



SOUTH AUSTRALIAN WINE INDUSTRY
ASSOCIATION INCORPORATED



Wine Grape Council SA

Joint Response to

**“Reducing Spray Drift – A
discussion paper on reducing off-
target drift of Group I herbicides”**

Date: 3 March 2013

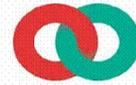
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Wine Grape Council SA

**Joint submission by:
The South Australian Wine Industry Association (SAWIA) and
The Wine Grape Council of South Australia (WGCSA)**

To: Biosecurity SA's '*REDUCING SPRAY DRIFT ~ Keeping it in the Paddock*'

Biosecurity SA have released a discussion paper about introducing means to reduce the risk of damage to commercial vineyards and other sensitive crops from unintended spray drift of farm chemicals. The proposal is for an approach that has a focus on education backed up by regulation, and considers several elements. These include a requirement for users of Group I herbicides (such as 2,4-D, triclopyr etc.) to be qualified through training, maintain records of their spray use, and follow a Code of Practice. The discussion paper also seeks views on the scope of any such regulations in terms of both the range of chemicals covered as well as the regions in South Australia to which the regulations might apply.

The Wine Grape Council of South Australia and the South Australian Wine Industry Association are pleased to present this joint submission in response to the discussion paper.

General comments:

Damage from off-target spray drift continues, as noted in the discussion paper, to occur in South Australian vineyards. Every region is at risk with more significant incidents occurring in the Clare Valley, Barossa Valley, Riverland and Coonawarra. It is believed that damage to vines can persist for a number of seasons.

As a precautionary measure against the impact of wine contamination arising from spray drift, the Australian wine industry has set a minimum residue limit (MRL) for 2,4-D in wine, even though it is not approved for use in wine grape production. The MRL (0.5mg/kg) is equivalent to that of most of our major export markets, except China which does not have an MRL. The implications of this are significant:

- for those exporting wine, residues of 2, 4-D are not allowed at any level
- for those supplying wine grapes, contamination is likely to increase the risk of their harvest being rejected for purchase, particularly when the grapes are to be blended with grapes from multiple vineyards as it isn't logistically feasible to keep contaminated grapes separate from uncontaminated grapes in the production process.

The economic impact is even greater for biodynamic and organic vineyards where contamination will inevitably see loss of certification for a number of years and subsequent loss of markets for grapes and wine.

We recognise that the use of Group I herbicides is currently an important aid to weed management in broad acre farming. However we believe that such use is unlikely to be compatible with the SA Government's 'Premium Food and Wine from Our Clean



Environment' strategy with its stated vision of South Australia to be 'renowned as a producer of premium food and wine from its clean water, clean air and clean soil'. In our view the long term goal should be to secure agreement for the replacement of Group I herbicides with alternatives that are less likely to be susceptible to drift or which will not contaminate grapes if drift occurs.

We understand that other States in Australia have regulations that impose a blanket ban on the use of particular herbicides at certain times of the year. We recommend that PIRSA consider reviewing the practices in place in other States, and seek national alignment of South Australian regulations.

Any response to the issue of spray drift must not be limited to primary producers. In consulting with our respective members, we have received feedback expressing concern at inappropriate use of herbicides by local government and other instrumentalities to control weeds on roadsides and in properties near vineyards. Education, awareness and monitoring needs to encompass all users of Group I herbicides.

It is unclear from the discussion paper how the proposed regulation will be applied in practice. We understand from discussions with Biosecurity SA that this might be through audits of users; however we are not aware of any Federal or State regulatory mechanism that requires users, or purchasers, of Group I herbicides to identify themselves (in contrast with the case for the purchase of Schedule 7s chemicals). By implication, the proposed regulation could only be effective if proof of certification was mandatory when purchasing Group I chemicals. It is unclear from the paper how audits will be undertaken without such a system of registration of users. If auditing is the mechanism of regulation, then it is also essential that adequate resources be made available for monitoring and enforcement.

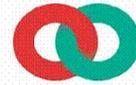
Responses to specific questions in the discussion paper

<p>1. <i>How could the operation of the Code of Practice for Summer Weed Control be improved? Should compliance with the code be mandatory?</i></p>
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The use of ester forms of the Group I herbicides is currently restricted to between 1 September and 30 April. However nutrient intake via leaves continues into May and symptoms may not be expressed until the next spring. We recommend that consideration be given to extending the exclusion period to 31 May to include autumn sprays.

