

Australian Pesticides and Veterinary Medicines Authority (APVMA)

Submission in response to the APVMA's proposed approach to spray drift management

SUBMISSION OF: WINE GRAPE COUNCIL OF SOUTH AUSTRALIA

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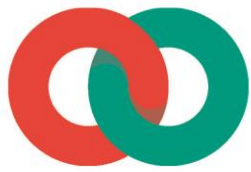
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Australian Pesticides and Veterinary Medicines Authority
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Key Issues

Spray drift is an important issue which needs to be addressed urgently on a number of levels.

Proposed programs to change agricultural practices need to have a high probability of success and deliver benefits to the implementer and/or avoid costs and problems.

This will only be achieved if the proposed changes are practical, ie capable of implementation, and supported by an effective widespread and sustained education program.

To achieve behavioural change, there need to be clear benefits and motivations for change. For example, the new program needs to be simple to implement and offer benefits for spray users – ie spray drift is a waste of chemicals for the users. Secondly it needs to be supported by respected leaders of best practice so that the new practice becomes industry standard. Additional motivators are not causing damage to other primary producers and the wider community.

To ensure compliance to new standards after such an education program, there should be effective punitive action for non-compliance.

The Wine Grape Council SA supports the concerns identified by SAWIA about the management proposal suggested by APVMA in particular,

- The spray drift management tool is complex and difficult to communicate
- It is not clear how the spray drift management tool would be made available and its benefits made clear to potential users
- It is not clear how adequate training of users would be undertaken.
- There is lack of clarity on how the proposed approach will be applied, monitored and enforced in practice, as well as the additional compliance costs that might result.

Hence while we agree with the intent and support action, the view of the WGCSA is that the program as proposed is not sufficient to achieve the necessary change.

**Heather Webster
Chair**



**Wine Grape Council
of South Australia**