



21 October 2026

Committee Secretary
Rural and Regional Affairs and Transport References Committee
PO Box 6100
Parliament House
Canberra ACT 2600

Via Email: rrat@aph.gov.au

Submission to the Senate Standing Committees on Rural and Regional Affairs and Transport:

Inquiry into the Continued Use and Regulation of Paraquat

To whom it may concern

1. Introduction and Executive Summary

This submission is presented on behalf of the Australian grain industry by the National Working Party on Grain Protection (NWPGP) and Grain Trade Australia (GTA).

The NWPGP is the premier industry body responsible for providing management and leadership across the entire grain supply chain in the areas of post-harvest storage, chemical use, market requirements, and chemical regulations. The NWPGP is facilitated by GTA, and the current Chair's activities are funded by Grains Australia Limited.

GTA is the national association representing Australia's commercial grain industry, with a leading role across the post-farm-gate supply chain. Its core purpose is to facilitate and promote efficient, transparent and competitive grain trade, domestically and internationally. GTA provides industry standards, trade rules, commercial frameworks, dispute resolution and supply-chain assurance, alongside advocacy, international engagement and industry-led stewardship.

Our industry and this submission cover the handling, storage and trading of cereal grains (except rice), pulses, and oilseeds (except poppies) for both domestic and international markets. The NWPGP previously submitted a detailed technical response to the Australian Pesticides and Veterinary Medicines Authority (APVMA) in October 2024 regarding its paraquat/diquat (paraquat) reconsideration notice.

The NWPGP and GTA strongly advocates that the regulation of agricultural chemicals in Australia must remain strictly **evidence-based, predictable, and independent**. We emphasize the APVMA must be supported as an independent, scientific regulator whose decisions are insulated from political or non-scientific interference. This independence is vital to preserving public safety, grower productivity, and the prized reputation of Australian grain across more than 50 international export markets.

2. Response to the Terms of Reference

(a) The scientific evidence considered by the APVMA in reaching its decision

The grain industry firmly supports a regulatory framework where decisions are dictated solely by robust scientific data.

In its evaluation and as outlined in the published Technical Report, the APVMA carefully reviewed all relevant data as required by its legislation. That information determined the changes to 'use patterns', Maximum Residue Limits (MRLs) and other aspects as outlined in that Technical Report. The NWPGP and GTA supports these scientific data-driven changes because they provide a verifiable, objective standard that supports human safety, the environment and market access when using paraquat.

(b) The adequacy, transparency and independence of the APVMA's decision-making process

The APVMA's decision-making framework is highly structured, providing transparent opportunities for public and industry consultation under section 34AB of the Agvet Chemical Code. The NWPGP and GTA stress the independence of this process is fundamental to the activities of the APVMA.

Chemical registration, restrictions on use, or label changes must be decided entirely by the APVMA's technical experts using sound risk-assessment methodologies. The potential introduction of political pressures or non-scientific criteria into the assessment process compromises the integrity of the regulator and harms the credibility of Australia's agricultural commodities abroad.

(c) The current evidence regarding any association between paraquat exposure and Parkinson's disease and other neurological conditions

The grain industry respects public interest regarding potential long-term health hazards, including neurological conditions when using all chemicals, including paraquat. However, we maintain that evaluating complex data such as epidemiological and toxicological data is strictly the domain of professional scientists within an independent regulatory body.

Under the relevant legislation, the APVMA employs rigorous weight-of-evidence methodologies to assess chemical safety. It is the role of the APVMA, and not political bodies, to review and recommend changes to chemical use patterns or to modify label directions if an unacceptable risk to human health is scientifically proven.

The grain industry has no expertise in that regard and relies on the APVMA to adequately undertake that task and determine a suitably robust scientifically driven outcome.

(d) The implications of the decision for farmers, agricultural workers, rural and regional communities, golfers and others who may be exposed to paraquat

Paraquat and diquat are vital agronomic tools utilized at various crop growth stages including pre-emergent/pre-sowing applications and pre-harvest desiccation of various crops.

- **Grain Quality & Trading Standards:** Access to these chemicals at effective rates allows growers to meet strict industry Trading Standards for grain quality parameters and levels of various contaminants such as weed seeds. For instance, crop desiccation ensures even crop maturation, thereby minimizing the risk of the presence of defects such as green kernels in some pulse commodities.
- **Weed and Quarantine Control:** Crop topping limits the seed-set of various hard to control weeds. This is critical for meeting strict quarantine limits for weed seed contaminants in several international markets.
- **Industry Concerns:** The NWPGP and GTA note that while label changes are supported for trade compliance, it is understood that reduced chemical access or reduced application rates

may impair treatment efficacy, potentially compromising grain quality, weed management and crop yields.

