



Australian Government
**Australian Pesticides and
Veterinary Medicines Authority**



**Public Release Summary on the evaluation of the active
constituent aclonifen in the product Mateno Complete
Herbicide**

Submissions received

April 2023



GPA

Grain Producers Australia

SUBMISSION

**Public Release Summary on the evaluation of the active constituent aclonifen
in the product Mateno Complete Herbicide APVMA product number 89959**

PO Box 370
Braidwood NSW 2662

22 December 2021

Executive Director, Risk Assessment Capability
Australian Pesticides and Veterinary Medicines Authority
GPO Box 3262
Sydney NSW 2001

Re: Public Release Summary on the evaluation of the active constituent aclonifen in the product Mateno Complete Herbicide APVMA product number 89959

Thank you for the opportunity for Grain Producers Australia (GPA) to provide a response to the **Public Release Summary on the evaluation of the active constituent aclonifen in the product Mateno Complete Herbicide APVMA product number 89959.**¹

Background

There is a strategic need for new herbicides of a different mode of action as part of an Australian resistance management and weed control strategy. Australian growers urgently require access to new herbicide control technologies in order to maintain crop production.

The total cost of weeds (revenue loss plus expenditure) to Australian grain growers is estimated at \$3,318 million, with weeds costing Australian grain growers \$146/ha. The cost of expenditure and losses, as well as resulting yield loss with weed competition amounts to 2.76 million tonnes of grain per annum on average. In expenditure and losses and resulting yield losses due to weeds amounting to 2.76 million tonnes of grain on average per annum.² Herbicide resistance is estimated to cost \$187 million in additional herbicide treatment costs plus the costs of using additional integrated weed management practices. The introduction of a new Group 32 herbicide mode of action (Inhibition of solanesyl diphosphate synthase) with a wide crop tolerance will deliver significant benefits to producers in terms of both productivity and strategic herbicide resistance management of weeds.

GPA supports the establishment of a label for the product Bayer CropScience Mateno Complete Herbicide for use on wheat (not durum wheat) and barley as tabled by the APVMA.

GPA has reviewed the APVMA **Public Release Summary on the product Bayer CropScience Mateno Complete Herbicide for use on wheat and barley.**

GPA notes the finite residues from trials and supports the APVMA in establishing an aclonifen MRL at the limit of quantification (LOQ) of *0.01 mg/kg on GC 0654 wheat and GC 0640 Barley. GPA notes and supports the APVMA in establishing an MRL of 0.3 mg/kg for aclonifen on AS 0081 straw and fodder (dry) of cereal grains to cover residues in wheat and barley, and an MRL of 1 mg/kg for aclonifen on Barley forage. GPA notes that residues of aclonifen are unlikely to occur in crops grown after wheat or barley treated as proposed.

GPA notes that no changes are required to the current MRLs for diflufenican in wheat or barley grain to cover the proposed use. GPA supports the proposed APVMA MRL of 0.5 mg/kg for diflufenican on AS 0654 wheat straw and fodder, dry to cover the proposed use on wheat and notes that no changes are required to the current barley MRL of 0.2 mg/kg for diflufenican on AS 0081 Straw and fodder (dry) of cereal grains. GPA notes and supports the APVMA recommendation for an MRL of 2 mg/kg for diflufenican on Wheat forage and an MRL of 0.5 mg/kg for diflufenican on Barley forage to cover the proposed use.

GPA notes that import tolerances for residues arising from the use of aclonifen have not been established with Codex or in most export markets except the EU. However, as detectable residues are not expected to occur in wheat or barley grain from the proposed uses, GPA considers there is very low risk to trade. GPA notes that detectable residues of pyroxasulfone and diflufenican are not expected to occur in wheat or barley grain resulting from the proposed uses.

GPA notes that the active constituent aclonifen is currently approved for use in several registered products for weed control in many countries within the European Union, plus Algeria, Morocco, Turkey, Chile, Uruguay and India. It is critically important that Australian producers have access to

¹ <https://apvma.gov.au/node/94451>

² https://grdc.com.au/__data/assets/pdf_file/0027/75843/grdc_weeds_review_r8.pdf.pdf

weed control technologies that other major export trade competitors have access to remain globally competitive.

As with a number of other existing grain commodities, any potential trade issues for grain markets can be adequately managed by industry through CVD or vendor declarations at delivery and segregation at receival sites.

If you would like to discuss any of these comments and suggestions further in detail, please contact me on email colin.bettles@grainproducers.com.au or mobile 0439 901 970.

Yours sincerely

Colin Bettles

A handwritten signature in black ink, appearing to read 'Colin Bettles', with a stylized, cursive script.

Chief Executive
Grain Producers Australia
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e: colin.bettles@grainproducers.com.au

Background on GPA

Grain Producers Australia (GPA) represents the interests of an estimated 23,000 grain producers who grow broadacre, grain, pulse and oilseed crops throughout Australia, contributing to the economic strength of their communities, and an industry valued at an estimated \$13 billion.

GPA advocates national policy outcomes with benefits for grain producers and to deliver a more profitable, sustainable and globally competitive Australian grains industry.

