Australian Government

Australian Pesticides and Veterinary Medicines Authority

Trade Advice Notice

on saflufenacil in the product Sharpen Herbicide
for use on mung beans and soybeans

APVMA product number 62853

July 2020

ISSN 2200-3894 (electronic)

Ownership of intellectual property rights in this publication

Unless otherwise noted, copyright (and any other intellectual property rights, if any) in this publication is owned by the Australian Pesticides and Veterinary Medicines Authority (APVMA).

Creative Commons licence

With the exception of the Coat of Arms and other elements specifically identified, this publication is licensed under a Creative Commons Attribution 4.0 Australia Licence. This is a standard form agreement that allows you to copy, distribute, transmit and adapt this publication provided that you attribute the work.

A summary of the licence terms and full licence terms are available from Creative Commons.

The APVMA's preference is that you attribute this publication (and any approved material sourced from it) using the following wording:

Source: Licensed from the Australian Pesticides and Veterinary Medicines Authority (APVMA) under a Creative Commons Attribution 4.0 Australia Licence.

In referencing this document the Australian Pesticides and Veterinary Medicines Authority should be cited as the author, publisher and copyright owner.

Cover image: iStockphoto (www.istockphoto.com)
iStockphoto images are not covered by this Creative Commons licence.

Use of the Coat of Arms

The terms under which the Coat of Arms can be used are set out on the Department of the Prime Minister and Cabinet website.

Disclaimer

The material in or linking from this report may contain the views or recommendations of third parties. Third party material does not necessarily reflect the views of the APVMA, or indicate a commitment to a particular course of action. There may be links in this document that will transfer you to external websites. The APVMA does not have responsibility for these websites, nor does linking to or from this document constitute any form of endorsement. The APVMA is not responsible for any errors, omissions or matters of interpretation in any third-party information contained within this document.

Comments and enquiries regarding copyright:

Assistant Director, Communications
Australian Pesticides and Veterinary Medicines Authority
GPO Box 3262
Sydney NSW 2001 Australia

Telephone: +61 2 6770 2300

Email: communications@apvma.gov.au.

This publication is available from the APVMA website.

CONTENTS

LIST OF TABLES

PREFACE

The Australian Pesticides and Veterinary Medicines Authority (APVMA) is an independent statutory authority 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 all proposed extensions of use for existing products where there may be trade implications.

The information and technical data required by the APVMA to assess the safety of new chemical products and the methods of assessment must be undertaken according to accepted scientific principles. Details are outlined in regulatory guidance published on the APVMA website.

About this document

This Trade Advice Notice 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 Sharpen Herbicide should 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. These grounds relate to the trade implications of the extended use of the product. Submissions should state the grounds on which they are based. Comments received outside these grounds cannot be considered by the APVMA.

Submissions must be received by the APVMA by close of business on **Thursday 20 August 2020** 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)
- submission date.

All personal and *confidential commercial information (CCI)*[1] 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:

Residues and Trade

Scientific Assessment and Chemical Review

Australian Pesticides and Veterinary Medicines Authority

GPO Box 3262

Sydney NSW 2001

Phone: +61 2 6770 2300

Email: enquiries@apvma.gov.au.

Further information

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

Further information on public release summaries can be found on the APVMA website: apvma.gov.au.

[1] 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 BASF Australia Ltd to vary the registration of Sharpen Herbicide containing 700 g/kg saflufenacil to include new uses on mung beans and soybeans as a harvest aid.

The use of saflufenacil as a harvest aid is currently registered in selected pulses (field pea, faba/broad bean, chickpea, lentil and lupin) and an MRL was previously established for the pulse crop group[2]. This proposal is for the first use of saflufenacil in mung beans and soybeans.

2 TRADE CONSIDERATIONS

2.1 Commodities exported

Mung beans are considered to be major export commodities[3], as are commodities of animal origin, such as meat, offal and dairy products, which may be derived from livestock fed feeds produced from treated mung beans and soybean grain, forage and/or stubble. Residues in these commodities resulting from the use of Sharpen Herbicide may have the potential to unduly prejudice trade.

