

**Senate Rural and Regional Affairs and Transport Committee-  
Red Imported Fire Ants in Australia**

Kate Mason- Community Voice Australia

**Additional information**

**Robert Puckett- Entomology**

I am raising to the Committee's attention that the US Entomology expert who spoke at the inquiry is a proponent of pesticides/ insecticides.

[https://www.texasinsects.org/uploads/4/9/3/0/49304017/rfb\\_product\\_list\\_for\\_homeowners\\_09152023.pdf?](https://www.texasinsects.org/uploads/4/9/3/0/49304017/rfb_product_list_for_homeowners_09152023.pdf?)

**Fipronil- scientific studies on damage to environment, insects, animals, human health**

**CCL 5 Chemical Contaminants** - Contaminants listed on the CCL may require future regulation under the Safe Drinking Water Act (SDWA)- Fipronil included

<https://www.epa.gov/ccl/ccl-5-chemical-contaminants>

**High acute risk to honeybees- EFSA-**

<https://www.theguardian.com/environment/2013/may/28/fipronil-fourth-insecticide-risk-honeybees>

**Pesticides connection to loss of insect biodiversity**

<https://www.sciencedirect.com/science/article/abs/pii/S0006320718313636>

"In recent years, the toxic effects of fipronil and its environmental products on non- target species have resulted in major restrictions being placed on its use in China, the United States, Europe, and South America. For example, the US EPA banned fipronil seed treatments for corn (maize), and Europe banned fipronil in agriculture. The future uses of fipronil are yet to be determined.

Keeping in mind the lack of data on fipronil's toxicity to amphibians, the thyrotoxicity of fipronil in mammals and the importance of thyroid hormone in amphibian metabolism and metamorphosis, the potent direct toxicity of fipronil to many species of arthropods, and the extreme effects on insectivorous reptiles from fipronil-induced elimination of their prey, there is an important need for research on the direct toxicity of fipronil to amphibians as well as on potential impacts of fipronil on invertebrate food supplies needed by amphibians, and on the protection of larval amphibians normally provided by diverse aquatic arthropods that ingest trematode cercariae. " p.3

Fipronil is highly toxic to numerous kinds of birds including bobwhite quail and pheasants, with an acute oral LD50 of 11.3 mg/kg and 31.0 mg/kg, respectively. Behnaz Bameri, in Reference Module in Biomedical Sciences, 2023

<https://www.sciencedirect.com/topics/neuroscience/fipronil>

**Fipronil and human health** <https://www.sciencedirect.com/topics/earth-and-planetary-sciences/fipronil>

It is often stated in scientific studies on Fipronil that there aren't enough studies completed, and that there needs to be more studies undertaken.

"Further work is needed on the impacts of fipronil on nontarget vertebrate fauna (amphibians, reptiles, birds, and mammals) in the field before the risk to wildlife from this insecticide can be adequately validated."

**Fipronil- raising concerns about the impacts of off target species eating Fipronil poisoned insects** <https://pubmed.ncbi.nlm.nih.gov/12442503/>

**Identifying global trends and gaps in research on pesticide fipronil: a scientometric review** <https://pubmed.ncbi.nlm.nih.gov/35705759/>

"However, with the increased use, many studies have reported the toxicity of fipronil and its metabolites in various non-target organisms during the last two decades. Currently, it is regarded as one of the most persistent and lipophilic insecticides in the market. In the environment, fipronil can undergo oxidation, reduction, hydrolysis, or photolysis to form fipronil sulfone, fipronil sulfide, fipronil amide, or fipronil desulfinyl respectively. These metabolites except fipronil amide are more or less toxic and persistent than fipronil and have been reported from diverse environmental samples."

