PESTICIDE ACTION AUSTRALIA

Statement of Concern: PFAS in pesticides used throughout Australia

17 February 2025

Pesticide Action Australia (PAA) is an environmental charity dedicated to reducing the pollution and harm being caused by pesticides. We work to support Australia's transition from hazardous pesticide dependency towards nature-friendly, sustainable alternatives.

Pesticide products used in Australia may contain a variety of chemicals that meet the per- and polyfluoroalkyl substances (PFAS) definition, as they have in international jurisdictions. Pesticides containing PFAS are known as 'forever pesticides' due to their extreme persistence in the environment. A list of pesticides containing PFAS can be found at 'Forever Pesticides: A Growing Source of PFAS Contamination in the Environment'.[1]

The source of PFAS in pesticides can be the active ingredient itself, the product's fluorinated container which leaches into the contents, or the product's 'inert' ingredients.[2] Due to commercial secrecy, inert ingredients in pesticide formulations are not publicly disclosed, despite the dangers they may pose.[3] According to the Environmental Working Group, 'PFAS can be used as an active ingredient in pesticides because the fluorinated qualities of the chemicals make the pesticide more effective and stable. PFAS can also be used as an ingredient to extend shelf life and provide an even coating.'[4]

Pesticide Action Australia wishes to express its deep concern at:

- the application throughout Australia of pesticides which have been found to contain PFAS;
- the application of pesticides found to contain PFAS which are linked with the National Fire Ant Eradication Program or the complementary work of the Queensland Government's Fire Ant Suppression Taskforce (FAST);
- the National Fire Ant Eradication Program's list of approved treatments for use by residents, schools, sports clubs, farmers, and operators of public spaces, which have been found to contain PFAS.

The use of pesticides which have been found to contain PFAS, including fipronil, indoxacarb and hydramethylnon, pose long-term threats to human health, wildlife and biodiversity, as well as water and soil quality. As of December 2024, fipronil is banned in 49 countries[5], including the UK and throughout the EU. Both indoxacarb and hydramethylnon are banned in 29 countries, including in the UK and EU. These chemicals are banned due to the weight of evidence indicating the unacceptable harm they cause. Five out of the six products listed on the National Fire Ant Eradication Program's Product Guide for fire ant treatment[6] contain one of these three PFAS pesticides.

Australia's National PFAS Position Statement[7] states that Australian governments agree to the objective that 'transitioning away from the use of chemicals that cause irreversible or long-term contamination of Australia's environment should be the ultimate goal for all users of PFAS in Australia'. For government at local, state or federal level to be releasing pesticide pollution containing PFAS into the environment runs counter to this

[1] https://ehp.niehs.nih.gov/doi/10.1289/ehp13954

[2] https://ehp.niehs.nih.gov/doi/10.1289/ehp13954

[3] https://www.panna.org/wp-content/uploads/2024/10/202410PFASBriefENGfinal.pdf

[4] https://www.ewg.org/news-insights/news-release/2023/06/maine-data-unveils-troubling-trend-55-pfas-related-chemicals

[5] https://pan-international.org/pan-international-consolidated-list-of-banned-pesticides/

[6] https://www.fireants.org.au/treat/residents/using-bait/fire-ant-bait-product-guide

[7] https://federation.gov.au/sites/default/files/about/agreements/appd-national-pfas-position-statement.pdf

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objective. The application of pesticides containing PFAS will contribute significantly to long-term pollution, environmental harm, and put public health at risk for generations to come.

The application and listing of PFAS pesticides undermines Australia's national and global commitments to reduce pollution and tackle our extinction crisis. Australia's Strategy for Nature 2024–2030 explicitly names pesticides as a source of pollution impacting our ecosystems.

> *'Pollution, including from chemicals such as pesticides and herbicides, waste and contamination, is driving ecosystem change. It has especially devastating direct effects on freshwater and marine habitats.'* [8]

The Strategy for Nature 2024-2030 undertakes to apply the precautionary principle, 'which involves taking actions against likely environmental threats, without waiting for full scientific certainty.'

As you may be aware, the Biodiversity Council of Australia recently reported on a new study[9] that:

> *'between 1-3 species of insects and other native invertebrates like worms, snails and spiders, are becoming extinct in Australia every week. The findings reveal that Australia's loss of biodiversity is far greater than was previously recognised.'*[10]

The authors of the study state that one of the causes of biodiversity loss in Australia is the use of pesticides, and that pesticide reduction is important for preventing extinctions.

