



Australian Government

**Australian Pesticides and
Veterinary Medicines Authority**



**Trade Advice Notice on sulfoxaflor in the products Expedite
Full Insecticide and Transform Isoclast Active Insecticide for
use on canola, cereal grains and lucerne**

Submissions received

October 2022



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: 1 October 2022

To whom it may concern

I write in response to a request for comments on an application Corteva Agriscience Australia Pty Ltd to vary the registration of Expedite Full Insecticide (containing 500 g/L sulfoxaflor) and Transform Isoclast Active Insecticide (containing 240 g/L sulfoxaflor) to amend the current use patterns of canola and cereals and approve a new use on lucerne.

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

a) Canola

Based on the information provided by APVMA in the Trade Advice Notice (TAN) and feedback from industry, the NWPGP supports the proposal for canola.

b) Cereal Grains except Oats

Based on the information provided by APVMA in the Trade Advice Notice (TAN) and feedback from industry, the NWPGP supports the proposal for all cereal commodities as listed in the TAN except Oat grain.



3. Industry Non-support for the Application – Oat Grain

Based on the information provided by APVMA in the Trade Advice Notice (TAN) and feedback from industry, the NWPGP does not support the proposal for oat grain (oats, under GC 2086).

Industry notes the proposed label directions and the proposed Withholding Period of “DO NOT harvest for 14 days after the last application”. The TAN advises that after scaling down residues from the data provided in numerous trials from various countries, residues up to 0.19mg/kg were found in barley grain. Additionally, the OECD calculator recommends an MRL of 0.2mg/kg, with a STMR of 0.03mg/kg.

Based on that data, an Australian MRL of 0.2mg/kg for “[GC 2087] Sub-group 020B, Barley, similar grains, and pseudocereals with husks is recommended” to replace the current 0.01mg/kg*.

Noting the proposed Australian MRL arising from the proposed usage pattern, a number of market MRLs were listed in the TAN. However, a number of current key and emerging oat grain markets were / were not listed and as of this date, the following market MRLs for oat grain are:

Bangladesh – 0
China – 0
Codex – 0
European Union – 0.04mg/kg
India – 0.01mg/kg (default)
Indonesia – 0
Japan – 0.2mg/kg
Korea South – 0.2mg/kg
Malaysia – 0.01mg/kg (default)
New Zealand – 0.1mg/kg (default)
Saudi Arabia – 0.04mg/kg (EU default)
Taiwan – 0
Thailand – 0.01mg/kg (default)
United Arab Emirates – 0.04mg/kg (EU default)
Vietnam – 0

While some of the above markets are not potentially analysing each shipment and imposing the MRL regulations where 0mg/kg applies, nevertheless there are a number of markets who do review shipments and whose MRL is significantly lower than the proposed Australian MRL to cover expected residues.

Oat grain is an important emerging export market and consignments at this stage may be in relatively small tonnage parcels to some countries, limiting the ability of industry to combine treated with untreated parcels and reduce the potential residues to meet every market requirement.

Industry noted “CROPS FOR EXPORT - Before using Transform® or Expedite® on crops destined for export it is essential to consult your exporter or Corteva Agriscience to ensure that an appropriate MRL is in place in the importing country”. Despite this statement, and industry implementation of a



range of management systems to ensure residues on delivered commodities are known and managed on outturn to meet importing country requirements, there remains a significant risk of finite residues arising in individual consignments and therefore violating several importing country MRLs.

Industry understands its role in meeting market requirements for all consignments. It has a strong reputation for enforcing its responsibility to meet regulated MRLs, however given the proposed usage on oats, the management systems required to meet that responsibility and market requirement would not be practical.

Hence industry does not support the proposed registration for oats, given the emerging markets for this important cereal commodity.

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 'Regards' text.

Gerard McMullen

Chair

National Working Party on Grain Protection

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Produced through Grains Australia Limited funding of this activity





SUBMISSION

Trade Advice Notice on sulfoxaflor in the products Expedite Full Insecticide and Transform Isoclast Active Insecticide for use on canola, cereal grains and lucerne

PO Box 370
Braidwood NSW 2662

3 October 2022

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

Re: Trade Advice Notice on sulfoxaflor in the products Expedite Full Insecticide and Transform Isoclast Active Insecticide for use on canola, cereal grains and lucerne.

