



Committee Secretary
Senate Standing Committees on Rural and Regional Affairs and Transport
PO Box 6100
Parliament House
Canberra ACT 2600
Via email: rrat.sen@aph.gov.au

Dear Committee Secretariat,

Re: The independence of regulatory decisions made by the Australian Pesticides and Veterinary Medicines Authority (APVMA)

GrainGrowers welcomes the opportunity to provide a submission to this inquiry into the independence of the Australian Pesticides and Veterinary Medicines Authority (APVMA).

GrainGrowers is an independent and technically resourced, grain farmer representative organisation with over 17,000 members across Australia. GrainGrowers' goal is a more efficient, sustainable and profitable grain production sector that benefits all Australian grain farmers and the wider grains industry.

Access to safe, effective chemicals is essential for farmers in the production of food and fibre. The grains sector requires an independent, globally recognised agency to evaluate and, if deemed appropriate, approve chemicals which are safe for use and fit for purpose. The independence and integrity of this organisation and its processes are paramount, for the health of the community and environment, the viability of the sector and meeting customer expectations.

GrainGrowers has confidence in the robust regulatory and science-based framework used by the APVMA in its assessment of all chemicals for agricultural use, and in the APVMA's independence and autonomy in relation to chemical registrations. This includes both initial registrations and subsequent reviews of registered products initiated in response to the APVMA (and associated



state and territory agencies) compliance and monitoring programs and/or when new information and evidence is available from domestic or international agencies.

GrainGrowers also considers it essential that APVMA has adequate funds to undertake its work. GrainGrowers believes that the current cost recovery model is appropriate and does not jeopardise the independence of the agency. Cost recovery models of regulatory agencies and/or functions are used in Australia and internationally, and alleviate the need for direct public funding. However, GrainGrowers would also support exploration of direct Government funding of the APVMA.

Finally, the relocation of the APVMA and associated loss of staff and key skills remain a concern for industry given the impact on the efficiency and timelines of decision making. Notwithstanding this, it is important to separate short term operational efficiency from the strategic issues of governance, independence and international reputation of the organisation which are the subject of this inquiry.

In the following pages GrainGrowers has addressed the key terms of reference of relevance to the grain production sector.

Thank you for the opportunity to provide a submission and should you require further information, please contact Fiona McCredie, National Policy Manager.

Yours sincerely

David McKeon

CEO

Grain Growers Limited

Responsiveness and effectiveness of the APVMA's process for reviewing and reassessing the safety of agricultural chemicals in Australia, including glyphosate, and how this compares with equivalent international regulators;

The strength of the regulatory and compliance measures imposed by the APVMA are recognised internationally through the memorandum of understanding held with New Zealand, and the mutual recognition agreement for good manufacturing practice with nations such as Europe, the US and Canada. Furthermore, the practice of international collaboration to assess specific applications, and use of international assessments reports in work-sharing arrangements, supports independent national risk assessment.

The issue remains that farmers need access to a range of safe chemicals and it is essential that applications are fully and efficiently considered. GrainGrowers supports the processes utilised by the APVMA for initial assessments, and subsequent reviews or evaluations pertaining to the safety of agricultural chemicals in Australia. GrainGrowers considers the collaborative efforts between the APVMA and international jurisdictions to assess specific applications and use international assessments reports in work-sharing arrangements, to be critical to support independent national risk assessment. Given grains is an export-oriented market, it is imperative the regulatory system in Australia is recognised internationally and seen as a global leader.

In relation to reviewing and reassessing registered products, GrainGrowers has been involved with the APVMA in its recent review of 2,4-D label instructions. This was initiated as a result of the APVMA's monitoring and compliance program and information provided by state regulatory agencies. The review resulted in the APVMA issuing new instructions which came into effect on 3 October 2018 and are aimed at reducing spraydrift. In this instance, the risk of the product had not changed (in relation to protecting the health and safety of people, animals and the environment) but there was concern about whether the label instructions were sufficient to prevent off-target spraydrift incidents. Such reviews are important to the industry as well as the APVMA, and GrainGrowers welcomed the responsiveness of the APVMA to ensure chemicals are being used in accordance with their label.



