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Director, Chemical Review and AERP
APVMA
PO Box 6182
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Dear Chemical Review Director,

Fenthion: Preliminary Review Findings - AMIA Response

The Australian Mango Industry Association (AMIA) is the national peak industry body representing the interests of Australian mango growers. AMIA welcomes this opportunity to provide a submission on behalf of its growers to the Environmental Chemical Review Assessment Report of fenthion from the Department of Environment.

In considering the report AMIA believes that the recommendation on dip disposal, in relation to immersion dips, has arisen due to a significant overestimate in volumes of spent dips requiring disposal. AMIA asks that the APVMA reconsider the recommendation on dip disposal and outlines below the reasoning behind this request.

Firstly, the interstate market access arrangements for mangoes in which post-harvest treatment is a requirement have recently changed with Victoria changing its Fruit Fly status. Growers in the major production regions now only need to treat post-harvest for fruit being marketed to South Australia, Western Australia or Tasmania. These markets account for less than 5% of production. Consequently, the vast majority of fruit produced in Australia will not require post-harvest treatment. As only a small number of growers produce mangoes for these specific markets the reliance on post-harvest treatments will be limited, i.e., many growers will not use fenthion at all. This will result in significant reduction in fenthion use.

Secondly, fenthion immersion dips predominantly contain no more than 500-1000 L, i.e., 206.25-412.5 g ai. Significantly lower quantities than would result from an infield spray. Given that pre-harvest treatment of mangoes is not supported there would be no other environmental exposure within in a

mango orchard from fenthion. The frequency of disposal will depend on the quantity of fruit being treated but could be limited to only several times in a week when dips are in use. Even so, the volume requiring disposal would be less than a few thousand litres a week, often over the short harvest season spanning three to four weeks for an orchard/packing shed, i.e., significantly lower than the 20,000 L/ha mentioned in the Report.

As a result the industry believes that the disposal of these lower volumes of spent dip could more easily be managed through infield disposal and could comply with a guideline in which spraying under orchard trees is allowed but with restraints on frequency and volumes based on the criteria elaborated by the Department of Environment on pages 79 and 80 of the Environmental Report.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Dunmall".

Trevor Dunmall

Industry Development Manager