



Australian Government

**Australian Pesticides and
Veterinary Medicines Authority**



**Trade Advice Notice on imazamox and imazapyr in the
product Nufarm Intercept Herbicide for use on field peas and
lentils**

Submissions received

January 2023



SUBMISSION

**Trade Advice Notice on imazamox and imazapyr in the product Nufarm
Intercept Herbicide for use on field peas and lentils
APVMA product number 69353**

PO Box 370
Braidwood NSW 2662

8 December 2022

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

Re: Trade Advice Notice on imazamox and imazapyr in the product Nufarm Intercept Herbicide for use on field peas and lentils.

Thank you for the opportunity for Grain Producers Australia (GPA) to provide a response to the **Trade Advice Notice on imazamox and imazapyr in the product Nufarm Intercept Herbicide for use on field peas and lentils APVMA product number 69353.**¹

Background

The total cost of weeds (revenue loss plus expenditure) to Australian grain growers is estimated at \$3,318 million, with weeds costing Australian grain growers \$146/ha. The cost of expenditure and losses, as well as resulting yield loss with weed competition amounts to 2.76 million tonnes of grain per annum on average, plus expenditure and losses and resulting yield losses due to weeds amounting to 2.76 million tonnes of grain on average per annum.² Herbicide resistance is estimated to cost \$187 million in additional herbicide treatment costs plus the costs of using additional integrated weed management practices. The use of imidazolone herbicides including imazamox and imazapyr are a key strategic tool to allow early post-emergence control of certain broadleaf weeds and manage herbicide resistance.

GPA supports the establishment of a label for the product imazamox and imazapyr in the product Nufarm Intercept Herbicide for use on field peas and lentils as tabled by the APVMA.

GPA has reviewed the **APVMA trade advice notice for the product Intercept Herbicide for use on field peas and lentils**. GPA supports the APVMA proposal to apply an MRL of 0.2 mg/kg for both imazamox and imazapyr for VD 0561 Field pea (dry) and VD 0533 Lentil (dry). GPA notes that the proposed label only allows application to imidazolinone herbicide tolerant field pea or lentil varieties up to the 6-node stage and with a harvest withholding period (WHP) of 'Not required when used as directed' and a grazing WHP of 4 weeks.

GPA notes that Pulse Australia currently holds an APVMA permit PER87417³ for use of Nufarm intercept herbicide containing: 33g/l imazamox and 15g/l imazapyr issued since 5 July 2019 and GPA notes that no National Residue Survey findings in excess of the existing Australian MRLs in field pea or lentils has been reported since that date. GPA notes the resulting data from the residue trails and supports the APVMA assessment of previously submitted lentil data with data provided for the registration of field peas which is considered relevant to lentils which both fall under the same commodity subgroup, '015B Dry peas' requires a change in the established MRLs for VD 0533 Lentil (dry) from *0.01 mg/kg to 0.2 mg/kg for both imazamox and imazapyr.

GPA notes that the applicant has indicated imazapyr products are registered for use in a range of crops in: Argentina, Bangladesh, Belarus, Bolivia, Brazil, Cameroon, Chile, China, Colombia, Costa Rica, Ecuador, India, Indonesia, Israel, Japan, Kazakhstan, Kenya, Malaysia, Mexico, Mozambique, New Zealand, Paraguay, Peru, Russia, South Africa, South Korea, Taiwan, Ukraine, Uruguay and the USA. GPA also notes that the applicant has indicated imazamox products are registered in for use in a range of crops in: Argentina, Austria, Belarus, Belgium, Bolivia, Brazil, Bulgaria, Canada, Chile, China, Colombia, Costa Rica, Croatia, Cyprus, Czech Republic, Estonia, Finland, France, Germany, Greece, Hungary, India, Ireland, Israel, Italy, Japan, Kazakhstan, Latvia, Lithuania, Malta, Mexico, Moldova, Morocco, Netherlands, Poland, Portugal, Romania, Serbia, Slovakia, Slovenia, South Africa, Spain, Sweden, Switzerland, Tunisia, Turkey, Ukraine, United Kingdom and the USA.

¹ <https://apvma.gov.au/node/106526>

² https://grdc.com.au/data/assets/pdf_file/0027/75843/grdc_weeds_review_r8.pdf.pdf

³ <https://permits.apvma.gov.au/PER87417.PDF>

GPA notes that the proposed imazamox MRL of 0.2 mg/kg for 'VC0561 Field peas (dry)' is greater than the *0.05 mg/kg MRLs currently established in EU, Japan, Canada or CODEX. GPA also notes that Imazapyr MRLs for 'VC0561 Field pea (dry)' have not been established in overseas markets or by CODEX. GPA notes the major Australian pulse export competitor Canada has a current imazamox MRL of 0.05 mg/kg for peas and 0.25 mg/kg for lentils and an Imazapyr MRL of 0.2 mg/kg for lentils.⁴ It is important that Australian producers have access to the same technologies as major overseas trade competitors such as Canada.

GPA however notes that the Supervised Trial Median Residues (STMRs) from the combined dataset of field pea, lentil and chickpea trials for both actives are at the Limits of Quantitation of 0.01 mg/kg in the seed and the high rates in the field pea trials were below the Limit of Detection (<0.005 mg/kg) for imazamox and 0.015 mg/kg for imazapyr.

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

A handwritten signature in black ink that reads 'Colin Bettles'.

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⁴ <https://pest-control.canada.ca/pesticide-registry/en/mrl-search.html>

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: 21 December 2022

To whom it may concern

I write in response to a request for comments on an application from Nufarm Australia Ltd to vary the registration of Nufarm Intercept Herbicide containing imazamox and imazapyr to allow early post-emergence control of certain broadleaf weeds in imidazolinone tolerant field peas.

This submission is presented on behalf of the National Working Party on Grain Protection (NWPGP) and deals with the commodity field peas only. The impact on use of lentils and the MRL in Australia is noted.

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 by APVMA in the Trade Advice Notice (TAN), the NWPGP supports the proposal. This support is provided based on a range of information including:

- The STMR (“supervised trial median residue”) from the combined dataset of field pea, lentil and chickpea trials for both actives are at the Limits of Quantitation of 0.01 mg/kg in the seed.
- Proposed label directions with various restrictions, including a Withholding period (WHP) of “Not required”.



- For imazamox, there is a Codex MRL and MRL in most markets, which despite being lower than the proposed Australian MRL, based on the residue trials, should not cause an unmanageable level of residues.
- For imazapyr, while there is no Codex MRL or MRL in overseas markets, the STMR indicates residues arising above the LOQ are not expected on a frequent basis given the usage pattern and restrictions on usage.
- Various industry management systems available to manage the risk of residues arising in export product.

While the proposed Australian MRL is higher than some market MRLs, the expected relative frequency of usage and limited initial sowing of these “IMI tolerant” varieties should enable industry to manage any residues arising from specific parcels of field peas for export. Over time, should the use of these varieties and chemical products significantly increase, that management may become more difficult, and industry may choose a reconsideration of the above decision based on an unacceptable risk to trade.

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