Thank you for the opportunity for Grain Producers Australia (GPA) to provide a response to the **Trade Advice Notice on sulfoxaflor in the products Expedite Full Insecticide and Transform Isoclast Active Insecticide for use on canola, cereal grains and lucerne, APVMA product number 65464 and 64101.**¹

Background

There is a strategic need for new insecticides of a different mode of action as part of an Australian aphid control and resistance management strategy. Australian growers urgently require broader access to new insecticide control technologies in order to maintain crop production. Aphids in grain crops remain a major threat to cereal and canola crop production across Australia. Aphid damage in Australian cereal grain crops, prior to the incursion of Russian Wheat Aphid has been estimated in 2012² to cause 6% average cereal yield losses from feeding injury and 23% yield loss from virus injury, equivalent to \$166 million and \$396 million annual gross value loss respectively. Aphid damage in Australian canola crops has been estimated to cause 23% yield loss from feeding injury and 34% yield loss from virus injury, equivalent to \$64 million and \$84 million annual gross value loss respectively. These loss values have significantly increased with the increase in the national grain crop size and value and the added complexity of managing Russian wheat Aphid crop damage since 2016.

GPA supports the establishment of a label for the product sulfoxaflor in the products Expedite Full Insecticide and Transform Isoclast Active Insecticide for use on canola, cereal grains as tabled by the APVMA.

GPA has reviewed the APVMA Trade Advice Notice for the product sulfoxaflor in the products Expedite Full Insecticide and Transform Isoclast Active Insecticide for use on canola, cereal grains

GPA notes the applicant has proposed to increase maximum application rate to 48 g ai/ha (Transform) or 50 g ai/ha (Expedite), remove the restrictions of crop growth stage for the last treatment in conjunction with a harvest withholding period of 14-days, and to allow grazing of sulfoxaflor treated canola forage. GPA notes and supports the APVMA recommendation to replace the current sulfoxaflor MRL for Rape seed [canola] of *0.01 mg/kg with the increased sulfoxaflor MRL of 0.15, plus notes the current sulfoxaflor MRL of 3 mg/kg for Rape seed [canola] forage remains appropriate to cover sulfoxaflor residues arising in canola/rapeseed forage as a result of the proposed use in conjunction with a grazing withholding period of 14 days.

GPA notes the proposed use pattern is an extension of the current use pattern to allow the use of sulfoxaflor on cereals from the wheat, barley and sorghum crop subgroups up to BBCH 80 in conjunction with a harvest withholding period of 14 days.

GPA notes the proposed rapeseed MRL of 0.15 mg/kg is equivalent to the current rapeseed MRLs established by EU and Codex and lower than those established by Japan and the USA. GPA also notes the proposed grain MRLs for the barley subgroup, wheat subgroup and sorghum subgroup are lower than the Codex, Japanese, Korean and Taiwanese MRLs for wheat, barley, and sorghum/other

¹ <https://apvma.gov.au/node/104546>

² <https://grdc.com.au/research/reports/report?id=3790>

cereals. GPA also notes the proposed oat MRL (included in barley subgroup) is equivalent to the Korean MRL of 0.2 mg/kg.

GPA considers that the resulting trade risks from the proposed label changes is low. GPA will leave comment on the fodder and lucerne implications detailed in this TAN to the fodder industry to respond. 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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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: 3 October 2022

To whom it may concern

I write in response to a request for comments on an application Corteva Agriscience Australia Pty Ltd to vary the registration of Expedite Full Insecticide (containing 500 g/L sulfoxaflor) and Transform Isoclast Active Insecticide (containing 240 g/L sulfoxaflor) to amend the current use patterns of canola and cereals and approve a new use on lucerne.

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 September 2022, the industry does not object to the proposed variation to registration or the proposed maximum residue limits. No comment is made for grain/seed production or animal products.

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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