



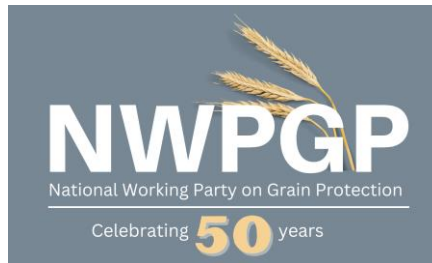
Australian Government
**Australian Pesticides and
Veterinary Medicines Authority**



**Trade Advice Notice on the emergency use of spirotetramat
on lentils**

Submissions received

September 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: 11 August 2023

To whom it may concern

I write in response to a request for comments on an application from Pulse Australia Limited for an emergency use permit for the use of Movento 240 SC Insecticide and all similar registered products containing 240 g/L spirotetramat for use in lentils.

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

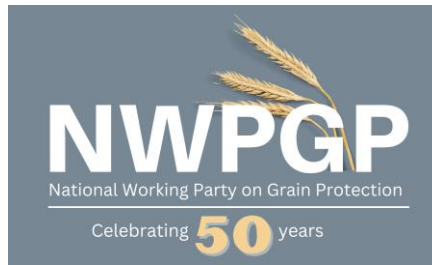
1. The NWPGP:

- 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 provided in the Trade Advice Notice (TAN), industry supports the registration as proposed. Comments to support that view include:

- a) Industry recognises there are substantial insect resistance issues in certain parts of South Australia, and the need for alternative chemistry to support and replace existing tools.
- b) The use is proposed for South Australia only for a duration of 3 years with an estimated area of use of approximately 250,000 ha.
- c) There is a Codex MRL in place.
- d) Most markets have an MRL higher than that proposed in Australia.



- e) While at least one key market does not have an MRL, industry has management systems in place that will enable continued marketing of these commodities according to importing country chemical regulations.
- f) 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.

Note that according to industry sources, the European Union MRL is 2mg/kg, not 1.5mg/kg as listed in the TAN.

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





GPA

Grain Producers Australia

SUBMISSION

Trade Advice Notice on application on Movento 240 SC Insecticide and all similar registered products containing 240 g/L spirotetramat for use in lentils.

PO Box 370
Braidwood NSW 2662

17 AUGUST 2023

TO: Executive Director, Risk Assessment Capability,
Australian Pesticides and Veterinary Medicines Authority.
GPO Box 3262, Sydney NSW 2001
Phone: +61 2 6770 2300 Email: enquiries@apvma.gov.au

Re: Trade Advice Notice on Movento 240 SC Insecticide and all similar registered products containing 240 g/L spirotetramat for use in lentils.

Thank you for providing Grain Producers Australia (GPA) with the opportunity to respond to the Trade Advice Notice on on Movento 240 SC Insecticide and all similar registered products containing 240 g/L spirotetramat for use in lentils. (APVMA product number 93824).

Comment on this TAN was sought by the APVMA on the potential for the use of Movento 240 SC Insecticide on lentils to prejudice Australian trade, when used according to the proposed label instructions.

GPA has reviewed the Notice, and sought further advice, and is supportive of the application. GPA considers there is a genuine need for this product to be used by producers to help manage crops effectively. And any resulting trade risks from the proposed use of this product can be managed appropriately, to help maintain market access for Australian lentils.

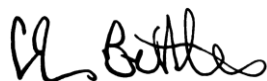
GPA notes the TAN's description of proposed use pattern for this product (Movento 240 SC Insecticide (250 g/L spirotetramat), in order to ensure the described product integrity and market access requirements are achieved.

GPA also notes the use pattern described in this application is proposed for limited use in South Australia and estimated area of use of approximately 250,000 ha, and a limited time duration of 3 years. 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



Chief Executive
Grain Producers Australia
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GPA's Representative Roles and Responsibilities

Grain Producers Australia represents the interests of an estimated 21,000 grain producers who grow broadacre, grain, pulse and oilseed crops throughout Australia, contributing to the social and economic strength of their communities, and the national economy. 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's responsibilities representing the interests of Australia's levy-paying grain producers are legitimised 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.

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

15 August 2023

Executive Director

Risk Assessment Capability

Australian Pesticides and Veterinary Medicines Authority

GPO Box 3262

Sydney NSW 2001

Email: enquires@apvma.gov.au

**Response to call for public comment on APVMA Trade Advice Notice 93824
Emergency use of spirotetramat on lentils**

The GRDC **supports** the proposed emergency use permit for the use of spirotetramat in the product Movento 240 EC Insecticide for use on lentil, on the bases that.

