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Dear Sir or Madam,

Re: Submission on the Consultation Regulation Impact Statement (RIS) – “A National Scheme for Assessment, Registration and Control Use of Agricultural and Veterinary Chemicals”.

Thank you for the opportunity to make a written submission on the Consultation Regulation Impact Statement (RIS) – “A National Scheme for Assessment, Registration and Control Use of Agricultural and Veterinary Chemicals” released by the Product Safety and Integrity Committee (PSIC) on behalf of the Council of Australian Government (COAG).

Australian Plantation Products and Paper Industry Council (A3P) is the national industry association representing the interests of all segments of the plantation-based wood products and paper manufacturing industry. A3P member's employ more than 13,500 people in plantation management, sawmills, panel board, and paper manufacturing plants, mainly in rural and regional areas. Each year A3P members create and sell more than \$4 billion of products, produce more than 12 million cubic metres of logs, 3 million cubic metres of sawn timber and more than 2 million tonnes of paper. A list of A3P members and statistics on their operations is available from the A3P website: www.a3p.asn.au.

A3P members include significant land/plantation managers and wood processors who are chemical users and have a keen interest in ensuring efficient and effective regulation of agricultural and veterinary (agvet) chemicals, due to the essential use of viable chemical solutions in forest growing applications and processed timber end-products.

A brief perspective on forestry and forest industries in Australia:

- 2 million hectares of plantations compared to 147 million hectares of native forests and 469 million hectares of agricultural land uses (dry-land livestock grazing, dry-land agriculture and irrigated agriculture).
- Forestry, milling, timber and paper manufacturing industries in Australia employing approximately 76,800 people.
- Agvet chemicals are essential for efficient, economic and environmentally sensitive wood production and timber treatment.
- Forestry is a relatively small player in the broader Australian agvet chemical market accounting for less than 0.7% of the total Australian spend on pesticides (*Jenkin & Tomkins 2006*).
- The majority of plantations have one or two agvet chemical applications over a ten (10) to thirty (30) year period, and so relative chemical use is small compared to the total life of the plantation crop.

A3P advises PISC that although plantation forestry is a relatively small chemical user, it, and its related industries are economically significant and important to rural economies and employment, and agvet chemicals are **essential** for effective and sustainable plantation forestry operations.

1. A3P and COAG Single Regulatory Framework For Agvet Chemicals Processes

A3P has previously, and will continue to be, engaged in the stakeholder consultation processes regarding the COAG single regulatory framework for agvet chemicals. These include:

- In February 2009 A3P lodged a written submission in response to the PSIC draft Discussion Paper – ‘A National Scheme for Assessment, Registration and Control of Use of Agricultural and Veterinary Chemicals’; and
- In January 2011 A3P lodged a written submission in response to the Department of Agriculture, Fisheries and Forestry (DAFF) Policy Discussion Paper – ‘Better Regulation of Agricultural and Veterinary Chemicals’.

A3P recommends that many of the previous suggestions/recommendations/observations in relation single regulatory framework and Australian Pesticides and Veterinary Medicine Authority (APVMA) operations are still relevant and should be considered if they have not already by PISC and DAFF in their processes.

2. General Comments on the RIS

The definition of agvet chemicals covers a vast array of products and uses, adding complexity and difficulty to the task of regulating this area. The goal of the proposed reforms should be a chemical regulation framework which is consistent, streamlined, continually simplified, flexible, clear and unambiguous, and efficient in order to achieve the desired outcomes at the lowest possible cost.

A3P main area of interest is in agricultural chemicals (i.e herbicide, insecticide and fungicide chemicals for forestry, and treatment chemicals for processed timber product) and where we felt unable to comment (ie for veterinary product regulation) we have not attempted to do so. The following general comments deal with key agvet chemical issues that are deemed very important to the plantation forestry industry.

Coordination of Chemical Regulation

One of the key issues of concern for the plantation forestry industry with chemical regulation policy development and implementation has been the lack of coordination and cohesion within the different levels of chemical regulation. That is, the national and state levels of chemical control and regulation in Australia exhibit different aspects of regulation, timeliness of outcomes, and levels of funding and resourcing, while in general the aims of regulation are the same. These differences and confusion make it difficult at times for registrant and users of the system to understand the process requirements and how to get important chemical solutions registered and reviewed effectively and efficiently.

