BEST MANAGEMENT PRACTICES.
Why it must Work

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Why Best Management Practices?

In recent times there has been general recognition that broad based legislation, while it must remain the cornerstone of community standards, does not fully address the needs of the community for better environmental performance. Laws can only enforce to a standard, they do not encourage performance greater than the standard. This has led to various sectors of the community putting in place Quality Assurance or Best management or Codes of Practice programs for the dual purpose of encouraging members of their sector to improve their performance above the law to a common benchmark for internal reasons and to provide a vehicle to demonstrate to other sectors of the community that they are responsive to, and share, the general increased awareness and concern with respect to environmental performance.

The diverse nature of agriculture has necessitated commodity groups to implement codes of practice specific to that commodity to address aspects of performance that are critical to that community. Some programs are market driven such as FleeceCare or CattleCare and some are issue driven . The spur for the cotton industry BMP was undoubtedly issue driven.

The Best Management Practices Program for the cotton industry had its origins in the Environmental Audit conducted in 1990. From the auditors recommendations flowed support for the monitoring program of the northwest river system. The presence of pesticide residues engendered the joint research program on determining the transport mechanisms into the river systems and remedial management action .

The BMP program is the outcome of both those research endeavours welded with established practices that have been determined by the industry. The modules at present relate to the primary issue of management of pesticide issues by means of risk assessment against the benchmarks however the program will grow including other areas such as occupational health and safety and soil and water management and will build into a whole of industry assessment tool.

The monitoring of the river systems showed that while there were only small residues resulting from use on cotton in the river systems they were unacceptable in terms of environmental standards. There were two courses of action . Do nothing, which would have resulted in regulatory action including the removal of use of the chemicals implicated or the activities associated with the use of chemicals or conducted the necessary research in the hope that by management the industry could continue to use these essential tools yet not have the impact on the riverine systems.

This is an instance of the critical nature of the BMP program for the cotton industry. At this point in time the industry is dependant on continued access to pesticides and the methods of application. The present module on pesticide use is an essential component of giving some measure of assurance to the regulatory authorities that the industry recognises its responsibility in managing its impact on the environment. This is not a goodwill issue; the authorities are charged with the maintenace and enhancement of the environment, they cannot condone known adverse impacts. Arguments of economic worth of an industry or what the loss of a chemical or an application technique cannot be taken into their consideration. There is no doubt that in the Existing Review of endosulfan, the loss of which to the industry has been costed at over $60 million per annum in direct costs and unknown damage to the Resistance Management Strategy, the fact that the BMP program was being implemented into the industry counted heavily in favour in retaining the use of the chemical pending further studies .

The Review of endosulfan raises another issue that is critical in Best Management. Regulatory authorities are not experts in the production of cotton , they are experts in the legislation they administer. Any prescribed controls by way of regulation may well be impractical. By virtue of putting argument of an industry based management plan , the regulatory authorities can assess whether the practical controls proposed by industry also meet the regulatory goals which they have to achieve . In short , BMP allows the industry to have some control of its destiny. Again with reference to the Review of endosulfan proposed label statements will state that the chemical must be applied in accordance with the industry's BMP program. That simple statement , referencing the whole of the risk assessment process contained within the manual , is far more powerful than if the label contained direct statements as to use of the chemical.

Role of BMP in Changing Community Attitudes.

There is no denying that the primary issue that attracts the most criticism from the general community in Australia is the necessary use of pesticides for the production of the crop. While the rate per hectare has dropped significantly there is still the perception, exploited by anti industry groups, that the practices of the past of high numbers of sprays and uncontrolled application ,is synominus with the cotton industry. In fact, with the rising concerns relating to pesticides and their residues in general , the pressures by the community for more stringent controls on the use and application of pesticides has increased.

The Helix contamination of cattle and the subsequent finding of endosulfan residues has also played a part in reinforcing the "pesticide" mentality with respect to cotton.

Entrenched attitudes are difficult to change especially when there are incidents each season that are widely reported. No amount of public relations or "good news" stories will shift those attitudes. This conditioning also means that the messages given by those against the industry are accepted by the community.

The only way to change attitudes is by demonstration . BMP is the ideal vehicle for this. BMP allows for the industry to narrow the normal spread that occurs in any group, in that by achieving benchmarks catering to the high achievers yet moving the poorer performers towards acceptable levels of performance. Once the industry moves towards a common standard of acceptable performance the weak links are removed and the focussed approach of the industry ,and the selling of that approach can be done without fear. The cotton industry has a distinct advantage in this respect because of the progressive nature of the industry the percentage is strongly biased towards the upper end of performance and therefore the goals that the industry has set for adoption of BMP are achievable in the short term. Once those goals are achieved the industry can, with confidence, take a more proactive stance in determining its destiny.

BMP is the only tool that will allow the industry to gain acceptance in the wider community. The community has to see something tangible, clearly demonstrable, they will not be swayed by empty assurances of increased environmental performance. If this is done there will not be a shift in perceptions but a distinct change which may allow the community to accept an infrequent accident as simply that, an accident and not the general performance of the industry.