**A comprehensive review of environmental fate and degradation of fipronil and its toxic metabolites** <https://pubmed.ncbi.nlm.nih.gov/33989624/>

**Civic Groups and Scientists open letter raising concerns about the United Nations FAO partnership with CropLife (Fipronil is mentioned)** <https://pan-international.org/release/350-civil-society-organizations-and-250-scientists-call-on-the-un-agency-not-to-partner-with-croplife-international/>

### **Fipronil- Australia- The APVMA**

**2006- Australian Government report into use of Fipronil in management of Varroa titled Asian honey bee (Apis cerana) remote nest treatment.** The study found that Fipronil would be ineffective, and concerns were raised regarding Fipronil impacting off target species. <https://www.planthealthaustralia.com.au/wp-content/uploads/2018/10/Asian-honey-bee-remote-nest-treatment-report.pdf>

**2002-** Continuing receipt of adverse experience reports at a steady rate up to 2002 raised concerns about the safety of fipronil. These ongoing concerns in relation to human health and the safety of target and non-target animals prompted the APVMA to undertake a review of fipronil as part of the APVMA's Review Program. <https://www.apvma.gov.au/chemicals-and-products/chemical-review/listing/fipronil>

**2011-** the APVMA released the component assessment reports along with the [Preliminary Review Findings Report](#). This includes the toxicology, occupational health and safety and animal safety reports. This is still in progress.

**2012 -** the APVMA released the report FIPRONIL – REVIEW SCOPE DOCUMENT

## Part 2: Environmental considerations

[https://www.apvma.gov.au/sites/default/files/publication/18701-scope1\\_fipronil.pdf](https://www.apvma.gov.au/sites/default/files/publication/18701-scope1_fipronil.pdf)

This report states:

“Following the commencement of the current fipronil review in 2003, the Department of Sustainability, Environment, Water, Population and Communities (DSEWPaC) subsequently nominated fipronil as a priority 1 chemical for environmental review. This followed the identification of new information, considered by international regulatory authorities (primarily the European Food Safety Authority in 2006), showing that fipronil and its metabolites are very highly toxic to organisms in the environment, particularly aquatic and terrestrial insects. These new studies also provided additional information on the toxicity of fipronil to fish and aquatic invertebrates, bees and non-target arthropods.

The scope document identifies some significant environmental concerns associated with continued use of selected fipronil agricultural products. Current uses of fipronil in Australia are quite diverse and have the potential for significant environmental exposure. Concerns over high application rates for termiticide uses, where the potential exists for contamination of aquatic areas via runoff, and those applications where spray drift and runoff into aquatic areas and impacts on non-target terrestrial species are considered very possible will be considered in the review.

The APVMA will review the following aspects of product registrations and label approvals for selected agricultural products containing fipronil, including but not limited to:

- aquatic degradation
- persistence in environmental media (soil, water and sediment)
- the partitioning in the environment, for example by deposition and adsorption
- toxicity to fish and aquatic invertebrates, sediment organisms, bees and non-target arthropods.”

The concerns that were to be addressed in the Fipronil environmental report are still not addressed (as the report is not completed), yet the APVMA approved Fipronil to be used off label to poison rogue bees in an attempt to stop Varroa. A measure that was identified would not be effective and dangerous to off target species in a 2006 government report.

### **Concerns raised about the corporate capture of the APVMA**

<https://www.agriculture.gov.au/sites/default/files/documents/APVMA%20-%20Strategic%20Review%20Report.PDF>

Federal Minister for Agriculture Murray Watt commissioned a rapid evaluation of the APVMA's structure and governance to be conducted by Mr Matthews.

“This will be conducted by eminent former public servant Mr Ken Matthews AO, and the evaluation was to provide to the Minister by 30 September 2023. The evaluation would include recommendations on the future governance, structure, and funding arrangements of the APVMA. Where is this report? CVA has attempted numerous times to communicate to Murray Watt's office regarding an update. We have had no response.

<https://minister.agriculture.gov.au/watt/media-releases/government-action-ensure-integrity-ag-chemical-regulation>

Until the APVMA is functioning effectively, with no concerns regarding corporate (i.e. chemical companies) capture we caution about the ever growing response of using chemicals in the environment. Chemical use must be looked at cumulatively; including agricultural, maintenance, biosecurity, gardening uses etc.

