

Committee Secretary

Senate Standing Committees on Rural and Regional Affairs and Transport

PO Box 6100

Parliament House

Canberra ACT 2600

23 January 2014

Dear Sir/Madam,

Please find attached our submission to the Senate Committees on Rural and Regional Affairs and Transport on the removal of Fenthion

Should you have any questions regarding our submission please contact us.

Yours Sincerely

Mark Scott

Nannup Fresh Fruit Pty Ltd

Submission to Standing Committees on Rural and Regional Affairs and Transport

The implications of the Restrictions on the use of Fenthion on Australia's Horticultural industry

Introduction

We are a company who produces packs and retails fresh fruit products, mainly stone(8ha), Pome(7ha) and citrus(2ha) from our property 300km South of Perth in Western Australia in the shire of Nannup. Our Family business, which has been growing fruit for over 100 years, currently provides employment for the two families which manage our operation, 2 permanent workers, 3 part time workers and up to 10 more casual staff in busy times. We are a HACCAP certified organisation who supplies 11 independent retailers, 350 private customers and larger pack houses for supply to the major retailers. We currently use area wide management to control Mediterranean Fruit Fly on our property. In the past fifteen years members of our organisation have been strongly involved in industry organisations at a local, state and national level.

The implications of the Restrictions on the use of Fenthion on Australia's Horticultural industry including:

A. The roles and responsibilities of relevant government departments and agencies of the commonwealth, state and territory governments in relation to the regulation of pesticides and veterinary chemicals

On a broad scale the current process of review of existing chemicals, particularly by the AVPMA is putting a huge cost burden onto industry. As most fruit industries are small the products they use quite often do not carry enough of a profit incentive for the chemical manufacturers to provide the updated information needed to maintain their current registration. As fruit industries have limited resources for research and development choices must be made as to which chemicals will have R&D money spent on them to maintain registration and which will be allowed to lapse even to the detriment of the industry at times.

The review of Fenthion has been widely communicated to industry for at least the last five years and growers have been warned of the need to find alternate methods of control of fruit flies as it would likely be banned. The WA state government carried out R&D into the area wide management of Fruit fly in the mid/late 1990's early 2000's (Delima and Broughton) which were communicated to growers through field days. In the past two years a large amount of time and effort has been put into helping growers transition from cover spraying for fruit fly by WA state government Department of Agricultural and Food and industry bodies who have received R&D funding through Horticulture Australia with Federal Government funding.

One failing of the WA state Government has been to not follow through on existing Legislation regarding the removal of neglected orchards whose owners will not carry out the necessary management. If this was to be funded and carried out it would greatly reduce the pressure to other commercial orchards in the area making control easier.

The current removal of Fenthion brings Australia into line with its major trading partners protecting our image from chemical residue findings. It is our belief that trails being carried out at the moment are still showing up to 5% of samples being over the recommended MRL for Fenthion posing a large risk to our industry.

B. The Short and long Term impact of the decision on stake holders

Whilst a small number of growers will need to rapidly progress from their current practise to the use of new chemicals and methods the impact on the overall industry will be minimal.

Large portions of the industry have heeded the advice given them and have transitioned to different use methods already. Those growers most affected are those where the real issue is urbanisation around them and whilst the banning of Fenthion is being blamed for putting their businesses under pressure, the real problem is businesses not making decisions about how and where they do business. If this issue does not cause them to close then noise complaints, spray drift or changing zonings are likely to do so. This proximity to urban areas and the high asset values of their properties means these growers have a greater ability to sell and re establish else where that does not contain the same pest pressure.

The long term benefit to our industry of this decision to remove Fenthion is that Australia will continue to be recognised for having produce with some of the lowest chemical residues and when market conditions allow use this as a strong market advantage.

C. The effectiveness and sustainability of chemicals other than Fenthion to manage Fruit Fly

We have used area wide management of Fruit Fly on our property for well over ten years with very good results. The number of pieces of fruit affected by stings would usually be less than twenty pieces out of an overall production of approximately 300, 000kg. It does require that a regular baiting program be carried out through the fruiting season and that monitoring and spraying of likely host species – citrus and natives surrounding the orchard – are carried out at times when the orchard is not in production. It also requires that growers are proactive by arranging (sometimes at their own cost) for the fly to be controlled on nearby hobby blocks or trees removed if the land owner agrees. The costs are usually low with time taken to carry out the baiting being the largest cost. It takes us about 1.5 hours per week to bait our 20ha block the total cost including labour to our business per year would be around \$2500 or \$125 per HA including wages and machinery cost.

The chemicals used in our baiting programs are also coming up for review in the next few years, one recommendation we would like to see from the committee it that extra R&D money be allocated to fruit industries for the establishment of new toxicant chemicals for baiting programs to replace some of the chemicals that will come up for review.

The major benefit of baiting is that in our situation we do not bait the fruit trees we will pick within 4 weeks. This combined with the fact that baiting does not mean we spray the whole

tree, but rather a small area of leaves in the tree means the chances of having residue found on the fruit is very low and much safer for consumers.

D. Transition arrangements following the restriction on the use of Fenthion including area wide management

Growers have known for a long period of time about the likely demise of the two cover spray chemicals for fruit fly - Dimethoate and Fenthion. It is only those growers who have chosen not to look at other methods of control in this time that now are finding that they have a problem controlling fruit fly. Growers have had a five year period with a large amount of information given to them from both Government and industry bodies to help them transition from the use of Fenthion.

Sterile insect technology and lethal gene use are emerging methods that look very useful for the fruit industries as no chemicals are required.

E. Any related matters

The committee and Senators will have no doubt have been lobbied by The Hill orchard improvement Group and it's off shoot the Fruit Fly Action Group. Whilst raising the ongoing cost to industry on the reregistration of chemicals was an admirable goal – this group has sought to far over state its representation and speak on behalf of all Western Australian Growers when it does not do so. We would estimate that the number of effected growers in WA would be less than 10% of the total. The ongoing publicity that this issue has raised in the media has the potential to do a huge amount of damage to our industry as all consumers have heard in the last two years has been the linking of our product and chemicals at a time when consumers are pushing for cleaner and healthier food choices.

The WA industry body Fruit West and the Western Australian Department of Agriculture have carried out a great deal of projects to help growers cope with the removal of Fenthion. This has been in our view to the detriment of other pro- active industry programs – fruit quality monitoring and standards, new varietal work and other extension programs. This means that a large part of industry that is unaffected by the removal of Fenthion has been unfairly disadvantaged, as they have been proactive in making the transition, and have missed out on programs to further their position.

F. Summary

Recommendations

1. That the government relieve the burden of chemical re registration for industries where there is no opportunity to pass on the associated cost
2. That new R&D money be allocated by governments and industry bodies to find new chemicals for baiting programs for Fruit Fly
3. That the registration of Fenthion be removed to bring us into line with our trading partners and to stop the risk of an industry residue violation.
4. That Sterile insect control and lethal gene technology be given R&D support

We would like to thank the Committee for the opportunity to provide this submission and would welcome the opportunity to further explain our submission if the committee has any points requiring clarification.

Yours Sincerely

Mark Scott
Nannup Fresh Fruit Pty Ltd