In 2022, the United Nations General Assembly passed an historic resolution recognising the right to a healthy environment as a universal human right, which Australia supported.[11] While Australia remains among a minority of countries that do not yet explicitly recognise the right to a healthy environment in treaties or legislation, widespread PFAS pollution by government actors may be a breach of Australians' right to a healthy environment. As an example, we have serious concerns that PFAS pollution from pesticides will impact Australia's drinking water for decades to come. We have also been made aware of a local council in Victoria using Fusilade Forte, a PFAS pesticide containing fluorinated chemical Fluazifop-P, on beaches and foreshore areas. We are concerned that this may be a widespread practice by local councils around the country.

Regarding the National Fire Ant Eradication Program, we note the informed concerns of Dr Joshua King[12], a world-leading fire ant expert from the Biology Department at the University of Central Florida, regarding the Program's excessive, potentially ecologically harmful over-application of toxic baits and the lack of alternative management approaches and tools utilised therein. Dr King concluded that the outcomes may run 'directly counter to the goals of the Australian Government's fire ant management program'. We would add and emphasise that the use of internationally-banned pesticides runs counter to the goals of the Australian Government's commitments to environmental and health protections. Further, the Australian National University released its PFAS Health Study report[13] in which it cited the increased psychological distress that PFAS-exposed communities face. This should be of primary concern to government at all levels.

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[8] https://www.dcceew.gov.au/environment/biodiversity/conservation/publications/australias-strategy-for-nature, p11

[9] https://www.cambridge.org/core/journals/cambridge-prisms-extinction/article/this-is-the-way-the-world-ends-not-with-a-bang-but-a-whimper-estimating-the-number-and-ongoing-rate-of-extinctions-of-australian-nonmarine-invertebrates/D0DCAA03EBA7ACC25F98F7BF5D87A2A6

[10] https://biodiversitycouncil.org.au/news/australia-extinction-tally-greater-than-previously-recognised

[11] https://www.hrlc.org.au/news/2023/10/26/right-healthy-environment

[12] https://constitutionwatch.com.au/fire-ants-biologist-josh-king-warns-australia/

[13] https://nceph.anu.edu.au/research/research-projects/pfas-health-study/reports

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Mitigation measures for controlling invasive species must not pose excessive and disproportionate threats to Australia's biodiversity, water, environment and public health. We must not burn the house down to safeguard from burglars. Pesticide Action Australia is reminded of the decades-long use of highly hazardous organochlorines, including dieldrin, to control the spread of the Argentine ant. After decades of approved use, dieldrin was banned in Australia due to its toxicity and impact on humans, wildlife and the environment. This ban came over a decade after dieldrin and other organochlorines had been banned in Europe. As a persistent pollutant, dieldrin remains a dangerous toxic contaminant in many Australian backyards to this day. This approach cannot be repeated. Alternatives must be prioritised in order to implement more sustainable, nature-friendly management strategies and ensure the transition away from treatments that contribute to environmental pollution.

Accepting the assurances currently being provided that PFAS pesticides and/or internationally-banned pesticides can be used safely in Australia requires that Australians ignore the following facts:

- Australia's federal regulator, the Australian Pesticides and Veterinary Authority (the APVMA), has faced scathing criticism by an independent review that it is captured by industry and that its 'approach to regulation appears to align with industry interests'[14];
- As of December 2024, Australia has banned only 24 pesticides, while the UK and EU have banned 225 pesticides, or nearly 10 times more. [15] This differential is cause for legitimate, serious concern; and
- The APVMA is the only regulator in the OECD to be majority-funded by industry (87% funded by industry in 2023-2024[16]), in a systemic conflict of interest which further undermines trust.

In the absence of an independent regulator, affected communities are left to research and advocate for their own health and environmental protections. It is both logical and necessary that they do not accept the assurances by authorities who cite or defer to a compromised, discredited, and industry-funded regulator.

Pesticide Action Australia urges the Australian Government to:

1. Immediately ban the use of any pesticides which contain PFAS, including any associated with the National Fire Ant Eradication Program or FAST activities;
2. Further engage, listen to and be directed by the legitimate and evidence-based concerns being put forward by affected communities of pesticide pollution;
3. Re-evaluate the harm being caused by PFAS pesticides currently and the projections of harm for the medium and long-term in regards to pesticide pollution;
4. Assess whether the application of PFAS pesticides violates Australia's national and global commitments to environmental and health protections;
5. Structurally reform the APVMA so that it is majority publicly-funded and publicly accountable, implementing the precautionary principle.

[14] https://www.agriculture.gov.au/sites/default/files/documents/APVMA%20-%20Strategic%20Review%20Report.PDF

[15] https://pesticideaction.org.au/2024/12/16/risk-and-hazard-based-approach/

[16] https://www.apvma.gov.au/news-forms-and-publications/publications/annual-reports/23-24