

SUSTAINABLE AGRICULTURE & COMMUNITIES ALLIANCE INC.
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11th December, 2012.

Att: The Senate Rural and Regional Affairs and Transport
Legislation Committee,
C/- Stephen Palethorpe, Committee Secretary
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**SACA Submission to Inquiry into Agricultural and Veterinary
Chemicals Legislation Amendment Bill 2012**

The members of the Sustainable Agriculture & Communities Alliance (SACA) thank the government and the Senate Rural and Regional Affairs and Transport Legislation Committee for the opportunity to comment on the Better Regulation of Chemicals Review.

Rising Evidence of Harm:

Our group includes farmers and members of the farming communities. We are aware that some chemicals previously used, or in current use, in Australian agriculture have now been linked with diseases such as cancer, Parkinsons disease, and other illness.

There is growing awareness in the community that such chemicals include developmental toxins, cytotoxins, neurotoxins, carcinogens, mutagens, endocrine disruptors, and epigenetic modifiers that can have effects on present populations and generations not yet born. Scientists are regularly proving the damage and threat to present and future generations from the thousands of chemicals released into our environment, food, air and water each year.

Precautionary Principle:

Our members believe that the reforms should be based on the precautionary principle, to protect people and the environment from the above-mentioned real dangers.

Not only new chemicals will need to be assessed, but evidence for harm against chemicals in present use must be included in assessments for safety. Some chemicals currently used in Australia have been banned overseas.

The Better Regulation of Chemicals Review will allow Australia to catch up with leading science and stricter regulation of chemicals practiced in many countries.

Bona fide modern methods of testing that are comprehensive and swiftly enacted are urgently required.

These methods will need to include inter-generational effects of chemicals tested, and cumulative effects in the environment and in people's bodies over varied lengths of exposure, from short periods of time up to years.

The new system of regulation should also act promptly on new evidence:

As new evidence reveals risks to people and the environment from the chemicals currently in use, this should be cause for prompt review and removal of any such chemicals where necessary. An example of the need of a review is the evidence against glyphosate, because of evidence of cumulative and damaging effects on soils, crops, and people's health. (1) Other examples are triazine herbicides which are hormone disruptors that migrate to groundwater, and neo-nicotinoids. (2)

Neonicotinoids have now been banned in some countries, due to evidence of harm to honeybees. The Italian Agriculture Ministry suspended the use of pesticides containing clothianidin, thiametoxam and imidacloprid for the coating of any plant seeds in May 2009.

The resultant resurgence of honeybee populations prompted the Italian government to uphold the ban. Australia should be following the example of these countries and acting pre-emptively to prevent the decline of Australia honey bees, which already face other serious biological threats to their existence.

Germany and Slovenia, also suspended the use of pesticides for seed coating purposes "as a precautionary measure". Fipronil was also added to be included in the ban because of its toxic effects on bees and dispersion into the environment at the time of sowing. (3) (4)

There is increasing and disturbing evidence from overseas studies that extremely low doses of chemicals act as hormone disruptors. Scientists of our time are now starting to discover that the assumption made in the 1400's by Paracelsus that the higher the dose the more profound the effect is incorrect, and that low doses of chemicals can be extremely damaging, even to subsequent generations. A few references to this modern paradigm are as follows: (5) (6) (7) (8) (9)

- **The above examples from overseas show that Australia should also be raising its level of scrutiny of chemicals in use, as well as new chemical products.**

- **The risk management of agri-veterinary chemicals's production, sale and use should include the precautionary principal of substituting proven less toxic chemicals and natural substances when these are available.**

Funding for testing and regulation of chemicals:

We believe that in order to achieve higher standards of testing of present and down-line risks from agro-veterinary chemicals the APVMA and DAFF must be better funded.

Due to conflict of interests, the testing of chemicals for safety for licensing purposes cannot be left to the producers of the chemicals.

Neither should the APVMA be funded by chemical and veterinary products manufacturers, due to conflict of interests.

The risks from poorly or inadequately tested agrichemicals affect the whole population; the government will need to allocate adequate funds from the public funds in order to meet the ethical responsibility for testing of these chemicals.

Public attitudes:

Food issues, growing of organic foods in home and school vegetable gardens, and the popularity of this trend are revealing that people are becoming more and more aware of chemical pollution and lifestyle issues that can affect their health and longevity.

If asked, people say that it is the responsibility of government to ensure that chemicals that have the potential to damage their health should be strictly tested by scientists employed by the government and, if such products are found to be harmful to people or the environment, that they should not be licensed.

APVMA Responsibility:

The APVMA's regulatory framework does not allow this organization to take action to prevent harm from the chemicals that it licenses. This is clearly nonsensical and unethical.

