



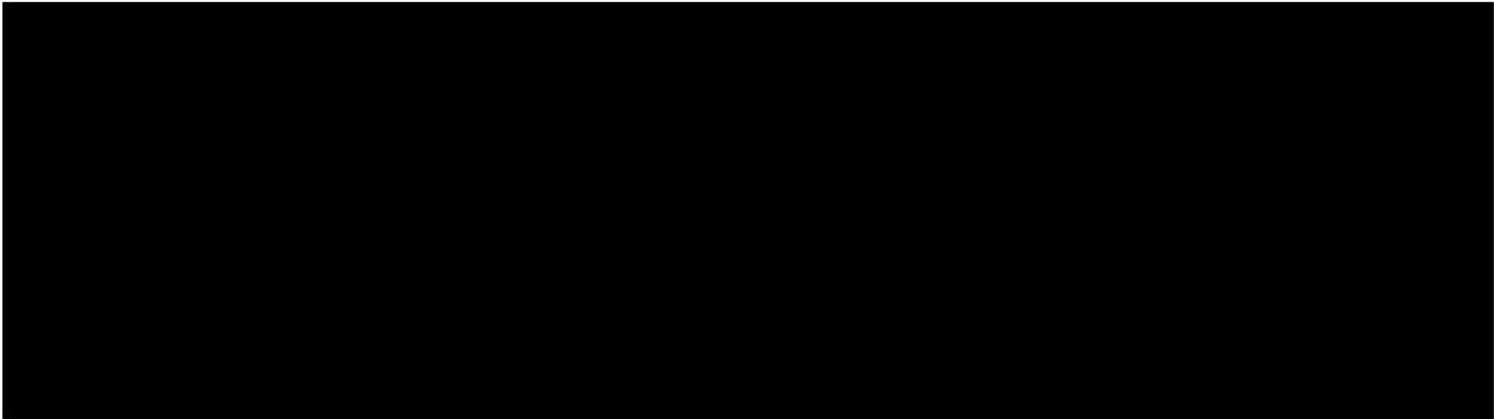
Australian Government
**Australian Pesticides and
Veterinary Medicines Authority**



**Trade Advice Notice on mefentrifluconazole in the product
Belanty Fungicide for use on cotton**

Submissions received

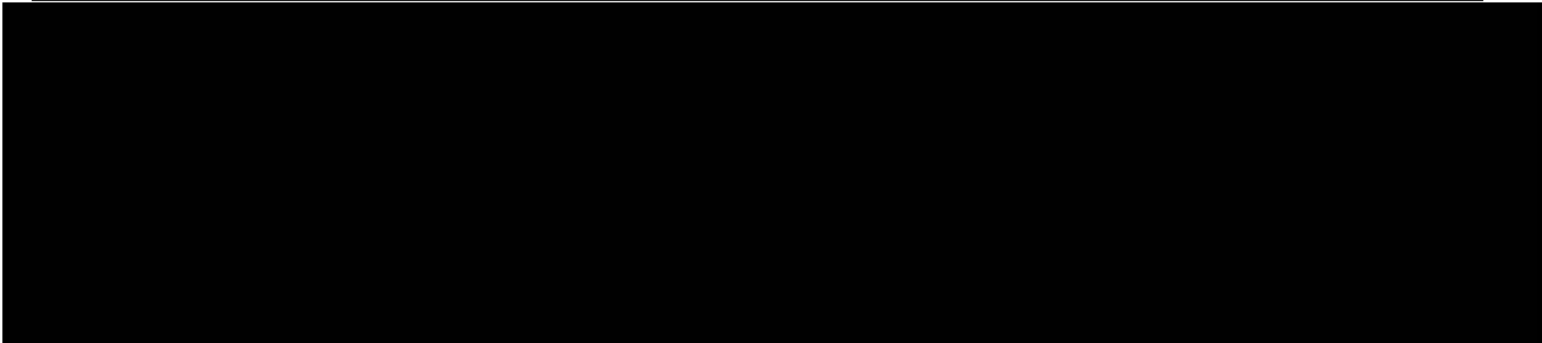
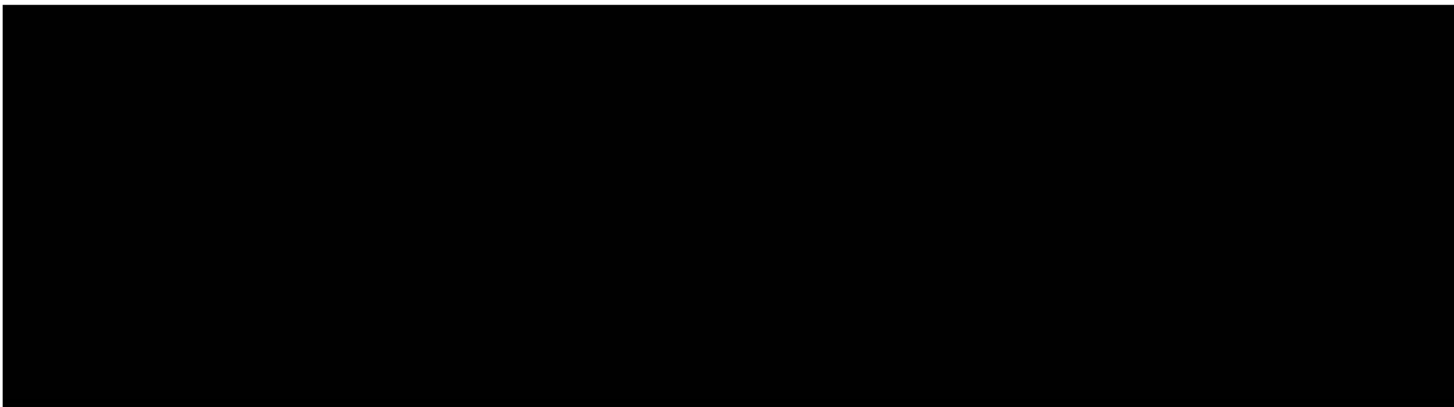
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Jacquelle Gorski



Sustainable Project Management



This pesticide is labelled in the SDS as toxic to aquatic life, with long lasting effects. The emergency use with aerial application is unacceptable, as the plantations are surrounded by a significant interlinked system of wetlands and waterways. . The proximity of cotton plantations to Ramsar and nationally significant wetlands demands additional controls to ensure application is targeted and site specific. The standard of no change in background conditions to Ramsar and nationally significant wetlands should be the benchmark. The precautionary principle should be applied, where there is risk of impact, impact should be avoided.

An environment and human health risk assessment should be made available for review, this RA should outline all 'sensitive environments' and controls to avoid impacts. This would include site specific application, where required, rather than broad scale uncontrolled application. Our environment has been impacted extensively by unabated chemical use. Australia is now at a point where long lasting impacts are evident and where we have the opportunity to reduce or eliminate impact, these should be considered.

This fungicide is toxic The use of biocides, particularly those that are perristent, bioaccumulatory and toxic, as the Belanty Fungicide should be applied with utmost caution. It should be applied where required in a targetted and controlled manner if there are no other alternatives. The impact pathways should be clearly delineated with appropriate and effective controls to reduce impacts and avoid impacts to waterways.

We are now at a stage where the environment must be prioritised. Australia cannot keep damaging our biodiversity when alternatives are available.