As a not-for-profit company limited by guarantee, GPA is governed by a board that's elected by producer members, representing the major grain producing regions. GPA's membership comprises direct producer members and producer members of the Grains Councils of State Farming Organisations. The elected leaders of these groups – backed by professional staff – also represent their members' interests, via the GPA Policy Council.

GPA's State Members include:

- Agforce Grains
- Grain Producers SA
- NSW Farmers Association
- Victorian Farmers' Federation Grains Group
- Tasmanian Farmers and Graziers Association
- WAFarmers Grains Council
- WA Grains Group

This robust representative process also engages and enables producers to advocate their views and deliver policy outcomes via various GPA Sub-Committees and Taskforces; such as the GPA Biosecurity Committee and GPA Pesticides and Technology Sub-Committee.

GPA's objectives are to:

- Provide a strong, independent, national advocate for grain producers based on a rigorous and transparent policy development process.
- Engage all sectors of the Australian grains industry to ensure operation of the most efficient and profitable grain supply chain.
- Facilitate a strategic approach to research, development and extension intended to deliver sound commercial outcomes from industry research.

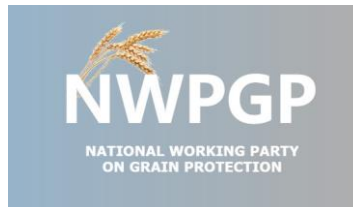
GPA also has important responsibilities representing the interests of Australia's 23,000 levy-paying grain producers under federal legislation.

This includes; managing biosecurity for the Australian grains industry through Plant Health Australia as a signatory to the Emergency Pest Plant Response Deed (EPPRD); as a joint Representative Organisation responsible for overseeing the Grains Research and Development Corporation's performance and strategic investment, with matching Federal Government funding, in RD&E activities, under the PIRD Act; and managing the risk of chemical residues and environmental contaminants in grain products, to help facilitate access to domestic and export markets and protect product integrity and export reputation, via the National Residue Survey.

Grain growers contribute 1.02 per cent of their net crop sales toward levies comprising the GRDC the EPPRD responsibilities, Plant Health Australia membership, National Residue Survey testing. Of that, the vast majority (0.99pc) goes to the GRDC, with PHA receiving 0.01pc, the NRS 0.015pc and emergency plant protection response the remaining 0.005pc.

According to the latest report (Report to levies stakeholders 2018–19, Appendix B) grower levies to GRDC (97% of levies paid by grain growers) were at least \$110 million for each of the 5 years reported. The average between 2014-15 and 2018-19 of grower levies to GRDC was about \$120m, ranging from \$100m to \$139m. The corresponding average paid to all bodies is about \$124m.

Further information: <https://www.grainproducers.com.au/>



To:

Executive Director Registration Management
Australian Pesticides and Veterinary Medicines Authority
GPO Box 3262
Sydney NSW 2001
Via email: enquiries@apvma.gov.au

Date: 10 December 2021

To whom it may concern

I write in response to a request for comments on an application for the proposed registration of Mateno Complete Herbicide, which contains Aclonifen, an approved active constituent not previously included in a registered product.

This submission is presented on behalf of the National Working Party on Grain Protection (NWPGP) and the Australian Export Fodder Industry.

1. The NWPGP:

- Is the industry body responsible for providing management and leadership to industry in the areas of post-harvest storage, chemical use, market requirements and chemical regulations.
- Is facilitated by Grain Trade Australia.
- Has members across the entire grain supply chain.
- Hosts an annual forum providing participants with the latest research and developments, in the area of post-harvest storage and hygiene, chemical usage and outturn tolerances, international and domestic market requirements, and regulations.
- Co-ordinates and provides government with industry views on chemicals in use on grain and associated products.
- For further details, refer to <http://www.graintrade.org.au/nwpgp>

2. Australian Export Fodder Industry, through a research project funded by AgriFutures Australia. That research project:

- Is undertaken on behalf of the Australian Export Fodder Industry.
- Is funded and supported by AgriFutures Australia.
- Is conducted on behalf of a range of members across the entire Australian fodder supply chain.
- Reviews current and proposed revisions to market MRLs.



- Provides advice to government on export fodder industry views in relation to the impact on market access of chemicals in use on Australian fodder.

3. Industry Views on the Application

On behalf of the above industries, I advise that based on the information provided by APVMA in the Public Release Summary (PRS), industry does not object to the proposed registration of Mateno Complete Herbicide.

It is noted in the PRS that for a number of cereal and fodder commodities the current APVMA MRLs are listed as T (temporary), yet the most recent version of APVMA MRLs listed on ComLaw does not list many of these as T (temporary). It is noted this does not affect the proposed MRLs as listed in the PRS.

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

Regards

A handwritten signature in black ink, appearing to read 'G McMullen', is written over the typed name.

Gerard McMullen

Chair

National Working Party on Grain Protection

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*Produced through Grains Australia Limited funding of "Co-ordination of registration of grain storage chemicals"
Consultant to Agrifutures Australia on behalf of the Australian Export Fodder Industry*