



Australian Government
Australian Pesticides and
Veterinary Medicines Authority



**Trade Advice Notice on methoxyfenozide and spinetoram in
the product Intrepid Edge Insecticide for use on cotton,
chickpeas, mung beans, soybeans and maize**

Submissions received

November 2022



SUBMISSION

**Trade Advice Notice on methoxyfenozide and spinetoram in the product
Intrepid Edge Insecticide for use on cotton, chickpeas, mung beans, soybeans
and maize, APVMA product number 92062**

PO Box 370
Braidwood NSW 2662

27 October 2022

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

Re: Trade Advice Notice on methoxyfenozide and spinetoram in the product Intrepid Edge Insecticide for use on cotton, chickpeas, mung beans, soybeans and maize.

Thank you for the opportunity for Grain Producers Australia (GPA) to provide a response to the **Trade Advice Notice on methoxyfenozide and spinetoram in the product Intrepid Edge Insecticide for use on cotton, chickpeas, mung beans, soybeans and maize APVMA product number 92062.¹**

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 18 (Ecdysone receptor agonists) diacylhydrazines 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 Insecticide resistance and management of bollworm and budworm is also a significant challenge for the Australian grains industry, particularly pulse grains. Industry-wide Cotton bollworm (*Helicoverpa armigera*) resistance to indoxacarb has increased significantly in 2016-17 and 2018-19, particularly in central and northern regions.³ Yield loss and grain quality downgrading from native budworm (*Helicoverpa punctigera*) is common for pulse crops.⁴

GPA supports the establishment of a label for the product Intrepid Edge Insecticide for use on grain crops as tabled by the APVMA.

GPA has reviewed the **APVMA trade advice notice for the product Intrepid Edge Insecticide for use on grain crops** only. GPA supports the APVMA proposal to apply an MRL of 2 mg/kg for methoxyfenozide on VD 0524 Chick-pea (dry), an MRL of 0.5 mg/kg for methoxyfenozide on VD 0536 Mung bean (dry), an MRL of 0.9 mg/kg for methoxyfenozide on VD 0541 Soya bean (dry) in conjunction with a proposed 14-day harvest withholding period, plus an MRL of *0.02 mg/kg for methoxyfenozide on GC 0645 Maize in conjunction with a proposed 28-day harvest withholding period.

GPA notes that no changes are required to the current MRL of 0.01 mg/kg for spinetoram on VD 0070 Pulses which covers current registrations (P64109 allows application of spinetoram to chickpeas either twice during flowering or once at flowering and once up to 14 days before harvest at 24 g ai/ha). GPA also notes and supports the APVMA recommendation that the current MRL of T*0.01 mg/kg for spinetoram on GC 2091 Maize cereals be made permanent, which will also cover the use of spinetoram on maize cereals under emergency permit PER89390.

GPA notes that the proposed methoxyfenozide chick-pea (dry) MRL is lower than the dried pea MRLs established by the EU, Japan and Taiwan, and higher than those established in Korea and the USA. GPA also notes that the methoxyfenozide mung bean (dry) MRL is at the same level as the dried beans MRLs established by Codex, the EU, Taiwan and the USA and lower than that for Japan. GPA also

¹ <https://apvma.gov.au/node/105416>

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

³ <https://thebeatsheet.com.au/helicoverpa-insecticide-resistance-levels-so-far-this-summer/>

⁴ https://grdc.com.au/_data/assets/pdf_file/0026/159281/grdc-report-current-potential-costs-invertebrate-pests-feb2013pdf.pdf-QR-code-editpdf.pdf

notes the proposed 7-day export slaughter interval (ESI) which is required for spinetoram use will also ensure that there will be no quantifiable residues of methoxyfenozide in animal commodities for export.

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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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: 25 October 2022

To whom it may concern

I write in response to a request for comments on an application from Corteva Agriscience Australia Pty Ltd to register Intrepid Edge Insecticide for use on cotton, chickpeas, mung beans, soybeans and maize.

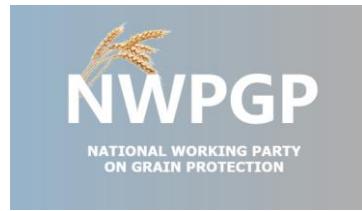
This submission is presented on behalf of the National Working Party on Grain Protection (NWPGP) and refers to chickpeas, mung beans and soybeans grain only.

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 forum 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 Views on the Application

While there are some markets with a lower MRL than that proposed in Australia, on behalf of the NWPGP I advise that based on the residue information provided by APVMA in the Trade Advice Notice (TAN), industry does not object to the proposed registration.



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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