



Hon. Diane Evers MLC
Member for the South West Region

Attn: Mrs Maddison Evans, Committee Clerk
Standing Committee on Environment and Public Affairs
Parliament House
PERTH WA 6000

Dear Committee Members,

PETITION NUMBER 112 – WALPOLE WILDERNESS AND MARINE PARK

Thank you for the opportunity to provide a written submission to the Standing Committee on Environment and Public Affairs regarding Petition No. 112 Walpole Wilderness and Marine Park. I confirm that I wish the Government/Committee to inquire into the matters raised in the petition. To the best of my knowledge, the issues described in this petition have not been taken to the Parliamentary Commissioner for Administrative Investigations (Ombudsman). I support the petitioner's request that the Legislative Council support measures to stop Water Corporation and Manuka Life from introducing large numbers of *Leptospermum scoparium*; prohibit the use of significant volumes of glyphosate in the drinking water catchment area; and rehabilitate the area with native vegetation to ensure the protection of Walpole's drinking water supply and the surrounding environment. Many local residents are deeply dissatisfied with the Corporation's planning and decision-making processes in relation to this proposal. A range of concerns about this proposal have been raised by the community which need to be addressed.

The use of glyphosate: Although the original plan to spray all of the cleared lands to prepare to plant the tea trees has been altered to strip spraying, this would still result in a higher chemical load than applied by the previous land manager in a vital water catchment area. Despite Water Corporation's assurances, the community is very concerned that the initial and ongoing use of glyphosate will contaminate their drinking water supply and cause unacceptable environmental and health risks. Recent research findings warrant a policy rethink in relation to the use of glyphosate-based herbicides (GBH) across many government portfolios, including the Manuka Life proposal. Research has revealed a compelling link between exposures to GBH and increased risk for non-Hodgkin lymphoma¹. Toxicology research shows that the toxic effects and endocrine disrupting properties of GBHs are mostly due to the chemical formulants in commercial pesticides and not to glyphosate itself. This means that laboratory experiments to determine acceptable daily intakes of pesticides appear insufficient to ensure public safety² since they only assess glyphosate or other declared active ingredients alone. They therefore cannot be relied on in this or any other case. Furthermore, the US Department of Health and Human Services' peer reviewed draft report *Toxicological Profile for Glyphosate*³, released in April 2019, appears to support and strengthen the 2015 assessment of the International Agency for Research on Cancer (IARC) that classified glyphosate as probably carcinogenic to humans⁴ and concluded that the evidence for genotoxicity was "strong" for both glyphosate and glyphosate formulations.

¹ Zhang, L., Rana, I., Shaffer, R., Taioli, E., Sheppard, L. 2019. 'Exposure to Glyphosate-Based Herbicides and Risk for Non-Hodgkin Lymphoma: A Meta-Analysis and Supporting Evidence', in *Mutation Research - Reviews in Mutation Research*. <https://doi.org/10.1016/j.mrrev.201916/j.mr>.

² Defarge, N., Spiroux de Vendômois, J., Séralini, G. 2018. 'Toxicity of Formulants and Heavy Metals in Glyphosate-based Herbicides and other Pesticides', in *Toxicology Reports*, Vol. 5, pp. 156-163.

³ U.S. Department of Health and Human Services, Agency for Toxic Substances and Disease Registry. 2019. *Toxicological Profile for Glyphosate: Draft for Public Comment, April 2019*. <https://www.atsdr.cdc.gov/toxprofiles/tp214.pdf>

⁴ WHO International Agency for Research on Cancer. 2015. IARC Monograph on Glyphosate <https://www.iarc.fr/featured-news/media-centre-iarc-news-glyphosate/>



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Use of a non-endemic species: The tea tree species *Leptospermum scoparium* is not endemic to the Walpole wilderness region and would be introduced in large numbers on Water Corporation land. There is some dispute over whether it could become an environmental weed, and there is no certainty that it would not. Given that our own jarrah honey has very similar properties, there is no need for an introduced species. It would be wise to apply the Precautionary Principle in this case, and prevent the introduction of large number of *Leptospermum scoparium* plants in an area next to important habitat.

Phytophthora cinnamomi (dieback): Since much of the land in this area is infected with dieback, the fact that apiary contractors will access the property and then travel to other areas of forested landscape may increase the risk of spread of the pathogen.

Carnaby's Cockatoo habitat: The land in question is situated beside the Walpole Wilderness, habitat of the endangered Carnaby's Cockatoo. As the Western Australian Museum notes 'Feral European honey bees have become a significant problem because of the change from grass-based grain farming, such as wheat (wind pollinated), to flowering plants'⁵. The WA Museum is currently undertaking field work into black cockatoos and has found 'large numbers of feral bee hives that have taken over tree hollows. This has meant a reduction in the number of suitable hollows left for the obligate hollow-nesting species including cockatoos and other birds e.g. small parrots, Sacred Kingfisher and mammals e.g. possums and bats'. The Museum notes an 'urgent need for research into effective methods of eradication and control of feral honey bees in order to develop a strategy that will reclaim the vast number of currently invaded tree hollows'. Clearly current management techniques need to be updated and improved. The introduction of a large number of flowering plants and European bees to the area could pose an unacceptable risk to local Carnaby's Cockatoos.

Community involvement: Members of the community have had to fight to obtain information, which is often incomplete or highly redacted. It is understandable that some commercially significant information might be withheld, but some documents provided are completely black. It is unacceptable that the Corporation should enter into this agreement without genuine community consultation *that is perceived as such by all participants*. A key deficit of the consultation processes to date has been the lack of adequate opportunity for community members to evaluate the quality of the consultation processes they have been involved in. Independent third party evaluation is also lacking. This is a problem throughout government. At the moment, it is possible for State Government departments to meet "consultation" requirements by holding processes which the majority of participants are not satisfied with, regardless of outcome. Improved evaluation processes would be helpful and respectful not only to participants but also to process designers, and could avoid conflicts such as this one in future. The Walpole Bio-diversity Protection Group are requesting that the Corporation, the Shire and the Walpole Community are *most urgently* engaged in meaningful deliberation to find the best and most appropriate outcome for this publicly owned land. This should include evaluation of the quality of the deliberation process itself.

Yours sincerely,



Hon Diane Evers MLC

Member for South West Region

26 April 2019

⁵<http://museum.wa.gov.au/explore/online-exhibitions/cockatoo-care/feral-bees> (Accessed 24 April 2019).