

# Aerial Agricultural Association of Australia

# Chemical Application Policy

Last Revised: 2008

## Introduction

*Chemical application is a complex process that involves the farmer, consultants and applicators. A national strategy should recognise this and plan for all jurisdictions and affected parties to work together to eliminate any problems.*

## Legal Issues

### Right to Farm

1. There should be in any regulation a clear statement that there is a right to farm and spraying is an integral part of that, as long as it is carried out responsibly and in line with government regulation, the label etc.

A key issue in this regard is the urban/rural interface where local government in particular allows urban and semi-urban encroachment on traditional farming land.

2. State and local government should have all 'hobby-farm' and rural residential developments protected from farming land by a suitable buffer (excised from the development area), and all landowners and residents required to sign a 'recognition of existing practice' contract that guarantees the continuation of traditional and future farming practices.

### Shared responsibility

The applicator is never making decisions in a vacuum - normally the farmer or consultant is telling the applicator when application is required, at what rate, and what susceptibles (crop and environment) are present.

3. Responsibility (and liability) to act with due diligence should be shared across all appropriate sectors, particularly the farmer, the consultant (where used) and the applicator. This concept should be reflected in legislation, regulation, policing and on chemical labels.

### The defence of 'due diligence'

Due diligence should be made a defence in all jurisdictions to ensure that the law and the courts' interpretation of the law reflects what is happening in the real world, rather than singling out that sector that may be the only visible part of the problem - the aerial applicator - who may have acted with due diligence and in good faith.

The NSW Pesticide Act 1999 allows this defence and creates a further offence for farmers and consultants who attempt to coerce or fail to provide all relevant information to an applicator. This is a useful piece of regulation.

### Environmental Damage vs Crop Damage

4. In a situation where there has been drift from an aerial application onto a neighbouring landholding, government agencies should not be able to prosecute where only crop damage has occurred and where any crop damage claim has been settled by the parties concerned.

In other words, government agencies should be concerned only with protecting public health and the environment, as the threat of civil action to recoup any damages to crops is enough to ensure due care and diligence is taken by aerial applicators.

This would remove the current situation where government regulators mount prosecutions even though the issues of damage to crops have been resolved.

### **Definitions of 'Harm' and 'Waterway'**

Current definitions of 'harm' and 'waterway' in some legislation are far too broad and would have the effect, if interpreted strictly, of ruling against all chemical applications despite the use of due diligence.

5. The definition of 'harm' in control of use legislation should not include psychological damage of humans or non-specific symptoms.
6. The definition of 'waterway' in legislation should be limited to include "any significant body of water (lakes, rivers, creeks) that has running water, but not including open grazing country that acts as a watershed or farm dams within the target area".

### **Local Government Planning**

A key issue that requires further government investigation is the impact of local government decisions on farming land and practices.

Often, local government decisions in regards to developments in rural and semi-rural situations are made with absolutely no regard to their impact on farming operations including spraying, or the possible impact of continued farming (and spraying) in that area on new, especially semi-residential, development.

7. Local government should be compelled to recognise a right to farm and should be restricted from permitting developments that significantly impact on that right.
8. Local government should be required to consult with local farmers and operators who may be affected by development decisions, and to compensate them for any additional costs they may have to incur or loss of income they may suffer as a result of local government planning decisions.
9. Local government should ensure that compatible industries are co-located and incompatible industries, which are likely to become the source of much controversy and conflict, are not encouraged to co-locate.
10. The integration of buffers into development approvals should be compulsory where developments abut or are near to agricultural land.

*(see also recommendation 2)*

A number of examples are obvious such as bee keeping being introduced in a cotton area, or organic farming in the middle of cotton country. Obviously such a responsibility would have to be accompanied by requirements to consult, but a great deal of needless conflict could be avoided by a smarter and longer term approach to planning issues.

## **Regulatory Issues**

### **Inter-government consistency**

To have as many different jurisdictions regulating the use of chemicals as Australia does is an assurance of a poor system.

11. Harmonisation of regulation, or better still having the same regulation in all States, should be a key goal of all regulators.

### **Regulatory Models**

12. AAAA supports government regulation that recognises and incorporates industry codes of practice and other programs (such as 'Spraysafe') as equivalent standards.

Government is the appropriate sector to regulate other industries such as ground rigs, farmers and consultants that play a major role in chemical application but which may not have a well developed industry code or program.

