



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



## TRADE ADVICE NOTICE

on Glyphosate in the Product Roundup Attack Herbicide with IQ inside

APVMA Product Number P66117

OCTOBER 2012

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ISSN: 1443-1335

ISBN: 978-1-9222188-04-5

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This publication is available from the APVMA website: [www.apvma.gov.au](http://www.apvma.gov.au).

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## PREFACE

The Australian Pesticides and Veterinary Medicines Authority (APVMA) is the Australian Government regulator with responsibility for assessing and approving agricultural and veterinary chemical products prior to their sale and use in Australia.

The APVMA has a policy of encouraging openness and transparency in its activities and of seeking stakeholder involvement in decision making. Part of that process is the publication of Trade Advice Notices for proposed extensions of use for existing chemicals where there may be trade implications, as defined in *Ag MORAG: Manual of Requirements and Guidelines* Part 5B.

## About this document

This is a Trade Advice Notice.

It indicates that the Australian Pesticides and Veterinary Medicines Authority (APVMA) is considering an application to vary the use of an existing registered agricultural or veterinary chemical. It provides a summary of the APVMA's residue and trade assessment.

Comment is sought from industry groups and stakeholders on the information contained within this document.

## Making a submission

The APVMA invites any person to submit a relevant written submission as to whether the application to vary the registration of **Roundup Attack Herbicide with IQ inside** containing the existing active constituent glyphosate be granted. Submissions should relate only to matters that the APVMA is required by legislation to take into account in deciding whether to grant the application. In relation to this document, these grounds relate to the **trade implications** of the extended use of the product. Comments received outside these grounds cannot be considered by the APVMA.

Submissions must be received by the APVMA by close of business on **18 November 2012** and be directed to the contact listed below. All submissions to the APVMA will be acknowledged in writing via email or by post.

Relevant comments will be taken into account by the APVMA in deciding whether to grant the application and in determining appropriate conditions of registration and product labelling.

When making a submission please include:

- Contact name
- Company or Group name (if relevant)
- Postal Address
- Email Address (if available)

- The date you made the submission.

All personal and ***confidential commercial information (CCI)***<sup>1</sup> material contained in submissions will be treated confidentially.

Written submissions on the APVMA's proposal to grant the application for registration that relate to the **grounds for registration** should be addressed in writing to:

Contact Officer, Pesticides  
Pesticides Program  
Australian Pesticides and Veterinary Medicines Authority  
PO Box 6182  
Kingston ACT 2604

**Phone:** 02 6210 4748

**Fax:** 02 6210 4776

**Email:** [pesticides@apvma.gov.au](mailto:pesticides@apvma.gov.au)

## Further information

Further information can be obtained via the contact details provided above.

Further information on trade advice notices can be found on the APVMA website: [www.apvma.gov.au](http://www.apvma.gov.au)

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<sup>1</sup> A full definition of "confidential commercial information" is contained in the Agvet Code.

## 1 INTRODUCTION

The Australian Pesticides and Veterinary Medicines Authority (APVMA) has before it an application from Monsanto Australia Ltd to vary the registration of the product, Roundup Attack Herbicide, containing 570 g/L glyphosate, for use on cereals and annual pastures for hay or silage production for the control of annual weeds. The proposed use does not require any MRL changes for glyphosate.

Oaten hay is exported along with meat and dairy products from animals that have been fed feeds containing residues arising from the proposed use. Livestock burden resulting from the proposed use is significantly lower than that for other approved uses. Therefore, risk to trade in animal commodities is not changed by this proposal and animal commodities will not be discussed further in this notice. The potential for glyphosate residues arising from the proposed use on cereals and annual pastures for hay or silage production to unduly prejudice trade is discussed below.

## 2 TRADE CONSIDERATIONS

### 2.1 Commodities exported

Oaten hay is considered to be a major export commodity, as are commodities of animal origin, such as meat, offal and dairy products, which may be derived from livestock feeding on treated animal feeds. Residues in these commodities resulting from the use of Roundup Attack Herbicide may have the potential to unduly prejudice trade in countries where no residue tolerance is established.

### 2.2 Destination and value of exports

Approximately 720 kilotonne of hay is exported from Australia, to the value of ~\$230-250 million, per annum<sup>2</sup>. Approximately 85% of exports are oaten hay, while 10% is straw and the balance is predominantly lucerne hay and chaff. Approximately 85% of Australian export hay is destined for Japan, while the volume of hay exported to China and the UAE is increasing.

### 2.3 Proposed Australian use-pattern

The proposed Australian use pattern for Roundup Attack Herbicide (570 g/L glyphosate) in pasture for hay/silage production is summarised below.

