

Diazinon proposed regulatory decision

WOOLPRODUCERS
AUSTRALIA

Chemical Review
Australian Pesticides and Veterinary Medicines Authority
GPO BOX 3262
Sydney NSW 2001

6 June, 2024

Via: chemicalreview@apvma.gov.au

To whom it may concern

On behalf of WoolProducers Australia (WoolProducers), I would like to thank you for the opportunity to present this submission into the *Diazinon proposed regulatory decision*.

WoolProducers is the peak representative body for Australian woolgrowers, representing and advocating on behalf of all woolgrowers in the country, rather than just certain sectors. Our mission is to develop constructive and profitable outcomes for woolgrowers nationally.

WoolProducers represents the single largest body of woolgrowers through our fee-paying State Farm Organisation membership network and three democratically elected Independent Directors and is the only national organisation that can speak on behalf of the mainstream wool industry and represent the concerns and interests of all Australian wool producers. Our representation capacity includes the industry's commercial, superfine, broad wool and stud breeding sectors.

Woolgrowers face many challenges when it comes to maintaining animal health and welfare which is a priority for all growers. There are only a limited number of products available to producers to mitigate these challenges, and with increasing resistance and the breakdown of other chemicals the last thing industry can afford is to lose access to effective treatments. Industry must have access to as many tools in the tool kit to make our enterprises viable.

There are a number of products that have been identified in Table 2 of the *APVMA Special Gazette – Diazinon reconsideration* which are relevant to sheep and wool production, which the APVMA are considering cancelling product registration for, namely:

Approval or registration number	Name
39572	WSD Diazinon For Sheep, Cattle, Goats And Pigs
39573	WSD Fly Strike Powder To Control Flystrike And For Wound Dressing For Animals
39574	WSD Mulesing Powder Wound Dressing Following Mules Operation General Wound Dressing For Sheep, Cattle And Goats
46231	Coopers Fly Strike Powder Insecticide
51290	Eureka Gold Op Spray-On Off-Shears Sheep Lice Treatment
62353	Coopers Diazinon Sheep Blowfly Dressing And Cattle, Goat And Pig Spray
68253	Nucidol Gold Op Spray-On Off-Shears Sheep Lice Treatment

86308	Coopers Erase Gold Spray-On Off-Shears Sheep Lice Treatment
86314	Coopers Gold Spray-On Off-Shears Sheep Lice Treatment
92828	BFD Blowfly Dressing

While the actual usage of each of these products across the wool industry is unknown, there is concern that the deregistration of these products will see even less products available for woolgrowers to combat flystrike and lice.

WoolProducers urges the APVMA to assess the volume of these products that are currently in use commercially before any move to de-register their use is conducted and expedite any pending product registrations that will assist Australian woolgrowers to manage flystrike and lice in sheep flocks.

WoolProducers also acknowledge that the APVMA have conducted a thorough review of products containing diazinon based on what is referred to as 'available information', and from that the APVMA have determined that they're not satisfied that some of them meet safety and trade criteria, even if product labelling was changed or variations to product use were made.

WoolProducers notes that throughout the *APVMA Special Gazette – Diazinon reconsideration*, that there is repeated reference to decisions made on 'available information', WoolProducers would like clarification on if there is the opportunity to seek further information on diazinon to assist these deliberations or if that is it to be taken to mean that there is no further information available but the APVMA are still not satisfied that diazinon meets the required safety and trade protocols

Again, thank you for considering this submission.

Should you wish to discuss our submission further, please contact me on 0488 554 811, or via email (jhall@woolproducers.com.au).

Yours Sincerely,



Jo Hall
CEO
WoolProducers Australia

