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Agricultural and Veterinary Chemicals First Principles Review
Department of Agriculture, Water, and the Environment
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Re: Submission on the draft report of the review of AgVet chemical regulatory framework

It is apparent that the previous non-industry submissions that were provided for the drafting of this report have not been addressed and remain valid and yet unanswered.

The current draft report is simply unacceptable for multiple reasons including blatant lack of transparency, bias, and vested interests e.g., The Chair is also chair of ABCA.

A summary of the main points addressed is detailed below:

- The protection of human and environmental health must be the primary reason why Australia regulates AgVet chemicals. The regulation of AgVet chemicals is immensely important as it affects us all through contamination of food, water, soil, and air as well as affecting us economically. Most of the AgVet chemicals are biocides; the consequences of not affording appropriate regulation can be shown to have already caused harm and the current system needs to be dramatically improved. The scope of assessment needs to be broadened to encompass health, the environment and water. Promotion of agricultural using pesticides can only do so in a safe and transparent manner preventing harm to health as far as is possible in the process. The current approach does not do so, and this proposed AgVet chemical regulatory framework will only allow further harm to occur.
- This proposed AgVet chemical regulatory framework has not undertaken a robust evidence-based process, has not sought a reality-based baseline from which new proposals/approaches could improve upon and could be argued is not in the public interest.
- It is essential to use the best science available and not to cherry pick data or use opinions and hearsay, as frequently occurs in this report. Current best practice is a dynamic process, dependent on the science and data that becomes available and will obviously change over the years as new data and science comes to light. Currently the EU is leading the way regarding the assessment of pesticides and is using the

hazard approach rather than risk assessment. It would seem imperative Australia at least aims for the best regulatory practice for AgVet chemicals. A hazard approach to assessment rather than risk assessment is essential as a harm minimisation, evidence-based approach. Monitoring for contamination after chemical use, puts human health and the environment at risk and is not a means of ensuring safe use.

- The proposal that chemicals can be fast-tracked into use if they are licenced for use in jurisdictions overseas is blatantly biased to the chemical industry, when there is no process for rapidly removing chemicals which are withdrawn from use by other international regulators. Science needs to dictate the changes in decision-making for AgVet chemicals, and all current AgVet chemicals and excipients should be rapidly reviewed using current scientific principles and fit for purpose toolkits.
- The cost-benefit analysis detailed in this review in no way reflects the true costs to health, the economy and society. Legal costs for the loss of national and international markets if this approach is taken will also need to be considered in the proposed cost analysis.
- There needs to be acknowledgement of the impact of real-world experience with:
 - 1) the off-site movement of pesticides and long half-lives for many of these chemicals with movement into the soil, water, air and food, and their adverse impacts.
 - 2) The toxicity of mixtures and most excipients and their multifaceted adverse impacts.
 - 3) The harm currently caused by endocrine disrupting chemicals (EDCs), those that cause epigenetic changes, developmental and reproductive chemicals/pesticides (including Highly Hazardous Pesticides) which are still licensed for use in Australia.
 - 4) The multigenerational toxicity and harmful disease and ill-health currently caused by many pesticides including EDCs to humans and all exposed ecosystems.
 - 5) Pesticides used in urban areas and homes – including rodenticides- need to be included in the AgVet legislation. They are pesticides, they do get into waterways, sewage systems and landfill as well as adversely affecting users of parks, playgrounds, green areas as well those unwittingly polluted by these pesticides. To legislate otherwise would compromise health and safety in these areas.
 - 6) Baseline assessments of public and environmental health need to be performed and longitudinal data needs to be collated to assess the impacts of pesticide use in our environment. For example, chemical exposure is particularly damaging during sensitive developmental stages such as through pregnancy, childhood, and puberty. Occupational Health and Safety is an issue for pesticide users, farmers and their families and employees and all those regularly exposed (knowingly or unknowingly) to pesticides.
- It is essential for experts in health and toxicology (e.g., EDCs, epidemiology, and developmental causes of chronic disease- humans, animals, plants, and aquatic organisms) to be included in any panel reviewing the regulatory reform of the AgVet chemicals.

- It is inappropriate that the APVMA sits solely within the department of Agriculture and is directly funded by the chemical companies it is meant to be regulating. This lack of independence, in addition to the proposal that would allow co-regulation is in fact self-regulation. There is therefore no transparency and appropriate independent review and decision-making that is in the public interest. The Department of Health, Environment and Water should also be an integral part of the decision-making in AgVet regulation due to the costs born in these portfolios.

To conclude, I am genuinely concerned about the lack scientific evidence that has been used to inform the proposed framework, which does not focus on the protection of human and environmental health.

I enclose my referenced submission to the Senate Inquiry into the independence of regulatory decisions made by the APVMA and related matters from Nov 2018 as part of this submission. This review into the regulatory framework has not addressed many of the same issues raised in that submission.

We all bear the costs of poor chemical regulation, and we have a duty of care to our communities and environment to produce a regulatory framework that minimises adverse consequences and is protective as far as possible to all.

This draft report does not meet those needs.



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(I agree to my submission being made publicly available with listing of my name and State.)