Critical Issues in BMP.

Obviously the most critical issue in the whole BMP program is adoption, ownership and implementation by growers. It is essential that each and every individual , at grower , employee or service industry accept that BMP concepts must be practised at all levels of operation that the industry can attain the focus necessary to allow the scrutiny that any such program must endure to earn the credibility of the wider community.

BMP is not a regulatory program of directed compliance . People must want to do it and for that to occur they must accept the "culture " of the practices. While in essence , the manual is a formalisation of the risk assessment process that all carry out , BMP introduces a new dimension in the risk assessment. For adoption to occur across the industry the program must not only appeal to the progressive portion of the cotton industry but also to those who are normally reluctant to change. The question is how to reach those who do not attend industry meetings, who do not make themselves aware of external issues , who are bounded by "the farm gate ", and who believe that their individual actions may not impact on the industry as a whole. It is not that they are necessarily poor growers, many would score highly on the risk assessment process, but they must accept the culture that is Best Management in terms of the industry and overcome the "inertia" that is common amongst this group.

A critical issue in terms of BMP or any other program that the industry has installed is the question of robustness. Some programs in the past have been adopted by growers when the times are good only to be discarded when things get tough. This program cannot suffer that fate.

The BMP program must also be sound in that the risk assessment and recommended practices must stand scrutiny from within the industry i.e. they must be practical, and from critics of the industry. It is essential that the manual be a "living" instrument capable of addressing particular situations. A key element in achieving this is input from growers to modify the generic guidelines to fine tune them to the particular situation in their region without losing any of the strength of the manual.

As part of the "soundness" of the program it is also essential that it achieves a wider credibility to those outside the industry. It must have in place a system capable of being refereed by virtue of an auditing/ validation mechanism. While the intracacies of the recommendations may be beyond the community to understand the auditing validation will be . Again this should not be seen as a pseudo regulatory measure but a performance indicator to both the industry and the community.

Threats and Opportunities of the Program.

Obviously the biggest threat to the program and the industry is if the program fails to permeate through the entire industry. It will be deemed a failure if there is a core group who do not take the opportunity to join and move with the industry. If this occurs the result will be divisive and weaken the inherent strength that the industry already possesses. It will inhibit the ability to "sell" or give undertakings to government that the industry will move to greater responsibility as a united group.

On the reverse another threat is complacency. As BMP is tapping into the culture change that has already occurred with the majority of growers and reflecting practices they have already installed . While it is unlikely such growers would look at the program and suddenly stop the innovations they are carrying out , the industry has to provide sufficient incentive for these growers to set the new benchmarks and to provide examples to those that follow.

While complacency is a minor threat the fact that the "culture" of BMP is already present in the majority of farms means that the cotton industry, more so than any other group attempting to go down this path, has a greater opportunity to rapidly encourage adoption and implementation across the entire industry. The comparatively small number of growers, the extensive communication pathways, the level of progressive attitudes are all conducive to obtaining the industry goal of total adoption by 2001. This brings the industry to the fore in the general push for BMP programs in commodity groups and gives a premier position to the industry in terms of negotiating with government and by cooperation with others, attempting to progress their Codes, break down some of the barriers between the cotton industry and the traditional endeavours.

Depending on how the industry handles the issue , recognition by the authorities of the BMP program can be seen as a threat or an opportunity. While referencing in legislation may confer a credibility to the program the industry must ensure that it does not also confer a de facto regulatory status. Obviously if there was an issue, proof that the grower was implementing BMP would be a mitigating circumstance, however abstraction of phrasing or parts of the program out of context could pervert the thrust of the guidelines.

Accreditation and Sanction Controls.

There is considerable debate within in the industry whether there should be a "carrot and stick" approach to the BMP program and if so what form should it take. What incentives should be given to encourage rapid adoption of the program and what benefits should accrue? What penalties should be imposed on those who choose not to join the program?

The issue is yet to be resolved. Some believe that if the preponderance of the industry has adopted BMP the poorer performers by peer pressure will have to comply. Others would argue that this is not enough and that some form of restriction should be imposed.

One can only observe existing accreditation programs. One long standing program has lost considerable credibility in both the community and government arenas as it has no capacity to address non compliance with the scheme. While the adoption rate is high commercial pressures have seen members go against the very principles of the scheme.

Another scheme, which has the ability to apply a "restraint of trade " provision has been highly successful in not only policing the program but generating a self regulatory industry stance amongst its members. Restraint of trade provisions must have authorisation from the authorities and entail a complex infrastructure of appeals mechanisms. Is it necessary for the cotton industry given the culture change has already occurred ?

Conclusion.

Best Management Practices must and will work as it is the pathway that many have already followed. They have given the guidance to the rest of the industry that it is the only clear road to harnessing the strengths of the industry and demonstrating to the wider community that the industry is being a better environmental citizen.