



Australian Government

**Australian Pesticides and
Veterinary Medicines Authority**



**Trade Advice Notice on cyantraniliprole in the product Exirel
Insecticide for use on canola**

Submissions received

April 2023



SUBMISSION

Trade Advice Notice on cyantraniliprole in the product Exirel Insecticide for use on canola APVMA
product number 64103

PO Box 370
Braidwood NSW 2662

22 March 2023

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

Re: Trade Advice Notice on cyantraniliprole in the product Exirel Insecticide for use on canola APVMA product number 64103

Thank you for the opportunity for Grain Producers Australia (GPA) to provide a response to the **Trade Advice Notice on cyantraniliprole in the product Exirel Insecticide for use on canola APVMA product number 64103**.¹

Background

There is a strategic need for new insecticides of a different mode of action and/or improved efficacy from analogue molecules as part of an Australian invertebrate control and resistance management strategy. Australian growers urgently require access to new insecticide control technologies for budworm (*Helicoverpa spp.*) and diamondback moth (*Plutella xylostella*) in order to maintain canola crop production.

GPA supports the establishment of a label for the product Exirel Insecticide for use on canola as tabled by the APVMA.

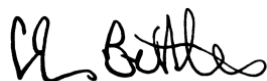
GPA has reviewed the **APVMA trade advice notice for Exirel Insecticide for use on canola**. GPA supports the APVMA proposal to establish an MRL of 0.03 mg/kg for cyantraniliprole on SO 0495 Rape seed [canola] to cover the proposed use with a harvest withholding period of 21 days.

GPA notes that the Supervised Trial Median Residue (STMR) for treated canola seed in the trails was <0.01 mg/kg. GPA notes that the recommended Australian rape seed cyantraniliprole MRL is significantly lower than that established by Codex and other major export destinations including China, EU, Japan and Korea, plus the current USA MRL. GPA considers the risk to trade to be low. GPA will leave comment on cyantraniliprole use on fodder to the respective peak body for this industry.

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/109686>

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.

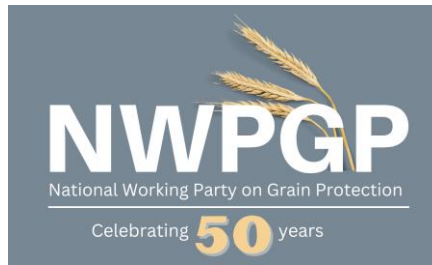
GPA also has important responsibilities representing the interests of Australia's 23,000 levy-paying grain producers under federal legislation.

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
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 FMC Australasia Pty Ltd to vary the registration of Exirel Insecticide to add uses on canola.

This submission is presented on behalf of the National Working Party on Grain Protection (NWPGP) and deals with the grain commodity canola 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>

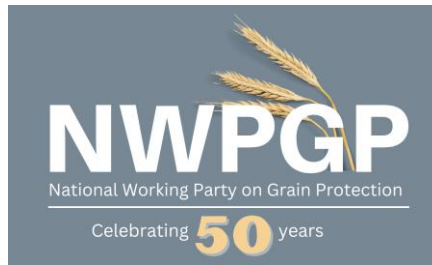
2. Industry Support for the Application

Based on the information in the Trade Advice Notice (TAN), industry supports the registration as proposed. Most markets for canola have adequate MRLs higher than that proposed by Australia.

Taiwan does not have an MRL for this product on canola. Given Taiwan is not a significant market for canola, industry should be able to manage exports to this market.

3. Additional Comments

a) Label Directions



As noted in the TAN, use of a desiccant is common practice for the harvesting of canola (and minor crops such as some pulses). It is noted in the TAN that *“The use of an additional chemical to desiccate the crop is not clearly defined in relation to the withholding period required for the initial pesticide product but it would be considered prudent to consider the withholding period as the interval between the last treatment of the pesticide and desiccation as a worst case given that the desiccant is expected kill the plant and stop metabolism of the active ingredient”*.

To give greater clarity to regulations, and importantly assist industry to correctly follow label directions, reduce uncertainty that may lead to different industry practices being employed and significantly, to reduce the risk of residues arising that may compromise market access, it is recommended the APVMA consider how greater clarity can be provided to industry on this matter.

It should be noted due to a range of agronomic factors, the use of desiccants is thought to have increased in recent years, while some markets have reduced their maximum residue limits for some desiccants on some commodities. While the industry has effectively managed market access, assistance in this regard would be of benefit to the industry.

b) FSANZ MRLs

It is noted that Schedule 20 lists an MRL for cyantraniliprole on oilseeds as 1.5mg/kg. Given no canola grain is thought to be imported, the impact of the higher MRL on imported canola grain should not be an issue. If any is imported, or other canola processed products such as canola oil/meal, it would be expected industry would manage resulting residues “at point of sale” through management systems such as blending etc.

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'.

Gerard McMullen

Chair

National Working Party on Grain Protection

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