Glyphosate

Glyphosate has been registered in Australia for over 40 years in Australia and is an active ingredient in more than 500 products registered for use here.

Recent concerns over the safety of glyphosate emerged in part due to the reaction to the World Health Organization's (WHO) International Agency for Research on Cancer (IARC) classification of glyphosate as a *probable human carcinogen* (along with indoor emissions from burning wood, high temperature frying, shift work, being a hairdresser and consuming red meat) in a [2015 study](#). The IARC determined this result using a hazard-based approach (as opposed to a risk-based approach) to assess carcinogenic potential.

In 2016, the European Food Safety Authority (EFSA) determined glyphosate as "unlikely" to cause cancer. Similarly, and following an extensive assessment of the IARC's and other recent assessments, the [APVMA](#), [Health Canada](#), the [United States Environmental Protection Agency](#), and [New Zealand's Environmental Protection Authority](#) all deemed that the scientific weight-of-evidence indicates that glyphosate was unlikely to cause cancer in humans and that products containing glyphosate are safe to use as per the label instructions. A little under a year ago, the European Commission also voted to extend the license of glyphosate.

The APVMA had also reviewed the safety of glyphosate previously in [1996](#), and [2013](#) in response to public concerns. Following the 1996 review, the APVMA increased the environmental safety margin for glyphosate products by amending product use patterns and labels. The 2013 review determined that glyphosate products registered in Australia and used according to label instructions do not present any unacceptable risks to human health, the environment and trade, and that glyphosate is not genotoxic, carcinogenic, or neurotoxic.

The Joint WHO/FAO Expert Meeting on Pesticide Residues (JMPR), which is responsible for assessing the risk of pesticide residues in Food in Codex, evaluated Glyphosate in 2004. JMPR did not find evidence for carcinogenicity in humans and assigned an Acceptable Daily Intake (ADI). On that basis, the Codex Alimentarius Commission (CAC) has established Maximum Residue Limits (MRLs) for Glyphosate in a large number of food crops.



In Australia, MRLs are set using internationally recognised methods and national scientific data and are well below the level that could pose health and safety risks to consumers – Food Standards Australia New Zealand (FSANZ). FSANZ assesses agvet chemical residues in food and works closely with the APVMA on these assessments.

FSANZ is also responsible for considering requests to harmonise MRLs with international limits. Maximum residue limits (MRLs) set by the FSANZ Code applicable to agvet chemicals are equivalent, or in most cases lower (i.e. more restrictive), across a broad range of agricultural commodities and food products when compared with Europe, and are tighter than the global standards set by the FAO/WHO CAC.

The funding arrangements of the APVMA, comparisons with equivalent agricultural chemical regulators internationally and any impact these arrangements have on independent evidence-based decision making

GrainGrowers does not believe that the APVMA's funding arrangements, through cost recovery, compromise the integrity of the system.

Except for a minor budgetary appropriation, the APVMA's activities are funded through cost recovery. This is in accordance with the agreement which established the National Registration Scheme. Most of the APVMA's operational income is collected from registrants of pesticides and veterinary medicines. Registrants pay application fees to register products, and an annual fee to maintain product registrations. Registrants also pay levies based on the annual wholesale sales value of registered products¹.

Cost-recovery arrangements allow the APVMA to operate effectively and are not dissimilar to other international regulators. Specifically, registration fees are a common critical component of many international agvet chemical regulatory bodies such as the European Chemicals Agency (ECHA) whom also collect revenue from fees and registrations.

Furthermore, cost-recovery measures have previously been deemed to be consistent with Australian Government policy objectives, and are used to fund FSANZ and the Therapeutic Goods Association (TGA) as just two examples. FSANZ and TGA charge registrants for the cost of a product evaluation during the registration process.

