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As a concerned member of the Australian Agrochemical industry I have read the TMRO report and would like to point out an issue where the TMRO has possibly been misled:

- Refering to the TMRO report points 15:

"the applicant submitted that this process would simply require the 62 per cent IPA salt, a surfactant (which the applicant submitted was readily available for purchase in agricultural stores) and water to be blended and agitated, but that no specialist equipment or expertise was required. The applicant said that this mixing (which was frequently done now by glyphosate users) was no more complicated than the addition of water to powdered or dry glyphosate which had been accepted by Customs as being included in the goods under consideration and which, in its dry form, was equally incapable of performing the function of fully formulated glyphosate."

- This is certainly an exaggerated and misleading argument designed to support the applicants claim. 62% IPA salt is manufactured in a relatively hazardous and polluting process called amination. NuFarm and all other IPA salt formulations are then formulated from this raw material (62% Glyphsate-IPA salt). This is then blended by a recipe that is approved by the APVMA (Australian Pesticides and Veterinary Medicines Authority). Any end-user purchase and formulation of 62% IPA into final product would be illegal, unless the end user was listed as a "formulation site" on the APVMA application. This is highly unlikely.
- Typically lower 360g/L formulations are mixed with environmentally friendly surfactants, and 450g/L with tallow amine ethoxylates (TAE). Since 450g/L is the bulk of the market, I will discuss this further. TAE's used in glyphosate formulation are not readily available for retail sale and would not be easily accessible to an end user. There are many different suppliers and specifications for TAE's. Knowledge of this is necessary to get the performance required.
- There are 4 APVMA registered TAE surfactant formulations designed for boosting existing Glyphosate liquid formulations, and 3 TAE/Alcohol Ethoxylate formulations registered for use with high load granular formulations. Use of these products to formulate from 62% IPA would be outside of their APVMA approved use.
- In the blending of the 62% IPA, surfactant, dye and water, variations exist due to variability in the raw materials that can only be accounted for by skilled adjustments on a per batch basis. MIPA must be used to adjust the pH of the formulated product. MIPA is a particularly hazardous material and requires skill and expertise in its safe use.
- Prior to release various quality parameters are assessed by equipment that would not be available or worthwhile for an end user to invest in (approx. $150 000). End users would also not have the skill or expertise to assess the final product, know what the results mean, and adjust the batch accordingly.
- The claim that this is frequently done by glyphosate users would require substantiation.
- If this were occurring, the applicant has recourse via the APVMA compliance section, and Avcare via their sanction rights backed by the ACCC.

It is a ridiculous affirmation that 62% Glyphosate-IPA can be likened to a fully formulated product.

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