

28 March 2018

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

To Whom It May Concern,

Submission on the draft proposal for spray drift risk assessment

GrainGrowers welcomes the opportunity to provide a submission on the APVMA's proposed approach to spray drift management. This should be read in conjunction with the submission from National Farmers Federation and the National Working Party on Pesticide Application (NWPPA).

GrainGrowers is a national grain grower representative organisation with more than 17,000 members across all of the major production zones in Australia. Our aim is to build a more efficient, sustainable and profitable grain production sector that benefits all Australia grain growers and the wider grains industry. GrainGrowers has developed several tools to assist growers manage their spraying activities including SprayWise®.

Australian growers are highly cognizant of the importance of stringent chemical management, handling and application to ensure the safety of the environment and people, to meet market requirements, and to achieve effective crop protection and weed/pest control.

GrainGrowers supports the need for reasonable buffer zones, clearer label instructions and the use of spray drift reducing technologies and tools. However we are aware of concerns raised by the Grains Research and Development Corporation and the NWPPA about the algorithms and modeling contained in the APVMA paper. These particularly relate to the proposed boom sprayer deposition curve and the lack of the model's ability to account for the presence of a crop canopy, with the current proposed model assuming a bare earth situation. There is also a concern that in its current form the resulting large buffers, at times significantly larger than the existing ones, will result in such tight label restraints that the resulting business case for new actives will be negative and thus act as a deterrent for the commercialisation of new actives in Australia. This is likely to be a risk especially for newer actives, which tend to be more efficacious and lower rates.

Accordingly GrainGrowers encourages the APVMA to review its modelling and deposition curves, and consult closely with the technical specialists in these organisations.

In relation to on-label spray drift instructions, growers (through our National Policy Group) have indicated that the main information they seek from labels for spray application is droplet size, application rate, recommended water rate, application pressure and withholding period. Overall, growers are satisfied with on-label spray drift management instructions and find the use of restraint statements, including those for aerial application and droplet size, easy to locate and follow. Generally the directions of use are clear and provide the use situation, target species and application rate in a logical and easy to understand format. However on some labels it is more difficult to locate



withholding period and adjuvant information compared to others. Accordingly it is recommended that APVMA provide stronger guidance to manufacturers to make withholding periods more easily identifiable on all labels and adopt a consistent approach on all products.

Chemical labels could also be improved by making the active ingredient stand-out more clearly on labels. As previously discussed with the APVMA, this could be achieved by increasing the minimum font size of active constituents on labels. Label integrity also remains a major issue of concern and with concerns that labels often do not remain adhered to chemical container for the life of the product. It is recommended that the APVMA investigate the adherence of labels to ensure they remain on product packaging for the entirety of the product's life.

The development of a Spray Drift Management Tool (SDMT) as proposed in the Spray Drift Risk Assessment Manual could be a useful tool for farmers and agronomists but further work is required to understand how this will be developed and rollout. GrainGrowers is happy to assist the APVMA in trialing this tool over the coming years. Such a tool should allow for flexibility in the application of products and allow users and agronomists to re-calculate buffer zones which may increase the area of land able to be included in agricultural production. The tool would make it easier to determine buffer zones for tank-mixed products.

There already exists an array of tools and information on spray drift management, such as SprayWise®, CottonMap and BeeConnected, and publications from the GRDC including Sprayright and the Spray Application Manual for Grain Growers. The APVMA tool needs to work with, or complement, these existing products in order to prevent duplication and ensure consistent information is provided to chemical users.

Should you wish to discuss our submission further, please contact me on 02 9286 2000 or by email (fiona.mccredie@graingrowers.com.au).

Kind regards,



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