Recent improvements to legislation in NSW where farmers and consultants can be held liable for pressuring applicators to apply chemical outside label requirements should help to contribute to greater 'shared responsibility'.

Importantly, government is the appropriate agency to ensure a level playing field between competing chemical application sectors, especially ground based versus aerial.

The current situation in some jurisdictions of aerial applicators being highly regulated and ground operators hardly being regulated at all is unfair and is producing a very poor result in the field where ground rig operators remain unlicensed, untrained and unpoliced.

### **Self-regulation**

Self-regulation will only work if an appropriate government policy framework is already in place to ensure *each* of the relevant sectors are held *equally* responsible for their role in chemical application.

13. AAAA does not favour self-regulation at this time.

### **Control of Use Legislation**

14. 'Control of use' legislation should be incorporated into a single Act that is comprehensive, coordinated, fair to all sectors and based on 'shared responsibility', and consistent across all States and Territories.
15. Responsibility for 'control of use' legislation should rest with the State Department of Agriculture or equivalent in that State.

This should serve to simplify processes where all regulation regarding chemical use and distribution can be found in one place under the control of one government agency. This is particularly important as different government agencies and agencies from different levels of government are often pursuing different agendas and policy outcomes.

## **Label Compliance**

16. AAAA fully supports the use of the chemical label as the underpinning document for chemical usage, and fully supports the APVMA's role in approving chemical labels and issuing permits as appropriate.
17. AAAA fully supports the requirement for all applications to be within the parameters of each label.

There is justification for flexibility to be incorporated into the way agvet chemicals are regulated so as to ensure that 'better' uses of the chemicals (such as reduced rates etc that are still effective) can be used.

This is particularly important in terms of consultants making off label recommendations and expecting applicators to comply with their recommendations. Only by making consultants and farmers responsible for their actions as part of the chain of responsibility of chemical application will this practice be stopped.

It is important to maintain flexibility in allowable variations to take account of the need for ongoing developmental work and field trials of new uses for existing chemicals and new or developing application techniques. A simplified APVMA permit process would fulfill this requirement.

## **Chemical Control Areas**

18. AAAA supports the use of 'chemical control areas' for particularly sensitive areas, as long as Governments consult with industry before their establishment and as long as the issue of permits as required is handled expeditiously.
19. 'Controlled chemical' rules should only apply for chemicals being used in controlled areas. In all other areas outside controlled areas, APVMA rules on labels should apply.
20. AAAA believes that the use of 'controlled chemicals' should be limited to commercial operators, and only those commercial operators (such as licenced aerial applicators) who are able to demonstrate a high level of competency in chemical application.

## **Chemical liability insurance**

21. All of the insurance regulations that currently apply to aerial applicators should immediately apply to ground applicators, including farmers.
22. Chemical insurance, including crop damage insurance, should not be compulsory, but should be a business decision for each operator.

It is worthwhile noting that currently, many cases of damage that affect neighbouring properties are often worked out between the two parties (i.e. farmers) without any insurance implications. It appears that the very existence of insurance encourages people to make claims that if there were no insurance they would not make and would use other avenues (such as direct discussions with their neighbour) to reach some agreement on compensation.

## **On label requirements for particular spray equipment**

It is in the operator's own interest to ensure that equipment used is going to deliver a suitable result. This is made even more likely due to the costs associated with drift or other problems.

23. Chemical labels should only specify spray quality (using Standard ASAE S752) and not dictate how operators are to achieve that requirement, but rather leave flexibility for innovation and operational issues that may develop a great deal faster than government is able to change legislation or labels.
24. If specific equipment is required for specific chemicals it should be specified on the label by the APVMA rather than by individual States, thereby ensuring a nationally consistent approach to the issue.

## **Offences**

25. Offences created under legislation should include the following features:
  - i) the defence of due diligence
  - ii) shared responsibility so that the pilot is not the only one who can be prosecuted
  - iii) the creation of the offence of 'coercion' by farmers and consultants based on the NSW model, where they can be found in breach of the legislation if they attempt to coerce an applicator to apply chemicals against their best judgement
  - iv) equality between aerial agriculture and ground rigs - a level playing field
  - v) any penalty should take into account previous record of performance, match the penalty to the seriousness of the offence, and consider the impact of the penalty on the viability of the business.
  - vi) should not seek to impose a further penalty on the applicator when only crop damage has occurred (i.e. not damage to the natural environment) and the issues of commercial compensation have been resolved.

