



## Submission on the Harmonised Agvet Chemical Control of Use Task Group (HACCUT) Options Paper: Updated proposal form harmonisation of agricultural chemical off-label use

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### Section A: General information

**Purpose of this form** For individuals and organisations to provide submissions on the HACCUT Options Paper: Updated proposal for harmonisation of agricultural chemical off-label use.

Use this form to provide a submission or to write a long-form response. You can also attach a separate response.

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**Before applying** See HACCUT Options Paper: Updated proposal for harmonisation of agricultural chemical off-label use

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**Closing date** 2pm, Thursday 27 September 2018 (EXTENSION GRANTED TO October 5, 2018)

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**To complete this form** Save the document to your computer.

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**Your submission must include**  a completed and signed submission form  
 where relevant, supporting information from organisations, written on their official letterhead.

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**Post or email (preferred) your submission** Agvet Chemicals Branch  
Sustainable Agriculture, Fisheries & Forestry Division  
Department of Agriculture and Water Resources  
GPO Box 858  
Canberra ACT 2601  
Email [agvetpolicy@agriculture.gov.au](mailto:agvetpolicy@agriculture.gov.au)

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### Section B: Applicant

**1 Organisation name (if applicable) - AUSVEG**

**2 Contact person**

Given name(s) Tyson \_\_\_\_\_ Family name Cattle \_\_\_\_\_

Work phone 03 9882 0277 \_\_\_\_\_ Mobile phone 0427 500 618 \_\_\_\_\_

Email Tyson.cattle@ausveg.com.au \_\_\_\_\_

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### 3 Contact address

Postal address 3 Glenarm Road \_\_\_\_\_

Suburb/town/city Glen Iris \_\_\_\_\_ State/territory Victoria\_\_ Postcode 3146 \_\_\_\_\_

### Section C: Confidentiality

#### 4 Is all of your submission confidential?

No

Yes  Clearly mark the submission 'In confidence'

#### 5 Is part of your submission confidential?

No

Yes  Clearly mark the relevant section(s) 'In confidence'

### Section D: Publication of submissions on the department website

Unless you request otherwise, the department will publish your name, organisation and the title of your submission on its website. Your contact information will not be made available.

#### 6 Do you agree to your submission being made publicly available?

No  Go to question 8

Yes  Go to question 7

#### 7 Do you agree to your name and state/territory being listed?

No

Yes

#### 8 Do you agree to the department contacting you about your submission if required?

No

Yes

### Section E: Submission type

#### 9 What type of submission are you making? (select one box only)

Response to key topics in the proposal → Go to section F

Long-form response to the whole proposal → Go to section G

Separate response in an attached document → Go to section H

## Section F: Response to key topics in the consultation paper

Support your answers with references as needed.

### **10 Should a national approach to harmonising off-label use incorporate Option 1 (Label and Permit only) OR Option 2 (Conditional use)? Please provide your reasoning.**

**If a model combining aspects of Options 1 and 2 would better address risk and respond to farmer needs, please describe this model and how it delivers improved outcomes.**

AUSVEG is supportive of a harmonised approach to off-label use, but is unable to reach a consensus between our membership.

While Option 2 (conditional use) is a more preferable outcome for many of our growers, not reaching a consensus for a national approach to harmonisation, is a strong representation that neither is appropriate and more work needs to be done.

Throughout this process it has highlighted a deep concern from industry around the statutory agency responsible for the management and regulation of all agricultural and veterinary chemical products, the APVMA.

There is significant concern about the APVMA's capability and capacity to deliver on Option 1 (label and permit only). In particular, its ability to approve permits at a commercially viable pace, as growers have a need to respond to pests quickly and efficiently. Discussions with our memberships clearly shows there is a significant lack of confidence in APVMA's ability to deliver.

It was highlighted that a significant concern of option 1, would be that minor crops would be a lower priority in the approval chain for APVMA permits, therefore meaning our growers would be heavily disadvantaged.

In line with previous submissions, AUSVEG is supportive of a harmonised approach to off-label chemical use.

### **Where option 1 is preferred please comment on the quantity factors (area, volume, frequency of application) that could be used to define small scale and lower risk off-label use.**

N/A

### **11 Please estimate, for your industry sector, the financial benefit or cost that would result from harmonisation with your preferred model.**

AUSVEG does not have access to this information.

### **12 Please describe scenarios where off-label use (i.e. outside of label instructions or permit) could be necessary in your industry. Please specify details on product, commodity and rates of application.**

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The ability to access chemical products that are on-label for a different crop could greatly benefit niche horticultural growers who have not had chemicals registered for their industry.

**13 Other comments (this could include additional information or relevant issues to be raised).**

Option 2 presents concerns which would need to be addressed prior to implementation, if that is the decision.

There needs to be greater detail and definitions as to what 'the conditions' are that a grower needs to comply with, while also clearly explaining how a grower can demonstrate compliance. A key example of this, is how can a grower demonstrate environmental safety?

There would also need to be clear definitions around MRLs set for both food and animal feed. It would need to be clearly defined as to whether the MRLs are set in place to show good agricultural practice, or food safety.

These definitions would need to be consulted with industry.

AUSVEG suggests that any change to agricultural chemical off-label use, it would need to be implemented on a trial basis and then reviewed after 12 months.

AUSVEG believes greater detail needs to be shown, and then discussed with industry, before a harmonised approach can be fully supported.

**→ Go to section H**



## Section H: Applicant declaration

To be completed by the person listed in section B of this application.

I understand that:

- the Australian Government reserves the right to refuse to publish submissions, or parts of submissions, that contain offensive language, potentially defamatory material or copyright infringing material
- a request may be made under the *Freedom of Information Act 1982* for a submission marked confidential to be made available. Such requests will be determined in accordance with provisions under that Act
- if I provide personal information about an individual other than myself, I must make that person aware of the privacy notice in [section I](#) of this form and draw their attention to the department's privacy policy.

Signature (type or sign your name) Tyson Cattle\_\_\_\_\_

Date (dd/mm/yyyy) 5 October 2018\_\_\_\_\_

Full name Tyson Cattle\_\_\_\_\_

## Section I: Privacy notice

'Personal information' means information or an opinion about an identified individual, or an individual who is reasonably identifiable.

The collection of personal information by the Department of Agriculture and Water Resources in relation to this submission is for the purposes of gathering information for the Harmonised Agvet Chemical Control of Use Task Group (HACCUT): Updated proposal for harmonisation of agricultural chemical off-label use, and related purposes. If you do not provide this information, the department will be unable to contact you to discuss your submission.

Under the *Freedom of Information Act 1982*, submissions marked confidential may be made available. Such requests will be determined in accordance with provisions under that Act.

Personal information may be published on the department's website, disclosed to other Australian agencies, persons or organisations where necessary for these purposes, provided the disclosure is consistent with relevant laws, in particular the *Privacy Act 1988*. Your personal information will be used and stored in accordance with the Privacy Principles.

See the department's [Privacy Policy](#) to learn more about accessing or correcting personal information or making a complaint. Alternatively, telephone the department on +61 2 6272 3933.