It is of particular concern that government bodies do not (DPI will not confirm that they monitor impacts of Fipronil) monitor any ongoing potential effects of chemicals in the environment due to their measures. There is no attempt to do any clean up. This must be addressed in biosecurity measures.

Additionally, there must be a clear pathway for the public to raise concerns regarding any impact on the environment and wildlife through the government's use of chemicals.

## **Learnings of Varroa mite in managing red imported fire ants**

Kate Mason from Community Voice Australia (CVA)

Thank you for this opportunity to speak to the government and industry bodies management of varroa mite. We appreciate the opportunity to put on the record the many questions and concerns the community had, which were ignored and swept under the carpet by government officials. My submission today will outline issues regarding the biosecurity governance decision making structure, issues with transparency and accountability to the public, and the APVMA's relationship to chemical corporate entities which we believe need to be grappled with prior to Fire Ant biosecurity measures are implemented.

From mid 2022 to September 2023 the NSW state government with industry partners commenced on a bee killing spree. Later in 2022 they started putting Fipronil in the environment. Healthy bees with no Varroa were being killed within an endlessly spreading 10 km red zones.

By the time the DPI moved to a plan of management in September 2023, 40 million bees were killed across NSW, crops were failing, and an unknown number of beekeepers were put out of business (particularly the small beekeepers). There was a total of 600 Fipronil bait stations deployed, at one time there was a forecast of another 200. So potentially 800 Fipronil bait stations deployed. We have no idea of how much Fipronil is in the environment.

CVA was aware of many beekeepers who were deeply traumatised by the DPI approach of coming on to their properties, pouring petrol in the bee hives and taping them up to die. The trauma of the brutal measures, loss of employment, crops failing, and lack of government transparency and accountability was damaging to say the least. CVA tried extensively to get information from the government and their private partners regarding their plans, we were unsuccessful, and I am grateful for the opportunity to document this today.

The Fipronil poisoning was approved in October 2022 and the Australian pesticide regulatory body APVMA approved the use of Fipronil off label. i.e. not for its intended use.

The Australian Native Bee Association (ANBA) at the time stated about the Fipronil traps "Feral European honeybees will collect toxic sugar syrup and take it back to their nests inside hollow trees. The Fipronil may continue to remain toxic in these areas for up to three years<sup>1</sup>. Unfortunately, native stingless bees and other nectar-feeding insects, reptiles, birds, and mammals may visit dead feral European honeybee nests and collect contaminated honey. Some of these native insects and animals may die from Fipronil poisoning."

Shortly afterwards Save the Bees Australia and Community Voice Australia started an online petition titled "Stop the poisoning of Australian native bees". We asked for:

- The immediate halting and removal of Fipronil baiting in NSW Red Zones
- A Judicial enquiry into the relationship between Government, Industry funded lobby groups, and Organisations representing Chemical Company interests, who have authority and sway over Government policies related to Bees.

The petition was tabled by AJP MP Emma Hurst in parliament in August 2023.

### **Why was Fipronil used?**

A government report was previously commissioned in 2006 regarding the effectiveness of the use of Fipronil for Varroa. The report titled "Asian honey bee remote nest treatment" findings were that Fipronil would be ineffective and concerns raised regarding Fipronil impacting off target species. Why was this report ignored?"

<https://www.planthealthaustralia.com.au/wp-content/uploads/2018/10/Asian-honey-bee-remote-nest-treatment-report.pdf>

### **APVMA Capture**

Fipronil is a highly controversial chemical which has been banned in many countries around the world. Fipronil was approved to be used in the Varroa measures. In July 2023, under the direction of the Australian government, Clayton Utz released a damning report detailing the APVMA's processes and procedures. Murray Watt stated that "the matters identified by the review are very serious and point to systemic problems with the administration and governance of the APVMA."

### **Of concern in the report:**

"The APVMA's approach to regulation appears to align with industry interests.