A3P in-principle supports policy reforms that:

- Strengthen the current role, timeliness and capability of APVMA through providing adequate funding and resources;
- Define and harmonise the relationships between responsible agencies at Federal and State level and associated regulatory tasks;
- Improve processes and communication between responsible agencies and industry; and
- Explore, develop and implement options to achieve greater efficiency and effectiveness of capabilities by Commonwealth and state agencies.

Precautionary Principle

The **precautionary principle** can be defined as follows: *‘Where there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation. In the application of the precautionary principle, public and private decisions should be guided by:*

- (i) *careful evaluation to avoid, wherever practicable, serious or irreversible damage to the environment; and*

(ii) *an assessment of the risk-weighted consequences of various options. (Intergovernmental Agreement on the Environment, May 1992, p 13)*

The precautionary principle is often seriously and deliberately misinterpreted. It is suggested the key words in operational terms are 'risk-weighted consequences'. The whole basis of application of agricultural chemicals is one of risk management. Too often, some groups tend to the position that if there is any risk, it is unacceptable. Lack of full scientific certainty is not unique to the use of chemicals in agriculture. It is considered dangerous, to place in the hands of persons with inadequate experience, practical knowledge and sometimes bias, the administrative power to curtail beneficial use. Operations should be assessed on a risk-managed basis within regulatory guidelines. Some may interpret the 'precautionary principle' as don't do anything unless a party is one hundred percent certain there will be no adverse effects, this is an unrealistic expectation.

Minor Use

Due to the relative size of the plantation forestry industry minor use permits are essential to ensure chemicals are available to use for forestry applications. As a result the forest industry needs the flexibility to use agvet chemicals in off-label situations. Having said that, and without reducing the potential chemical solutions available, initiatives to reduce the number of minor use permits by having some incentive for chemical companies to include forestry applications directly on the label would be welcome. This is due in part to the long waiting time for minor use approval, and the practice of backdating these delayed approvals to the original application date meaning the renewal process occurs far more rapidly.

Control of Use

Some of the proposed policy options or reforms propose to move aspects of the 'control of use' regulation that are currently the responsibilities of State governments to Federal control. As a general comment A3P does not support and urges caution with this approach as there are many regional differences in the appropriateness and efficacy of agvet chemicals that need to be recognised and acknowledged (e.g. efficacy of certain chemicals are different in QLD and TAS). In addition flexibility of 'off-label' use for 'minor users' such as forestry is needed to ensure efficient and effective chemical use.

Permissible Use

As discussed earlier due to the relative size of the plantation forestry industry minor use permits are essential to ensure chemicals are available to use for plantation forestry applications. As a result the forest industry and other smaller chemical using industries need flexibility to use agvet chemicals in off-label situations. A3P preferred option which is not listed, other than as an example in the RIS, is to adopt the current Victorian legislation for off label Agvet chemical use detailed below (i.e. from the RIS document).

'Users have the freedom to apply agricultural chemical products to crops off-label provided that they do not use restricted products (RCPs and S7 poisons) and provided that they do not use any agvet chemicals (restricted and non-restricted) at a higher rate or more frequently than that specified on the label, or in contravention of a specific label restriction. Additionally, it is a user's responsibility to ensure that nil residues are present in the treated commodity.'

This should be the recommendation for the national framework rather than the other options proposed in the RIS. It is effective, practical and efficient. This alternative option does not place an onerous additional burden on the APVMA or state/territory governments to enforce and already has a proven track record of not increasing the risk to human health, trade or the environment. It is a little perplexing that the Victorian legislation is being either ignored or not considered further in order to impose another level of regulation.

It is recommended that the proposed options 1 to 4 be set aside in favour of widely adopting the current Victorian legislation. A3P sees that adoption of the Victorian model would also fix a significant proportion of the issues surrounding minor use permits.