We note that the Code of Practice attached to the discussion paper did not consider the use of drift retardant additives. These additives, referred to as adjuvants, are readily available and can enhance the efficacy of spraying, for example by reducing evaporation of spray droplets after they leave the sprayer (GRDC, *Adjuvants: Oils, surfactants and other additives for farm chemicals*, Revised 2012 edition).

The Code of Practice attached to the discussion paper provides guidance on recognising the risk factors to drift, keeping records of spraying, and on the application of the spray. It



would appear that if the training and record keeping aspects (considered below) are mandatory, then the Code will effectively be mandated by default.

2. *Should the proposal apply to all Group I herbicides (except home garden products)? If not, what should be the reason for exclusion?*

On the basis that grapevines are susceptible to damage from all of the Group I herbicides, we recommend that the proposal apply to all. Exclusion of particular chemicals may add complexity to the regulations risking confusion and off-label use.

The definition of 'home garden products' requires clarification, e.g. what container size is a home gardener restricted to purchasing? It could be argued that both home gardeners and hobby farmers pose a potentially higher risk; their likely lack of chemical use experience presents an increased risk of spraying outside the restricted period and/or outside optimum wind and temperature parameters.

3. *Should users of Group I herbicides (except home garden products) be required to have a prescribed qualification incorporating the competency (AHCCHM303A) 'Prepare and Apply Chemicals'?*

In our view, users of Group I herbicides should be required to demonstrate competency in their use, particularly as this would apply to a relative minority of broad-acre farmers (Biosecurity SA estimates about 10%). We note that the majority of winegrape growers already have *ChemCert* or equivalent qualifications as a contract requirement and/or to meet the wine industry's environmental management program, Entwine Australia.

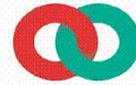
We understand that such qualifications will meet the requirements of the proposed regulation; however, this should be clearly spelt out to avoid confusion.

We also consider that the use Group I herbicides by 'hobby farmers' might continue to be a significant risk even with the proposed regulations, most particularly in outer metropolitan areas such as the Adelaide Hills, or McLaren Vale. This is because they might be less inclined to undertake such training, and it may be possible for them to circumvent the regulation by using 'home garden products'. This risk should be given further consideration.

4. *Should additional training, providing greater depth on the application of low drift technology and interpreting weather conditions, also be considered as a mandatory requirement for use of Group I herbicides (except home garden products)?*

Training may introduce an additional compliance cost to some of the smaller-scale farmers, and may not produce an incremental benefit beyond that obtained by the requirement for qualification. It may be necessary to provide some form of assistance to encourage users to undertake training.

We understand that some tools to assist in making decisions to spray do exist (e.g. Nufarm's *Spraysense*, Bayer's *The Grower's Edge*, GWRDC fact sheet), although it is recognised that



some of these may not be able to predict all possible eventualities and will not completely eliminate the risk.

Quality of training has also been raised as an issue. We understand that the National Working Party on Pesticide Applications will soon release the results of a study evaluating training for chemical use. This might highlight a number of areas for improvement that Biosecurity SA should consider.

5. *Should users of Group I herbicides (except home garden products) be required to keep records of their use? If not, explain why.*

We consider that keeping records is an essential first step in raising awareness of the issues in prevention of spray drift. Furthermore, most winegrape growers in SA already keep spray records as a result of the industry's own traceability requirements for exporting overseas, as well as the possible inclusion of such conditions in contracts to supply grapes to wineries.

6. *Should the proposal apply to the whole state or the nominated area(s)? Please provide reasons.*

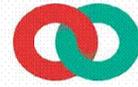
Vineyards (and other sensitive food crops) are widespread across the state, and given the possibility of herbicides drifting very long distances, it is prudent to apply the regulation state-wide without exception. Any case for exemption in remote areas should be well supported with due consideration to potential impact on all food production systems.

7. *Do you agree with the overall approach to use training and record keeping as regulatory tools to reduce the risk of economic damage to vineyards and other sensitive crops from off-target drift of Group I herbicides? If you do not agree, what alternative approach should be considered?*

We agree with the approach and reiterate our concern that it is important that Biosecurity SA has the personnel and resources to both enforce the regulations, and also maintain active engagement in leading edge research in spray technology. Knowledge in this area is improving and will inevitably lead to new recommendations for safer chemical use; the Code of Practice should be continuously updated to reflect new knowledge. For example, the National Working Party on Pesticide Applications has commissioned research into developing predictive models for temperature-inversion layers. This may open the possibility for the Bureau of Meteorology to be able to issue weather warnings for spray drift risk, in a similar way as they currently do with 'Downy Mildew risk' and 'Sheep Grazer Alerts'.



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