

Manchil IPM Services Pty Ltd



Integrated Pest Management

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The Director

Food Standards Australia New Zealand (FSANZ)

Re: Improving food safety for fresh horticultural produce

We refer to your recent call for submissions to assist you ensure food safety in fresh horticultural produce.

Manchil IPM Services Pty Ltd is a wholly owned Australian private company based in Perth and is involved in providing integrated pest management to growers of vegetables and in the breeding, release and monitoring of beneficial predatory insects. Our business takes us to all Australian states and the ACT. Our association with growers and their use of chemical pesticides puts us in the position to ask - **who is testing the levels of pesticide once the product has left the farm gate?**

We further make the following points: -

- We understand that the general public is aware that pesticides and in particular insecticides are used in the production of agricultural crops in Australia.
- The general public assumes that control of the use of these products is in accordance with current Government rules and regulations and that the use of these products is effectively policed.
- The main issues that are of concern to us are firstly, are pesticides being used in accordance with the legal limits and secondly, would the inappropriate use of pesticides be detected by the current system.

We note that problems associated with the current testing are that a very high percentage of fruit and vegetables that are sold in major supermarkets are passed through middle men or market agents. The growers that sell their produce to market agents only need one pesticide residual test per year and they only test for old pesticides called **c3**. The majority of growers use pesticides in the **c5** class and these chemicals are not tested at all. These pesticides

include Imidacloprid, Etoxazole, Methomyl, Carbendazim which are some of the most commonly used pesticides throughout the world.

To make matters worse most growers that have their produce tested by market agents are informed beforehand as to when their produce is to be tested, therefore being able to avoid the use of any unregistered chemicals prior to testing. Due to the absence of regulated pesticide testing it is very easy for growers to use toxic unregistered pesticides without any chance of being detected. Added to this, many registered chemicals are toxic, while new generation softer chemistry is not being registered due to chemical companies wanting to maximise profit from old chemistry.

APVMA and FSANZ are the government agencies that are responsible for pesticide use in Australia and New Zealand. However, neither agency performs any pesticide residual testing of fruit and vegetables in Australia. This job completely relies on state governments to perform the tests and enforce the laws. Some states are performing more testing than others but some states only perform on average 2 tests a week. At the same time hundreds of thousands of pieces of fruit and vegetables go into retailer's stores each week and only 2 pieces of fruit and veg are tested. On top of this the chemicals being tested are only old chemistry and would have been used 20 years ago, no new chemistry is being tested. The reasons for poor state government chemical residue testing include: lack of funding to these departments and lack of commercial understanding from the health departments that test them.

The Australian federal testing only looks at 5 crops a year and we believe it relies on market agent results. But this program is only a minute snap shoot of a few horticulture sectors.

There are some dangerous insecticide use patterns occurring in Australia. Imidacloprid for example is a very systemic insecticide, being the most widely used insecticide for horticulture in the world. This pesticide has been linked to causing major decline in European bird numbers due to the leaking of the product into the water table and the possible link to the decline of bees is well documented. This insecticide is registered on most horticultural crops in Australia. If a consumer purchases a salad there is a good chance that the lettuce, cucumber, tomato and capsicum, have been treated with this chemical. However the APVMA doesn't look at the whole salad consumption of one insecticide; instead it looks at one crop consumption at a time, thereby distorting the total effect of Imidacloprid.

Dimethoate, another toxic chemical is sprayed by strawberry growers in Queensland. They are being forced by government regulators to spray their fields with this toxic chemical for the control of fruit fly. Incidentally this chemical also kills all the beneficial insects. These sprays are also taking place in the off season periods of mid- winter when recorded levels of fruit fly are very low. The worse news for consumers is that the aim of this program is to leave a chemical residue on the fruit. Avocados, peaches, tomatoes and many other products from northern Australia are also drenched in Dimethoate. They are then packed into boxes before being delivered to stores. One must question how in the year 2011 this process is still

happening, an insecticide of such toxicity being sprayed onto fruit and vegetables only hours before eating.

Basically the produce that the consumer buys at a supermarket comes from a market agent who is not required to conduct random testing of pesticide residues or the testing of new pesticides. We acknowledge that in some supermarkets there is internal random testing of pesticide residues as well as a wider range of newer pesticides however this is not Government regulated or mandatory.

In conclusion, as a company heavily involved in Horticulture Australia, we trust that more testing of fruit and vegetables occurs and a much wider range of new chemistry is tested, also that the information is presented to the public soon after the produce is tested. A labelling system to show the consumer how much pesticide has been applied on all produce would be the ultimate plan – this could also lead to greater competition between the major retailers.

Yours faithfully

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