3. *Specific Comments on the RIS and proposed options.*

The following specific comments in summary form (in **Table 1** below) and in detailed form (in **ATTACHMENT 1**) are made from a plantation forestry industry perspective and should be considered by PISC and COAG in the ongoing reform process of agvet chemical regulation:

Table 1: Summary of preferred policy options.

No.	Section	Preferred Option
5	Policy options and impacts of options - Governance	Option 1
6.1.1	Risk framework	Option 1
6.1.2	Efficiency in assessment and registration	Option 1
6.1.3	Assessment and use information	Option 1
6.1.4	Facilitating registration of low risk products	Option 1
6.1.5	Facilitating access for minor use	Option 1
6.1.6	Access to high risk chemicals	Option 1
6.2.1	Enhancing the provisions of expert advice	See comment (otherwise Option 1)
6.2.2	Improving legal interaction with the APVMA	See comment
6.2.3	The precautionary principle	See comment (otherwise Option 2)
6.3.1	General access categories and permits	Option 2
6.3.2	Permissible uses for crops	See comment
6.3.3	Veterinarians prescribed rights	Not applicable to forestry
6.4	Management of the chemical portfolio	Option 3
6.5	Supplier compliance	Option 1
7.1	A national system of use controls – monitoring, auditing etc	Option 1
7.2	A national system of use controls – record keeping	Option 1
8.1	Fee for reward users	Option 1
8.2	Farmers and occupational users	Option 1
8.3	Sales personnel and advisors	See comment (otherwise Option 2)

4. Conclusion.

A3P urges PISC and DAFF to consider A3P comments and preferred policy options detailed in this submission, and the plantation forestry industry looks forward to working constructively with PSIC and DAFF as the policy reforms are further developed and implemented.

If you have any questions regarding this submission please contact Gavin Matthew (on (02) 6273 8111 or gavin.matthew@a3p.asn.au).

Yours sincerely

RICHARD STANTON
Chief Executive Officer

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ATTACHMENT 1: A3P Specific Comments on the RIS and proposed options.

No.	Section	Preferred Option	Comments
5	Policy options and impacts of options - Governance	Option 1	<p>Option 1 has significant merit, with it fulfilling the desire for harmonised regulations of ‘control of use’ of agricultural (ag) chemicals across state and territory borders. The lack of harmonisation is a major problem Australia-wide not only for forest growers/managers who straddle state borders but especially for spraying contractors who need differing licences and record keeping systems for each jurisdiction in which they operate.</p> <p>It is understood that all state/territory governments have in place relevant responsible government agencies that are responsible for regulation of control-of-use of ag chemicals, so there is no need to create a centralised Federal authority to replace an existing state/regional based structure with trained staff. Harmonisation would ensure that the skills and knowledge that exist within these state/regional organisations are retained and utilised.</p> <p>It is the discrepancy between legislation and regulation at state/territory level that is the main issue rather than the structures in place to enforce the legislation. Having harmonised/single training, licensing and accreditation standards makes sense, as does having a single authority to provide the framework which the states then administer.</p> <p>There are some concerns about increasing the powers, size and functions of the APVMA to include training etc such as the possible replication of state resourcing in this area. As/if APVMA’s role changes it would be appropriate for the states to vary their public spending, resources and effort in equivalent areas to compensate.</p> <p>Option 2 removes the ability of states and territories to respond to valid regional needs and differences. The suggestion of an ‘open tender’ for the supply of control-of-use regulation is not considered to be viable given the size of the ag chemical operational use nation-wide and the potential consequences on trade, the environment and possibly human health.</p> <p>As a general comment control-of-use regulation is too large, technically complex, socially and economically important to the nation’s interest to hand over control to the lowest bidder.</p>
6.1.1	Risk framework	Option 1	<p>Option 1 has merit and is supported in principal, however industry and end-users will need to be able to comment on and suggest changes to the risk framework. The risk framework is an area where the risk assessment methodology needs to reflect actual operational practice rather than a precautionary principle process that may have little or no relevance to best practice, resulting in outcomes to the detriment of growers, chemical application contractors and the Australian economy.</p> <p>Option 1 has the potential to reduce the backlog of applications and if used correctly, it should eliminate this bottleneck rather than shifting it along the chain.</p>