There are instances where the APVMA's level of engagement with industry stakeholders should be carefully examined." P.3

And

"A majority of the APVMA's ongoing chemical reviews have been in progress for nearly two decades." P.4

The APVMA is predominately funded by the industry it is tasked to regulate. In our view, this is a highly problematic model and fraught with high potential for corporate capture over a government body. Specifically, the APVMA review of Fipronil has been ongoing since 2002 and expected to be finalised next year (a 22-year process). *It is highly concerning that Fipronil was allowed to be used Off Label under these conditions, even more considering the review was nominated in 2002 for review following the receipt of a number of adverse experiences reports*" <https://apvma.gov.au/node/12546>

The Federal Minister of Agriculture, Fisheries and Forestry Senator Murray Watt commissioned a further report in to the APVMA which was to be released on September 30<sup>th</sup> 2023, this report was to include recommendations on the future governance, structure, and funding arrangements of the APVMA.

<https://minister.agriculture.gov.au/watt/media-releases/government-action-ensure-integrity-ag-chemical-regulation>

Where is this report- our multiple attempts to secure information on this report have been ignored.

### **Effort to communicate with government and private bodies**

There was a clear lack of responsibility and clarity on the decision-making process for community members wanting to know what was going on regarding the varroa mite

measures. CVA contacted –, DPI, Dept of Agriculture, Fisheries and Forestry, Plant Health, AHBIC, the National Management Group, who all seemed to have a role in the killing of bees.

### **March 2023**

We asked both the NMG and Dept of Ag, fisheries and forestry and Plant health Australia for the assessment process for when they would transition to a management response phase, the answer was there was no transition to management plan.

We asked for the risk assessment to ensure no harm would come to native bees, and to ensure waterways are not impacted by Fipronil. The response was that the Fipronil traps were monitored. There was no acknowledgement, and never has been that the contaminated Fipronil honey would not stay in the traps.

### **State government**

*September 2023 CVA wrote to the DPI and asked for transparent information on the process regarding removing of the bait stations, cleaning up of Fipronil from the environment, where the bait stations have been placed, the overall usage of Fipronil and what people should do if they see any injuries or deaths of off target species near bait stations. We also asked if there were any Fipronil traps still in operation. We were ignored. We asked the same question to the Minister for Agriculture Tara Moriarty and additionally sent her the petition with over 35,000 signatures at the time, we were ignored.*

### **Federal government**

*As the APVMA's decision to allow Fipronil off label, was during a time of corporate capture by industry and lagging chemical reviews, we wrote to Senator Murray Watt to ask for a public review into the process whereby the APVMA granted the use of Fipronil off Label. We additionally requested a thorough independent environmental assessment regarding the subsequent cumulative impacts on the environment through the Fipronil baiting stations.*

*Murray Watts office responded stating there will be no review and that there were no issues with the environment. He stated that all Fipronil traps have been removed. He made clear that there was no assessment of the Fipronil's effect on the natural environment. Murray ignored our request for the 30<sup>th</sup> September 2023 report on the corporate capture on the APVMA. His only response to the APVMA question was that the governance issues would be attended to. What about the focus on the industry capture of the APVMA? It looks like it's been swept under the carpet. We have asked for this report numerous times from Murray Watt's office and been ignored.*

Murray Watt said in his response that the Fipronil baits were all removed, if this is the case why will the DPI not put in writing that they are all removed?

In October 2023 the public learnt from an ABC article **Beekeepers battling varroa mite count the cost of failed eradication and call for industry exit strategy** that varroa had been in Australia for 1-1.5 years prior to mid 2022.

DPI Director General Mr Hansen is quoted as saying "Unfortunately as it turned out with Newcastle, we know now it arrived 12 to 18 months before it became obvious and apparent to government and the industry parties that it was there,"

"Those time lags really are an impediment to an effective eradication response."

