



30 March 2018

Australian Pesticides and Veterinary Medicines Authority
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Kingston ACT 2604
Email: enquiries@apvma.gov.au

To who it may concern,

The National Farmers' Federation (NFF) welcomes the opportunity to make a submission to the APVMA's *proposed approach to spray drift management*.

The NFF is the voice of Australian farmers and was established in 1979 as the national peak body representing farmers and, more broadly, agriculture across Australia. The NFF's membership comprises all of Australia's major agricultural commodities across the breadth and the length of the supply chain.

Preventing spray drift is an essential aspect of using agricultural chemicals responsibly. The NFF is supportive of the aims of the APVMA's proposed spray drift management approach to enable more reasonable buffer zones to be set; provide clearer label instructions and increased flexibility; and support the use of drift reducing technologies (DRT).

There is a significant need for flexibility in off-label and minor use permits particularly for niche markets (such as rice, lavender, ginseng and saffron). Availability of alternative pest and disease management tools is critical if the industry is to meet the production standards while being competitive in these niche markets.

However, currently the cost of developing the necessary documentation to meet regulatory requirements for minor use permits is prohibitive for many of these niche markets, and manufacturing companies are limited in the financial returns that may be gained by accessing niche markets in Australia. The NFF believe that the minor use system needs to be publicly funded to address the current market failure.

For example, pineapple growers in Queensland with limited resources and market incentives to invest in the requirements to gain reduced buffer zones have largely stopped using Diuron due to stipulated buffer zones being larger than industry can manage. These smaller industries are at a distinct disadvantage when it comes to making an application for reduced buffer zones or worst-case scenarios.

We also have concerns about the practicality of the proposed online tool. The proposed approach of determining different buffer zones to those stipulated on the label and refining worst-case scenarios is potentially onerous, resource intensive and expensive for those

operating in niche, sensitive or small markets. Industry already has a range of online tools that it has developed, including SprayWise®, CottonMap and BeeConnected as well as publications from the GRDC including Sprayright and the Spray Application Manual for grain producers. It will be important that the APVMA online tool is compatible or complementary to existing products already being utilised by producers. The NFF views these existing products to be valuable DRT, and believe that these tools are be part of the broader approach to managing spray drift.

Further consultation with the agricultural industry regarding the online tool is needed as there is some confusion in regards to how the tool will assist producers determine alternative buffer zones. It is currently financially prohibitive and resource intensive for small scale and niche market producers to collate the regulatory required documentation to support smaller buffer zones.

The NFF holds similar concerns in regards to standard deposition curves to determine buffer zones based on realistic worst case scenarios being prohibitive for most small scale and niche market producers to demonstrate.

There is also some confusion as to how the proposed changes will be implemented. The proposal indicates that the buffer requirements would be introduced well before the online tool to reduce buffers is available to producers. There is concern in industry as to how applicators manage their buffer requirements in the short term, and whether the online tool will recognise targeted spray rigs.

Similarly we would also welcome clarity about the rights of producers in the instance where using the online tool to determines a buffer that is different to that which is stipulated on the label and producer then apply this buffer 'contrary' to the label.

It is also unclear from the current proposal how planted vegetation buffers will be assessed. The NFF believe that planted vegetation buffers (including native vegetation buffers) should be recognised as a DRT and would urge the APVMA to consider this.

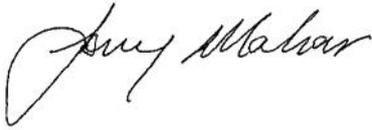
The NFF believes that Australian farmers are acutely sensitive to issues relating to chemical safety and that they are willing to adopt new technologies, farming methods and products to reduce the risk of spray drift incidents.

The majority of producers are able to manage drift particularly well, especially those who have grown sensitive crops side-by-side for some time and have a vested interest in keeping their spray on the target. Many farmers grow sensitive crops concurrently and are experienced in managing Maximum Residue Limits to facilitate access to international and domestic markets.

The NFF is continuing to work with industry stakeholders and government agencies on an integrated strategy to reduce incidence of chemical spray drift. In order to minimize incidents of spray drift, it is critical that farmers work together at a local, regional and industry level, and in doing so, ensure they can retain access to the full range of farm chemical tools.

We are eager to continue to work towards a range of national, practical, sensible solutions to spray drift management. If you require any additional information regarding this submission, please contact Mark Harvey-Sutton (Manager, Rural Affairs) on 02 6269 5666.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Tony Mahar'. The signature is fluid and cursive, with a large initial 'T' and 'M'.

TONY MAHAR
Chief Executive Officer