6.1.2	Efficiency in assessment and registration	Option 1	<p>Two options are listed under the '<i>Efficiency in Assessment and Registration</i>' section these being retain the status quo or agree to ten changes as a total package. This area has more relevance to chemical companies and has little direct impact on individual forest grower/manager organisations, apart from the flow on impact on pricing and continued availability of viable and effective chemical solutions. The chemical companies that are directly involved with the APVMA during the registration process are in a better position to fully respond to the implications of the following:</p> <ul style="list-style-type: none"> a) <i>Limiting application screening to an administrative completeness check</i> b) <i>Providing an upfront pre-registration assistance session to applicants, with additional assistance to be cost recovered</i> c) <i>Preventing the applicant from changing categories after lodging an application</i> d) <i>Restructuring assessment timeframes to take greater account of elapsed time</i> e) <i>Including time limits for an applicant to submit data to the APVMA</i> f) <i>Extensions to timeframes based on mutual agreement</i> g) <i>Rejecting applications that have not been improved by the applicant in response to an APVMA request</i> <p>The arguments in favour of the above suggestions seem logical with regard to improving timeframes and efficiency of APVMA operations but again the plantation forestry industry is not as close to the process as chemical registration applicants and is not in a position to comment with any authority on the impacts that these proposed changes would or could have.</p> <p>If the proposed changes result in decreases in the turn-around time of the chemical approval and registration process, without disadvantaging the applicant with an increased administrative burden or financial cost, or compromise the integrity of the safety assessment process, then the proposed reform seems to improve the system.</p> <p>In particular, the pre-registration assistance may significantly streamline the application process by clarifying expectations before getting to far into the application process and the financial commitment that entails. It is suggested that if the first two proposals (a & b) under this option work as intended, then the third proposal (c) should not be required. Further the fourth proposal (d) to restructure the timeframes will not make a change on its own, it is suggested that APVMA will only be able to meet revised timelines if the process is streamlined and/or extra resources are provided.</p> <ul style="list-style-type: none"> h) <i>Using overseas data and assessments more efficiently</i> <p>This proposal has significant merit.</p> <ul style="list-style-type: none"> i) <i>Limiting requirements for efficacy or trade data in some applications</i> <p>There is some merit in limiting the requirements for trade data in some applications as highlighted in the examples provided in the RIS however the establishment of product efficacy should still be retained in order to protect industry users from the threat of chemical weed resistance and potential</p>
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6.1.3	Assessment and use information	Option 1	<p>Option 1 has merit as it is logical and seems to make financial sense. Option 1 potentially overcomes current inconsistencies between states, but sufficient flexibility still needs to be retained in labels to account for real differences between states. Further there is value in labels potentially being based on environmental conditions rather than state boundaries. An example, periodic inundation can occur almost anywhere and state label variations attempt to cater for this but perhaps can better be managed by listing environmental (temperature, rainfall, soil) caveats/provisions.</p> <p>Option 2 (<i>require that companies put all their market labels on a single web based database</i>) has merit but practically would require an additional administrative burden on all chemical manufacturers in Australia for no increased benefit to them. It is understood that all of the large chemical companies already maintain websites with this information which are readily accessible.</p>
6.1.4	Facilitating registration of low risk products	Option 1	<p>Until the parameters for what constitutes a 'low risk' product are defined (by APVMA etc) it is not possible to make any informed suggestions on this issue.</p> <p>Option 1 (<i>facilitating registration of lower risk products</i>) has some merit as it makes some sense and reduces the workload of the APVMA.</p> <p>The formation of a 'low risk' chemical group has merit, as long as everything else does not automatically fall into high risk and the products are known to be 'low risk' before the registration process. High and low risk are subjective and a significant concern would be that chemicals just outside the 'low risk' group are potentially given an equal weighting to that of the most hazardous chemicals. There may be merit in exploring the application of a system like 'Chem-alert' with green, amber and red warning levels.</p>