It is not appropriate that the ABC seems to be the only medium through which the public are told that the measures were never going to work in the first place, and that the killing of their bees was pointless. Beekeepers themselves, were constantly scapegoated by the Dpi as to the reason Varroa was spreading. There is no transparency as to when the DPI was made aware of Varroa being in Australia since January 2021, and the questions remains as to why the DPI continued to advance with their scorched earth approach to Varroa as though it was only in Newcastle in mid 2022 and could be contained?

The DPI is still releasing information that Varroa was found in Newcastle in mid 2022, as though that's the starting point.

The lack of accountability and transparency and plain disrespect to the Australian people has been very distressing to encounter. CVA had beekeepers reaching out who were desperate, small beekeepers often form very strong relationships with their bees. And to have a government response that refuses to answer any questions is unacceptable whilst small business was destroyed, food security threatened, pollinators killed and Fipronil released without any oversight.

**We still don't know:**

1. Where the Federal report into the corporate capture of the APVMA is up to, and when it will be made publicly available?
2. Are there any Fipronil traps still being used by the DPI?
3. Is there any scrutiny regarding the effect of Fipronil in the environment?
4. Where are the risk assessments regarding the use of Fipronil?
5. Why did the DPI commence the Fipronil measures when a 2006 government report had clearly stated the Fipronil would not work in contained Varroa, and would affect off target species?
6. When did the DPI become aware that the Varroa was already in Australia (purportedly from around January of 2021), and once they became aware why did they keep progressing with the scorched earth approach?
7. Why didn't the government have a clear parameter in place as to when they would move to a Plan of Management?
8. How can the State government ignore questions from the community who are affected by their measures? Particularly when it comes with a 35,000 strong petition.

**Suggestions:**

1. Implement a department tasked with representing all the players involved in the decision-making regarding bio security measures. It is this body that must answer questions and respond to the public.
2. The corporate capture by the APVMA is scrutinised in an inquiry.
3. Concerns about the implications of chemical corporations funding the APVMA is addressed.



4. Decisions makers regarding biosecurity measures are all named and held responsible.
5. Risk management reports are available to the public, as are parameters to be used for a change of management policy.
6. The public can see the decision chain regarding biosecurity measures.
7. Any chemical released into the environment is monitored, and this monitoring is transparent and is publicly available.
8. All costs associated with the biosecurity measures are transparent and publicly available, including the corporations paid for the use of chemicals.



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20/09/2023

**Re: Petition “Stop the poisoning of Australian Native Bees” and the Rapid evaluation of the APVMA's structure and governance conducted by Mr Ken Matthews AO due 30<sup>th</sup> September 2023**

Attn: Senator The Hon Murray Watt  
Minister for Agriculture, Fisheries and Forestry

**Dear Mr Watts,**

We are formally presenting you with a Change.org Petition with over 35,000 signatures titled “Stop the poisoning of Australian Native Bees”.

The local community petitions the following:

- The immediate halting and removal of Fipronil baiting in NSW Red Zones
- A Judicial enquiry into the relationship between Government, Industry funded lobby groups, and Organisations representing Chemical Company interests, who have authority and sway over Government policies related to Bees.

<https://www.change.org/p/halt-the-poisoning-of-native-australian-bees-through-fipronil-baiting>

This petition was tabled in Parliament by The Hon. Emma Hurst MP of the Animal Justice Party on the 1/08/2023

Though the DPI is moving to a Plan of Management, we are still waiting for confirmation that the Fipronil bait stations will be removed, and what subsequent measures the DPI will take to clean up the environment.

We are sending you the “Stop the poisoning of Australian Native Bees” to coincide with the **evaluation of the APVMA's structure and governance to be released on the 30<sup>th</sup> September**, which was commissioned at your request.

In July 2023 Clayton Utz released a damning report detailing the APVMA's processes and procedures. <https://www.agriculture.gov.au/sites/default/files/documents/APVMA%20-%20Strategic%20Review%20Report.PDF>

**Of note were concerns regarding:**

“The APVMA's approach to regulation appears to align with industry interests.