¹ APVMA website

GrainGrowers supports the operational provisions for the APVMA's powers and activities, as detailed in the Agvet Code. In addition, this system also allows the APVMA the opportunity to review licences, applications, permits and registrations to ensure that they demonstrated and continue to demonstrate compliance with Australian safety and manufacturing standards. Current funding arrangements ensures the APVMA is adequately resourced to exercise this power and conduct these activities effectively and efficiently. It is the responsibility of the relevant portfolio minister to ensure the continuation of the APVMA's implementation and compliance with cost recovery policy.

Another alternative funding would be through direct Government funding and GrainGrowers would support exploration of such a funding arrangement for the APVMA. Of course, it would be essential that the APVMA had the resources to undertake its full legislative responsibilities and ensure the independence and rigour of its decisions, and currently this amounts to an annual budget of \$39.9m.

The need to ensure Australia's farmers have timely access to safe, environmentally sustainable and productivity enhancing products;

Agvet chemicals form an integral component of sustainable production systems. They provide farmers with a suite of options for agile integrated pest and natural resource management and biosecurity, and contribute to the productivity and viability of grain production.

Given the small size of the Australia market, and the extent of global chemical development and manufacturing, Australian farmers are inherently disadvantaged in the range of chemicals they can access compared to growers in other countries. Put simply, the lower commercial return available in Australia compared to larger markets results in products never being submitted for registration or a delay in submitting for registration in Australia. It is therefore imperative that Australia's chemical assessment and registration processes are efficient as well as rigorous to ensure that registrations are assessed as soon as possible. This enables farmers to access safe new chemistry in a timely manner and maintain their competitive advantage. GrainGrowers understands there are concerns that the APVMA does not rely on international registration of products to a sufficient extent, thus duplicating the assessment of the same product's registration in Australia despite it being registered in many other countries. While supporting the APVMA's



objective to ensure all products are safe for use in Australia, there may be opportunities to streamline assessment processes through stronger international cooperation.

To support the need for access to safe chemicals, GrainGrowers recently conducted an open survey asking producers to voice their opinion on glyphosate and its importance to their production systems. A summary of the responses is attached. It was evident that respondents consider glyphosate as an essential tool in farming operations, mostly used as a means of improving soil health and environmental sustainability by reducing the need for cultivation and subsequently contributing to improved soil structure and reduced erosion. Respondents emphasised the fact that there are very few (if any) alternatives to glyphosate, and that in its absence, chemicals substitute for glyphosate are incomparable in terms of efficiency, cost and overall safety to the operator and environment.

The impact of the APVMA's relocation on its capability to undertake chemical reviews in a timely manner

Timely access to a range of safe, effective chemicals is critical to the performance of many farming businesses, particularly in terms of managing agronomic, pest and/or other issues as they arise throughout the production cycle. Any delay in processing applications will have major operational and financial consequences for farmers and the broader agriculture sector, and can impair the ability to respond appropriately to biosecurity risks.

Many sectors, including grains, rely on the APVMA to make efficient and effective decisions in relation applications for chemical registrations.

The relocation of the APVMA, and associated loss of staff and key skills, remains a concern for industry given the impact on the efficiency and timelines of decision making. Notwithstanding this, it is important to separate short term operational efficiency from the strategic issues of governance, independence and international reputation of the organisation which are the subject of this inquiry.

The APVMA's performance over the last few years in meeting its time frames are of concern, however GrainGrowers is pleased that recent performance improvement suggests the APVMA may be improving their ability to consider registrations in a timely manner.



A number of other concerns associated with the APVMA's performance, particularly following the decision to relocate, have been raised and GrainGrowers has addressed this via submission to the House of Representatives Select Committee on Regional Development and Decentralisation Secretariat.

GrainGrowers is pleased to see recent improvements in meeting KPIs with 85 per cent of applications completed on time during the 2018 June quarter. GrainGrowers also acknowledges the APVMA's commitment to adopt recommendations from the Reason Group 2017 performance review which will assist with improving the efficiency and efficacy of the agency.





