



**Submission in relation
to Forestry Tasmania's**

**Alpha-cypermethrin Derogation Application to FSC
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Submission from:
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Alpha-cypermethrin is classified as a “**highly hazardous pesticide**” (FSC-GUI-30-001 Annex 11) and Cleanairtas opposes any derogation, temporary or not, to use this chemical.

Tasmania has a documented number of defined air sheds (EPA).

National ambient air quality standards are in the process of being tightened to meet community expectations and this will happen early in the five year proposed period of the derogation.

Therefore, it is no time for Forestry Tasmania to be going against public opinion by adding further toxins to our ambient air.

In Tasmania there are extremely short travel distances between plantations and water catchments/river systems.

In Tasmania we have streams or rivers in almost every valley, plus water storage areas of various sizes.

There is a push by the state water authority (and this is already happening) for every town to have better water quality and this is planned for more communities using open storage areas in the five year proposed period of the derogation.

Again, it is no time for Forestry Tasmania to be going against this statutory body by adding further toxins to our catchments and thus our water.

Cleanairtas has had the need to complain to Forestry Tasmania in the past about aerial spraying of plantations.

Questions were asked about what chemical was being used at the time and whether it was mixed with any other chemical that might change the toxicity to that stated on individual labels.

Questions were asked about the spray equipment being used, i.e. pump pressure, number of jets and jet size, and pesticide droplet/vapour size.

(Particulate matter can stay airborne for days to weeks depending on size and can travel up to 1000Km subject to wind strength and direction – National Resources Defense Council 2000.

Alpha cypermethrin has a half-life in the vapour stage of 49 days).

Forestry Tas. could not answer these questions and we were referred to the operator who could not help us either and now Forestry Tas. are asking to continue use of a highly hazardous substance that they have little knowledge about how it is used and where it can end up.

Forestry Tas. only mentions about minimizing the risk of off-site spread of the insecticide. If it cannot be stated there will be no off-site spread then it should not be used and no derogation is required.

Forestry Tas even goes on to say there could be a, “...need to conduct water sampling to detect any spread of insecticide into waterways following the operation.” The same applies.

It is also acknowledged by Forestry Tas that alpha-cypermethrin is a problem because, “...of adverse impacts to non-target species with off-site spread...” when it claims pyrethrum is a better option.

The fact that a 14 day exclusion period prohibiting entry by forestry workers to plantations that have been sprayed with this pesticide shows it does not meet community expectations.

Plantations sizes should be managed so that natural methods of controlling beetles can occur.

Forestry Tas. has identified other options to replace this insecticide to control beetles.

They feel there could be, not that there will be, a dollar loss because of beetle strike so they may wish to get on and bring forward their research. This would be a better way than applying for derogation before this work is concluded.

These alternative ways should be fully investigated before any derogation application to FSC is made as this chemical is known to be a neuro-toxin and has endocrine disrupting effects.

There is a fair chance any such derogation application would fail as FSC has deemed alpha cypermethrin to be highly hazardous and has delisted it as an acceptable chemical that can be used by the forestry industries.

Cleanairtas agrees with the FSC decision.

It is unacceptable for all the above reasons, for a derogation to be allowed.