Trevor Hold
Advocate Manager
477 Gatton Esk Road
Adare Queensland 4343
trevor.hold79@gmail.com

05 October 2025

The Hon. Tara Moriarty MLC
Minister for Agriculture
Parliament of New South Wales
Macquarie Street
SYDNEY NSW 2000

Reference: MF25/1553

Dear Minister Moriarty,

Thank you for your correspondence dated 2 October 2025 regarding fire ant management and the National Fire Ant Eradication Program (NFAEP). I appreciate your department's efforts to engage with the Australian Advocacy Group (AAG) community, as well as your engagement with Professor Joshua King from the University of Central Florida and acknowledgment of his work in developing the hot-water eradication system.

After reviewing the 2023–2027 NFAEP Response Plan and its implementation, I wish to raise six significant concerns.

1. **Human rights and private property considerations**
   The current administration of the NFAEP often contravenes fundamental human rights, private property rights, and individual choice regarding chemical exposure. Forced treatments, unconsented access, and limited avenues for objection are inconsistent with principles of informed consent and autonomy, particularly for landholders seeking non-chemical management options.

2. **PFAS and hazardous chemical use, including direct nest treatment**
   I am deeply concerned by the ongoing use of PFAS-based formulations and active ingredients such as fipronil, indoxacarb, bifenthrin, and hydramethylnon, particularly for **direct nest treatment**. These substances are internationally recognised for persistence, bioaccumulation, and potential carcinogenicity. Public messaging fails to adequately disclose these risks and, in some cases, misinforms communities by implying the chemicals are harmless, undermining transparency and public trust.

3. **Compliance restrictions and economic impact on producers**
   Blanket compliance measures applied to 'fire ant carrier materials', particularly professionally produced hay, are imposing significant strain on viable hay farms and supply chains, even when following accepted fire ant mitigation strategies. We advocate shifting from a **heavy-handed, top-down approach** to a **producer-led accreditation scheme**, working collaboratively with farmers. Many already operate under such accreditation, recognising that it is their business and reputation that ensure no fire ants are transported in high-value products. Current restrictions are creating financial and social hardship across affected regions, and the compliance framework requires urgent review to balance risk management with economic

sustainability. In addition, other industries are also impacted, including several nurseries which have contacted AAG indicating compliance cost causing an anti-competitive environment impacting financial feasibility of operating business.

4. **Adverse effects on animals and non-target species**
   Despite assurances of 'no scientific evidence' of harm, thousands of adverse reports have been submitted to the APVMA, including my own experience of four calf deaths directly linked to prophylactic baiting and chemicals from forced compliance from a next-door nursery washing into my susceptible animals drinking water. Community reports describe harm to pets, livestock, wildlife, and pollinators, indicating an urgent need for independent investigation into acute and cumulative impacts of current chemicals.

5. **Human health effects**
   The Program's failure to engage respectfully with communities has serious human health implications. Residents report stress and anxiety, particularly related to forced or poorly communicated chemical treatments. Exposure can exacerbate chemical sensitivities, causing skin irritation, rashes, and respiratory problems, which negatively impact mental health and overall well-being. This highlights the need for a community-focused, transparent, and health-conscious approach.

6. **Organic Producers and Organic Land Management**

   Current prophylactic treatment chemical offerings of the NFAEP are not compliant with organic producers and organic land management due to genetically modified products, namely corn grit and soy oil. Further supporting the need to chemical alternatives. Concerns also are raised from individuals' whose lifestyles are aligned with organic land management without the financial capacity to officially pay for the certification. These people are currently ignored by the application of the current program.

I acknowledge that the NFAEP has a dedicated science team and collaborates with international experts. However, many affected community members report feeling unconsulted and ignored, particularly when experiencing adverse effects.

The Australian Advocacy Group (AAG) has worked with Professor Joshua King and the biology team at the University of Central Florida to licence an Australian-first FASO machine, accessed by Professor Nigel Andrew from Southern Cross University in an Australian-first pilot program. We have also collaborated with veterinary practitioners, environmental scientists, aquatic specialists, chemical analysis experts, and researchers, all committed to advocating for change to the current high-risk approach.

I would welcome the opportunity to initiate a meeting to discuss these issues and provide meaningful engagement on the lived experiences and concerns of affected communities.

As the New South Wales representative on the National Management Group, you are uniquely positioned to advocate for change. I urge you to champion evaluation and adoption of non-chemical eradication technologies, such as Professor King's Fire Ant Soup Operations (FASO). Paired with effective surveillance, FASO has demonstrated capacity to achieve eradication in nominated areas while avoiding unnecessary chemical exposure.

Integrating these technologies would demonstrate NSW leadership in adaptive, ethical, and environmentally responsible biosecurity management. I would welcome the opportunity to

meet with your department or the National Management Group to discuss options for evaluation and implementation.

Thank you for your attention and continued leadership in safeguarding NSW's agricultural and environmental biosecurity.

Yours sincerely,
Trevor Hold
Advocate Manager
0401 517 906

References and Supporting Evidence

Video Stories: Real Voices, Real Impact

1. **Shattered Dreams**
   Wesley Trevor, 50-year plant industry veteran, shares how harsh chemical treatments devastated his low-chemical nursery.
   🔗 Watch on Rumble
2. **Can You Hear Us?**
   Hay farmers in Lockyer Valley plead for urgent government action to stop livelihood damage caused by fire ant control methods.
   🔗 Watch on Rumble
3. **Trevor's Story**
   Organic cattle farmer Trevor Hold recounts livestock deaths after multiple bait treatments, despite no fire ant presence.
   🔗 Watch on YouTube

📚 Scientific Research: Evidence-Based Insights

4. **Toxic Consequences of Australia's Fire Ant Eradication Program**
   An open-access review (Rasmussen et al., 2025) revealing the failure of pesticide-heavy methods and ecological risks from broad pesticide use.
   🔗 Read Full Study

✉️ Letters & Statements of Concern

5. **Professor Joshua King's Letter (Oct 2024)**
   Leading fire ant researcher from University of Central Florida criticizes Australia's pesticide-heavy approach, advocates for hot water mound injection and other non-toxic alternatives, and warns eradication is unlikely.
   🔗 Read Letter

Supporting research:
Pesticide-Free Management of Invasive Ants Impacting Ground-

Nesting Wildlife
🔗 Read Study

6. **Pesticide Action Australia: PFAS Contamination Statement (Feb 2025)**
   Highlights serious risks from "forever chemical" PFAS in fire ant pesticides, calls for immediate bans and community engagement.
   🔗 Read Statement



7. **Environmental Health Effects: Investigative Articles**
   Exposes government disregard for health and safety in the National Fire Ant Eradication Program.
   🔗 Fire Ant National Management Group Issues
   🔗 Government Departments Disregarding Health and Safety Obligations



🔬 Innovative Alternatives

8. **Fire Ant Soup Operations (FASO) Pilot**
   Southern Cross University undertakes an Australian first pilot project using patented technology and processes from University of Central Florida (Professor Joshua King) for targeted, non-toxic fire ant control.
   🔗 More Info