Table 1: Proposed use pattern

*Roundup® Attack Herbicide™ with IQ inside (containing 570 g/L glyphosate as the potassium salt)*

CROP	WEEDS CONTROLLED	RATE	CRITICAL COMMENTS
<p>PRE-HARVEST/CUTTING APPLICATION in annual pasture and cereals for <b>Hay/Silage</b> production.</p> <p>For application prior to cutting for hay or silage and for weed control and prevention of regrowth.</p>	Annual weeds	1.15 - 3.4 L/ha	<p>Apply to mature standing pasture within 1 – 10 days prior to cutting or mowing.</p> <p>Apply with ground boom or aerial equipment.</p> <p>Use the higher rate if the hay/silage is of high density, if cutting is planned within 3 days of application, or if the crop is rank or lodged and where faster desiccation is required. The lower rate is for low density hay and silage pasture only.</p> <p>DO NOT cut within 1 day after application. A minimum of 3 days prior to cutting is recommended where conditions result in slow translocation in the target plant. Good spray coverage is also important for best results and it is recommended that a minimum application water volume of 70L/ha is used.</p>

<sup>2</sup> Personal communication, AFIA, August 2010

## WITHHOLDING PERIODS

Hay/Silage: DO NOT mow or cut 1 day after application. A minimum 3 days prior to cutting is recommended where conditions result in slow translocation in the target plant.

## 2.4 Results from residues trials presented to the APVMA

The proposed use of glyphosate involves a single pre-harvest foliar application at a maximum rate of 1.94 kg ai/ha to cereals and annual pastures crops for hay or silage production. A harvest WHP of 1 day is proposed.

Details of 4 GLP compliant reverse decline glyphosate residue trials conducted in Australia on oaten hay or annual pasture crops have been provided. The applicant has provided details of a further 7 GLP glyphosate residue trials conducted in Australia on wheat nearing maturity (BBCH 86-92) following a single application of glyphosate at 0.5x, 1x and 2x the maximum proposed application rate.

At the proposed 1 day WHP, the total residues of glyphosate (parent + AMPA metabolite) on oaten hay or rye grass pasture crops following a single application at the proposed rate were in rank order 4.6, 7.2, 9.7 and 10 mg/kg. At application rate approximately 2x the maximum proposed, the total residues of glyphosate (parent + AMPA metabolite) were in rank order 9.2, 10, 13 and 14 mg/kg (on a dry weight basis).

At day 0 (immediately after application), residues of glyphosate (parent + AMPA metabolite) on wheat forage (BBCH 86-92) following a single application at the proposed rate were in rank order 2.6, 3.5, 5.3, 5.4, 5.4, 9.5 and 14 mg/kg. At 2x the maximum proposed rate, the total residues were 3.9, 6.6, 8, 9.7, 10, 12 and 15 mg/kg.

The available data indicates that residues occurring in hay or pasture derived animal feeds would comply with the current Table 4 *MRL Standard* entry for Primary Feed Commodities [other than rape seed forage, rape seed straw and fodder (dry), cotton forage, soya bean hulls and soya bean aspirated grain fractions] set at 150 mg/kg.

## 2.5 Codex alimentarius commission and overseas MRLs

The Codex Alimentarius Commission (Codex) is responsible for establishing Codex Maximum Residue Limits (CXLs) for pesticides. Codex CXLs are primarily intended to facilitate international trade, and accommodate differences in Good Agricultural Practice (GAP) employed by various countries. Some countries may accept Codex CXLs when importing foods.

The following relevant Codex CXLs and international MRLs have been established for glyphosate:

Table 2: Comparison of glyphosate MRLs (mg/kg) in major export markets

Country/status	Commodity	Tolerance, mg/kg
Australia <sup>3</sup>	Primary feed commodities [other than rape seed forage, rape seed straw and fodder (dry), cotton forage, soya bean hulls and soya bean aspirated grain fractions]	150
Codex <sup>4</sup>	Hay or fodder	500
Japan <sup>5</sup>	Hay	120
USA <sup>6</sup>	Grass forage, fodder and hay	300

## 2.6 Potential risk to trade

Export of treated produce containing finite (measurable) residues of glyphosate may pose a risk to Australian trade in situations where (i) no residue tolerance (import tolerance) is established in the importing country or (ii) where residues in Australian produce are likely to exceed a residue tolerance (import tolerance) established in the importing country.

Residues in oaten hay are expected to comply with the standards established in Japan and by codex and the risk to trade associated with the proposed use is considered to be low.

<sup>3</sup> [www.apvma.gov.au/residues/docs/mrl\\_table4\\_october\\_2012.pdf](http://www.apvma.gov.au/residues/docs/mrl_table4_october_2012.pdf)

<sup>4</sup> [www.codexalimentarius.net/pestres/data/pesticides/details.html?id=158](http://www.codexalimentarius.net/pestres/data/pesticides/details.html?id=158)

<sup>5</sup> [www.famic.go.jp/ffis/feed/obj/shore\\_eng.pdf](http://www.famic.go.jp/ffis/feed/obj/shore_eng.pdf)

<sup>6</sup> [www.ecfr.gov/cgi-bin/text-idx?c=ecfr&tpl=/ecfrbrowse/Title40/40cfr180\\_main\\_02.tpl](http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&tpl=/ecfrbrowse/Title40/40cfr180_main_02.tpl)

### 3 CONCLUSIONS

The proposed use does not require any MRL changes to the current MRL standards for glyphosate. Comment is sought on the potential for glyphosate residues to prejudice Australian trade when Roundup Attack Herbicide is used on cereals and annual pastures for hay or silage production.

A more detailed technical assessment report on the evaluation of the trade implications of this chemical can be obtained by contacting the APVMA at (02) 6210 4748. Alternatively, the reports can be viewed at the APVMA Library, which is located at:

18 Wormald Street

Symonston ACT, 2609

Office hours: 9.00am–5.00pm (EST) Monday to Friday