



Inquiry into the Implications of the use of Fenthion on Australia's horticultural industry

Submission made by

Name Rod Thomson

Date 14 January 2014

I am a small low chill stone fruit grower on the north coast of NSW for whom control of QFF is of paramount importance. QFF control not only affects the quality of the fruit I produce but also the access to markets into which I can deliver fruit. Until last season, my eligibility to market fruit into Victoria, Tasmania and South Australia was based on audited compliance with ICA21 protocols which compelled multiple application of Fenthion (up to nine applications per season). No alternative control measures have been permitted. Hence, our reliance on Fenthion has been compulsory and as such no effort or endeavour to seek alternatives has been possible because of the necessity for strict adherence to the ICA protocols.

QFF attacks a broad range of fruit and vegetable products across most of the Eastern states of Australia and consequently huge amounts of effort and money have been spent on all aspect of its management over a period of many many years. A great deal of expertise has been developed by some entomology specialists if you can find them. And yet as the prospect of removal of Fenthion from the arsenal of control measures available to growers, to maintain the health of Australian fruit and vegetables loomed large, all that occurred was mass confusion and lack of transparency from all of the relevant bodies. No clear direction or assistance was available to growers from any source. It has been left to individual food industries to try to develop their own alternative control measures as best they can. If ever there was a case for a co-ordinated national approach to a wide ranging problem, surely this is one.

- a) Roles and responsibilities of relevant departments, agencies of Commonwealth, State and Territory governments in relation to the regulation of pesticide and chemicals.

As a grower, the whole Fenthion issue for me has been one of complete confusion. The relevant stakeholders who provide me with information on Fenthion/QFF are as follows:

Bayer- As manufacturer of Fenthion this company has the ultimate decision on the commercial future of Fenthion.

Norco – my local Fenthion stockist whose staff supply the latest recommendations according to direction from Bayer

Department of Agriculture – My local Department of Agriculture officer who has been a long standing supporter of North Coast stone fruit industry has recently been made the officer for berry fruits state wide and replaced with a state wide stone fruit officer based in Tumut. Despite his years of local stone fruit experience and close relations with relevant entomologists and AVPMA he is no longer available. Figure that out! Department of Agriculture entomologists have accumulated expertise to best advise on any future alternatives to Fenthion but seem reluctant to become involved and take a leading role.

AVPMA – Commonwealth arbiters of all aspects of Fenthion registration including MRLs, information on any changes would normally be transmitted through the local Department of Agriculture.

ICA – Administrators of eligibility to move fruit across regions according to QFF status. Work closely with Department of Agriculture and supply information to us via their own staff.

Freshcare – Annually audit the production methods of fruit including the QFF/Fenthion residue status.

Biosecurity Australia – Their name now appears on previous Department of Agriculture documents including the notification without notice of the removal of Fenthion. I have no idea of who they are or where they sit but suspect they have some hidden agenda against all of the other stakeholders in this debate.

HAL, SAL and LCA – Grower representative bodies to whom I look for interaction with relevant government organisations.

Private Consultants – There are a number of private consultancies with expertise in QFF management and it is to these companies that we have turned for advice.

In summary, I wish to emphasise that from a grower's position, all I can see is a complete lack of coordination between all of the relevant authorities and stakeholders on this issue which potentially could have a devastating effect on the fresh fruit and vegetables

supplied to Australian households and exporters. At times the inability to get clear direction from any of the participating stakeholders was staggering.

- b) The short and long term impact of the decision on stakeholders

As a grower and provider of fresh stone fruit to Australian households, we just don't know the answer to either question.

We have been forced to use Fenthion by ICA protocols for many years and in doing so have had excellent control of QFF without exceeding the relevant MRL for Fenthion.

To go from this status to one of limited or no experience with alternative strategies across the range of conditions we incur in production seasons, means we just don't know what will happen and nor can we speculate on outcome.

- c) The effectiveness and sustainability of chemicals other than Fenthion to manage fruit fly

In just recent years Department of Agriculture entomologists in response to industry pressure, have conducted very limited laboratory trials to do preliminary evaluations to answer this very question. I understand that a comprehensive list of possible candidate insecticides has been included and as yet the results are very early and inconclusive. However, for me, a couple of interesting results have become apparent. Samurai insecticide has shown some useful effectiveness against QFF and a limited permit has been granted for its use on stone fruit. Trichlorfon, an insecticide with existing registration against QFF/stone fruit has shown to have knockdown only on adult QFF with only one day residual control and no effect on laid eggs. This makes this insecticide virtually useless in commercial orchard circumstances and this result is in line with grower experience.

Most interesting was the inclusion of Fenthion at half normal rate as a possible candidate treatment by the Department of Agriculture entomologist and the result that it was as effective as full Fenthion rate in both knockdown and residual control of QFF which is possibility a real way forward. This possibility has major potential ramifications for its continued use with the obvious reduction in residue concerns.

I would hope that the entomologist who suggested the possible inclusion of this half rate Fenthion treatment in the initial trial be consulted about the further evaluation of this treatment.

d) Transition arrangements following the restriction on the use of Fenthion including Area Wide Management

As a grower during the 2013 season we attempted our very first incorporation of AWM as part of a very mixed QFF control program. Our results under this season's conditions provided good control of QFF. However, we did have Fenthion available for use in the early season which will not be case for peaches next season and we did have dry weather for the late maturity season in November which is abnormal.

As mentioned previously, our lack of experience without Fenthion means we don't know what our future outcomes will be as circumstances vary season to season.

We are aware of the QFF control experiences that some other industries have adopted with success which has given us some guidance in our efforts so far. We are still a long way from commercial confidence. The availability of a half rate Fenthion treatment could be very useful in conjunction with AWM of QFF, particularly in the transition years.

e) Any related matters

Times change in all aspects of business but with this issue having a major impact on the quality food supply to Australian and export markets, this process needs to be handled in a far more coordinated and professional manner. All of the affected industries and stakeholders need to be included in a directed, professional process.

I need to be kept informed and guided as to the direction I need to go, not by an email from Biosecurity Australia in the middle of the night halting any further use of Fenthion from that date.

But equally, I don't want a never-ending gab fest! QFF has been researched for 50 years. Get the expert opinion together ... no hidden agendas ... decide what we are going to do ... research ASAP and please keep me informed.