Micro Survey Response ~ Glyphosate



Submission Date	How important is glyphosate to your farm and what would happen if it was no longer available?
16/10/2018	Incredibly important and safe to use if label is followed
16/10/2018	Glyphosate is an essential and safe herbicide option for the zero-tillage cropping system on our farms. Without it we would need to control fallow weeds with very dangerous S7 chemicals (eg Sprayseed or Gramoxone), or revert to a tillage based cropping systems that would rapidly undo the fantastic soil structure and organic matter gains we have made to our soils over the last 20 years of no-till farming.
11/10/2018	On light granite soil I wouldn't be able to grow any crops for fodder or grain due to erosion. The stories in the media were short on fact and figures but do create hysteria and doubt in farmers minds. This is not what farmers need when already struggling with the drought.
10/10/2018	Glyphosate is a key chemistry for our farm. The banning of it would reduce the effectiveness and production of our farm significantly.
09/10/2018	Very important. it would become almost impossible to farm without it.
08/10/2018	Our farm would crumble, and we would have to rely on many more hours of hard labour.
07/10/2018	Glyphosate is an extremely important tool that we utilise in our zero till, continual cropping program in central west NSW. The large majority of our conservation farming advancements in the last 20 years have largely come off the back of the weed control benefits that glyphosate provides us. Significant reductions in fossil fuels, significant reductions in soil degradation, increases in moisture conservation and utilisation are the key components to sustaining our variability in today's farming climate. Should glyphosate be no longer available to us, we would be forced to consider resorted or more conservative methods of farming which would increase our fossil fuel use, machinery and labour costs. It would also force us to lean on other chemistry, potentially with a greater operator exposure risk profile, at a significantly higher cost.
07/10/2018	Glyphosate is vitally important to my farm. Without it I would not be able to produce anything like the amount of grain that I do now. I would have to go back to cultivation which damages the soil much more. My cost of production would also increase.
06/10/2018	Glyphosate is essential to the operation of my farming business as without it we would not be able to control noxious weeds as well as paddock preparation for fallowing of pre-cropping. Using the proper safety equipment, I believe that it is a safe product to use.
06/10/2018	Vitally important. Without glyphosate our costs of production would increase significantly, the alternative would be a more toxic chemical (such as paraquat and diquat), and a return to cultivation . The negative impacts of mechanical cultivation would be loss of soil structure and soil moisture, increased soil erosion, loss of soil carbon, increased fuel consumption and poorer crop yields.
06/10/2018	Critical.
05/10/2018	More than 800 scientific studies and reviews have judged Glyphosate to be safe for human, animal and environmental health when used according to label instructions. All science -based regulators worldwide, including the APVMA, has reached the same conclusion so I definitely wish to see the glyphosate remains available to Australian farmers.
05/10/2018	It is the single most important pesticide in modern agriculture. If its registration is lost without a viable (safe, cost effective, non-residual, broad spectrum, low volatility and highly compatible) being available we would most likely go out of business.
05/10/2018	Cereal farming for our enterprise would be over. To revert back to tillage would be a disaster in our undulating contoured country.
04/10/2018	It is absolutely vital to our operation. Have been using it for almost 40 years and there is no alternative product to replace it. Our profitability would be severely cut if it were no longer available.

