

31 January 2017

Director, Chemical Review  
Australian Pesticides and Veterinary Medicines Authority  
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Dear Director,

**RE: PROPOSED RESTRICTION OF DIMETHOATE**

Australian Dairy Farmers (ADF) appreciates the opportunity to provide input into the recommendations in the Dimethoate proposed regulatory decisions report.

The Australian dairy industry is a \$13.7 billion farm manufacturing and export industry. Australia's 6,102 dairy farmers produce approximately 9.5 billion litres of milk a year.

More than 100,000 Australians rely on dairy for their livelihoods, including vets, scientists, mechanics, financial advisers and feed suppliers, while 38,000 Australians are directly employed on farms and in dairy processing. Approximately 98% of Australian dairy farms are family-owned businesses.

Our quality and safety processes are among the best in the world and Australian dairy makes a vital contribution to the national economy. With a farm gate value alone of \$4.3 billion, dairy enriches regional Australian communities across Australia.

We are the fourth largest exporter in the world, accounting for 6% of global trade. Around 65% of Australian dairy product is sold on the domestic market, with the remainder exported. Australian dairy exports go to more than 100 countries and are worth just under \$3 billion a year. More than 125 Australian companies export dairy products.

Major export markets include China, Japan, Singapore, Malaysia and Indonesia.

ADF is the national advocacy body representing dairy farmers across the six dairying states and our mission is to improve the profitability and sustainability of dairy farmers in Australia.

The dairy industry supports modern and simplified legislation and supports reduction of the red tape associated with the use of agvet chemicals on Australian farms. Effective agricultural chemicals and veterinary medicines are critical for successful farm businesses and the importance of responsible use of chemicals is well understood by the dairy industry.

The dairy industry places great importance in the safety of our whole supply chain. As a producer of high quality, nutritious food which is exported to the world, the industry supports legislation and regulations to maintain and uphold the industry's reputation.

Dairy farmers are concerned with the APVMA's proposal to restrict the use of Dimeothoate at crop emergence only. Dairy farmers use dimethoate in crop to control Red Legged Earth Mite, Lucerne Flea and Aphids. The main timing of application is in autumn after the first rains when insects hatch and the newly hatched insects attack newly sown pasture. The other key use is in early spring with insects damaging these same pastures after populations rebuild following winter.

With omethoate no longer allowed to be used on pastures or crops intended to be fed to food producing animals from December 1, dairy farmers are concerned that two commonly used chemicals are no longer available at all times. There are few other alternatives which can

effectively control Red Legged Earth Mite and Lucerne Flea and resistance has already been developed to several of chemicals.

ADF has no scientific basis to oppose the APVMA's scientific assessment of dimethoate and understands the basis for this restriction. The importance of responsible use of chemicals is well understood and supported by the dairy industry.

Dairy farmers need access to safe, affordable and effective agricultural chemicals and veterinary medicines to manage pests and diseases that would otherwise threaten production of safe food. This is also important to achieve satisfactory animal health and animal welfare outcomes, and ensure staff safety.

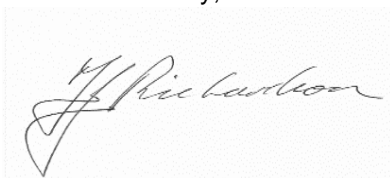
The time and expense required to register new products with the APVMA is a major barrier to innovation in Australia's relatively small market for agvet chemicals. The dairy industry welcomes the use of international data, assessments, standards and decisions, where appropriate, to reduce the burden of regulation, ADF supports a risk-based approach to accepting the decisions of regulators in peer nations to streamline approvals in this country.

Where the APVMA makes a regulatory decision that takes a pest management tool away from farmers, the approval of alternatives should be prioritised and where possible fast-tracked. This would minimise the regulatory burden of increased restrictions such as the restrictions on dimethoate and omethoate, by supporting farmers' access to a full range of real alternatives to combat significant pests like Red Legged Earth Mite, Lucerne Flea and Aphids within the transition period. ADF requests that the APVMA consults with the dairy industry on the chemicals which need prioritisation.

To allow new products to be registered and to allow farmers to develop new tools and strategies to combat Red Legged Earth Mite, Lucerne Flea and Aphids, the APVMA must allow two years following the conclusion of the review before the product restrictions are brought in.

If you have any questions about the contents of this submission, please contact ADF Senior Policy Manager Adele Beasley on (03) 86214200 or at [abeasley@australiandairyfarmers.com.au](mailto:abeasley@australiandairyfarmers.com.au).

Yours sincerely,



**Terry Richardson**  
Acting President