6.1.5	Facilitating access for minor use	Option 1	<ul style="list-style-type: none"> • See general comment regarding 'minor use'. <p>Chemical use in plantation forestry is mostly limited to the initial one or two years of a plantation's total life of 10 to 30 years, and thus the share of the total chemical market is small. Any impediment to chemical registration potentially reduces or removes that chemical from the market. Minor use permits become a significant or only viable option for industries such as forest plantations. This is an important initiative for forestry as few pesticides are developed specifically for forestry use. In addition a significant issue with minor use permits is the number required for often low risk products, and the timeframes often granted tend to be short, requiring re-application frequently.</p> <p>Option 1 has some merit with the qualification that a specific proposal is required covering the methodology to be used to achieve this process.</p> <p>It has been observed in the past that there is reduced incentive for chemical manufacturers to pursue additions to labels for minor use as the financial return is often out-weighed by the effort involved in providing the prerequisite data requirements of the APVMA. By not providing a cost effective and efficient method to add minor use registrations for existing registered products the current registration process is encouraging the continued off-label use of specific chemical and restricting potential productivity gains in the agricultural industry and negatively impacting on the Australian economy. Easier facilitation of minor use applications would be highly beneficial to the forest sector.</p> <p>Option 1 does not suggest a solution/approach to increasing encouragement to chemical companies to add extra detail to a label or approach further testing needed for chemicals.</p>
6.1.6	Access to high risk chemicals	Option 1	<p>This issue is more important for other sectors/industries than the plantation forestry industry at this time. Option 1 has merit. The current minimum requirement in Victoria (i.e. the Agricultural Chemical Users Permit) is a good example of what a national based training and access program for restricted chemicals can be (should be) successfully based on.</p>
6.2.1	Enhancing the provisions of expert advice	See Comment (Otherwise Option 1)	<p>There is concern if this proposal results in the removal of a necessary level of governance on the basis of saving some money. There is some merit in expert panels of advisors on a required ad-hoc basis for specific scientific or social issues but community and industry oversight of the operation of the APVMA is desirable.</p> <p>One of the biggest complaint classes levelled at the APVMA is its lack of understanding of its customers' needs and being out of touch with industry and community expectations. It is suggested that removing an advisory board (made up of industry representatives, end users and community representatives) is a significant risk to addressing that concern, and in general the financial viability and productive capacity of the entire food, forestry and fibre production of Australia.</p> <p>In regard to Option 1 it may hold some merit as appropriate expertise may be sought.</p>

6.2.2	Improving legal interaction with the APVMA	See comment	Not have enough information to provide informed comment on this option.
6.2.3	The precautionary principle	See comment (otherwise Option 2)	<ul style="list-style-type: none"> • See general comment regarding 'precautionary principle'. <p>Chemical registration could be delayed indefinitely if the precautionary principle is applied indiscriminately. Science is never 100% sure as a result a managed risk approach is preferable.</p> <p>Option 2 is the preferable of the two listed regarding the precautionary principle. Unfortunately in the past the precautionary principle has been utilised indiscriminately even when the science is clear and the potential risks can be quantified. All assessments need to be actual risk based with modelling of factors such as potential off site movement, spray drift, chemical exposure, application rates, environmental and human health risks etc based upon actual practice rather than unrealistic precautionary principle models.</p>
6.3.1	General access categories and permits	Option 2	<p>Option 2 has some merit. As detailed in the RIS no firm suggestions have been put forward on how to achieve this option. The single biggest problem with the current system is the time taken to assess and approve minor use permits. Even the renewal of permits (example the sulfometuron-methyl forestry minor use permit) can take many, many months, this for a product and use pattern which industry has been using as standard practice for many years without a break.</p> <p>It is perplexing that a permit should not be able to be rolled over with minimum administration, if it is a widespread standard practice; a clearly defined minor use which is not economic to proceed through to label registration (or has registration pending); and there are no negative environmental or health reports. It is suggested that this issue should be turned around and the solution is to reduce the burden of adding minor use to label requirements rather than enhancing the issue of minor use permits.</p> <ul style="list-style-type: none"> • See general comment regarding 'minor uses'. <p>Minor use permits are a feature of forestry pesticide use. Previous comments relating to minor use permits are applicable to this section, as are the comments relating to low risk or reduced risk GRAS chemicals (Generally Regarded as Safe). Another key issue is that whatever reform is potentially adopted, emergency use permits should continue to be facilitated urgently, as by their nature they are not planned and need rapid progression.</p>
6.3.2	Permissible uses for crops	See comment	<ul style="list-style-type: none"> • See general comment regarding 'permissible uses'. <p>Due to the relative size of the forest industry minor use permits are essential to ensure chemicals are available to use for forestry applications. As a result the forest industry and other smaller chemical using industries need flexibility to use agvet chemicals in off-label situations. A3P preferred option which is not listed, other than as an example in the RIS, is to adopt the current Victorian legislation for off label Agvet chemical use.</p>

