



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



**Trade Advice Notice on azoxystrobin and tebuconazole in the
product Veritas Opti Fungicide**

Submissions received

March 2021



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: 8 February 2021

To whom it may concern

I write in response to a request for comments on an application from Adama Australia Pty Limited for approval of a new product Veritas Opti Fungicide (containing 222 g/L azoxystrobin and 370 g/L tebuconazole) for use on mung beans, adzuki beans and navy beans for the control of powdery mildew.

This submission is presented on behalf of the National Working Party on Grain Protection (NWPGP).

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.
- 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

On behalf of the NWPGP I advise that based on the information provided by the Australian Pesticides and Veterinary Medicines Authority (APVMA) in the Trade Advice Notice (TAN), industry does not object to the proposed registration on mung beans, adzuki beans and navy beans.



3. Other Comments

- a) While acknowledging the *Australian Pesticides and Veterinary Medicines Authority, APVMA Regulatory Guidelines—Data Guidelines: Agricultural—Overseas trade (Part 5B)*, APVMA website, 20 July 2020, industry does not consider that navy beans qualify as a “major export crop” from Australia.
- b) In relation to the provision of other pulse crop export tonnages that are not part of this application (acknowledging the commodities Veritas Fungicide is currently registered on), similar to the comment above, it would be useful for the TAN to provide some indication of the markets for each commodity. The MRLs listed for countries in Table 4 in general are not common or key pulse markets. In the absence of export markets for unprocessed commodities, some comment on the Australian market may be useful in determining whether there are “exports of processed product from these commodities”. A source may be ABS or Pulse Australia.

- c) In relation to two aspects cited in the TAN, being:

“(Tebuconazole) - It is noted that this MRL is currently required for the registered use on other pulses at a higher rate as well as a minor use permit (PER82104) for use on mung beans, adzuki beans and navy beans at the same rate but a shorter withholding period (21 days).

This risk to trade has also been managed for adzuki bean, mung bean and navy bean as a similar use but with a shorter withholding period (21 days) has been issued under permit (PER82104) since November 2016.”

While it is potentially true that market requirements have been managed since release of the permit for these 3 commodities, there is no information in the TAN to determine if the product was used on these crops AND they were exported to each market under an industry management system to manage residues.

Should you have any questions on this submission please do not hesitate to contact me.

Regards

Gerard McMullen

Chair

National Working Party on Grain Protection

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GPA

Grain Producers Australia

SUBMISSION

**APVMA Trade Advice Notice
on azoxystrobin and tebuconazole in the product Veritas Opti Fungicide for
use on adzuki beans, mung beans and navy beans
APVMA product number 89698**

PO Box 370
Braidwood NSW 2662

24 February 2021

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

Re: Trade Advice Notice on azoxystrobin and tebuconazole in the product Veritas Opti Fungicide for use on adzuki beans, mung beans and navy beans

Thank you for the opportunity for Grain Producers Australia (GPA) to provide a response to the **Trade Advice Notice on azoxystrobin and tebuconazole in the product Veritas Opti Fungicide for use on adzuki beans, mung beans and navy beans, APVMA product number 89698.**¹

Background

Powdery mildew of mungbean is caused by the fungus *Podosphaera fusca*. In Australia, yield losses of up to 40% have been recorded in highly susceptible varieties² and there is potentially similar significant losses resulting from powdery mildew infection in adzuki and navy beans. There is a critical industry need for effective fungicide control options for this disease.

GPA supports the establishment of a label for the product Veritas Opti Fungicide for use on adzuki beans, mung beans and navy beans as tabled by the APVMA.

GPA has reviewed the APVMA **the Trade Advice Notice for the product Veritas Opti Fungicide**. GPA notes that when used as per the proposed label application method, detectable residues in Australian field trials of the product Veritas Opti for azoxystrobin resulted in a Supervised Trial Median Residue (STMR) of 0.05 mg/kg with a recommendation for the current pulses (VD 0070) MRL to remain at 0.3 mg/kg, while tebuconazole resulted in a Supervised Trial Median Residue (STMR) of 0.06 mg/kg with a recommendation for the exiting pulses (VD 0070) MRL to include the new uses on mung beans, adzuki beans and navy beans with an MRL of 1.0 mg/kg in conjunction with a 4 weeks harvest withholding period.

GPA notes that while the proposed Australian azoxystrobin MRL is higher than the Codex, EU and Taiwan MRLs and the proposed Australian tebuconazole MRL is higher than all other international MRLs including Codex, the STMR residues derived from the comprehensive trial data set detailed in the Veritas Opti TAN resulted in residues below these trade MRLs. GPA notes the actives in this product have been used by the grains industry under APVMA permit PER82104 since November 2016 with a shorter withholding period (21 days) without any adverse issues. In addition it should be noted there is very limited international trade of adzuki and navy beans.

GPA considers that the risk to trade is considered to be low. 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 andrew.weidemann@grainproducers.com.au or 0428 504 544.

Yours sincerely



Andrew Weidemann
Chairman GPA

¹ <https://apvma.gov.au/node/79356>

² <https://grdc.com.au/resources-and-publications/grdc-update-papers/tab-content/grdc-update-papers/2016/06/fungicide-management-of-mungbean-powdery-mildew>

Background on GPA

Grain Producers Australia (GPA) represents Australia's broadacre, grain, pulse and oilseed producers at the national level. Grain Producers Australia works to foster a strong, innovative, profitable, globally competitive and environmentally sustainable Australian grains industry. Representing 5200 farm businesses, it strives to represent Australian grain farmers nationally and internationally in their contribution to sustainable development and society.

Working with its members – state farm organisations and farmers across the grain production area of Australia - GPA advocates for sound outcomes that deliver a positive commercial result. GPA is a not-for-profit company limited by guarantee. It is governed by a board, elected by its members.

The objectives of GPA 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 has a policy council, strategically focused on three pillars of economic development, social responsibility and environmental management. Our policy council is supported by, and engages with, representatives from State Farm Organisations including:

- Agforce Grains
- Grain Producers SA
- NSW Farmers Association
- Victorian Farmers' Federation Grains Group
- Tasmanian Farmers and Graziers Association
- WA Farmers
- WA Grains Group

GPA³ manages the biosecurity program for the grains industry through Plant Health Australia and is a joint Representative Organisation (RO) responsible for overseeing the performance of the Grains Research and Development Corporation (GRDC).

³ Further information on GPA: <https://www.grainproducers.com.au/>