



22 December 2017

Agvet Chemical Task Group Secretariat
Via email: agvetpolicy@agriculture.gov.au

Dear Agvet Chemical Task Group Secretariat

The NFF was established in 1979 as the peak national body representing Australian farmers. For 38 years, the NFF has engaged in the identification, development and achievement of policy outcomes affecting Australian agriculture. The NFF exists as the single, united voice for the agricultural sector, providing high level advice and guidance on issues of critical importance to the sector.

There are approximately 85,681 farm businesses in Australia, 99 percent of which are family owned and operated. The NFF represents these businesses, along with a broad cross section of the agriculture sector across Australia. The NFF's membership includes State Farmer Organisations, National and State Commodity Councils and other participants of the agricultural value chain. A full list of NFF members has been appended to this letter for your information.

The Australian agriculture sector is a critical contributor to the Australian economy. In 2015-16, farm and fisheries production and processing accounted for approximately two percent of Australia's GDP and 16 percent of the total value of merchandise trade exports. The sector provides economic, social and environmental benefits across the country and relies on an effective and responsive partnership with the government across a range of important areas, including agricultural and veterinary chemicals.

The NFF appreciates the opportunity to comment on the Agvet Chemical Task Group (ACTG) Draft Proposal: National harmonisation of minimum training and licensing requirements for occupational (fee for service) users of agvet chemicals. The NFF is not an agvet chemical training organisation, and is not directly involved in the training process. As such, we are not in a position to comment on all specific details of the draft proposal. However, NFF members have an interest in this process, particularly in ensuring that agvet chemical training results in efficient, effective and safe application. Thus the NFF urges the Secretariat to also consider the submissions of the NFF membership to inform further development of this draft proposal.

The NFF supports harmonisation in meeting these objectives and stresses the need to improve efficiency of current structures, rather than create unnecessary and duplicative processes. The NFF welcomes the current Government's commitment to the harmonisation of agvet training across Australia and is supportive of reforms that would improve the efficiency and

effectiveness of the current system. There are however, a number of issues that need to be addressed by the ACTG before the NFF can support the draft proposal.

The NFF recognises that the Government has worked to clarify industry concerns regarding some unclear terminology in the draft proposal. However, the NFF still has concerns that terminology used in the draft proposal may have unintended consequences. Members seeking to gain clarity around the inclusion of 'in-kind' remuneration, have been advised by the Department of Agriculture and Water Resources that "fee for service" for this draft proposal is taken to mean "pertaining to the charging of fees, either in remuneration or in-kind, for specific services – in this case the application of agvet chemicals". This interpretation poses specific issues and further uncertainty for the NFF membership.

If farmers provide agvet chemical services on neighbouring properties as 'in-kind' remuneration or have specialised spray equipment, it appears that they are then bound by training & licensing requirements for individuals & businesses. The NFF contests that this type of bartering arrangement is not intended to be covered by the draft proposal and should not be captured by the draft proposed changes.

There is considerable ambiguity around the requirements of recreational feral animal hunters/trappers that are not charging a 'fee' but provide an in-kind service to a property or community baiting program where a landholder places a bait on a consenting adjoining property (absentee or hobby farm). Fencing & stockyard building contractors also face uncertainty on training requirements as they may occasionally use a termiticide in pole holes. Further clarity is needed as to how the draft proposal affects these service providers and the level of competencies that they will be expected to have.

The NFF recommends that the ACTG gather more feedback on minimum training qualification and specifically the level of training competency needed for the types of examples given above. It is also unclear within the draft proposal how State Departments will ensure compliance of these proposed measures.

Another concern that the NFF holds, is that it appears in the draft proposal that no consideration has been given for new, emerging agvet chemical application technologies such as robotic spraying and swarm bots. It is important that the draft proposal is able to accommodate these technologies and the NFF urges the ACTG to consult further with the NFF membership as to how these technologies would be treated under the draft proposal.

Also, it will be important for the ACTG to give some consideration for applying agvet chemicals to waterways. The NFF would suggest that waterways be included in the 'ground' definition.

The NFF would like to note the importance of appropriate timeframes for implementation of any changes to the status quo. The NFF notes that major changes to training systems can take time to implement and for chemical users to adapt to. It will be important that this is considered through the implementation of proposed changes. Within this period, transitional arrangements still need to provide transparency and certainty for farm chemical application.

The NFF recommends that to avoid confusion in any transitional phase that anyone with an existing Commercial Operators Licence (COL) is automatically recognised as competent for agricultural spraying with powered ground equipment. These operators have often held the

licence for a number of years and have proven their competency during this time and thus should not be compelled to undergo additional requirements.

Additionally, it has been disappointing that the current draft proposal has not been better integrated with work by industry on effective training programs and the efforts to harmonise state arrangements. Limited consultation with affected agricultural industries by the national and state working groups on agvet chemical reform & changes in usage, limits the opportunity for improved outcomes in agvet chemical training. Consultation has often occurred at the end of a process with very limited feedback opportunities. The NFF suggests that better outcomes would be achieved if the national ACTG consulted with industry at all stages of the process.

The NFF encourages the Australian Government to work collaboratively with industry and continue any further reforms of agricultural and veterinary chemical training through a more holistic approach. The NFF recommends setting up multi-industry feedback forums throughout the process of regulatory reform to ensure that industry is confident that any proposed changes will have the desired outcome.

Thank you for the opportunity to comment on the draft proposal. If you have any questions regarding this letter, please contact NFF Rural Affairs Manager, Mark Harvey-Sutton on 02 6269 5666.

Yours sincerely

TONY MAHAR
Chief Executive Officer

NFF Members:

-) AgForce Queensland;
-) Animal Medicines Australia;
-) Australian Chicken Growers Council;
-) Australian Dairy Farmers Limited;
-) Australian Livestock and Property Agents Association Limited;
-) Australian Livestock Exporters' Council;
-) Australian Forest Products Association;
-) Australian Pork Limited;
-) Australian Veterinary Association;
-) Beechworth Honey Pty Ltd;
-) Cattle Council of Australia;
-) Corporate Agriculture Group;
-) Cotton Australia Limited;
-) Dried Fruits Australia;
-) Farmers for Climate Action;
-) Goat Industry Council of Australia;
-) GrainCorp Limited;
-) GrainGrowers Limited;
-) Northern Territory Cattlemen's Association;
-) NSW Farmers' Association;
-) NSW Irrigators' Council;
-) Pastoralists' Association of West Darling;
-) Primary Employers Tasmania;
-) Primary Producers South Australia;
-) Australian Cane Growers' Council Limited;
-) Ricegrowers' Association of Australia;
-) Sheepmeat Council of Australia;
-) Soils for Life
-) Summerfruit Australia;
-) Victorian Farmers Federation;
-) Western Australia Farmers Federation;
-) WoolProducers Australia.