Submission Date	How important is glyphosate to your farm and what would happen if it was no longer available?
04/10/2018	Extremely we would not be able to farm sustainably without it.
04/10/2018	Do not worry about the farmers without Glyphosate, but how to explain to the expected close to ten billion people on the planet by 2050 when there is no lunch! Try explaining that to hungry people. Without the judicious use of agrochemicals including Glyphosate providing food for the worlds population is probably going to be a bit of a challenge!
04/10/2018	Our business would not be viable in our low rainfall environment. Our currently valuable land asset would be significantly decrease.
04/10/2018	Very important, a must have product. If it was no longer available we would have a major production decline.
04/10/2018	It is extremely important, because without glyphosate, I would be unable to continue zero tilling, and be forced to conveniently farm of 30 years ago, destroying my soil, creating compaction and suffering enormous soil loss through erosion.
04/10/2018	Very important we would have to go back to the old ways with a lot of cultivation causing drift of the soil with our soils deteriorating. Glyphosate is one of the safe chemicals that we handle we rely on chemicals.
04/10/2018	Glyphosate is the single most important chemical we use. Without it our costs would rise and reliability of production would fall.
04/10/2018	To be able to have continued access to Glyphosate is vital to our farming operations. If it was no longer available it would turn back the clocks 30 years and destroy the gains we have made in sustainability, productivity and reverse environmental benefits that have been gained.
04/10/2018	Extremely important. Burning and cultivating would have to come back in which would not be good for the environment.
04/10/2018	It's by far one of the most important tools we have in farming, I have an organic farmer and it is by far one of the most important tools in farming we have.
04/10/2018	We farm crop 7,850 ha. in the central wheatbelt W.A. Glyphosate is an essential tool for our successful grain production. It allows minimum tillage which has the long term benefits of soil and water conservation. I know that without glyphosate we would not be able to successfully grow crops. There is no true information that there is any problem with glyphosate.
04/10/2018	Glyphosate is our main chemical when it comes to weed control. It's the most cost effective tool we have. Without glyphosate our costs would increase significantly. But if we aren't using glyphosate I think alternative chemicals could be much worse. We currently pay a lot of attention to water quality allowing us to use lower and more responsible rates of glyphosate. We do not use glyphosate on any crops as a desiccation tool.
03/10/2018	A considerable cost increase to more dangerous (in my view) chemicals. With two failures out of four seasons many are in a precarious position now and it will take a long time to recover . Without glyphosate production will drop guaranteed.
03/10/2018	Vital. Extremely important. Very difficult to farm sustainably without it.
03/10/2018	Extremely important as a cost effective way to manage weeds and enable us to operate minimum till cropping system. That means we can look after our soil, avoid wind erosion, reduce water loss. It is crucial to us that we disturb the soil as little as possible to conserve all rainfall. Glyphosate helps us look after and improve our environment. We use many technologies like glyphosate to produce high quality grains and pulses and the low cost consumers expect. Loss of glyphosate would mean more expensive food or imported cheaper alternatives. We need to listen science not social media.

Submission Date	How important is glyphosate to your farm and what would happen if it was no longer available?
03/10/2018	We use glyphosate on every crop we grow. it is very important cheap effective. there is not another chemical that can take its place we would have to give up certain crops if we didn't have glyphosate.
03/10/2018	Glyphosate is a very important tool in our farming operation. It's use saves many thousands of litres of fossil fuels that would have been used to control weeds with multiple cultivations. Moreover, the use of Glyphosate to control summer weeds in fallow enables valuable moisture to be stored without the erosion risk that comes with a mechanical fallow. There is much more I could say, however. in the interests of brevity, there are many other examples that could be stated to further the argument that Glyphosate is a SAFE, EFFECTIVE, NON INTRUSIVE & ENVIRONMENTALLY friendly chemical, that should not be subject to misquotes & downright lies by a minute minority of ratbag, socialist activists who have nothing better to do with their lives, but to make life as difficult as they can for anyone who may be successful in life. Those type of people would not exist if they had to gather mushrooms & wild fruits & freeze in their dark, dank caves.
03/10/2018	Vitaly important, our crop yields and livestock production would be so significantly reduced it would no longer be viable to crop. Fallow and multiple cultivations would have to occur at a huge cost to the soil structure and environment.
03/10/2018	As a zero till farmer concerned about the health of our soil rather than destroying it with cultivation, glyphosate is essential, without it we would step back 35 years and would have a dramatic reduction in productivity and soil health. Soil water would not be conserved, and the cost of production would escalate dramatically.
03/10/2018	Glyphosate is the single most important herbicide on our farm and it is pivotal in allowing us to practice our "conservation agriculture" system. There are no apparent replacement herbicides for its role. Without it, we would have to return to tillage to prepare for seeding and that would be an environmental disaster on many fronts - increased soil erosion, increased fossil fuel use, greater workloads for farmers, etc. Europe has gone mad - don't follow their ridiculous approach to agriculture! Listen to the science.
03/10/2018	Without Glyphosate the many years of progress towards sustainable farming, improvements in soil biology, and reduction to soil erosion exposure will be put in jeopardy and the chemical will be replaced with other types which are far more dangerous to the users, environment, other farms and crops and to the general public.
03/10/2018	Essential. If glyphosate wasn't available, we would to use other herbicides that are more toxic, more expensive and less effective. I seriously doubt whether our farm would remain profitable without the use of glyphosate.
03/10/2018	Extremely important; would have to use more toxic chemicals; we would have greatly reduced production and increased soil degradation; and increased use of fossil fuels.
03/10/2018	Glyphosate is extremely important. Our whole farming enterprise would be compromised if it were not able to be used. Farming would become economically unviable.
03/10/2018	Extremely necessary to cropping.
03/10/2018	Critically important & if we couldn't use it, the farms would be over taken with African Boxthorns & weeds. The loss of glyphosate would like render my farms unsustainable. Used correctly glyphosate is safe & it's continued use is absolutely essential for bio security, farm financial security, pest animal control & maintenance of all areas of the farm. Glyphosate is also essential to ensure food supplies for humans, animals & many native animals.