			<p>If the above approach is adopted it would mean the number of minor use permits applied for would be substantially reduced and the workload for the APVMA reduced without increasing risk. Further APVMA could grant permits for longer periods.</p> <p>Under the other proposed options there is concern with the size of the potential monitoring program that may be enforced on applicators or land owners.</p>
6.3.3	Veterinarians prescribed rights	Not applicable to forestry	Not applicable to forestry.
6.4	Management of the chemical portfolio	Option 3	<p>Option 3 (maintain the status quo) has merit. The APVMA already has a dedicated chemical review process which is specifically targeted at reviewing the risk of all agvet chemistry as and when required based upon the latest scientific evidence from Australia and overseas. The current system works although at times adhoc and hazardous chemicals have been removed from use. It is suggested that a risk based prioritisation of chemicals and the potential of varying levels of review based on risk and usage. Potentially a desk top audit of the existing science and reported MRL breaches may be sufficient to determine which chemicals need to be reviewed.</p> <p>Options 1 & 2 as proposed in the RIS is seen to add additional administration and staff costs to both the APVMA and chemical manufacturers for no clearly defined benefit above the current risk assessment system while at the same time significantly increasing costs, staff number requirements and be time consuming.</p>
6.5	Supplier compliance	Option 1	Option 1 has some merit. This issue is potentially important to plantation forestry industry as a user, but A3P has no specific comment, except in the regard that consistency of quality/efficacy of ag chemical products is desirable.
7.1	A national system of use controls – monitoring, auditing etc	Option 1	Option 1 has some merit. The development of an efficient system national monitoring and auditing of ag chemical products that can be used in wider forums may be desirable.
7.2	A national system of use controls – record keeping	Option 1	Option 1 has merit. The development of effective and efficient national regulations for record keeping would potentially eliminate state differences and simplify compliance for industry. It is suggested that a single standard for record keeping will make life easier for all commercial and non commercial spray operations and make investigation of potential chemical trespass far simpler.
8.1	Fee for reward users	Option 1	Option 1 has merit. It would enable consistency across states and jurisdictions providing a framework for a national cross border standardisation of spraying contractor's qualifications and training, more so than other proposed options.

8.2	Farmers and occupational users	Option 1	<p>Option 1 has some merit however the logistics of achieving the objectives may be difficult and complex. The use and re-organisation of currently existing competency training in ag chemical use (via Chem-cert and ACUP training) under a harmonised/single curriculum/framework maybe more effective than reinventing the wheel. Licensing proposals should be used for accreditation of fee for service spray contractors rather than for individual businesses, plantation owners and farmers spraying on their own land.</p> <p>The proposed Option 2 would only add additional costs and another layer of administration for no foreseeable benefit to agriculture and forestry.</p>
8.3	Sales personnel and advisors	See comment (otherwise Option 2)	<p>It is not clear in this context if advisors referred to in the RIS are in the retail industry or ag-advisors? Sales personnel change frequently and it is assumed that to become an advisor, extensive knowledge of the business is a pre-requisite. Further thought is needed in this section and a better understanding should be gained of how the agronomy industry, plantation forestry industry work, and associated training operates.</p> <p>In absence of this understanding Option 2 has some merit. It is further suggested that the market provides some balance with any adviser or chemical company or agronomist or sales-rep that provides erroneous or bad advice to the agricultural or plantation forestry industry will not remain engaged into the future. It is understood that all of the big chemical wholesalers and manufacturers maintain teams of trained/qualified advisors to undertake this function. It is suggested that if all else fails read the chemical label.</p>

[END]