. Like human healthcare and education, veterinary services provide both private benefits to individuals and critical public benefits to society, in areas like biosecurity surveillance, wildlife treatment and health and emergency animal disease management.

Recognised among Australia's most ethical and trusted professionals, veterinarians are highly respected and trusted members of their communities. The Governance Institute of Australia's 2025 Ethics Index ranked veterinarians among the nation's top 5 ethical occupations¹.

¹ [Governance Institute 2025](#)



Executive Summary

The Australian Veterinary Association (AVA) welcomes the opportunity to respond to this consultation on the proposed declaration of second-generation anticoagulant rodenticides (SGARs) as restricted chemical products (RCPs).

The AVA supports the proposed RCP declaration as an appropriate and necessary regulatory mechanism to reduce the well-established risks posed by SGARs to non-target species, including native wildlife, companion animals and livestock, as well as broader environmental and public health risks. Restricting access to authorised users aligns with a risk-based regulatory framework and reflects international best practice.

Discussion

The AVA's position on SGAR regulation, including the rationale for strengthened controls, is set out in detail in our previous submission to the APVMA's anticoagulant rodenticides reconsideration (March 2026). That submission highlighted:

- The **disproportionate risks associated with SGARs** due to their potency, persistence and potential for secondary poisoning
- The **need to restrict access to trained or authorised users**
- The importance of **prioritising safer alternatives and integrated pest management approaches**.

The current proposal to declare SGARs as RCPs is consistent with these recommendations and represents a significant step toward addressing identified regulatory gaps in Australia.

In response to the consultation questions:

- **Question 1:** The AVA supports declaring SGARs as restricted chemical products to ensure supply is limited to authorised persons with appropriate competency.
- **Question 2:** The AVA does not identify any reasons why the RCP declaration should not proceed. On the contrary, it considers this reform necessary to mitigate ongoing and avoidable harms.
- **Question 3:** The AVA notes that implementation should be accompanied by:
 - Clear and nationally consistent definitions of “authorised persons”
 - Appropriate training and accreditation frameworks
 - Communication and education to support transition to safer alternatives



Recommendation

The AVA recommends that SGARs should not be readily accessible for general domestic use and that stronger controls are essential to protect animal welfare, biodiversity and community safety.

Contact

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