

30 September 2025

Pesticide Action Australia Submission for the Feeding Australia: National Food Security Strategy

Pesticide Action Australia (PAA) is a for-purpose, not-for-profit charity dedicated to reducing the health and environmental harm being caused by pesticides, and supporting Australia's transition to nature-positive alternatives.

Pesticides is an umbrella term that includes a range of compounds including herbicides (designed to kill plants), insecticides, fungicides, rodenticides, molluscicides and nematicides, but also include plant growth regulators, defoliants and desiccants.ⁱ

We welcome and commend the initiative to develop the *Feeding Australia: National Food Security Strategy* and establish the National Food Council. We appreciate the opportunity to provide feedback and input into this important Strategy.

The importance of naming pesticides as a source of pollution and harm

We note the importance placed in the discussion paper on taking a systems approach, and we support the momentum to shift from narrow agricultural productivity metrics to consideration of total system productivity and wellbeing, factoring in social, environmental, health and economic outcomes. Accordingly, Pesticide Action Australia wishes to express its concern at the **lack of attention to pesticide harm** in the discussion paper as it is a crucial cross-cutting issue with significant repercussions on health, environmental, climate and market outcomes.

The discussion paper:

- **does not once use the term pesticides, chemical pesticides, or hazardous pesticides;**
- does not include **targets and/or commitments** to encourage, support and incentivise Australian farmers to reduce their reliance on pesticides, and;
- **does not reference the overwhelming evidence** outlining the harm being caused to Australian national interests by the overuse of pesticides.

We recommend these serious omissions be rectified.

If we are to take meaningful steps towards a food system that will benefit public health, social and environmental outcomes, **pesticides must be named and the issues around health and environmental harm addressed within the Strategy.**

Concerning use of agrochemical industry-supporting language

We are deeply concerned by the discussion paper's use of **industry-coined terms such as 'protection chemicals' and 'critical inputs'.**

'Protection chemicals' is a misleading term which has been developed by the agrochemical industry and their public relations firms to manufacture, or '**spin**', a positive narrative around hazardous chemicals. Likewise, describing chemical pesticides as 'critical inputs' is **contested by thousands of profitable, productive Australian farmers** who have reduced or eliminated their reliance on pesticides.^{ii iii} This



Protecting Australia's health and environment from the harm caused by hazardous pesticides.

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growing cohort of **nature-friendly farmers should be recognised, celebrated and incentivised by a national food security strategy** as the flow-on social, environmental and public health benefits are significant.

Use of industry-promoting language implies that the document aligns with promoting agrochemical industry interests, ahead of Australia's broader national food security interests, which must balance other outcomes regarding health, environment and the rights of future generations, as well as agricultural yield and profitability.

This issue of terminology and framing is of particular sensitivity and urgency given that Australia's federal pesticide regulator, the Australian Pesticides and Veterinary Medicines Authority (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. **Tellingly, many of the most hazardous pesticides applied in Australia are banned in the countries that produce them.** As of December 2024, Australia has banned only 24 hazardous pesticides, compared to 225 being banned in the UK and EU.^{iv}

As you are aware, the APVMA faces **serious and credible 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.^v Key observations from this report were 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.*'

Corporate capture poses a grave threat to Australia's democratic principles as well as to the sustainability and integrity of our food and farming system. When corporate and profit interests are prioritised ahead of Australia's national interest, public trust in Government inevitably erodes. The serious allegations of corporate capture of Australia's pesticide regulatory system also severely threatens and undermines Australia's reputation as a 'clean and green' exporter of produce. Once lost, this reputation will take decades to restore.

As such, we recommend that all industry-coined terms such as 'protection chemicals' and 'critical inputs' are removed and replaced with neutral, accurate terminology: pesticides, chemical pesticides, hazardous pesticides and the broader context of corporate capture risk be carefully considered in the development of Australia's National Food Security Strategy.

A systems-approach to food security must prioritise Australia's environment and health

PAA believes a holistic, intersectional, rights-based approach to developing and implementing a Food Strategy should include targets, outcomes and progress metrics associated with improving Australia's health and environment.

Pesticide overuse and dependency in Australia is contributing to significant and wide-ranging harms, and as such **pesticide reduction targets are essential to address and start reversing these harms.**

We recommend that the National Food Security Strategy is re-framed in order to ensure an intersectional approach to food system reform that places due weight and importance on metrics of nutrition, health and environmental outcomes.