## **On the Spot Fines**

This is an appropriate and modern response to low-level offences as long as the ability to challenge the offence in the courts is maintained.

26. If on the spot fines are introduced, they should be accompanied by an assurance from government that the aerial industry will not be unduly targeted because aerial operators have permanent bases and are well known, and that ground rig operators, including farmers, will come under exactly the same level and rate of scrutiny as the aerial industry.

## Competition Issues

### A level playing field

Current legislation, regulations, enforcement and policing activity are focused on the role of the aerial agricultural industry, rather than focusing on chemical application competency no matter how it is applied.

This is partly because of the misconception that aerial application in practice is more likely to cause drift than ground operations.

Any perceived advantage of ground rigs is lost through a lack of education and subsequent operations in poor meteorological conditions.

In addition, the ground rig takes far longer to cover an area than an aircraft, the result being they are exposed to deteriorating meteorological conditions if they spray during the day, and likely surface temperature inversions if they spray through the night.

These factors completely nullify any regulatory distinction that should be drawn between ground rigs and aircraft.

A key point is that aerial agriculture is one of the most highly regulated activities in Australia, while ground application of chemicals in some States does not require education, licencing or any environmental safeguards.

It is simply not possible in the current environment to compete on an equal footing with ground rig operators as a result of discriminatory regulation.

### Regulation Coverage

AAAA supports the extension of regulation to cover all industries involved in the application of chemicals, not just the aerial industry.

There should be no distinction in principle between the application of herbicides or pesticides, or between aerial or ground application, including misters, air blast sprayers or other ground based equipment.

In particular, AAAA supports the regulation of the ground application industry to establish a level playing field between it and aerial agriculture and to ensure equivalent standards of safety and responsibility are met by that sector.

Similarly, control of use legislation at the State level should also include farmer's use of ground application equipment as well as commercial contractors.

27. Regulation should include, as a minimum, licencing of all commercial ground rig operators to ensure they meet the same standards as the aerial industry in areas such as competency with:

- application technology
- chemical handling, mixing and storage
- record keeping
- meteorological conditions.

## Competency Issues

### Competency based access to chemicals

A key issue with chemical use is the competency of the applicator to use that chemical according to label instructions.

Regardless of who is putting out chemical, especially in the case of the application of large quantities of chemicals, a key determination of who should have access to that chemical is demonstrated competency.

AAAA has run a very successful program for many years - Spraysafe - to ensure our operators, pilots and loader/mixers all acquire appropriate competency before applying chemicals. The same cannot be said for ground rig operators, either commercial or farmers on their own land, who are often very poorly equipped with information to make good decisions or to abide with label directions.

### Qualifications for ag pilots and ground operators

The issue is competency across the board, regardless of the particular chemical being put out.

The most obvious starting point is that any person involved in the commercial application of chemicals should have to meet a competency based standard or equivalent, such as through an industry accreditation program, and one that is relevant to their industry.

This comment is particularly aimed at commercially operated ground rigs.

From that starting point, the next issue is the position of farmers applying chemicals on their own land.

There is no sensible argument that farmers should not be required to possess the same competency that other applicators are required to have. Farmers are putting out the same chemicals in similar quantities (in fact probably far greater than all other sectors combined) but in some jurisdictions without the education, training or licencing required of aerial applicators.

Ground rig operators should be required to be licenced for the application of any chemicals, regardless of distinction between herbicide or pesticide, especially as the environmental and implications of off-target application by ground rigs are significant, regardless of the chemical being herbicide or pesticide or other chemical.

The fundamental issue is that all current methods of application have the potential to cause chemical drift and other problems if they are configured or used incorrectly.

Aerial applicators are required:

- to have significant training for the issue of a commercial pilots licence;
- to have a further minimum 42 hours of flight training for the issuing of an agricultural rating;
- to be supervised in the field for a further 110 hours

after being granted a Grade II Ag rating which permits operation of less complex aircraft;

- to have a chemical distribution licence issued by the Government;
- to have crop insurance in some States;
- to work for an operator with a CASA issued Aerial Operators Certificate;
- who in turn must have a chemical distribution licence.

In addition, Spraysafe, the aerial application industry accreditation program, specifies a range of minimum infrastructure standards, good practices and pilot and loader/mixer education before accreditation. The program is very well supported by the industry and is recognised in all States, except WA, as an 'equivalent standard' for the issuing of a chemical distribution licence.