Submission Date	How important is glyphosate to your farm and what would happen if it was no longer available?
03/10/2018	At the moment very important. No longer available? we managed before glyphosate and we will do the same if it taken off the market. The question you should is it environment. One always needs to remember Silent Springs and DDT.
2/10/2018	Glyphosate is vital to the efficient running of our beef production farm, especially managing fence line weeds and pasture improvement. Without it we would need to resort to less efficient and environmentally less benign alternatives - setting us back many years. Management of growth for fire prevention would also become much more difficult.
01/10/2018	Glyphosate is a very important chemical for our farming business. It is used safely and often, and if it was no longer available, then another chemical would be sourced and used in its place.
01/10/2018	Glyphosate is an essential tool in our farming operation, it has taken years to improve soil health and structure with the use of minimum tillage, without glyphosate this would be impossible. Alternative chemicals are much more dangerous to use and cultivation is not an option to produce yields that are required to profitably feed the world. If there is some remote possibility that it can affect health educate the untrained users.
30/09/2018	Very important. If it was no longer available, we would probably stop farming. Having said that, my husband is close to retirement anyway and that would sway his decision.
30/09/2018	It is the most important tool on our farm and believe if glyphosate was not available Australia would need to import grain in many seasons.
23/09/2018	Yes very important without it I guess it's back to the plough!
20/09/2018	Essential for our reduced tillage cropping program. Without it our productivity would plummet & soil conservation efforts trashed.
20/09/2018	Glyphosate is one of the important tools in our farming operation if it was no longer available we would need to find alternative if we went back to ploughing this would increase costs pollution and create dust storms.
20/09/2018	Back 40 years.
19/09/2018	Glyphosate is the most important chemical we have available to us if we had it removed as an option we would have to go back to using cultivation to prepare for sowing & this would lead to erosion & not being able use moisture efficiently & get maximum water use efficiency.
18/09/2018	Glyphosate is very important in our farming practices, as yet we do not have plants that are resistant to it. If the right to use it was taken from us, we would have to use chemicals that are more expensive and more dangerous to our health. Being able to use glyphosate enables us to keep our costs down and this is important in helping farmers stay viable!
18/09/2018	Roundup is Vital to our weed management and profitability for our Business. Without it our weed population would be unmanageable and would have to resort to more cultivation resulting in increased erosion unable to plant in a timely manner.

