



Royal Zoological Society  
of New South Wales

PO Box 20 Mosman NSW 2088  
02 9978 4616  
rzsnsw.org.au  
office@rzsnsw.org.au  
ABN 31 000 007 518

Ms Lisa Croft  
Chief Executive Officer  
The Australian Pesticides and Veterinary Medicines Authority  
GPO Box 3262, Sydney, NSW, 2001, Australia  
Email: enquiries@apvma.gov.au

## Re: Broad acre use of Bromadiolone to manage current NSW mouse plague

Dear Ms Croft,

We write to express our support for your decision to reject approval for NSW to use broad acre distribution of the 2<sup>nd</sup> generation rodenticide Bromadiolone to manage the current mouse plague in NSW. We had been deeply concerned about the secondary poisoning impacts of this toxin on native wildlife which consume poisoned mice, and the direct impact of the toxin on birds that eat poisoned grain. The already stressed native wildlife in farmland ecosystems would not have been able to survive this.

We were concerned that Bromadiolone is a dangerous, non-specific anticoagulant poison that is very fast acting on any vertebrate that consumes it. It also poses significant threats of secondary poisoning from just one dose obtained from eating a poisoned mouse and it accumulates in higher predators. Across NSW native predators are currently feasting on dead mice that are dying from starvation as the plague reaches its natural end. All of these birds would have been dead if they consumed a mouse killed by Bromadiolone, but for your decision. Other birds would have been killed in large numbers if they ate grain poisoned with Bromadiolone, much faster than if they consumed mouse baits with the current mouse poison used, zinc phosphide.

The proposal to use Bromadiolone was driven by concerns about the very high numbers of mice especially in and around farming infrastructure. However, to our understanding Bromadiolone is already approved in and around farming infrastructure because of the dangers it poses to wildlife. Broad acre use of this toxin would never have solved that problem.

Broad acre use of Bromadiolone would not have stopped the current plague either, natural declines will. Mouse plagues have occurred in Australia for decades and seasonal mouse plague events typically end in late autumn/winter. One key potential driver of the crash is the onset of cold weather, together with high mouse density and reduced food availability leads to higher mortality and cessation of breeding. This is happening now, without the need for Bromadiolone. The request for its emergency registration came too late to impact mouse numbers this year beyond natural declines that are occurring.

To our knowledge there is no published evidence broad acre Bromadiolone will reduce mouse numbers better than double strength zinc phosphide in order to reduce the potential for a double plague event in 2021/22. If the lack of efficacy of single strength zinc phosphide has been to limited potency- use of double strength should solve this problem without the exaggerated secondary poisoning impacts on wildlife caused by Bromadiolone.

We are very sympathetic to the impact of mouse plagues on farmers and rural communities but believe that approval for the broad acre use of Bromadiolone would have helped solve this problem. In fact the use of this dangerous poison would have made rural conditions worse with widespread death of native wildlife and significant risks for farm animals.

We thank you for decision to rejection the requests for emergency use of Bromadiolone in broad acre applications in NSW, on behalf of all the wildlife that have been saved from its impacts.

Yours faithfully

Dr Pat Hutchings  
President Royal Zoological Society of NSW  
president@rzsnsw.org.au  
24 June 2021