

29 March 2018

Australian Pesticides and
Veterinary Medicines Authority
PO Box 6182
Kingston ACT 2604

To whom it may concern,

Re: APVMA's proposed approach to spray drift management

Thank you for the opportunity to provide a response to APVMA's proposed approach to spray drift management.

The VFF is Australia's largest state farmer organisation, representing over 5,000 Victorian farming businesses. Despite farming on only three per cent of Australia's available agricultural land, Victorians produce 30 per cent of the nation's agricultural product. The VFF represents the interests of our state's dairy, livestock, grains, horticulture, flowers, chicken meat, pigs and egg producers.

The VFF supports a science- based approach to decision making regarding agricultural and veterinary chemicals. It is imperative the regulatory framework mitigates risk whilst ensuring the productivity and sustainability of Australian food and fibre production.

The VFF is broadly supportive of the aims of APVMA'S proposed spray drift management approach. VFF support the need to create more reasonable buffer zones and support the use of drift reducing technologies to create better stewardship options for farmers.

However, to ensure that farmers are able to continue to utilise products to manage the pests, diseases and weeds that can have an impact on productivity and health it is critical the following factors are incorporated into any approach

Accessibility

Ensuring access to the appropriate spray drift risk assessment tools will play a critical role in the reduction of adverse spray drift events.

To enable sufficient uptake, risk assessment tools must be able to be accessed in a variety of formats. Farmers should be able to access the tools on both smart phone



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and tablet devices as well as being able to have the tools integrated into spray system controllers, reflecting the need to use risk assessment tool in-field.

The VFF are concerned the risk assessment tool in its current format may not meet the needs of niche market farmers. The research required to provide the necessary data to satisfy the requirements may be too time intensive and cost prohibitive for producers of niche crops.

It is critical any assessment tools are able to accommodate the diverse range of produce grown in Australia. Support is needed to ensure the tools are accessible without placing unnecessarily onerous regulatory obligations on niche producers.

Collaboration

To support flexibility and avoid duplication and wasted resources, it is critical APVMA collaborates effectively with other organisations and key stakeholders operating in this space.

It is critical that APVMA is able to work effectively with industry and State Governments. Given the role of States within the discussion and their continued powers to monitor and regulate control of use of chemicals, they will be a crucial conduit between farmers and APVMA in regulation of any changes.

APVMA's assessment tools provide significant opportunity for broader investment from commercial enterprises or research and development corporations. APVMA must be open to joint investment models with industry and the commercial sector to enhance the options for delivery of APVMA approved systems. One example is the need for co-investment to ensure the integration of tools into digital business management systems.

Flexible forward thinking

To ensure long term adaptability and therefore applicability it is important APVMA's approach is forward thinking and flexible enough to accommodate future technologies.

This is particularly relevant in terms of label instructions. The traditional approach to chemical labelling is no longer the most effective method of delivering best practice stewardship outcomes.

VFF acknowledges the need for chemical labels to provide complete guidelines for product use Given the extensive range of DRT and spray equipment options



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available to producers now and in the future, the VFF does not believe relying on hard copy labels alone is the most appropriate response.

Labels should incorporate reference to online resources which can be accessed by all available DRT options and effectively link in with buffer zone calculator tools.

Timelines for implementation

Recognising the importance of good chemical stewardship, it is imperative any tools that can lead to improved spray application are made available as soon as possible.

Promptly integrating these tools into future spray application training programs is also important to ensure uptake. The VFF looks forward to working with the APVMA on its approach to spray drift management. If you would like to discuss any of the comments further please contact me on (03) 9207 5538.

Yours sincerely,

David Jochinke

President

Victorian Farmers Federation