- Blue Green Aphid (*Acyrtosiphon kondoi*) and Green Peach Aphid (*Myzus persicae*) populations are known to rapidly develop resistance to insecticides. The availability of insecticides, approved for use against the blue green aphid and green peach aphid in lentils is limited to the Groups 1A, 3A and 1B.
- Further reducing potential management options for growers is the recent findings of resistance in the blue green aphid in South Australia and in green peach aphid to carbamate (1A), organophosphate (1B) and synthetic pyrethroid (3A) insecticides.
- CESAR have conducted resistance studies which have confirmed the existence of resistance to multiple chemicals in blue green aphid in South Australia. In addition, concerns exist over the limited management options for the green peach aphid due to the existence of organophosphate and carbamate resistance as well.
- Movento 240 EC Insecticide (*spirotetramat*) was selected for this application as being a different mode of action (Group 23) for the management of these resistant aphid populations in lentils in South Australia.
- The proposed usage is restricted to South Australia and the use of *spirotetramat* is expected to be focused on the Yorke Peninsula where blue green aphid and green peach aphid control has proven problematic last season and as such it is not envisaged that the use would be widespread.
- The majority of the listed markets have an MRL above (1.5 mg/kg) the proposed Australian MRL (1.0 mg/kg), noting the MRL in the key market of India is set at default (0.01 mg/kg).

Industry should be able to implement effective management strategies and processes to meet market requirements where risks of market access issues may arise. Such strategies include the use of vendor declarations, stock selection and /or grain testing to ensure its suitability prior to outturn.

Please contact me as needed if you would like to discuss any of these comments and suggestions further.

Regards



Gordon Cumming

Manager – Chemical Regulations

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E: gordon.cumming@grdc.com.au

About the Grains Research and Development Corporation

GRDC was established in 1990, under the then Primary Industries and Energy Research and Development Act 1989 (PIERD Act), as a transparent accountable entity to fund and administer the levy into RD&E to increase the profitability of the grains industry in Australia. As a result of amendments made in December 2013, that Act is now known as the Primary Industries Research and Development Act 1989 (PIRD Act).

The PIRD Act provides for the funding and administration of primary industries R&D to:

- increase the economic, environmental and social benefits to members of primary industries and to the community in general by improving the production, processing, storage, transport or marketing of the products of primary industries
- achieve sustainable use and management of natural resources
- make more effective use of the resources and skills of the community in general and the scientific community in particular
- support the development of scientific and technical capacity
- develop the adaptive capacity of primary producers
- improve accountability for expenditure on R&D activities in relation to primary industries.

The GRDC is principally supported by a grower levy and Australian Government contributions. The levy is based on the net farm gate value of the annual production of 25 crops: wheat; coarse grains—barley, oats, sorghum, maize, triticale, millets/panicums, cereal rye and canary seed; pulses—lupins, field peas, chickpeas, faba beans, vetch, peanuts, mung beans, navy beans, pigeon peas, cowpeas and lentils; and oilseeds—canola, sunflower, soybean, safflower and linseed.

GRDC's investment activities is administered under a Statutory Funding Agreement (SFA) between GRDC and the Commonwealth of Australia. A copy of the agreement is available on the GRDC website (www.grdc.com.au).

GRDC strategic purpose is:

To invest in Research, Development and Extension to create enduring profitability for Australian Grain Growers.

Australian grain growers aim to achieve sustainable profit by adopting the outputs of GRDC's investments in RD&E. The focus on enduring profitability is important to achieving the statutory objectives of GRDC's enabling legislation. It is only at the point at which a grain grower adopts the new technologies, tools and

practices made available through GRDC's investment in RD&E that spill over benefits associated with this investment are realised. Some of the spill over benefits include:

- Improved economic and social outcomes in rural and regional communities.
- Improved environmental management underpinned by sound RD&E.
- Enhanced contribution to the broader Australian economy.

Operationally GRDC invests in RD&E portfolio that addresses profitability constraints and opportunities spanning temperate and tropical cereals, coarse grains, pulses and oilseeds. This involves coordinating and investing in RD&E initiatives; monitoring, evaluating and reporting on their impact; and facilitating the dissemination, adoption and commercialisation of their results.

GRDC invests approximately \$1,000,000 annually in generating data for submission for registration, variation or permitted use of agricultural chemicals. This investment is done usually with a similar or greater investment with a registrant.