

ATTN: Nillumbik Shire Council

Via participate.nillumbik.vic.gov.au/local-laws

14 July 2021

RE: Nillumbik Shire Local Law Proposals

The Victorian Farmers Federation (VFF) appreciates the opportunity to provide comment on the proposals for the Nillumbik Shire Local Law review. The VFF is Victoria's peak farming body and has been the voice of Victorian farmers and rural communities since 1979. Recognising that agriculture is an intrinsic part of Nillumbik's history, economy, identity and its present day community life we are deeply concerned by the proposals to ban both barbed wire and glyphosate.

The VFF strongly opposes the proposals and is calling for both proposals to be rejected.

Proposal 1: Use of Barbed Wire

Consider a provision prohibiting the use of barbed wire as fencing in the municipality. Council could regulate, but could not be made retrospective i.e. this would only apply to new fences constructed, which adds to the complexity of enforcing this provision.

The VFF does not support the proposal of prohibiting the use of barbed wire as fencing within the municipality. The assertion by council that barbed wire poses a greater animal welfare risk than alternative, such as electric fences, ringlock and plain wire fences is incorrect. Different animals, both livestock and wildlife, have different risk profiles related to different fencing technologies. Farmers should be able to choose their fencing technology to ensure public safety and protect animal welfare dependent on their farming system and local fauna.

Farmers use barbed wire to prevent stock, namely cattle and sheep, from escaping through perimeter fences. Barbed wire fencing is the most cost effective and reliable tool for livestock producers in ensuring that their livestock are appropriately contained within their property, protecting public safety. Uncontained stock pose a public safety risk, particularly when on roads. In addition, barbed wire is a cost effective tool in protecting fences from livestock damage by preventing them from leaning and scratching on the wire and posts.

An alternative to barbed wire, electric fencing, is less reliable, more expensive and does not provide improved animal welfare outcomes. Animals may entangle themselves in electric fencing and electric fencing is reliant on mains power or solar powered batteries to ensure that the fence remains operational. If this power source is lost, for example in severe weather events, animals may escape, putting the public at risk. Other alternatives, such as ringlock and deer fencing may pose greater risks to wildlife attempting to pass through the fence.

The VFF is also concerned as to the regulatory impact and cost burden on residents of the municipality with the enforcement of this proposal. This proposal would result in costs being unnecessarily inflicted onto residents during the process of fence construction if an application and

approval system was put in place. It would also cause confusion as to what materials would be allowed for the maintenance and/or renovation of existing fence lines. Overall the risk associated with the proposal to ban barbed wire are greater than the risks associated with the use of barbed wire with no proven positive animal welfare outcomes.

The VFF encourages landholders with fencing along wildlife corridors to consider the use of fencing markers and to be cognisant of local fauna when choosing a fencing technology.

Proposal 2: Use of Glyphosate

Consider a restriction on the use of glyphosate and other harmful chemicals and/or prohibit the sale of glyphosates within the municipality

The VFF strongly opposes any restrictions to the sale or use of agvet chemicals by a municipal body and questions whether Nillumbik has the regulatory authority to do so.

The Commonwealth Government agency, the Australian Pesticides and Veterinary Medicines Authority (APVMA) regulates the supply and sale of agricultural and veterinary chemicals nationally.

Australia has an independent and rigorous science-based regulation process undertaken by the APVMA designed to assess agricultural and veterinary chemical products and their risks. APVMA considers the impact on human health and worker safety – including long and short term exposure to users, as well as environmental and animal health risks.

APVMA found the following when reviewing the 2015 International Agency for Research on Cancer (IARC) report cited by Nillumbik Shire;

“The APVMA conducted a weight-of-evidence evaluation that included a commissioned review of the IARC monograph by the Department of Health, and risk assessments undertaken by expert international bodies and regulatory agencies.

The review commissioned by the Department of Health was conducted in two phases. The first phase ([Tier 1](#)) identified which studies relied on by IARC should be reviewed in more detail, while the second phase ([Tier 2](#)) involved a detailed assessment of those studies.

The APVMA has concluded that glyphosate does not pose a carcinogenic risk to humans and that there are no grounds to place it under formal reconsideration. You can read the full assessment in the proposed [regulatory position report](#) on our website

*The current assessment by the APVMA is that products containing glyphosate are safe to use according to the label instructions.” - **The Australian Pesticides and Veterinary Medicines Authority***

It is concerning that the Nillumbik Shire has cited the IARC report in isolation, without proper representation of this rigorous APVMA review.



In addition to this national framework, the State Government is responsible for regulating the use and some aspects of the supply agricultural chemicals in Victoria. There are a range of controls under Victorian legislation that define how agricultural and veterinary chemicals may be supplied and used which are designed to protect the health and welfare of animals, chemical users, the general public and the environment.

It is also important to note that restricting access to glyphosate will extend beyond the agricultural industry, as glyphosate is also an important and popular tool for gardeners and home owners in the control of pest weeds. This use is also approved by the APVMA. Restricting access to glyphosate risks incentivising the use of more potent and dangerous chemicals.

The VFF appreciates the opportunity to provide our feedback in regards to the Nillumbik Shire Local Law proposals and look forward to continuing to provide feedback throughout the remaining review process.

Should you wish to discuss our submission further, please contact Luke Hooke, Stakeholder, Policy and Advocacy Manager on 0428 288 909 or via lhooke@vff.org.au.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'Emma Germano', written over a light blue horizontal line.

Emma Germano
President
Victorian Farmers Federation