Contrast all of the above to a ground rig operation in NSW, where any person with the finances can purchase a ground rig and without licensing be applying exactly the same chemicals as the highly qualified aerial applicator.

Particularly, the lack of education clearly evident through the practices of ground rigs in spraying in surface temperature inversion conditions is a signal that the lack of current government regulation does not encourage or require due diligence to be taken seriously by all ground rig operators.

Apart from the very unlevel playing field this creates in competition terms, it makes an absolute mockery of regulation in terms of controlling the application of chemicals.

This is a central feature of regulation across Australia that must be changed to ensure the public can have confidence that government is displaying due diligence and responsibility to the regulation of chemical distribution.

### **Industry Relevant Training**

28. Training, education and accreditation/licencing should be relevant to the task to be done and within the context of the industry that it will be taking place.

In the aerial application industry, where there is a 15 year history of a recurrent industry education and accreditation program that has been independently mapped as attaining national competency standards, there can be little doubt that there already exists a well developed curriculum, education materials and testing regime to ensure the government's and the public's peace of mind.

Government's should be supporting (both in regulatory and resource terms) industry developed training programs.

### **Recognition of Industry Standards**

There is a very clear case for recognising existing industry standards for the licencing of agricultural pilots and operators.

AAAA initiated the 'Spraysafe' program 15 years ago and in that time it has been accepted by governments as an equivalent standard for the purposes of licencing for chemical distribution.

The program is based on operators complying with a comprehensive range of requirements as outlined in the Spraysafe Pilots and Operators Manual, subjecting themselves to an audit of their operation by people who are independent of their operation (such as agronomists), and employing pilots and loader/mixers who have been through their own training and testing regime as a part of Spraysafe.

The program has recently been reviewed and now features an initial self-audit according to the Spraysafe requirements, followed up by further scrutiny by an audit program that will cover 20% of the accredited operators nationally every year. That means that at least every five years every operator will be audited by a person independent from their business and with an interest in ensuring that the provisions of Spraysafe are being met.

The simple recognition of Spraysafe accreditation as an equivalent standard for the issuing of a chemical distribution licence would free up government resources which could in turn be committed to assisting the industry to further develop its training and education programs.

Competency is the key issue.

Government should have a flexible approach in accepting programs put forward by industry that gives the government confidence that minimum competency standards are being met to fulfill the requirement of the various Acts.

29. All States should recognise Spraysafe accreditation for the purposes of issuing chemical distribution licences.

30. AAAA supports the principle of a national chemical distribution licencing system as long as that system also seeks to licence at least ground rig contractors, and for pilots, is based on the recognition of Spraysafe accreditation as a suitable standard.

### **Operational Issues**

#### **Record Keeping**

31. AAAA supports record keeping by all chemical users in terms of when and where chemicals are applied etc, but believes that any regulation has to take greater account of the farmers' or landholders' responsibilities to ensure they have appropriate records of what chemicals have been put on their land.

For many years the aerial applicator, because of their record keeping, has been used as the de facto policeman in terms of regulating the behaviour of consultants in recommending certain chemical applications at certain times, and in curbing the propensity for farmers to insist that chemicals be applied in poor meteorological conditions.

It is an appropriate time to bring responsibility for record keeping and responsible behaviour home to where it should rest - with the farmer that is growing the crop and reaping the final benefit.

32. Regulation should ensure that records kept by farmers have to be made available during any investigation, including the name of the ground contractor they used and the contractor's contact details.

AAAA members' level of record keeping represents 'best practice' for any ag. chemical applicator in Australia. If all applicators were required to meet the same standards as aerial ag there would be a great improvement in current practices, education, record keeping etc of ground applicators.

### **Prior Notification of Neighbours**

33. AAAA does not support mandatory neighbour notification requirements for each spray other than those that are currently on label for only one chemical - endosulfan.
34. AAAA supports the concept of neighbor notification and AAAA members attempt to encourage this process by farmers wherever possible as part of AAAA commitment to best practice.

A great disadvantage of having to notify all neighbours each time a spray is to be carried out is of course the cost, time and practicality of reaching all neighbours in a timely fashion.

35. Neighbour notification is very clearly the responsibility of the farmer or landholder, rather than the contractor, aerial or ground, that the farmer may use to actually apply the chemical.
36. AAAA supports the APVMA's role in placing any neighbour notification requirements on label, rather than individual States pursuing different neighbour notification regimes. This support is contingent on the APVMA continuing to make case-by-case assessments of the various risks of each individual chemical.

