

APVMA
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Via email: chemicalreview@apvma.gov.au

Dear Sir

Protected Cropping Australia (PCA) is the peak industry body representing commercial hydroponic and greenhouse growers Australia-wide. PCA members also include equipment and installation suppliers, specialist consultants and advisors, researchers and educators.

The protected cropping industry is the fastest growing food producing sector in Australia with annual growth rates averaging more than 60% over the past five years. In 2017, it was valued at around \$1.5 billion (\$1,589 million) per annum at the farm gate, up from \$486 million in 2014. This is equivalent to around 15% of the total value of vegetable and cut flower production in Australia (RIRDC report HSA-9A). Anecdotally, it is understood that almost 30% of all Australian farmers are growing produce in some form of protected cropping system.

The level of technology in protected cropping varies greatly.

At the high-tech end of the industry, this amounts to almost total control over the plants growing environment, from the root zone through to the atmosphere. Sowing, crop management and picking are also partially or fully automated.

Medium technology consists of enclosed polyhouses for which the sides can be opened and closed, allowing some degree of control of the inside temperature and humidity.

Low technology consists of polytunnels are open at each end, without any automation or control.

We have recently been informed that the APVMA has released an 'Agricultural uses survey' requesting information on critical uses and work practices for the following review chemicals: 2,4-D, chlorpyrifos, diazinon, diquat, fenitrothion, fipronil, malathion, methidathion, neomycin, paraquat and procymidone.

Unfortunately, the website link provided to the survey does not provide any specific questions for comment, so we are unclear as to what exactly APVMA is seeking input on.

In any case, we assume APVMA has contacted the plant-based research and development corporations. In the past, Hort Innovation and its predecessor organisations have facilitated a whole of horticulture response.

From our point of view, the timeframe for review is unclear. As far as we are aware, chlorpyrifos is the only chemical from that list which is currently under review. APVMA couldn't possibly review all eleven listed chemicals at one time due their broad use registrations, so we assume the process would need to be staged over a reasonable period of time.

Critical use patterns for chemicals in a protected cropping environment will most likely differ to patterns for the same chemical in an open field production system. However, most commodity-based organisations will focus their responses on open field production and not include protected cropping uses in their industry scan.

In light of the number of chemicals being considered for review by APVMA, the time frame allowed for responses is unrealistic. This is especially so, based on our diverse production sector. PCA has limited resources to undertake such a review of so many chemicals in such a short time frame.

In order to ensure the needs of the protected cropping industry are appropriately represented, PCA would need to consult with the commodity-based associations in the vegetables, fruit, nursery and medicinal cannabis sectors to determine appropriate responses on a product-by-product basis. We would suggest that a more appropriate date would be March 2020.

We would of course be prepared to expand on these comments should more information be required.

Yours sincerely



Jan Davis
Executive Officer

23rd September 2019

