

Contact Telephone: (02) 6210 4831

Mr Stephen Targett Secretary Crop Pollination Association PO Box 325 Narrandera NSW 2700

OBJECTIVE RECORD NO: A354270

Dear Stephen

Thank you for your letter to the APVMA dated 26 June 2015 regarding labelling for chemical products and its effect on the beekeeping industry.

In the past the APVMA has dealt with Brynn on issues that are of concern to the Crop Pollination Association (CPA). I take it that Brynn has now handed the responsibilities of office over to you. If this is the case, please send him my regards.

In your correspondence you raised two issues, being that chemical wording was neither standardised nor legally enforceable. You also raised the issue of spray drift and the label wording associated with spraying of particular chemicals.

In relation to your concern regarding standardisation of label wording I can advise that, after the APVMA's regulatory workshop on "Pesticides and the Health of Insect Pollinators" in July 2013, we have been working hard to develop a regulatory approach to this issue. The APVMA will shortly be releasing a draft of the roadmap which outlines our proposed approach to assessing the risks that pesticide products might present to insect pollinators. Included in this document will be options for the standardisation of label statements. This will improve communication and ensure uniformity across all registered products. I will ensure that you are sent a copy of the document when it is ready tor consultation.

In relation to your concern that label wording is not legally enforceable, I can advise that the "DO NOT" statements on product labels are legally enforceable throughout Australia. However, please note that the APVMA's jurisdiction extends only to the point of retail sale. Control of use, subsequent to retail sale, is the responsibility of state and territory governments. In matters of suspected illegal use the responsible state or territory government department should be contacted to investigate the incident.

However, if you know, or become aware, that a label statement is causing a critical risk, I would suggest contacting the APVMA's Adverse Experience Reporting Program (AERP) to report your concern.

Spray drift buffer zones for the protection of pollinators has been mandatory on all labels approved by the APVMA since March 2010. As old labels are updated, buffer zones are determined, and where appropriate, placed on label. Again, this is an area the APVMA is working on to improve communication with users and ensure that the use of chemicals remains safe for the Australian community and the environment.

The APVMA does not approve buffer zones in relation to "houses" as this is seen as a chemical trespass matter and there is zero tolerance for chemical trespass. Chemical trespass is a state matter and the laws relating to this vary between jurisdictions.

Details regarding all of these projects are communicated in detail on our website (www.apvma.gov.au) and I would encourage you to look through some of the excellent work that we have been doing in regard to improving the protection of Australia's pollinating community.

If you have any further enquiries I can be contacted on the (02) 6210 4831 or at karl.adamson@apvma.gov.au.

Regards

Karl Adamson