The fact that the aerial applicator has asked the farmer to confirm on a spray order form that all appropriate neighbours have been notified should be proof of due diligence by the applicator - in other words, regulation should ensure that it is not the applicator's responsibility to do the farmer's job for them or to police their compliance with any neighbour notification requirements.

In many cases, notification of all neighbours is not relevant as many will be upwind from spraying operations and therefore not affected in any way.

37. In no way should the concept of *notification* be taken to mean the need to gain *permission* from neighbours to spray.

### **Spraying Near Towns and Notification**

In some cases, such as where spraying takes place close to towns, further work may be required to develop a notification process that meets the principle of neighbour notification without ridiculous costs. In these cases, such a process as pre-season advertising of a spray season and the establishment of a clear spray management program for those fields close to towns could be developed.

If, for example, the clearly stated spray management program for those fields was that spraying was to take place only when the wind was blowing away from town, then there should be no need for widespread notification of townspeople who would be upwind from any application.

### **Awareness and Buffer Zones**

38. AAAA fully supports the concept of awareness zones, as there is such a high degree of variability in spraying conditions, chemicals used, rates etc that awareness is the key issue, rather than some arbitrary buffer zone.

The introduction of awareness zones is already an accepted part of many cotton operations and certainly aerial applicators' best practice programs.

39. The development of spray management plans for each farm is fully supported by AAAA and is a key management tool for many aerial applicators, but again the responsibility must be brought home to farmers to undertake this planning, in cooperation with their applicator.

A difficulty is likely to be poor acceptance of this concept (e.g. in broadacre farming) where there is not as strong an industry organisation as there is in cotton (for example) to lead farmers through the process and to devote sufficient staff and resource to ensure the success of a such a program.

40. Government should promote the adoption of spray planning as an integral part of farm planning by supporting, financially and with staff resources, an education program to be delivered by industry and farming associations.

Buffer zones are by their nature a variable management tool that will change with all the variables normally encountered in a spray operation, including wind speed, direction, surrounding hazards/susceptibles, vegetation cover etc.

41. AAAA fully supports the use of appropriate buffer zones as another tool in managing spray operations, but believes that a better result will be

achieved by leaving such decisions up to operators, albeit promoting the concept and their use through education, accreditation and other industry based programs. This is relevant both from the farm planning and aerial application perspectives.

42. Buffer zones should not be mandated through legislation or regulation. However, if they are to be introduced, it should be on the chemical label by the APVMA so as to ensure a nationally consistent approach to chemical use.
43. Any buffer zones put on labels by the APVMA should be established by the application of proven scientific principles backed up by relevant modelling and field trials and should include considerable direct consultation with industry, including AAAA, by the APVMA.

### **Third Party Access to Spray Fields**

44. Farmers should be responsible for ensuring that only essential personnel are allowed near fields when spraying operations are underway.
45. Third parties should not be allowed to enter farm fields without first informing the farmer of their intentions, and the farmer in turn advising the aerial applicator.
46. State regulators should ensure responsibility and liability rests with farmers for ensuring the security and vacancy of the field and vicinity during spray operations.

### **Powerlines**

47. Electricity network owners and operators should not be able to refuse the aerial agricultural industry permission to operate around powerlines, including flying under them where appropriate, as this is often the safer option.
48. Electricity network owners and operators should be required by legislation to consult with landholders and aerial operators when proposing to construct a new powerline in farming areas, and to pay compensation to the farmer where this results in increased costs of aerial application as a result of forcing changes to flight paths.
49. If unable to put powerlines underground, electricity network owners and operators should be required to mark powerlines to ensure they can be easily seen.

## **Other Industry Issues**

### **Managing residues**

The key responsibility for managing residue issues lies with the appropriate commodity industry organisation, in cooperation with government.

50. As long as the aerial applicator has carried out their applications according to the label directions, they should not incur any liability from second or third parties or others.

The example of the way that the cotton industry responded to the residues found in beef of endosulfan is a good example of how industry can respond responsibly, positively and with little government interference.

However, in industries that have a less coordinated structure, this result may not have been possible.

The best approach is to take issues on a case-by-case basis that enables appropriate flexibility to develop suitable protocols as each industry affected will have different capabilities and response mechanisms.

