PESTICIDE ACTION AUSTRALIA

22 August 2025

To the Chemical Review team at the APVMA,

As of December 2024, dimethoate, a recognised potential endocrine disruptor and carcinogen, is banned in 38 countries due to the evidence of its health and environmental harm.[i]

Organophosphate (OP) pesticides, including dimethoate, are known to have neurotoxic effects though endocrine and other modes of action.

The European Food Safety Authority (EFSA) found that dimethoate may be genotoxic, that adverse effects were observed on reproductive performance and that 'the experts considered that classification as **'Suspected of damaging the unborn child'** may be appropriate'.[ii] As such, to safeguard the health of farmers, their families, consumers and the environment, this active ingredient is banned for use throughout Europe.

In contrast, the APVMA faces serious allegations of having failed to safeguard Australians' health and environment for decades, instead favouring industry-aligned practices as outlined in the APVMA Strategic Review Report by Clayton Utz dated July 2023.[iii] One key observation from this report was that the '*APVMA's approach to regulation appears to align with industry interests*' and '3.2.2: *Overall, the APVMA's approach to regulation, coupled with its engagement with specific stakeholders in certain instances has a high risk of regulatory capture by industry*.'

Illustrating this, as of December 2024, Australia has banned only 24 hazardous pesticides, compared to 225 being banned in the UK and EU.[iv] The APVMA is the only pesticide regulator in the OECD to be majority-funded by the industry it is mandated to regulate, resulting in a structural and systemic conflict of interest.

Despite, or because of this regulatory capture and conflict of interest, Pesticide Action Australia and other Australians must continue to share the evidence and call for change. This submission reflects the urgency of the issue.

Australian berries are being found to contain cocktails of hazardous pesticides that are linked with cancer, reproductive harm and other chronic health disorders.[v]

According to the most recent International Agency for Research on Cancer's (IARC) Cancer Today figures,[vi] Australians are suffering the highest diagnosed incidence rates of:

- cancer in the world,
- leukaemia in the world,
- cancer for people aged 0-19 in the world,
- cancer for people aged 0-49 in the world,
- bowel cancer for people aged 0-49 in the world, and
- breast cancer in the world, alongside New Zealand.

Blueberries are routinely listed in the Dirty Dozen as containing multiple hazardous pesticide residues.[vii] **Pesticide Action Australia is deeply disturbed that the APVMA approved dimethoate to be sprayed on berries only 24 hours before harvesting, entering the market and consumers' diet shortly after.**

One the main consumers of conventionally grown blueberries are children, who have around a third of the body mass of adults and are developmentally particularly vulnerable to toxic load. UNICEF and Human Rights Watch actively campaign on how exposure to hazardous pesticides is a violation of fundamental human rights, including the rights of children. As well as children, our farmers and pickers are also at very high risk, and the misuse of hazardous pesticides severely threatens Australia's reputation in the export market.

The absence of transparency in labelling that would allow consumers to make informed decisions is also cause for concern.

Results of testing product formulations containing dimethoate are not disclosed to the public for independent verification of safety, despite research demonstrating that pesticide adjuvants amplify harm.[viii] The lasting harm to our water and soil quality, biodiversity and Australians' health being caused by the interaction of different pesticides used on produce, including through tank mixtures, is also not tested for by the APVMA.

Pesticide Action Australia writes to call for:

- An immediate ban of dimethoate for all uses in Australia;
- Widespread reform and restructure of the APVMA, so that it is majority publicly-funded, publicly accountable and adopts the precautionary principle and a hazard-based approach;
- The avoidance of regrettable chemical substitution and of targeting single chemicals in isolation – instead implementing holistic, sustainable and nature positive approaches to the production, distribution, and use of synthetic pesticides;
- Transparency in food labelling so that consumers can make informed decisions about their pesticide exposure;
- Practical support for farmers to transition to practices that protect and enhance our biodiversity and health to safeguard current and future generations.

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i PAN International Consolidated List of Banned Pesticides: https://pan-international.org/pan-international-consolidated-list-of-banned-pesticides/

ii Peer review of the pesticide risk assessment of the active substance dimethoate https://efsa.onlinelibrary.wiley.com/doi/full/10.2903/j.efsa.2018.5454

iii https://www.agriculture.gov.au/agriculture-land/farm-food-drought/ag-vet-chemicals/better-regulation-of-ag-vet-chemicals/rapid-evaluation-detailed-response/apvma-strategic-review

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

v https://www.newsofthearea.com.au/farm-chemicals-found-in-waterways-of-mid-north-coast

vi International Agency for Research on Cancer: https://gco.iarc.fr/today/en/dataviz/maps-heatmap?mode=population

vii https://www.ewg.org/foodnews/blueberries.php

viii Mesnage R, Antoniou MN. Ignoring Adjuvant Toxicity Falsifies the Safety Profile of Commercial Pesticides. Front Public Health. 2018 Jan 22;5:361. doi: 10.3389/fpubh.2017.00361. PMID: 29404314; PMCID: PMC5786549.