To quote from the World Summit on Sustainable Development 2002, over 1,000 non-government organizations stated that they would work towards a "toxics-free future". Their aim is that all chemicals should be produced and used in a manner "to eliminate significant adverse effects on human health and the environment".

The members of SACA believe that there is no reason that producers and users of agricultural and veterinary products, or any consumers, should be subject to harmful chemicals.

We believe that:

- The public has a right to know the harmful effects of the chemicals presently in use and/or about to be released;
- If there is no information on the label about the damaging effects of a chemical, and no reference to freely available comprehensive information on the internet, then such chemicals should not be licensed for release;
- If there is a natural/non-toxic or less toxic product that could be substituted, then this should be the product licensed instead of the more toxic one;
- As increasing scientific evidence shows, no assumptions can be made about the levels of safety of varying small amounts of chemicals; the express aim should be to have no residues in food, water, soil or air. ()
- *Aerial spraying should be banned*, as these toxic chemicals can drift for hundreds or thousands of kilometers, and come down in the rain, enter rainwater tanks, be breathed in by people, enter houses on dust particles, and enter our bodies to cause damage to present and future generations;
- With the current uptake of water recycling, it is necessary that measures be taken to prevent runoff from pesticides entering the water cycle, groundwater, sewage effluent, and storm-water. A system of testing of storm-water should be set up.
- *An independent regulatory body* must be set up to monitor and enforce compliance standards of testing, use and migration of chemicals into the environment. Non-toxic chemical markers may be necessary in order to follow chemicals from their source and check whether they are leaching into the environment.
- Producers of chemicals should not regulate themselves, nor should they be the only testers for toxicity and effects of chemicals.
- The Adjuvants that are included in chemicals used, which are sometimes referred to as inert, are often far from inert, and may have originated as active constituents in previous products: therefore, when testing chemicals, the whole product as well as individual components must be tested for short-term and long-term safety. These adjuvants must be included on the labels.
- Mixtures of chemicals must be tested by the independent national regulating body before their release;
- Such national regulator should not be funded by the chemical producers, as presently happens with the APVMA, as this may compromise the regulator and influence the results of testing and the licencing of chemicals;
- Non-government organizations that represent the health of people and the environment, such as the National Toxics Network, as well as independent toxicologists and chemical professionals with no links to the chemical producers, should be employed to conduct chemical testing and assessment, and be included in the national regulatory organization as a stake-holder Advisory Board.
- Such an Advisory Board should be autonomous and have the power to report to the Minister or government about any concerns or evidence they may have.
- Communities should have input and where necessary representation on the national regulatory body. This might be

short-term or long-term, depending on the situation and community and regulatory body needs.

- There needs to be a clear direction on Australia's attitude to certain classes of chemicals: these include:
Persistent Organic Pollutants (POPs);
Endocrine Disruptors;
Persistent Bioaccumulative and Toxic (PBT) chemicals;
Very Persistent and Very Toxic (VPVT) chemicals;
Mutagenic chemicals;
Carcinogenic chemicals;
- The new regime should encourage biological and organic alternatives to chemically-dependent agriculture;

The new policy framework should explicitly acknowledge that:
The above classes of chemicals are not acceptable in Australia;
They will be targeted for priority review against modern science;
Where substitutes are available the above chemicals will be deregistered.

The new Advisory Board must include expanded membership of appropriately qualified expert independent scientists and toxicologists.

Independent scientists and toxicologists should be the authorities who conduct testing of new and existing chemicals prior to licencing or denial of licences.

We do not support the use of people from the agricultural and veterinary chemical companies as consultants to the Advisory Board.

Yours truly,

Gillian Blair
Secretary, SACA Inc.

References:

- (1) *ISIS Report 26/05/10: Glyphosate Tolerant Crops Bring Diseases and Death*
- (2) *MacLennan, P., et al., Cancer incidence among triazine herbicide manufacturing workers. JOEM, 2002. 44(11): p. 1048- 1058.*
- (3) *Henk A. Tennekes: The significance of the Druckrey-Küpfmüller equation for risk assessment—The toxicity of neonicotinoid insecticides to arthropods is reinforced by exposure Henk A. Tennekes, Experimental Toxicology Services (ETS) Nederland BV, Frankensteeg 4, 7201 KN, Zutphen, The Netherlands.*
- {4} *European Research Media Centre.*
- (5) *Nature, Toxicology: The learning curve, Dan Fagin, 24 October, 2012.*
- (6) *Birnbaum, L.S. Environ. Health Persp. 120, 143-144 (2012)*
- (7) *Vandenberg, L.N. et al. Endocr. Rev. 33,378-445 (2012)*
- (8) *vom Saal, F.S. & Bronson, F.H. Biol. Reprod. 19, 842-853 (1978).*
- (9) *vom Saal, F.S. et al., Proceedings of the National Academy of Science, USA, 94, 2056-2061 (1997).*