It is clear from the endosulfan experience that considerable changes to on-the-ground practices can be made over a relatively short period of time if the industry concerned and associated industries (such as aerial agriculture) are given sufficient government support, including resources where necessary, to encourage and help make changes.

The cooperative/educational approach that emphasises a partnership between government and the concerned industry is much more likely to produce a positive, long lasting impact than a government regulation or policing role alone.

AAAA believes that government has a role to play in assisting industries to manage their own problems, rather than taking over the total management of an issue itself.

A significant part of this could be in facilitating meetings/taskforces of the various stakeholders involved, especially in terms of managing and resolving often fast moving issues. In particular, government involvement in convening taskforces that would meet and develop protocols for action should a residue issue emerge would be appropriate, with much of the on the ground action being undertaken by industry organisations. However, this would depend on the capabilities of the particular industry involved.

Industry codes of practice should be more involved with avoiding residue situations than managing them.

51. Government should play a significant role in helping to resource industry associations so that they can undertake the type of ongoing education, best practice and accreditation programs that serve to continually improve the performance of members of that industry.

This could be through a program of specific grants aimed at particular industries and issues, or it could be through a support program such as that for voluntary environmental organisations that helps them to build capacities and which would help industry associations to deliver real improvements.

A partnership approach between government and industry is most desirable.

Disadvantages of government standing alone on these issues include the fact that government does not pos-

sess the grass roots contacts within industry to communicate important messages; government processes are not as time sensitive as industry reactions; and there is often not the expertise within government, particularly on technical issues.

### **Complaints of Crop or Stock Damage**

52. AAAA believes that government should restrict its consideration of drift incidences to occasions where public health or environmental considerations are evident, or where there is an ongoing record of drift complaints relating to a particular operator that may affect licencing of that operator.

Complaints regarding damage to crops or animals, or simply complaints regarding alleged spray drift, need to be handled quickly, transparently and fairly.

Importantly, any government agency involved needs to have a mechanism to ensure that vexatious claims or mischievous claims, especially made by those people who have been shown to have previously made such claims, do not clog up the system and detract from the resources available to investigate genuine problems.

53. Appropriate government agencies should have the power *not* to investigate drift claims should the agency determine that a person's history of vexatious claims raises significant doubts as to their motives.

While a fee-for service approach for the investigation of drift incidences may provide a disincentive for vexatious claims, it raises the question of who would pay the fee, and whether it should vary according to the complexity of the investigation/tests required etc.

54. AAAA does not support government charging a fee for drift investigations.

A simple approach would be for government to adopt a phased process:

- i) an initial government investigation is carried out to determine if a breach of any legislation has occurred (local DPI/Dept Ag/EPA officer).
- ii) if there are only commercial damage issues, that should be left to the parties concerned to resolve through negotiation or through the courts. This would remove the 'double jeopardy' of both civil and government actions.
- iii) if there appears to have been a breach of government regulation (such as on environmental grounds), the government could then upgrade its investigation.

On balance, AAAA believes that government has a duty to undertake at least the initial investigation of alleged drift events.

### **Community Consultation**

AAAA experience is that genuine community concerns can best be addressed in a cooperative manner at the local level.

Many aerial operators play an important role in establishing community consultation committees where concerned people are given information about the processes that are gone through before a spray takes place. In most cases, information and cooperation are sufficient to alleviate any community concerns.

However, in some cases, it must be recognised that there are some members of the public for whom no spraying at all is the ultimate goal. This is particularly the case with environmental organisations who generally are not interested in playing a constructive role in managing spray issues, but rather are involved in an ideological attack upon the use of chemicals in farming.

It is important that any regulation recognise the right of farmers and aerial and other applicators to go about what is a legal operation and to do so with the support of the government.

55. AAAA supports involving the local community in consultation on spray issues but AAAA does not agree with any proposal to give consultative committees any standing under legislation.

Government should encourage and support voluntary community consultative committees whose principal task is to improve information flow in both directions and to provide both a forum and a mechanism for problems or issues to be worked out at the local level in a cooperative manner.

AAAA members have been instrumental in establishing a significant number of such successful community consultative committees, and giving such committees official standing under regulation and making the appointments to that committee the role of government would completely undermine the good work that has already been put in place and which is functioning well.

### **FURTHER INFORMATION**

If you would like more information on the vital and responsible role the aerial agricultural industry plays:

[www.aerialag.com.au](http://www.aerialag.com.au)

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