

Submission to the Standing Committee on Environment and Public Affairs

Petition No 0.64 – Pesticides in public places

Dear Committee,

Thankyou for the opportunity to make a submission on this important issue. I can confirm that I have not referred this issue to the Ombudsman.

The use of pesticides (or scheduled poisons) in the urban environment is a growing concern in the WA community. Over the years local community groups have recorded an increasing level of community complaints, adverse experiences and non-compliant pesticide applications in our urban environment by local and state government agencies. These complaints are going largely unheard and unaddressed by local, state and federal authorities. Simply, our regulatory framework does not provide:

1. Adequate public access to information about the types of pesticides applied in their local environment, the exact times and locations of these pesticide applications - information which is needed to be able to prevent exposure to themselves and their children and to provide critical information to medical practitioners or emergency and hospital personnel if required. The Department of Health's Pesticide Advisory Committee is essentially a secret committee under "restricted access" yet they provide policy and guideline advice to LGA's, which are all voluntary. This model of regulation does not reflect the serious nature of, or critical public interest inherent in, the use of scheduled poisons in our urban environment.
2. A local or state adverse experience (complaints) programme needed to correlate data with the national APVMA Adverse Experience Reporting Programme (AERP) and to identify and monitor the performance and compliance of industry.
3. Critical volume and use data for the pesticides used in our urban environment which is essential data for any public health exposure assessment, information that is needed to provide a database for public health and environmental regulatory reviews or assessments and to map and address weed resistance and other environmental adverse impacts.
4. Any laboratory capable of measuring the most commonly used pesticide Glyphosate (and other pesticides) in human blood, urine or tissues. Without access to a laboratory that can measure Glyphosate (and other pesticides) soon after a significant exposure, the public is being denied natural justice.
5. Any requirements or support for Local Government Authority's (LGA)to phase out and eliminate the use of pesticides to control weeds on hard surfaces and in children's playgrounds and pursue safer more sustainable options.
6. Any requirements or support for LGA's to establish pesticide reduction plans in urban bushlands and wetlands and pursue safer more sustainable options.
7. Any requirements or support for LGA's to implement non-chemical weed control in all high use public places.
8. Any requirements for mandatory full prior informed notification to Traditional Owners of registered sites within any LGA.

Given that:

- The highest international authority on cancer research – WHO IARC has declared Glyphosate a Class 2A Carcinogen. <https://www.iarc.fr/en/media-centre/iarcnews/pdf/MonographVolume112.pdf>
- European and US pesticide regulators have been caught out manipulating the regulation of Glyphosate especially through undue industry influence and collusion. <https://usrtk.org/tag/epa/>, <http://time.com/4711846/roundup-weed-killer-cancer/>, https://www.nytimes.com/2017/03/14/business/monsanto-roundup-safety-lawsuit.html?_r=1, https://www.theguardian.com/business/2018/may/22/monsanto-trial-cancer-weedkiller-roundup-dewayne-johnson?CMP=share_btn_fb&page=with%3Aimg-2#img-2, <https://www.youtube.com/watch?v=9-R2jPnbTt8>
As demonstrated here, this claim was based on multiple deviations from a proper use of important WoE elements. Applying existing rules and guidance and a transparent WoE approach supports the finding of statistically significant tumour effects caused by glyphosate and warrants its classification as a presumed carcinogen. <http://jech.bmj.com/content/early/2018/03/06/jech-2017-209776.full>
- The APVMA is a 100% cost recovery agency heavily influenced by the pesticide industry. The APVMA does not undertake research into AGVET chemicals but instead relies on the analysis of data and information provided by applicants – the AGVET chemical industry. <https://www.righttoknow.org.au/request/3324/response/9370/attach/3/Doc%2014.pdf>, <http://www.wafarmers.org.au/submission-made-glyphosate/>
- Recent independent studies have identified that the levels of Glyphosate that the public are currently exposed to, have demonstrated adverse impacts. <https://glyphosatestudy.org/global-glyphosate-study-pilot-phase/>, <https://www.greens-efa.eu/en/article/press/ramazzini-institute-pilot-study-shows-adverse-health-effects-from-doses-considered-safe/>
Our pilot study provides initial evidence that maternal exposure to commonly used GBHs, at doses currently considered as acceptable in humans, is capable of modifying the gut microbiota in rat pups, in particular before puberty (PND 31). Further long-term investigations are necessary to elucidate if the shift in the microbiota induced by GBHs exposure is contributing to the downstream

other health effects. Nevertheless, understanding the microbiota changes during this critical window of susceptibility could be of great importance for disease prevention. The potential health effects of GBHs during development, such as childhood, warrant further investigation. <https://glyphosatestudy.org/wp-content/uploads/2018/05/MICROBIOME-GLY-PILOT-IN-PRESS-8-5-1.pdf>