There are instances where the APVMA's level of engagement with industry stakeholders should be carefully examined." P.3

"... information reviewed includes instances where the APVMA's approach appears focused on assisting industry. Alignment with industry interests also appears to be embedded into the APVMA's regulatory priorities and culture." P.4

"A majority of the APVMA's ongoing chemical reviews have been in progress for nearly two decades." P.4

Of note, is that the APVMA is predominately funded by the industry it is tasked to regulate. In our view, this is a highly problematic model and fraught with potential for corporate capture over a government body.

On the 27<sup>th</sup> of September 2022 "NSW DPI has been authorised by the Australian Pesticides and Veterinary Medicines Authority to use Fipronil to remove wild European honey bees." <https://www.dpi.nsw.gov.au/about-us/media-centre/releases/2022/general/next-phase-in-varroa-mite-response-turns-to-wild-european-honey-bees> PERMIT NUMBER – PER92639

This is particularly alarming as the Australian Native Bee Association states that Fipronil will be taken from the bait stations to nests in trees and will kill native bees, insects, reptiles birds and mammals. <https://www.anba.org.au/varroa-response/>

The use of Fipronil for Varroa is contradictory to 2006 government report "Asian honey bee remote nest treatment" report findings that Fipronil would be ineffective and concerns raised regarding Fipronil impacting off target species. <https://www.planthealthaustralia.com.au/wp-content/uploads/2018/10/Asian-honey-bee-remote-nest-treatment-report.pdf>

Regarding the APVMA and Fipronil- A review is still in progress. This review commenced in 2011. <https://apvma.gov.au/node/12546>

Since 2011 numerous reports and concerns about Fipronil have been raised globally, due to its effects on wildlife, environment, human and animal health and bees. **Numerous countries have banned the use of Fipronil during this time.**

#### **A few documents outlining concerns about Fipronil:**

"In recent years, the toxic effects of fipronil and its environmental products on non- target species have resulted in major restrictions being placed on its use in China, the United States, Europe, and South America. For example, the US EPA banned fipronil seed treatments for corn (maize), and Europe banned fipronil in agriculture. The future uses of fipronil are yet to be determined.

Keeping in mind the lack of data on fipronil's toxicity to amphibians, the thyrotoxicity of fipronil in mammals and the importance of thyroid hormone in amphibian metabolism and metamorphosis, the potent direct toxicity of fipronil to many species of arthropods, and the

extreme effects on insectivorous reptiles from fipronil-induced elimination of their prey, there is an important need for research on the direct toxicity of fipronil to amphibians as well as on potential impacts of fipronil on invertebrate food supplies needed by amphibians, and on the protection of larval amphibians normally provided by diverse aquatic arthropods that ingest trematode cercariae. “ p.3

Fipronil is highly toxic to numerous kinds of birds including bobwhite quail and pheasants, with an acute oral LD<sub>50</sub> of 11.3 mg/kg and 31.0 mg/kg, respectively. Behnaz Bameri, in [Reference Module in Biomedical Sciences](#), 2023  
<https://www.sciencedirect.com/topics/neuroscience/fipronil>

More concerns are listed in the following scientific reviews:

<https://pubmed.ncbi.nlm.nih.gov/33989624/>  
<https://pubmed.ncbi.nlm.nih.gov/35705759/>

**Due to APVMA’s decision to allow Fipronil off label, during a time of corporate capture by industry and lagging chemical reviews, we ask specifically for:**

1. A public review into the process whereby the APVMA granted the use of Fipronil Off Label including: What scientific studies the APVMA relied upon to take this action? What other bodies were involved in the decision making? What risk assessments did the APVMA conduct regarding Fipronil being used in the environment?
2. A thorough independent assessment regarding the subsequent cumulative impacts on the environment through the Fipronil baiting stations.
3. Make available a service which the public can contact if they see any disturbing implications for wildlife near where a baiting station was placed.
4. Seek detailed information from the NSW Department of Primary Industries regarding what areas have been subjected to fipronil baiting. Including:
  - (a) How much Fipronil was used?
  - (b) How the DPI plans on decontaminating these areas?