As the mammalian and poultry dietary burdens through consumption of forage, fodder or grain derived from treated mung beans or soybeans should be no greater than previously considered for other pulse crops, no changes are required to the established animal commodity MRLs for saflufenacil. The risk to trade in animal commodities is unchanged and does not require further consideration.

2.2 Destination of exports

The total exports for Australian mungbeans for 2018–19 was ~46,000 tonnes. The major export destinations for Australian mung beans in 2018–19 were Vietnam and China followed by Indonesia, the Philippines, India, Sri Lanka and Taiwan[4].

[2] Trade Advice Notice for Saflufenacil in the product Sharpen WG Herbicide, June 2016: apvma.gov.au/node/20316
[3] APVMA Regulatory Guidelines—Data Guidelines: Agricultural—Overseas trade (Part 5B)
[4] Personal Communication—Australian Mungbean Association

2.3 Proposed Australian use-pattern

Table 1: Proposed use pattern

Crop	Pest	Rate/concentration	Critical comments
Ground and aerial application Prior to harvest of: Mung bean, soybean	Harvest-aid to avoid uneven maturity, improve speed of maturity, reduce broadleaf weed biomass and increase harvest efficiency.	34 g/ha (23.8 g ai/ha) plus recommended label rate of glyphosate or diquat herbicide plus 1% Hasten or high quality MSO	**Always apply Sharpen WG Herbicide with 1% v/v Hasten Spray adjuvant or high quality methylated seed oil (MSO).** Apply at crop maturity at least 7 days before harvest as per growth stage timings described below. Early applications than described below may result in grain yield penalties. Desiccation timing: Mung bean: Apply crops when majority of pods are physiologically mature; where 90% of the pods have turned either yellow or black. Soybean: apply to mature crops when pods are yellow/brown and very late leaf fall (85-90%). In order to guarantee good coverage it is recommended to apply SHARPEN WG at minimum 100 L/ha volume.

Withholding periods:

Harvest: DO NOT HARVEST GRAIN FOR 7 DAYS AFTER APPLICATION.

Grazing: DO NOT GRAZE OR CUT FOR STOCKFOOD FOR 7 DAYS AFTER APPLICATION.

Trade advice:

LIVESTOCK DESTINED FOR EXPORT MARKETS

The grazing withholding period only applies to stock slaughtered for the domestic market. Some export markets apply different standards. To meet these standards, ensure that in addition to complying with the grazing withholding period, the Export Slaughter Interval is observed before stock are sold or slaughtered.

EXPORT SLAUGHTER INTERVAL (ESI)—30 DAYS

Livestock that has grazed on or been fed treated forage, fodder or stubble should be placed on clean feed for 30 days prior to export slaughter. This ESI requirement must be declared on any Commodity Vendor Declaration accompanying traded fodder.

Growers should note that suitable Maximum Residue Limits (MRLs) or import tolerances may not exist in all export markets for crops treated with Sharpen Herbicide. Additionally, some export markets have established MRLs different to those in Australia. Please check with your peak industry body or BASF Australia Ltd for the latest information on MRLs and import tolerances before using Sharpen Herbicide.

2.4 Results from residues trials presented to the APVMA

The residues assessment for the use of Sharpen Herbicide in the currently registered pulse crops considered seven Australian trials on field peas (three), chickpeas (three) and faba beans (one), 10 US trials on dry beans and nine US trials on dry peas. No new residues data has been provided.

Residues of saflufenacil in pulse grain from Australian and US trials (scaled for application rate) after application close to harvest were <0.01 (25 DAT), 0.02, 0.02, 0.03, <0.03 (n = 13), 0.03 (n = 2), 0.04 (n = 2), 0.08, 0.09, 0.11 (n = 2) and 0.12 mg/kg. Based on the combined Australian and scaled US data, the OECD MRL calculator recommends an MRL of 0.2 mg/kg. (STMR = 0.03 mg/kg).

Residues of saflufenacil in pulse straw in the Australian trials at seven days after application at 23.8 g ai/ha were 0.27, 0.50, 0.60, 0.88, 1.0 and 1.5 mg/kg on a dry weight basis. The OECD MRL calculator recommends an MRL of 3 mg/kg (STMR = 0.74 mg/kg).