Prioritising Environment: Alignment with Australia's National Biodiversity Strategy and Action Plan

The Australian Government's Department of Climate Change, Energy, the Environment and Water's (DCCEEW) *Strategy for Nature - Australia's National Biodiversity Strategy and Action Plan* names **pesticides as pollution that is driving ecosystem change**. It states:

'Pollution, including from chemicals such as pesticides and herbicides, waste and contamination, is driving ecosystem change. It has especially devastating direct effects on freshwater and marine habitats.'^{vi}

Australia's national commitments to reduce pollution by 2030 align with global targets set under the Kunming-Montreal Global Biodiversity Framework (GBF) at the 15th Conference of Parties to the Convention on Biological Diversity. As party to this Framework, Australia should integrate GBF targets into national plans and demonstrate progress.

GBF Target 7: Reduce Pollution to Levels That Are Not Harmful to Biodiversity

*'Reduce pollution risks and the negative impact of pollution from all sources, by 2030, to levels that are not harmful to biodiversity and ecosystem functions and services, considering cumulative effects, including: reducing excess nutrients lost to the environment by at least half including through more efficient nutrient cycling and use; **reducing the overall risk from pesticides and highly hazardous chemicals by at least half including through integrated pest management, based on science, taking into account food security and livelihoods**; and also preventing, reducing, and working towards eliminating plastic pollution.'*^{vii}

With food systems 'vulnerable to and contributing to...biodiversity loss and pollution', as referenced in the discussion paper, **Australia's National Food Security Strategy should reflect and align with the country's National Biodiversity Strategy and our international commitments.**

As such, we encourage the Department of Agriculture, Fisheries and Forestry to reflect on the European Commission's *'Farm to Fork Strategy - For a fair, healthy and environmentally-friendly food system'*^{viii} substantial section on pesticides, which states:

'the use of chemical pesticides in agriculture contributes to soil, water and air pollution, biodiversity loss and can harm non-target plants, insects, birds, mammals and amphibians.'

Crucially, the Farm to Fork document identifies **the importance of supporting farmers to transition away from chemical input dependency**, and makes non-binding commitments of:

- reducing the overall use and risk of chemical pesticides by 50%, and
- reducing the use of more hazardous pesticides by 50%, by 2030.

Prioritising Health and Nutrition

To work towards a food system that provides safe and nutritious food that meets dietary needs, the National Food Security Strategy must prioritise health and nutrition and address the harms caused to farmers, farming communities and consumers in the production of food grown with hazardous and oftentimes, internationally-banned, pesticides.



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In practice, this means prioritising health and nutrition to a fourth key priority area and addressing the importance of reducing people's pesticide exposure through food production and consumption.

Parkinson's Disease

Exposure to pesticides is a **preventable, key contributing factor to the Parkinson's Disease 'silent pandemic'** facing Australians around the country – and especially rural and regional communities as documented extensively by international Parkinson's experts, Dr. Ray Dorsey and Dr. Michael S. Okun, in their new book, *The Parkinson's Plan*.

In purely economic terms, Parkinson's Disease has been estimated to cost Australia \$10 billion per year, rising every year^{ix}. There is a significant loss of economic productivity to the Australian economy as the incidence rate of Parkinson's rises annually. The personal toll on families cannot be quantified.

Cancer

According to the most recent International Agency for Research on Cancer's (IARC) Cancer Today figures^x, Australia has 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, and
- among the highest rates of breast cancer in the world;
- bowel cancer for people aged 0-49 in the world.

Breast Cancer UK has publicly stated that '*pesticides could increase breast cancer risk by acting as carcinogens*', and have referenced studies demonstrating pesticide exposure may be associated with an increased risk of breast cancer.^{xi}

The American Academy of Pediatrics, an organisation of 67,000 US paediatricians committed to the optimal physical, mental, and social health and well-being for all infants, children, adolescents, and young adults has written a position paper on pesticides, stating: '*Epidemiologic evidence demonstrates associations between early life exposure to pesticides and pediatric cancers, decreased cognitive function, and behavioral problems. Related animal toxicology studies provide supportive biological plausibility for these findings.*'^{xii}

Irish Cancer Society lists certain pesticides as a risk factor for developing Acute Myeloid Leukaemia.^{xiii}

New Zealand Breast Cancer Foundation writes '*all cancers develop because of gene changes. Usually, these changes are due to chance or to factors such as ageing, exposure to carcinogenic substances or to damaging environmental effects like sunshine, radiation exposure, pesticides, cigarette smoke or alcohol.*'^{xiv}

The Canadian Cancer Society lists exposure to certain pesticides pre-conception, in utero or as a child as a possible risk factor for increasing the risk of developing childhood leukaemia.^{xv}

Harvard University School of Public Health conducted research that found children exposed to indoor insecticides have a higher risk of childhood hematopoietic cancers, stating that '*preventive measures*



should be considered to reduce children's exposure to pesticides at home.' The study also found a significant increase in risk of leukemia was associated with herbicide exposure. ^{xvi}

Breast Cancer Prevention Partners in the USA state that '*fewer than 10% of breast cancer cases are due to family history*' and go on to advise '*many studies show links between specific pesticides and breast cancer.*'^{xvii}

