

26 August 2014

Manager
Fenthion Review
Australian Pesticides and Veterinary Medicines Authority
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Dear Manager,

Thank you for the opportunity to provide a submission for the review of fenthion in Australia's apple and pear industries.

Apple and Pear Australia Limited (APAL) is the peak industry body representing the interests of commercial apple and pear growers in Australia in matters of national importance including regulation, legislation, marketing, research and development.

Should the APVMA ban the pesticide fenthion that is used to control fruit flies, APAL recommends the APVMA adopt a 24 month transition and phase-out period.

Time to adopt Area Wide Management

This transition period will give apple and pear growers time to adapt their fruit fly management programs to include Area Wide Management practices without the use of fenthion. Many growers are not yet familiar with Area Wide Management and have not had experience implementing it to ensure their productivity is not affected.

Comprehensive adoption of Area Wide Management will also be essential for the successful roll-out of Sterile Insect Technique (SIT), which is being developed as a future technology to control fruit fly as part of the National Fruit Fly Strategy.

This imminent cancellation of the registration of fenthion will come as a blow for many apple and pear growers, because there are no alternative cover sprays that are as effective in the control of Mediterranean and Queensland Fruit Fly (QFF). Cover sprays like fenthion are particularly effective because they kill adult fruit flies on contact, as well as penetrating the edible fruit flesh, killing eggs and larvae within apples and pears.

Time to prepare the industry

The Senate Standing Committee inquiry the *Implications of the restriction on the use of fenthion on Australia's horticultural industry* recently submitted their findings. Amongst many things, this inquiry found significant variations in the level of industry preparedness for the suspension of fenthion. The committee noted that in some regions abandoned orchards harbouring fruit fly was a key issue when adopting Area Wide Management. Growers living next to an abandoned orchard are subject to intense fruit fly pressure and cannot maintain a zero threshold that their export customers demand.

The problem of abandoned orchards was demonstrated on 16th July 2014 when APAL held a Fruit Fly Workshop in Tatura, Victoria, which aimed to update growers on how to implement Area Wide Management on their farms.

The industry needs Commonwealth and State agencies to coordinate their assistance to help fruit growers adapt to changes in the regulatory system to ensure an ongoing supply of fruit to Australia, and our export markets. The Senate Committee report also raised concerns about the complexity of the regulation process which has caused much confusion.

Time to implement the National Fruit Fly Strategy

The National Fruit Fly Strategy is an important step towards establishing a national approach to fruit fly management. The National Fruit Fly Strategy Implementation Plan, finalised in 2010, failed to attract on-going funding support, in part due to constrained resources amongst grower groups. The revival of National Fruit Fly Strategy is in the early stages, but ultimately it could help lead to the successful roll-out of SIT treated fruit flies into region to help manage outbreaks. However, it is still expected that it will take 5 years before any SIT treated fruit fly are available for commercial release, (note that SIT will only work if the fly population has already been substantially reduced by other methods as it takes 50 sterile males to affect a female) so in the interim, with the removal of fenthion, growers will solely be relying on Area Wide Management.

APAL understands that the APVMA is an industry regulator and is not required to identify alternatives to control fruit fly. APAL recommends that a phase-out period of 24 months is given to allow growers to transition successfully to different management systems to reduce the damage done by fruit fly, such as Area Wide Management. The alternative sprays don't give similar control and SIT, which will require full adoption of Area Wide

Management, is still some 5 years away and yet to be proven successful in QFF.

Basis for APVMA recommendations

In the environmental report a rate of 82.5 g ac/100 L (equal to 150 mL/100L) was used in estimating the predicted environmental concentration for fenthion. APAL believes that this has resulted in a significant over estimate. The rates, labelled for fruit fly control, appear to be an anomaly reflecting a degree of label drift. As indicated in Table 1 of the Environment Report there are multiple use rates listed for fruit fly control. That different rates for the same pest species in the same crops occurred APAL contends is abnormal and reflects historically different priorities at the State level prior to the creation of the APVMA, i.e., rates of 150 mL/100 L were for use in eradication campaigns following pest incursions, rather than for general grower use. APAL believes this is supported by the fact that rate of 75 mL/100 L which is half the rate in the environment report, has provided adequate fruit fly control in a range of tree crops.

To further refine the risk assessment APAL asks that the APVMA also consider risk scenarios involving lower water volumes, i.e., water volumes of 1500 L to 2000 L/ha. APAL believes that making such refinements will further reduce the predicted environmental concentrations.

Therefore, APAL asks that the APVMA reconsider the recommendation to delete fenthion uses for pome fruit and consider employing a managed 24 month phase-out for use against Queensland fruit fly and Mediterranean fruit fly as outlined in PER13841 and PER13840.

Such an approach would give industry a clear regulatory path forward and provide growers with an opportunity to successfully implement alternative fruit fly strategies such as AWM and ultimately integrate SIT into their businesses.

Yours sincerely

John Dollisson
CEO, Apple and Pear Australia Ltd

Cc Kevin Sanders
Chairman, Research and Development Sub-Committee

Note: Commercially sensitive information provided to the APVMA has been removed from this document.