

## break o'day catchment risk group

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### **Recommendations re: Implementation of Regulatory Controls for Aerial Spraying and Ground Spraying Agricultural Chemical Products: A Consultation Paper April 2008.**

#### **Additional Comments:**

I provide a copy of the letter signed by Jim Harris and myself and given to the chair of the advisory committee of the Tasmanian River Catchment Water Quality Monitoring Initiative (TRCWQMI) on 30 May 2008.

This letter expresses our concerns regarding the outcomes that will be obtained by the TRCWQMI especially with regard to the use and fate of pesticides in the Tasmanian environment. It also expresses our concerns with the specific use of endocrine disrupting chemicals (EDCs).

The confirmed increased half life of most pesticides in Tasmania due to the cooler climate and soil characteristics, is particularly noteworthy, with a half life of atrazine being approximately between 140 and 230 days as was initially detailed in the 1997 atrazine review. Similarly simazine has an extended half-life compared to other warmer States.

That simazine and atrazine has contaminated many rivers in Tasmania in the last few years is no longer disputed. In 2006, degradation products of simazine and atrazine were documented in the sediments of the entire George River and in Georges Bay.

The issue at stake from pesticide pollution is the adverse impacts caused by the contamination of air, soil and water, crops, animals and people by toxic chemicals that are designed specifically to harm living cells. These chemicals can never be described as safe.

EDCs are biologically active at levels usually below detection levels and their effects are often additive - the mixture (or toxic soup) effect. The potential for accumulation of pesticides in the food chain is increased. That the adverse effects on humans and other animals can be long lasting, produce effects

years after exposure, and can contribute to many diverse illnesses, diseases and cancers is surely of concern to us all. Currently there seems to be no regulator, industry or pesticide user awareness of mixture or very low dose effects. Those especially vulnerable to pesticides are foetuses, infants and children, and those genetically susceptible.

That businesses are presently allowed to diffusely pollute the environment and contribute to harm, suffering and illness is unacceptable. The 'minority groups' objecting to the proposed new pesticide regulations, referred to in the recent media, are in reality the majority; those who wish to be healthy and want their children to have good health.

All life needs water; water is becoming generally scarcer and more polluted as pesticide use continues year after year and concentration effects begin to take effect. The need and ability to source safe and non-polluted water will continue to gain importance. Holistic and protective approaches to water catchments are essential if water pollution is to be prevented. Pesticide use cannot be allowed to occur in a way that may pollute water or non-target areas.

It should be noted that pesticide movement off-site is being increasingly documented. Pesticides including DDE and endosulfan are being carried on sand by the wind from the Sahara desert more than half way around the world, and being detected in Trinidad and Tobago (pers. comm. Dr Asad Mohammed, University of West Indies).

Thus the use of pesticides along with their means of application must take all off-site contamination into account.

We have stated that no endocrine disrupters should be used in water catchments in Tasmania. This of course also applies to all persistent organic pollutants.

At present consumers bear the cost and consequences of pesticide pollution.

The determination of enforceable regulations by the regulator must be fair and just to all consumers and water users.



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