Recommendations:

Pesticide Action Australia recommends that:

1. **The National Food Security Strategy names, and serves to mitigate the health and environmental harms caused to our food system by pesticides**, which include:
 - Australia's agricultural land and soil degradation;
 - public health harm to Australian farmers, rural communities and consumers of produce dependent on hazardous pesticides;
 - biodiversity loss;
 - drinking water contamination;
 - marine and air pollution.
2. **All industry-coined terms such as 'protection chemicals' and 'critical inputs' are removed and replaced with neutral, accurate terminology**: pesticides, chemical pesticides, hazardous pesticides.
3. **The Food Security Strategy includes metrics and targets for pesticide reduction**, particularly highly hazardous pesticides, in line with comparable international food strategies, as well as our national and global commitments. **Pesticide reduction targets should accompany commitments to support Australian farmers reduce usage and transition to nature-friendly farming.**
4. A broader range of governmental departments beyond the Department of Agriculture, Fisheries and Forestry are resourced and engaged in the development and implementation of the National Food Security Strategy in order to **facilitate coordinated action across multiple departments to the benefit of Australia's national interest**. This may involve the National Food Council reporting to Cabinet as a cross-portfolio body.
5. **The Food Security Strategy aligns and is linked with the National Biodiversity Strategy** environmental commitments and goals outlined in Australia's Strategy for Nature and the Global Biodiversity Framework.
6. **Health and nutrition are prioritised to a fourth key priority area and the importance of reducing people's pesticide exposure through food production and consumption is addressed.**
7. **The Food Security Strategy adopts and implements a rights-based approach** and must be anchored to and fulfil requirements under our right to adequate food, our right to a clean, healthy environment, and the rights of the child.



- ⁱ **Pesticide Action Network:** <https://www.pan-uk.org/key-issues/>
- ⁱⁱ **Frontiers in Sustainable Food Systems:** <https://www.frontiersin.org/journals/sustainable-food-systems/articles/10.3389/fsufs.2024.1402849/full>
- ⁱⁱⁱ **Australian Organic Limited:** <https://austorganic.com/wp-content/uploads/2025/02/AOL-Federal-Budget-Submission-2025-26.pdf>
- ^{iv} **Pesticide Action Australia:** <https://pesticideaction.org.au/2024/12/16/risk-and-hazard-based-approach/>
- ^v **Australian Government Department of Agriculture, Fisheries and Forestry:** <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>
- ^{vi} **Australia's National Biodiversity Strategy and Action Plan 2024–2030:**
<https://www.dccew.gov.au/sites/default/files/documents/australias-strategy-for-nature-2024-2030.pdf>
- ^{vii} **Convention on Biological Diversity, Global Biodiversity Framework:** <https://www.cbd.int/gbf/targets/7>
- ^{viii} **European Commission's Farm to Fork (F2F) Strategy:** https://food.ec.europa.eu/document/download/472acca8-7f7b-4171-98b0-ed76720d68d3_en?filename=f2f_action-plan_2020_strategy-info_en.pdf
- ^{ix} **Parkinson's Australia:** <https://www.parkinsons.org.au/wp-content/uploads/2025/02/Pre-budget-Submission-PAL-2025-FINAL-1.pdf?filedefault/files/do>
- ^x **International Agency for Research on Cancer:** <https://gco.iarc.fr/today/en/dataviz/maps-heatmap?mode=population>
- ^{xi} **Breast Cancer UK:** <https://www.breastcanceruk.org.uk/links-between-pesticides-and-breast-cancer/> & <https://www.breastcanceruk.org.uk/reduce-your-risk/chemicals-and-our-environment/pesticides-and-organic-food/>
- ^{xii} **American Academy of Pediatrics:** <https://publications.aap.org/pediatrics/article/130/6/e1757/30399/Pesticide-Exposure-in-Children?autologincheck=redirected>
- ^{xiii} **Irish Cancer Society:** <https://www.cancer.ie/cancer-information-and-support/cancer-types/leukaemia/acute-myeloid-leukaemia-aml/what-increases-my-risk-of-aml>
- ^{xiv} **Breast Cancer Foundation New Zealand:** <https://www.breastcancerfoundation.org.nz/breast-awareness/inherited-risk/faqs>
- ^{xv} **Canadian Cancer Society:** <https://cancer.ca/en/cancer-information/cancer-types/leukemia-childhood/risks>
- ^{xvi} **American Academy of Pediatrics:** <https://publications.aap.org/pediatrics/article-abstract/136/4/719/73869/Residential-Exposure-to-Pesticide-During-Childhood?redirectedFrom=fulltext?autologincheck=redirected>
- ^{xvii} **Breast Cancer Prevention Partners:** <https://www.bcpp.org/resource/pesticides-other/>