- **Safety:** Clear, science-backed labels protect workers using chemicals through enforceable label directions including withholding periods and specific application/usage instructions.

(e) The extent to which Australia's regulatory framework appropriately responds to emerging scientific evidence and uncertainty regarding the long-term health impacts of agricultural chemicals

While not obligated to conduct routine periodic reviews, Australia's existing Agvet Chemical Code contains mechanism tools, such as formal chemical reconsiderations, that allow the APVMA to systematically re-evaluate existing chemical registrations when new, validated scientific evidence emerges. This ensures the framework is highly responsive to long-term health or environmental changes without reacting prematurely to unverified claims. This assists to preserve the integrity of the decision-making criteria used by the APVMA on previously registered chemicals.

(f) International approaches to the regulation of paraquat and other agricultural chemicals with potential long-term health impacts

Global trading partners maintain very different chemical regulations and MRLs for many chemicals and commodities. This includes paraquat. Grains from Australia are exported to over 50 international markets, many of which maintain MRLs lower than Australia's, or default to a zero-tolerance policy where the Codex Committee on Pesticide Residues MRL vary or have been revoked or do not exist.

The Australian grain industry effectively manages these various market MRLs through sophisticated supply chain management systems including:

- **Stewardship & Education:** Quality programs like the Grain Producers Australia On-Farm Stewardship Guide and the Australian Grain Industry Code of Practice produced on behalf of industry by GTA educate growers and the post farmgate managers of grain on legal label and market MRL compliance.
- **Traceability & Segregation:** Utilizing Commodity Vendor Declarations (CVDs) to track chemical applications and segregate grain parcels matching specific market requirements.
- **Sampling and Testing Programs:** Conducting strategic sampling and testing at delivery, blending stocks, stock selection prior to outturn and participating in the National Residue Survey to verify consignment compliance.

Because industry possesses robust mechanisms to manage international trade risks, Australia does not need to adopt various international practices such as duplicating international bans on specific chemicals. Instead, it should confidently maintain its own independent, localized scientific benchmarks based on independent scientific assessment of use of these chemicals under Australian conditions.

(g) Whether any changes to Australia's regulatory framework are required to ensure public confidence in the assessment of agricultural chemicals

Public and market confidence is best preserved by reinforcing, rather than overhauling, the APVMA's scientific autonomy and processes. The public and grain industry must be reassured that chemical safety thresholds are set free from commercial or political influence.

Additionally, to preserve supply chain integrity when the APVMA reduces an MRL based on contemporary data clear advance notice and practical transition periods should address both existing treated grain and chemical inventories held by suppliers and growers. Where consistent with the APVMA's risk assessment, arrangements should permit lawful stock run-down or provide for return and safe disposal, minimising avoidable waste and financial loss without compromising health, safety or environmental protection.

The Chair of NWPGP has been actively involved in the annual meeting of the Codex Committee on Pesticide Residues (CCPR) for many years and has seen firsthand the lead that the APVMA takes in leading the Australian delegation. Additionally, the Chair of the CCPR and many delegate country members regularly seek APVMA views on many topics raised during and post the annual CCPR meeting. This engagement is sought because of the integrity and robust reputation of not only APVMA attendees but the regulations underlying the APVMA processes for regulating chemicals in Australia.

3. Conclusion

The NWPGP and GTA reiterate that the APVMA must remain a strictly independent, science-focused authority. Decisions concerning the restriction or retention of crucial tools like paraquat must be insulated from political intervention and rely solely on qualified, technical risk assessments.

We thank the Committee for considering the views of the Australian grain industry in this submission.

Should you have any questions on this submission please do not hesitate to contact the undersigned.

Regards

 Gerard McMullen Chair National Working Party on Grain Protection Address : 76 Bruce Street, Coburg VIC 3058, Australia Mobile: +61 419 156 065 E: gerard@mcmullengrainagricultural.com www.graintrade.org.au/nwpgp	 Pat O'Shannassy CEO – Grain Trade Australia
--	---

NWPGP - Produced through Grains Australia Limited funding of this activity

