

Statement of Reasons - Response to submissions from consultation on proposed Agricultural and Veterinary Chemicals (Control of Use) Regulations 2017

Submission number(s)	Issues raised	Government Response
1	<ul style="list-style-type: none"> Two aspects of the record keeping requirements for agricultural chemical use were considered ambiguous (Reg 6 (2)(e) location of use and Reg 6 (2)(h) contact details for supervisors) and clarification was sought. 	<ul style="list-style-type: none"> Communications material for agricultural chemical users will provide further guidance and clarity for the record keeping requirements.
2 & 4	<ul style="list-style-type: none"> None – Regulations were supported. 	<ul style="list-style-type: none"> Not applicable
5, 6, 7, 8, 9, 10, 11, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 25 & 26	<ul style="list-style-type: none"> The banning of 1080 based on grounds of animal welfare, protection of dingoes, non-target species and the environment was requested. When registering toxins, implications for animal welfare be considered . The ease of access to 1080 due to its classification as a chemical of concern by the Council of Australian Governments. Farmers should be encouraged to use alternative control measures. 	<ul style="list-style-type: none"> Pest animals pose a threat to Victoria's primary production, crown land, the environment and community health. Best practice pest management must consider a range of tools including 1080. In many situations, the use of 1080 pest animal bait products is the most suitable method of control. The Victorian Government will continue to work with users of 1080 to monitor the effectiveness of 1080 regulations and improve best practice in pest animal management programs. This includes support for research into additional pest control methods, improvements to humaneness and reduction in harm to non-target species.
27	<ol style="list-style-type: none"> Request to retain the current requirement to record 'extent of use' of an agricultural chemical. Request clauses 6(2)(h) & (i) be reworded to clarify the term 'if applicable'. Add 'Aircraft and Mister' to the heading of Reg 12. Request that Reg 12 include 'Water Corporations' as a relevant service that must be notified. Concern that the Regulatory Impact Statement (RIS) did not cover risks to water supplies and that broader consultation did not occur regarding notification of spraying. Support for a prohibition of all unregistered agricultural and veterinary chemicals, but with a one year amnesty period from the date of deregistration. 	<ol style="list-style-type: none"> The proposed Reg 6(2)(c) provides the option to record information to allow calculation of rate of application, which could include extent of use. Further clarification will be provided via public communication materials rather than in the Regulations. Changes to the title and structure of Reg 12 have been made to better communicate requirements for notification of spraying by aircraft or mister. These changes include the addition of 'aircraft or mister' in the heading. Considerable implications that would need to be assessed in a RIS. Other options including non-regulatory methods would need to be considered. We accept concerns that the RIS did not specifically address risks to water supplies and Agriculture Victoria will seek to address this in future consultations. The RIS considered this option but concluded to limit the prohibition to a small number of higher risk chemicals.

Please note: Organisations and individuals who requested their submission remain confidential and not be published are not included in this summary.