The 35,000 people who have signed the petition “Stop the poisoning of Australian Native Bees” are all deeply concerned about the usage of Fipronil off label and the subsequent cumulative effects on non-target species and the environment.

We ask that you take our concerns seriously and commission an enquiry into the use of Fipronil off label and the subsequent harms caused to species and the environment.

We look forward to your response.

Sincerely,

Mathew Low  
Facilitator  
Community Voice Australia



**SENATOR THE HON MURRAY WATT  
MINISTER FOR AGRICULTURE, FISHERIES AND FORESTRY  
MINISTER FOR EMERGENCY MANAGEMENT**

MC23-010165

Mr Mathew Low  
Facilitator  
Community Voice Australia Inc

[communityvoicecentralcoast@tutanota.com](mailto:communityvoicecentralcoast@tutanota.com)

Dear Mr Low

Thank you for your correspondence of 20 September 2023 (subsequently followed up on 26 September by Laurence Perrin) concerning the petition to remove fipronil baiting in the NSW eradication response to varroa mite and to launch a judicial enquiry into the agricultural chemical industry's potential sway over government policies in relation to bees.

I appreciate your concerns regarding the health and safety of native and introduced bees in Australia. Protecting human health and the environment is always the Australian Government's first priority with respect to chemical use which is why we regulate agricultural chemicals.

Euthanasia of wild European honey bees from the Emergency Eradication Zones during the eradication response to varroa mite was undertaken by New South Wales Department of Primary Industries (NSW DPI) under strict controls in accordance with an Australian Pesticide and Veterinary Medicines Authority (APVMA) permit [PER84929v2]. NSW DPI sought and obtained an exemption for the use of fipronil baiting for use during the response under the *Environment Protection and Biodiversity Conservation Act* from the Department of Climate, Change, Energy, the Environment and Water.

Fipronil bait stations were used in line with best available science to exclude other animals and insects, including native bees, and to prevent contamination of soil and water. The baiting stations were monitored at all times by NSW DPI for the short periods they were in use to ensure there was no impact to non-target species.

The use of fipronil baiting stations ended when the decision was made to transition the varroa mite response from eradication to management. NSW DPI is now in the process of removing baiting stations. Under the current arrangements, existing feeder stations, containing sugar syrup only, are being used by NSW DPI for the purpose of observing and monitoring swarm activity in these areas. Further information on the ongoing activities can be obtained from the NSW DPI website ([www.dpi.nsw.gov.au/emergencies/biosecurity/current-situation/varroa-mite-emergency-response](http://www.dpi.nsw.gov.au/emergencies/biosecurity/current-situation/varroa-mite-emergency-response)).

I have noted the points within the petition and your correspondence but will not be seeking a judicial enquiry, a public review or an independent assessment as requested. I can advise you that reports of impact on wildlife from chemical use, or the misuse of chemical products, can be made to the relevant state or territory body ([apvma.gov.au/node/15891](http://apvma.gov.au/node/15891)) or to the APVMA adverse experience program ([portal.apvma.gov.au/aerp](http://portal.apvma.gov.au/aerp)).

The government takes the matters raised in APVMA Strategic Review Report – July 2023 seriously and the consequential impact on public confidence in the integrity of Australia's agricultural and veterinary chemicals regulatory system. The APVMA's interim leadership team have been working hard to address the cultural issues raised in the Strategic Review. As you may be aware I issued a direction to the APVMA to finalise outstanding reviews expeditiously, and to report to me on the progress of these. Additionally, I have made clear to the APVMA Board and interim CEO my expectation that adequate resourcing is provided to all regulatory functions and roles.

The government is committed to improving the Australian agricultural and veterinary chemicals regulatory system, and ensuring our agricultural regulator is robust and world leading.

Thank you again for raising this matter with me.

Yours sincerely

MURRAY WATT

01 / 12 / 2023