

Paraquat and Diquat Proposed Regulatory Decisions

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This submission is provided to:

Chemical Review, Australian Pesticides and Veterinary Medicines Authority (AVPMA)

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Our members

- Canegrowers
- Cotton Australia
- Queensland Fruit & Vegetable Growers
- Nursery & Garden Industry Queensland
- eastAUSmilk
- Australian Cane Farmers Association
- Queensland United Egg Producers
- Turf Queensland
- Pork Queensland
- Bundaberg Regional Irrigators Group
- Burdekin River Irrigation Area
- Central Downs Irrigators Ltd
- Fairburn Irrigation Network
- Mallowa Irrigation
- Pioneer Valley Water Co-operative Ltd
- Theodore Water Pty Ltd
- Eton Irrigation
- Lockyer Valley Water Users

About the Queensland Farmers' Federation

The Queensland Farmers' Federation (QFF) is the united voice of agriculture in Queensland.

Our members are agricultural peak bodies who collectively represent more than 13,000 farmers who produce food, fibre and foliage across the state.

QFF's peak body members come together to develop policy and lead projects on the key issues that are important to their farmer members and the Queensland agriculture sector.

Together, we form a strong, unified voice leveraging our effectiveness by working together to drive policy and initiatives that support a strong future for Queensland agriculture.

Submission

Queensland Farmers' Federation welcomes the opportunity to provide comment on the Paraquat/diquat chemical review.

We provide this submission without prejudice to any additional submission from our members or individual farmers.

Chemical Review Considerations

The chemical review of paraquat and diquat is a very comprehensive review looking at impacts on safety, efficacy, trade, and the environment. Although this review process dates back some years, Queensland Farmers' Federation (QFF) is concerned that:

- The proposed significant reductions in the rates of use for affected crop protection products will render their use impracticable or ineffective in many circumstances of horticulture and broad acre cropping.
- QFF challenges the assumptions made on the environmental risk to target species in Australia. The data for this report appears to come from European studies based on force fed grain to birds in an experimental situation where there are no alternatives for food. The use of glyphosate will likely need to increase which may result in resistance.
- Minimum tillage practices will likely have to cease thus increasing impacts on emissions and climate change.
- The agricultural sector has serious reliance on these products and the lack of equivalent products to use will likely cause crop yield losses across Queensland and Australia.
- It is recommended that if these reduced levels are mandated, then an extended phase out period for agricultural use be allowed for adjustment for potential alternatives. Access to safe and effective agricultural and veterinary (agvet) chemicals underpins agricultural productivity, sustainability and competitiveness.

Environmental Criteria

QFF recognises the very comprehensive review of the impact of paraquat on the environment including terrestrial animals, birds, aquatic species, bees, earthworms and soil micro-organisms. It is noted that acute toxic effects on small (herbivorous and insectivorous) mammals and birds is not expected to pose a significant risk to birds or mammals. While moderately toxic, acute toxicity only

exists immediately after application. Once the applied paraquat has dried, (or becomes bound), its risk is greatly reduced.¹ If bird kills were a problem with this chemical, this could be readily validated in Queensland by government records of investigation into deaths of large numbers of birds. Any large number of reported deaths in wildlife are regularly investigated to exclude exotic disease and this usually includes a toxicological screen.

Safety Criteria

QFF is supportive of the proposal to strengthen occupational safety requirements for the operator to use the protective equipment changes proposed for people who are using the chemical in their daily activities.

Efficiency Criteria

QFF queries if the information informing the reduced rates proposed included the common weeds that are found in agricultural production in Australia. Paraquat is a strong chemical that needs to be used carefully but is really useful. The alternatives are not as effective, and overuse could increase resistance. The only other way to keep paddocks and drains free is to cultivate it repeatedly. This in turn will use lots of diesel and release much of the carbon held in the soil. Farmers will need good advice about and assistance with best practice alternatives if this goes ahead – that would require a lengthy lead time, field trials and extension.

Conclusion

Paraquat has been used in Australia for over 50 years without evidential reports of serious impacts on the environment. The removal of labelled uses based on the technical report is going to have a significant impact on agriculture. The impact on the environment and human safety can be controlled through processes and procedures. What is less clear is how the reduced rates are going to be effective in controlling weeds in agriculture. Minimum tillage may have to cease with subsequent environmental impacts. There needs to be alternatives to paraquat and diquat if maximum rates are to be reduced. If this proceeds, QFF recommends that an extended phase out period be put in place that will give adequate time to find an effective alternative.

Thank you for the opportunity to provide comment. Should you have any questions, please contact Dr Laurie Dowling at laurie@qff.org.au.

Yours sincerely

Jo Sheppard
Chief Executive Officer

¹ Pesticides – fact sheet for paraquat dichloride. United States Environmental Protection Agency chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www3.epa.gov/pesticides/chem_search/reg_actions/reregistration/fs_PC-061601_1-Aug-97.pdf



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