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Professor Hugh Durrant-Whyte  
NSW Chief Scientist and Engineer  
Office of Chief Scientist & Engineer  
Level 6 52 Martin Place  
**SYDNEY NSW 2000**

Via email: [fishdeaths@chiefscientist.nsw.gov.au](mailto:fishdeaths@chiefscientist.nsw.gov.au)

7 July 2023

Dear Professor Durrant-Whyte

**Re: Independent Review into the February-March 2023 fish deaths in the Darling-Baaka River, Menindee**

CropLife Australia is the national peak industry organisation representing the agricultural chemical and plant biotechnology (plant science) sector in Australia. CropLife represents the innovators, developers, manufacturers, suppliers and formulators of crop protection and agricultural biotechnology products. As such, we wish to provide comment to the Independent Review of the horrific and tragic fish mortality event which occurred earlier this year.

Australian river systems, including the Darling-Baaka, serve as vital sources of freshwater, providing a lifeline for ecosystems, human communities and agricultural activities. They support diverse flora and fauna, including numerous endemic species and play a crucial role in maintaining biodiversity. Healthy river systems ensure the availability of clean water for drinking, irrigation and industrial purposes, supporting sustainable development and the well-being of both rural and urban populations. This is why CropLife and our members have developed, implemented and support a range of world's-best industry stewardship programs and initiatives. We also continue to work with farmers, environmental land managers and other end users to ensure world's best-practice for the industry's products and are committed to protecting Australian rivers, streams, lakes and tidal water from any potential impact that crop protection products (synthetic, biological and organic pesticides) might have.

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The current regulatory system for agricultural chemicals in Australia is scientifically competent, technically proficient and globally recognised. The plant science industry's crop protection products include fungicides, herbicides and insecticides critical to maintaining and improving Australia's agricultural productivity to meet future global food security challenges. Each of these products is rigorously assessed by the Australian Pesticides and Veterinary Medicines Authority (APVMA). When these products are used according to the label directions assessed and approved by the APVMA, they present no unacceptable risk to users, consumers, the environment or the trade of agricultural produce.

It is important to note that, despite timely, targeted and thorough sampling and necroscopy for over 600 pesticides, no trace of pesticide residues or derivatives could be detected.

The NSW Department of Primary Industry has indicated that the deaths are believed to be attributed to hypoxic blackwater, a naturally occurring phenomenon that causes extremely low dissolved oxygen levels. The scale of this event has been exacerbated by recent hot weather and significantly increased numbers of fish in the system.

However, despite the likely natural causes of this unfortunate and ghastly incident, the responsible care and duty in safe and effective management of pesticides by Australian Farmers should be noted. Climate change will be one of the biggest challenges to both water management and agricultural production over the coming decades, as changing temperatures and weather patterns are introducing changes in crop pests. Weeds, pest insects and diseases will continue to be major threats to the productivity, profitability and sustainability both of Australia's farming sector and human food security.

In supporting farmers' crop production success, CropLife is proud of our suite of world-leading industry stewardship initiatives and programs, StewardshipFirst<sup>1</sup>, which ensures the responsible use of crop protection products. The StewardshipFirst suite includes CropLife's industry-led best practice application guides MyAgCHEMUSE and SprayBEST for responsible application and spray drift management. It also contains the Seed Treatment Stewardship Strategy, which provides best practice guidance to ensure that modern, innovative crop protection products are used responsibly and in a manner that minimises risk to not only pollinators, but flowing water and aquatic fauna.

In addition to CropLife's Resistance Management Strategies and Pollination Protection Initiative, StewardshipFirst also includes stewardship programs delivered through Agsafe, CropLife Australia's internationally recognised and awarded not-for-profit stewardship organisation. CropLife's flagship environmental stewardship programs **drumMUSTER**<sup>®</sup> and ChemClear<sup>®</sup> are managed and operated by Agsafe. These stewardship programs are fully funded by industry. Since **drumMUSTER**<sup>®</sup> started operations in 1999, more than 40,000 tonnes (almost 40 million containers) of plant science industry product container plastics have been diverted from landfill sites into recycling programs. There are over 800 collection sites throughout Australia, with almost 250 in NSW alone, for farmers, environmental land managers and other pesticide users to return their drums, including over 350 local council sites.

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<sup>1</sup> <https://stewardshipfirst.com.au/>



The ChemClear® initiative further demonstrates the plant science industry's rigorous commitment to product stewardship. ChemClear® enables the removal of obsolete or damaged chemicals off farms for proper disposal and destruction, allowing farmers to safely remove these unwanted products. This is particularly pertinent during events such as floods and bushfires. ChemClear® has a successful history in partnering with state governments to conduct collections to safely capture, remove and dispose of unwanted or unknown pesticides from properties or surrounding public lands following natural disasters. These initiatives have ensured the proper disposal of these products, which has eliminated the risk of them causing pollution events.

Finally, the Senate Standing Committee on Rural and Regional Affairs and Transport, in its report for the inquiry into *Identification of leading practices in ensuring evidence-based regulation of farm practices that impact water quality outcomes in the Great Barrier Reef*<sup>2</sup>, emphasised the requirements of effective stewardship of crop protection products. Also included in the report was the information about our industry's best practice programs to support farmers with on-farm management of their pesticide usage. The report encouraged other input sectors to take inspiration and lessons from the pesticide industry for the best way to achieve environmental outcomes.

Please do not hesitate to contact CropLife's Director of Stewardship and Sustainability Policy, Dr Jana Phan ([jana.phan@croplife.org.au](mailto:jana.phan@croplife.org.au) | 02 6273 2733), should you require any additional information with regard to any aspect of this submission.

Yours sincerely



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<sup>2</sup> [Identification of leading practices in ensuring evidence-based regulation of farm practices that impact water quality outcomes in the Great Barrier Reef – Parliament of Australia \(aph.gov.au\)](#)