



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



**Trade Advice Notice on tetraniliprole in the product Vayego
200 SC Insecticide for use on grapes, maize and sweet corn**

Submissions received

October 2022



GPA

Grain Producers Australia

SUBMISSION

**Trade Advice Notice on tetraniliprole in the product Vayego 200 SC Insecticide
for use on grapes, maize and sweet corn**

PO Box 370
Braidwood NSW 2662

11 October 2022

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

Re: Trade Advice Notice on tetraniliprole in the product Vayego 200 SC Insecticide for use on grapes, maize and sweet corn.

Thank you for the opportunity for Grain Producers Australia (GPA) to provide a response to the **Trade Advice Notice on tetraniliprole in the product Vayego 200 SC Insecticide for use on grapes, maize and sweet corn, APVMA product number 86756.**¹

Background

There is a strategic need for new insecticides of a different mode of action as part of an Australian Fall Armyworm control and resistance management strategy. Since Fall armyworm arrived in Australia in February 2020, this pest has rapidly become widely distributed across Australia, with significant impact particularly in Northern Australia. Australian growers urgently require broader access to new insecticide control technologies in order to maintain crop production. Alternate Group 28 (ryanodine receptor modulator) Diamide insecticides will be an important tool for producers. Recent testing has revealed established insecticide resistance in Australian FAW populations to other modes of action. A planned approach to insecticide selection and rotation is required to minimise further resistance development and optimise the cost-effectiveness of insecticide applications.²

GPA supports the establishment of a label for the product Vayego 200 SC Insecticide for use on maize as tabled by the APVMA.

GPA has reviewed the APVMA **Vayego 200 SC Insecticide for use on maize** only. GPA notes that the APVMA details the high residue (HR) of 0.01 mg/kg and that all trials were conducted in the USA and Canada. GPA supports the proposed APVMA tetraniliprole MRL for GC 0645 Maize at 0.02 mg/kg for the proposed use in maize, in conjunction with a proposed 14 days harvest WHP.

GPA notes that the proposed MRL is less than the Japan MRL for corn (maize, including popcorn and sweet corn) but higher than the Japan MRL for corn (field grain). GPA notes that the HR is the same as the Japan MRL for grain corn. GPA notes that tetraniliprole has not yet been considered by Codex and no relevant tetraniliprole MRLs have been established by Taiwan, EU or China. GPA notes however that Vayego 200 SC Insecticide is registered for use in Cambodia, Canada, China, Ecuador, Georgia, Guatemala, India, Indonesia, Japan, Korea, Malaysia, Mozambique, New Zealand, Peru, Philippines, United States of America, Vietnam, Zambia, Zimbabwe. Many of these countries are trade competitors with Australian maize exports.

GPA notes that in rotational crop studies, no quantifiable residues were observed in rotational crops for human consumption (barley, sorghum and wheat grain, canola and sunflower seed, snow peas and snap beans, lima beans and garden peas, dried peas, dried beans and soybeans,

GPA notes the significant threat of Fall Armyworm to the Australian maize production. Tetraniliprole is already registered for control of this significant pest in many other trade competitor countries. 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.

¹ <https://apvma.gov.au/node/104876>

² <https://grdc.com.au/resources-and-publications/grdc-update-papers/tab-content/grdc-update-papers/2021/03/fall-armyworm-update>

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 that reads 'Colin Bettles'. The signature is written in a cursive style with a large, prominent 'C' and 'B'.

Chief Executive
Grain Producers Australia
m: 0439 901 970
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
Risk Assessment Capability
Australian Pesticides and Veterinary Medicines Authority
GPO Box 3262
Sydney NSW 2001
Via email: enquiries@apvma.gov.au

Date: 9 October 2022

To whom it may concern

I write in response to a request for comments on an application from Bayer CropScience Pty Ltd to vary the registration of Vayego 200 SC Insecticide, to add new uses on grapes, maize and sweet corn. The product contains 200 g/L tetraniliprole as its only active ingredient.

This submission is presented on behalf of the National Working Party on Grain Protection (NWPGP) and deals with the commodity maize 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 Comments on the Application

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

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 'Gerard McMullen', is positioned below the 'Regards' text.

Gerard McMullen

Chair

National Working Party on Grain Protection

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