



Australian Government

**Australian Pesticides and
Veterinary Medicines Authority**



**Trade Advice Notice on benzovindiflupyr and propiconazole in
the product Elatus Ace Solatenol active Fungicide for use on
oats, rye, triticale and peanuts**

Submissions received

March 2023

To:
Executive Director, Risk Assessment Capability
Australian Pesticides and Veterinary Medicines Authority
GPO Box 3262
Sydney NSW 2001
Via email: enquiries@apvma.gov.au
Date: 10 March 2023

To whom it may concern

I write in response to a request for comments on an application from Syngenta Australia Pty Ltd to vary the registration of Elatus Ace Solatenol active Fungicide to add uses on oats, rye, triticale and peanuts.

This submission is presented on behalf of the 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.

On behalf of the export fodder industry, I advise that based on the information provided by APVMA in the Trade Advice Notice dated February 2023, the industry does not object to the proposed variation to registration or the proposed maximum residue limits as it relates to oat straw. No comment is made for:

- Grain production and its impacts
- Animal products
- Forage, and Rye/Triticale straw given the limited export markets for these commodities.

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

Regards



Gerard McMullen
Consultant to AgriFutures Australia on behalf of the Australian Export Fodder Industry

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Produced through AgriFutures Australia funding of "Chemical Residue monitoring for the Fodder Industry"



SUBMISSION

Trade Advice Notice on benzovindiflupyr and propiconazole in the product
Elatus Ace Solatenol active Fungicide for use on oats, rye, triticale and peanuts - APVMA product
number 86310

PO Box 370
Braidwood NSW 2662

10 March 2023

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

Re: Trade Advice Notice on benzovindiflupyr and propiconazole in the product Elatus Ace Solatenol active Fungicide for use on oats, rye, triticale and peanuts - APVMA product number 86310

Thank you for the opportunity for Grain Producers Australia (GPA) to provide a response to the **Trade Advice Notice on benzovindiflupyr and propiconazole in the product Elatus Ace Solatenol active Fungicide for use on oats, rye, triticale and peanuts - APVMA product number 86310.**¹

Background

There is a strategic need for new fungicides of a different mode of action as part of an Australian disease control and resistance management strategy. Australian growers urgently require access to new fungicide control technologies, including use of mixtures with succinate dehydrogenase inhibitor (SDHI) fungicides for use in oats, rye and triticale in order to maintain crop production.

GPA supports the establishment of a label Elatus Ace Solatenol active Fungicide for use on oats, rye, triticale as tabled by the APVMA.


GPA has reviewed the **APVMA trade advice notice for Elatus Ace Solatenol active Fungicide for use on oats, rye, triticale**. GPA supports the APVMA proposal to establish an MRL for benzovindiflupyr at 0.2 mg/kg for GC 0647 Oats as per the current GC 0640 Barley MRL based on representative crop data. GPA also supports the APVMA proposal to establish an MRL of 0.01 mg/kg for GC 0650 Rye and GC 0653 Triticale as per the current GC 0654 Wheat MRL based on representative crop data.

GPA notes that the proposed MRL of 0.2 mg/kg for benzovindiflupyr on oats is lower than the MRLs established by China, Codex, the EU, Japan and the USA and agrees with the APVMA assessment that the risk to trade in oat grain is expected to be low. GPA also notes that for rye and triticale, the proposed MRLs of 0.01 mg/kg are also generally lower than those established by Codex and overseas and agrees with the APVMA assessment that the risk to trade in rye and triticale grain is expected to be low. GPA agrees with the APVMA assessment that the available wheat data suggests residues at or above 0.01 mg/kg are unlikely and the risk to trade in rye and triticale is expected to be low. GPA will leave comment on benzovindiflupyr use for fodder and peanuts to the respective peak bodies for these industries.

GPA considers that while there are some potential trade risks to some markets, 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

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Grain Producers Australia
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¹ <https://apvma.gov.au/node/109386>

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.

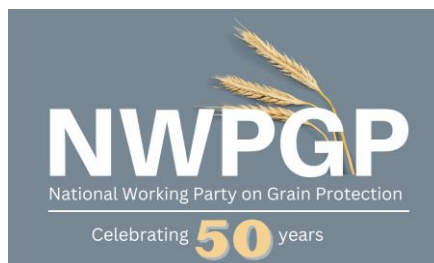
GPA also has important responsibilities representing the interests of Australia's 23,000 levy-paying grain producers under federal legislation.

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:

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Date: 10 March 2023

To whom it may concern

I write in response to a request for comments on an application from Syngenta Australia Pty Ltd to vary the registration of Elatus Ace Solatenol active Fungicide to add uses on oats, rye, triticale and peanuts.

This submission is presented on behalf of the National Working Party on Grain Protection (NWPGP) and deals with the grain commodities oats, rye and triticale only.

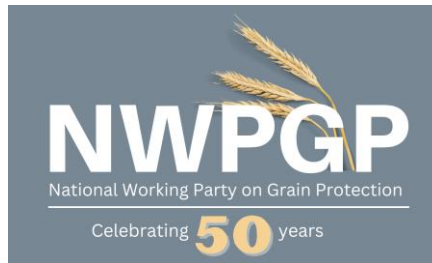
1. The NWPGP:

- 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 and the Chair is funded by Grains Australia.
- Has members across the entire grain supply chain.
- Hosts an annual conference 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. Industry Support for the Application

Based on the information in the Trade Advice Notice, industry supports the registration as proposed. While some market MRLs are higher than that proposed in Australia through this registration process, industry has management systems in place that will enable continued marketing of these commodities according to importing country chemical regulations.

Additionally, as stated in the TAN, a high level of residues is not expected to arise, further assisting industry to manage any residues that may be present as a consequence of the use of this product on these commodities.



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 below the word 'Regards'.

Gerard McMullen

Chair

National Working Party on Grain Protection

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Produced through Grains Australia Limited funding of this activity