The current MRLs for saflufenacil in pulses are established at 0.2 mg/kg for pulses [VD 0070] and 3 mg/kg for legume animal feeds [AL 0157]. These MRLs are considered appropriate to cover the proposed use of saflufenacil in mung beans and soybeans as a desiccant in conjunction with the harvest and grazing withholding periods of seven days each.

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. Saflufenacil has been considered by Codex. The following relevant Codex CXLs and overseas MRLs have been established for saflufenacil.

Table 2: Current and proposed Australian and overseas MRLs/tolerances for saflufenacil

Commodity	Tolerance for residues arising from the use of saflufenacil (mg/kg)						
	Australia	Codex[5]	EU[6]	Japan[7]	Taiwan[8]	USA[9]	Rep. Korea[10]
Residue Definition (plants)	Plants: Sum of saflufenacil and 2 metabolites	Saflufenacil	Plants: Sum of saflufenacil and 2 metabolites	Saflufenacil	Saflufenacil	Plants: Sum of saflufenacil and 2 metabolites	Saflufenacil
Pulses	0.2	0.3	-	0.3	-	-	-
Beans	-	-	0.5	-	0.03	0.3	0.3
Soybean	-	-	-	0.3	0.07	0.1	-

China has not established a MRL for saflufenacil in mung beans.

2.6 Current Australian MRLs for saflufenacil

No MRL changes are required to support the proposed new uses on mung beans and soybeans as current MRLs for pulses and legume animal feeds remain appropriate to cover the additional pulse crops.

Table 3: Current MRL Standard—Table1

COMPOUND	FOOD	MRL (mg/kg)
SAFLUFENACIL		
MO 0105	Edible offal (mammalian)	7
PE 0112	Eggs	*0.01
VP 0060	Legume vegetables	*0.03
MM 0095	Meat (mammalian)	*0.01
ML 0106	Milks	*0.01
PM 0110	Poultry meat	*0.01
PO 0111	Poultry, edible offal of	*0.01
VD 0070	Pulses	0.2

[5] fao.org/fao-who-codexalimentarius/codex-texts/dbs/pestres/pesticide-detail/en/?p_id=251
[6] ec.europa.eu/food/plant/pesticides/eu-pesticides-database/public/?event=pesticide.residue.CurrentMRL&language=EN
[7] db.ffcr.or.jp/front/pesticide_detail?id=24250
[8] consumer.fda.gov.tw//Law/Detail.aspx?nodeID=518&lang=1&lawid=127
[9] ecfr.gov/cgi-bin/text-idx?SID=7e27bd27efd73a9af38dbe92d13867f5&mc=true&node=se40.26.180_1649&rgn=div8
[10] foodsafetykorea.go.kr/residue/search/list.do?searchType=&searchValue=Saflufenacil&searchFlag=ALL

Table 4: Current MRL Standard—Table 4

COMPOUND	FOOD	MRL (mg/kg)
SAFLUFENACIL		
AL 0157	Legume animal feeds	3

2.7 Potential risk to trade

Export of treated produce containing finite (measurable) residues of saflufenacil 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.

The risk to international trade associated with the use of saflufenacil on the currently registered pulse crops with the established pulse crop group MRL at 0.2 mg/kg has previously been considered acceptable, however this proposal is for the first use in mung beans and soybeans.

MRLs established by Codex and Japan for pulses at 0.3 mg/kg, the US and the Republic of Korea for beans at 0.3 mg/kg and the EU for beans at 0.5 mg/kg MRLs are higher than the current Australian saflufenacil MRL of 0.2 mg/kg for pulses, which remains appropriate for mung beans and soybeans. The Taiwanese MRL at 0.03 mg/kg is however lower than the Australian MRL, while China has not established relevant saflufenacil MRLs.

3 CONCLUSION

BASF Australia Ltd have made an application to vary the registration of Sharpen Herbicide to extend the current use of saflufenacil as a harvest aid in selected pulses (field pea, faba/broad bean, chickpea, lentil and lupin) to include mung beans and soybeans.

Comment is sought on the potential for Sharpen Herbicide to prejudice Australian trade when used on mung beans and soybeans according to the proposed label instructions.