- Given that civil society has resorted to taking their claims to the Peoples Tribunal in Hague to charge Monsanto (the lead and parent company for Glyphosate) with crimes against humanity. <http://www.monsanto-tribunal.org/>
- Many European countries and other countries around the world have now banned the use of Glyphosate in the urban environment, especially in children's playgrounds and parks and for non-commercial uses. <https://www.baumhedlundlaw.com/toxic-tort-law/monsanto-roundup-lawsuit/where-is-glyphosate-banned/>
- The Department of Agriculture has approved Permit 13333 allowing for the use of a range of hazardous pesticides some of which are banned overseas (ie Paraquat) to be used in urban parks such as Kings Park, Bold Park and all bushlands, wetlands and forests, cemeteries, rights of way, industrial premises including those that adjoin urban environments. <http://permits.apvma.gov.au/PER13333.PDF>, <https://www.dpaw.wa.gov.au/plants-and-animals/plants/weeds/155-how-to-control-weeds>. The City of Joondalup lists Permit 13333 in their current weed management plan - <http://api.joondalup.wa.gov.au/files/councilmeetings/2016/Attach5brf160913.pdf>. But the WA Minister for Agriculture appears unaware. <http://www.robinchapple.com/sites/default/files/2017-09-4%20QON%20Permit%20PER133333.pdf> <http://ntn.org.au/wp/wp-content/uploads/2011/03/Paraquat-monograph-final-2011.pdf>
- The WA Education department and other state departments and local governments continue to claim that the APVMA allows them to use Glyphosate in areas children frequent while the APVMA clearly state they are limited to the registration and assessment of pesticides and have no role in any state or local government decision-making about product choice and methods of weed control.
- It is internationally recognised that children's exposure to pesticides can cause long term adverse impacts. <https://www.panna.org/sites/default/files/KidsHealthReportOct2012.pdf> <https://www.panna.org/sites/default/files/2013-PAN-AP-POISONING-OUR-FUTURE-Children-and-Pesticides-Book-v8-WEB-lo-res.pdf>
- That those who apply pesticides in our urban environment in LGA's mostly have only certificate training and often refer to Glyphosate as being "as safe as salt" demonstrating a poor culture of regulatory compliance and disregard for human health protection. <http://www.ruralcareers.net.au/parks-and-gardens/>
- That the Swan River Trust has documented a range of pesticide residues in the sediment of the Swan river and the main drains leading into the Swan river. https://www.water.wa.gov.au/_data/assets/pdf_file/0007/3130/83909.pdf
- That 8000 trees, surface waters and groundwater on the Swan Coastal Plain were poisoned by the unauthorised application of a pesticide in the Cities of Stirling and Joondalup by a contractor that is still employed today by most LGA's. <https://www.stirling.wa.gov.au/Council/Meetings/Council%20meetings%20and%20petitions/Council%20Minutes%20and%20Agenda/Council%20Agenda%2018%20September%202007.pdf>
- There are proven, more cost effective and safer weed control methods available to LGA's. <http://www.emrc.org.au/regional-services/environmental-services/natural-resource-management/steam-weeding.aspx>, <http://www.weedtechnics.com/>
- That some LGA's and school principals are already taking decisive action to use safer alternatives to protect children's health from pesticide exposures. <https://www.communitynews.com.au/eastern-reporter/news/town-of-bassendean-to-stick-with-ban-on-glyphosate-after-heated-council-meeting/>
- That numerous petitions, letters and requests by the public demanding an end to the use of Glyphosate and other scheduled poisons in our urban environment have been delivered to government over many years.
- That victims of pesticide poisonings, such as the Kimberley APB workers and their families have not received compensation or justice. <http://www.abc.net.au/4corners/chemical-time-bomb/4836466> <http://www.abc.net.au/news/2015-07-25/government-inquiry-push-in-chemical-kimberley-poisoning-case/6643150>

I call on the Legislative Council Committee for Environment and Public Affairs to immediately investigate the adequacy and effectiveness of WA's current pesticide regulatory framework to protect our environment and public health, particularly children in our urban environment and ensure justice and compensation for those adversely affected.

Yours sincerely,

Jane Bremmer

25th May 2018