

Tim Watling  
Committee Secretary  
Rural and Regional Affairs and Transport References Committee  
Via email: RRAT.Sen@aph.gov.au

**Rural and Regional Affairs and Transport References Committee**  
**INQUIRY INTO THE IMPLICATIONS OF THE USE OF FENTHION ON AUSTRALIA'S HORTICULTURAL**  
**INDUSTRY**  
**Hills Orchard Improvement Group Inc. further submission.**

Dear Mr Watling

The Hills Orchard Improvement Group thanks the Committee for the opportunity to give evidence in Perth on February 2, 2014.

On reviewing the Draft Hansard transcript of the of evidence it has become apparent that HOIG needs to clarify the evidence regarding the Agrisearch Services trial referred to in our submission to the Committee.

Agrisearch was commissioned by Horticulture Australia Ltd in 2012 to conduct residue testing on stonefruit from around Australia as part of its submission to the APVMA review of fenthion.

At page 23 of Hansard, Senator Back asks about the methodology in which fruit that had not been sprayed at all returned a residue level above the allowable limit of either 0.2 or 0.25 mg/kg.

The correct response is that in the Agrisearch draft report the control fruit, or unsprayed fruit, recorded residues of <0.05mg/kg for each metabolite of fenthion. That is, unsprayed fruit was below the detectable level for the tests for fenthion. Many other samples of fruit that had been sprayed also recorded residue levels of <0.05mg/kg. Despite containing no traces of fenthion, all these samples were reported to have a residue of 0.3mg/kg because the result of <0.5mg/kg was treated as though it was actually 0.5mg/kg.

HOIG questioned why the residue levels were recorded that way and was informed by HAL that it was at the request of the APVMA that readings of <0.5mg/kg be recorded as being at 0.5mg/kg. As six metabolites of fenthion were being tested, these results gave a false positive reading of 0.3mg/kg (6 x 0.5) – which is above the allowable limit of either 0.2 or 0.25 mg/kg.

Using this flawed methodology, even though the control fruit contained no fenthion it returned a test result that was above the permitted level. It follows that sprayed fruit also recorded a residue above the permitted level even when the test results were <0.5mg/kg per metabolite.

HOIG argued in its submission to the APVMA that on a proper scientific basis these results should be treated as zero, as they were below the detectable level.

In the final Agrisearch report, these results were replaced. HOIG raised this with the RRATC as an illustration of the difficulty in dealing with the APVMA and its apparent lack of scientific rigour.

Yours sincerely

Brett Delsimone