Submission Date	How important is glyphosate to your farm and what would happen if it was no longer available?
18/09/2018	Extremely important, it is the number one pesticide tool we have available. Without it, we would lose ability to control certain weeds, would lose yield due to various reasons, not only from weed competition but also potentially timeliness of sowing, would see more toxic and more expensive herbicide options being needed to take its place. This would see workers exposed to the far more toxic chemicals Paraquat and Diquat, something we try to avoid at the moment, whenever possible. We would not have the ability to desiccate some crops to aid in harvesting them, not having any replacement herbicide options with the same degree of systemic activity would lead to a great deal of problems controlling weeds. The lack of viable alternatives would threaten many of our farming systems.
18/09/2018	We'd be screwed without it! Back to the bad old days of using cold hard steel to control weeds, and nobody wants that!
18/09/2018	Our Farming operation would become barely viable.
18/09/2018	Our farm will be unviable.
18/09/2018	Extremely important for the control of the summer weeds - Innocent weed and Couch grass. Also when combined with Ester 680 for winter weeds like cape weed, brome, annual rye grass and barley grass prior to sowing and spray topping in spring where grass herbicides not used. Also combined with dicamba for both broad acre and spot spraying Blanket weed.
18/09/2018	We use approx 15,000L of various formulations of Glyphosate per year. Some other chemicals would have to replace this would include large amount of Paraquat which we limit because of its perceived risk to operator. The other alternative is a return to cultivation which is very harmful to our soil types. It would also treble our fuel use and would necessitate trebling our labour force.
18/09/2018	Very. We would have go back to mechanical fallow and all its failings.
18/09/2018	Glyphosate is a very important chemical for fallow management and broadleaf management in GM (ROUNDUP READY) crops. If it became banned it would be very difficult to control weeds and more ploughing and cultivating would have to happen which would cause huge land damage.
18/09/2018	Glyphosate is extremely important to maintain soil health and sustainability by reducing cultivation and improving soil structure.
18/09/2018	Would be a total disaster if prohibited.
18/09/2018	It is an essential tool to successfully cropping the wheatbelt of W.A. If it was no longer available we would struggle to go a crop in most years.
17/09/2018	Glyphosate is extremely important to my grain growing business & if it became unavailable I would have to use more dangerous chemicals i.e. paraquat more often.
17/09/2018	Glyphosate is the cornerstone and is essential in rotation with other chemicals to allow us to use No Till in grain production. In turn No till has seen massive steps forward in environmental stewardship and conservation. Without glyphosate we would have to return to full cut tillage with it's associated soil and wider ecological damage, and place even greater reliance and pressure on selective herbicides, which are already struggling.

Submission Date	How important is glyphosate to your farm and what would happen if it was no longer available?
17/09/2018	This is just about unthinkable, we are in a marginal cropping area that relies on saving as much moisture as possible. To use less effective knockdown chemicals that are generally much less safe than Glyphosate will change the way we look after the soil. I have used Gly since 1982 and have changed our dirt to soil that produces well above what it used to. If this stuff was so dangerous I should definitely be 6 foot under by now. Social media is going to control the world unless a stance is taken on this issue. Take chemicals and GMO plants out of the worlds grains industry will see a lot of starvation and high food prices. I suppose that may be good for farm incomes but sad for the land.
17/09/2018	DISASTER.
17/09/2018	Very important.
17/09/2018	It is very important. I would have to go back to full tillage of the soil resulting in soil erosion and less stored moisture.
17/09/2018	As a zero till cropper it is a vital tool for us. Without it we would have to rely on paraquat and cultivation.
17/09/2018	Extremely important without glyphosate erosion would be extreme.
17/09/2018	Extremely important.
17/09/2018	Extremely important. There would be a lot more 'dangerous' chemical around and weed control would be severely compromised!
17/09/2018	I would use heaps of Paraquat which is far more toxic than glyphosate.
17/09/2018	It is vitally important to our farming system. Glyphosate is an effective and cost-efficient herbicide. Without it, our business would not be viable.
17/09/2018	It would no longer viable to economically farm. The years of soil improvement would be lost if cultivation had to be used again.
17/09/2018	Glyphosate is an extremely valuable tool. It has few direct replacements so if not available would be a huge loss to the grains industry.
17/09/2018	Very important.
17/09/2018	Run sheep on a weed invested property. Go back to the ploughing. Buy a fuel distribution business.
16/09/2018	Our cropping program would suffer greatly/we use so much.
30/08/2018	Don't spray