

The Manager
Fenthion Review
Australian Pesticides and
Veterinary Medicines Authority
PO Box 6182
KINGSTON, ACT, 2604

David Betland
Mobile No. 0401156037
PO BOX 773
59 Betland Lane
Forbes, NSW, 2871

RE: Fenthion Review

My names David Betland and I am a fruit grower in the Central West of New South Wales. I am a fourth generation Orchardist. My family has had a commercial orchard, producing stone fruit for over eighty years. During that time we have used fenthion solely for fruit fly control since its introduction over 50 years ago. Before fenthion was available my grandfather used DDT and before that nicotine sulphate although he had not much success with these chemicals. Fruit fly quickly built a resistance to these chemicals and the control of fruit fly was no longer successful.

During our farming years we have used large quantities of fenthion in its raw state and without any signs of the health risks you have stated in your review. One would think that we would be most at risk due to dermal contact and inhalations of spray drift. This also takes into account that until the last fifteen years all spraying took place on open tractors therefore we came into contact with these chemicals on a regular basis.

The DPI alternatives to fruit fly control are as listed below:-

- Bait sprays once a week for the entire growing season.
- Traps for monitoring male fly (mat traps – Male Annihilation Technique). Up to 20 per hectare.
- Cover sprays that don't control fruit fly larvae.

These sprays have to be applied in large numbers due to the poor performance of these sprays. Lebaycid will be replaced with four different chemicals and two applications of each can be used with up to eight sprays in total. That level of chemical residue is much worse than Lebaycid and its effectiveness to control fruit fly will be inadequate.

The alternative cover sprays are not new to the industry, but are old products used to control other insect pests in our industry. The DPI has stated in the past that bait sprays and traps are not effective without cover sprays of dimethoate or fenthion. Today the DPI states effective control is achieved by baits and traps. The fact is baits and traps are not effective in high pressure areas and the DPI is aware of this.

The growers are not getting any assistance from the government to control backyard fruit fly in the surrounds of towns and neighbouring houses. The numbers of fruit fly are increasing due to chemical restrictions and lack of control of urban fruit fly. For baits and traps to be successful in controlling fruit fly there needs to be widespread monitoring and control measures implemented across the whole community, commercial fruit growers cannot and should not be responsible for that.

The APVMA has stated that residue levels are low and there is a large safety margin to protect consumers and to my knowledge Lebaycid has not caused any health concerns in over 50 years. We

haven't seen any environmental issues in or around our orchard, with birds and wildlife in general on the increase. I am aware that there has been deliberate poisoning of birds by members of the public but this is not the actions of commercial fruit growers and this will never happen whilst spraying to control fruit fly at the recommended rate. The actions of people poisoning birds goes on with or without fenthion as there is still plenty of alternate insecticides and herbicides that are more than capable of this. If the APVMA removes all chemicals that pose a risk to wildlife and environment there won't be many if any left to protect crops and maintain food security in this country.

As a food producer in this country it is becoming a real concern to see so many useful chemicals that we have become reliant on removed from use, and in the horticulture industry we are seeing more chemicals removed than general agriculture due to low volume sales. Chemical companies are withdrawing minimal use products, as it is becoming too costly to comply with APVMA compliance and to obtain residue data the APVMA now require to maintain registration. The way the APVMA is totally funded through chemical sales and registration fees is not indicative of fair and impartial judgement and is a big concern, it rewards the removal of effective low use chemicals such as fenthion as fruit growers will apply large volumes of inadequate alternate chemicals. The DPI has been forthcoming with alternate fruit fly control measures for growers once dimethoate and fenthion is removed. These alternative control measures range from inadequate to just plain ridiculous and demonstrate their lack of knowledge in regards to the workings of a commercial orchard today. The DPI interaction with growers for a long time now has been very limited and the department has been more of a compliance wing of the government than a useful resource to the industry.

Export is on the increase, but due to the proposed banning of fenthion it will become unachievable as we cannot guarantee fruit that is free from fruit fly larvae with alternate control measures. It is preposterous to think we cannot send fruit to China because of the fenthion suspension when this country is still actively using this product and does send produce to Australia through New Zealand's back door. There is also the risk of fruit reaching our stores with larvae in them as you cannot detect a piece of fruit stung by a fruit fly. Our fruit will become much more expensive due to the higher cost of producing fruit in Australia. There will be a shortage of produce as I assume many growers will retire from the industry, as they can no longer meet the requirements financially and handle the work load of the new control measures that are inadequate and not even guaranteed to work.

I cannot see how it can be fair or equitable that we have restrictions in our own country, but fruit can be imported with the same chemicals that we cannot use but can be sold to consumers. Please explain the difference as I can only see that we are pushing the agriculture industry into a situation that will lead to a shortage of food Australia wide. The APVMA decision to remove fenthion was made even before there was residue level data to support their claims that the treated product was unsafe, the industry partners that our levy moneys go to obtained the data and met the APVMA safety standards on everything except peaches and apricots but to no avail. The APVMA turned their attention to Occupational Health and Safety issues to remove the product but again our industry partners satisfied Work cover's safety concerns.

Finally the APVMA moved to environmental issues to remove fenthion without conclusive evidence but are going to press on regardless even though the alternative chemicals are just as dangerous to the environment and one in particular even more so than fenthion. During the fenthion review

process it has been frustrating for fruit growers as we have not received any support from either side of the government, but this is of no surprise as we don't account too many votes. The APVMA's ruling to suspend fenthion for the use of spraying food crops will have far reaching effects on this country and I don't believe they fully understand the seriousness of their actions. Over the many years my family have been in the fruit industry we haven't seen anything as remotely ruinous as this predicament we are now facing, the horticulture industry is not ready for this.

Yours faithfully,

David Betland