

An open letter to the Hon. Julia Gillard MP, The Prime Minister of Australia and Senator the Hon. Joe Ludwig MP, Minister for Agriculture, Fisheries and Forestry

We write to you with deep concern about the way pesticides are regulated in Australia.

We support the Australian Government's intention to introduce reforms to better protect human health and the environment and strongly urge you to deliver a strengthened regulatory framework that truly results in improved protection for all Australians and our environment.

We support the following principles for a new Australian pesticide regulatory system and urge you to act decisively on this issue.

Fundamental principles for a new pesticide regulatory system

1. The overriding priority of the regulatory system should be the protection of human health and the environment. The regulator should have a mandate to substantially reduce the load of pesticides in Australian air, soils and water and animals as well as the "body burden" in human beings.
2. There should be a requirement for all chemicals and products to be periodically assessed against contemporary safety standards in order to remain registered, every 5 to 10 years depending on the level of risk. The regulator should retain the capacity to trigger interim safety reviews.
3. Regulatory decision-making should be based on precaution and include consideration of scientific information and social expectations. This means where reliable scientific evidence is available that a chemical may have an adverse impact on human health or the environment, the regulator does not have to wait for full scientific certainty about its harmful impacts before it can take steps to prevent damage.
4. Dangerous chemicals that do not meet contemporary health and environmental standards should be taken off the market. This should include chemicals that are at sufficient risk of being carcinogenic, mutagenic, endocrine disrupting, PBT (persistent, bioaccumulative and toxic), vPvT (very persistent and very bioaccumulative) and persistent organic pollutants (POPs).
5. High-risk chemicals should be replaced by safer alternatives wherever possible (the substitution principle). The regulator should be required to consider the international availability of other, less toxic chemicals when assessing new chemicals for registration (or an existing chemical for re-registration).
6. There should be incentives for registrants to bring low-risk chemicals to market, such as registration periods and fees proportionate to risk.
7. Risk assessments should be conducted in accordance with the best available scientific evidence, including endocrine disruption and immune function modification endpoints. Safety testing must include the full life-cycle effects, including the effects of chemical metabolites, the effects of mixtures, the toxicity of other substances

used in product formulations and impurities such as dioxins. Any reforms to improve the efficiency of the regulator must not compromise the rigor of scientific risk assessments.

8. There should be strict deadlines for the submission of data by registrants and for the completion of risk assessments by the regulator. This also means "no data - no market".
9. Full information about chemicals' health and environmental risks should be provided to (and easily accessible by) the public, whilst protecting genuine commercially sensitive information. Sales data, by volume of chemical and by region, should also be made regularly available to the public.
10. Low chemical input, non-residual and biological agriculture should be encouraged. Low-risk chemistries and farming practices should be a priority for government-funded research, development, extension and incentives.
11. The regulator's governance should be truly independent of industry. Community interests (including for the environment, public health and consumers) should be properly represented alongside industry in the regulator's advisory structure.
12. There should be a targeted program of independent, public interest health and ecotoxicology research and monitoring to address knowledge gaps about the presence of pesticides in Australian environments and food chains, and their potential human health and environmental impacts.

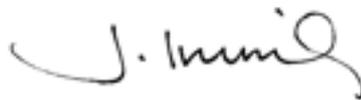
Yours sincerely,



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