



Australian Government

**Australian Pesticides and
Veterinary Medicines Authority**



Trade Advice Notice on glyphosate in the product Nufarm CRUCIAL Herbicide on lupins

Submissions received

December 2021



SUBMISSION

**APVMA Trade Advice Notice on glyphosate in the product Nufarm CRUCIAL
Herbicide for use on lupins APVMA product number 86761**

PO Box 370
Braidwood NSW 2662

22 December 2021

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

Re: Trade Advice Notice on glyphosate in the product Nufarm CRUCIAL Herbicide for use on lupins APVMA product number 86761

Thank you for the opportunity for Grain Producers Australia (GPA) to provide a response to the **Trade Advice Notice on glyphosate in the product Nufarm CRUCIAL Herbicide for use on lupins APVMA product number 86761**.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 glyphosate pre-harvest is a key strategic weed management tool for herbicide resistance management.

Pulse Australia currently holds a permit with the APVMA for 'Pre-Harvest Desiccation and late Season weed control in Lupins – Permit number PER91458'.³ This permit expires on the 31 December 2021. Permits for late season glyphosate use have been in place since November 2010.

This current permit PER91458 has been essential for both pulse grain producers and grain traders and extending this to a label is required for growers to put plans in place for the 2021/22 harvest. Access to the registration proposed in this TAN is essential for industry confidence in making business and production plans for the 2022/23 season.

GPA supports the establishment of a label for the product Nufarm CRUCIAL Herbicide for use on lupins as tabled by the APVMA.

GPA has reviewed the APVMA **Trade Advice Notice for the product Nufarm CRUCIAL Herbicide for use on lupins**. GPA notes the APVMA crop group guidelines, that lupins are classified under the Sub Group 015A, Dry beans, of the Crop Group 015: Pulses. Dry beans (faba beans) and Dry peas are the representative crops of the pulse crop group. GPA notes that Nufarm CRUCIAL Herbicide is currently registered with a similar GAP in pulses including faba beans and field peas. GPA supports the APVMA to extend the registered use of glyphosate in pulses, and the applicable crop group [VD 0070] Pulses [except soybeans (dry), cowpeas (dry), adzuki beans (dry), mung beans (dry)] MRL of 5 mg/kg to lupins. GPA supports the proposed use in conjunction with a harvest withholding period of 7 days. GPA also supports the APVMA current glyphosate MRL of 200 mg/kg for Primary feed commodities (except Cotton forage; Rape seed [canola] forage and fodder) to cover glyphosate residues arising in lupin straw as a result of the proposed use.

GPA notes that in the 2010/11 Australian trials residues of glyphosate and AMPA residues in lupin grain at ~1× or ~2× the maximum proposed rate were <Limit of Quantification (LOQ) and in international trials at similar rates and timings, AMPA residues were <0.05 mg/kg. GPA notes that the major export destinations of Australian pulses are Asia, Middle East and Europe. GPA notes that pulse and/or lupin MRLs are set at the same or higher levels in the EU, Japan and USA and at 2 mg/kg in Taiwan and by Codex and that China currently has no glyphosate MRL established for lupins or dried beans.

GPA considers that while some export markets currently have no glyphosate MRL set for lupins, the trade risks from this product approval is low as these risks have been effectively managed by the industry through minor use permits for over a decade. As with a number of other existing grain

¹ <https://apvma.gov.au/node/94221>

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

³ <https://permits.apvma.gov.au/PER91458.PDF>

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, appearing to read 'Colin Bettles', with a stylized, cursive script.

Chief Executive
Grain Producers Australia
m: 0439 901 970
e: colin.bettles@grainproducers.com.au

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/>

[REDACTED]
[REDACTED]
[REDACTED]
8/12/2021

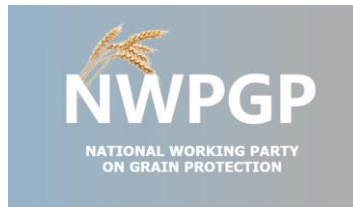
RE: Trade Advice Notice on glyphosate in the product Nufarm CRUCIAL Herbicide for use on lupins
APVMA product number 86761 November 2021

Please accept the following as our submission to this proposed change by Nufarm :-

1. We note that India specifically is referred to in the spreadsheet as having a 0.01mg/kg limit for MRL. This appears to be the lowest of the MRL's on this list and indicates a NIL tolerance in real terms. This is their default value.
2. India is an emerging market for us for Lupins as a human food and I would be disappointed to see this disrupted as a result of growers using Glyphosate and either not observing the label rates, not observing the withholding period or as a result of a lack of information on the degradation rate of Glyphosate post spraying and hence leaving a residue exceeding that allowed for this market.
3. From the data provided, all withholding periods and application rates for lupin pre-harvest, did not provide residues less than the Indian MRL of 0.01mg/kg.
4. We concluded that If the degradation rate of Glyphosate is not sufficient to provide an effective residue of less than 0.01 on the 'hull/husk', NOT pod, then either the rate of application needs to be very much lower than that prescribed on the label or the withholding period needs to be much longer, until such time as the residue is less than the Indian MRL
5. I would prefer to see growers have very clean paddocks and not need to spray with Glyphosate on lupins – so the rotation and weed management prior to growing lupin is the critical piece here.
6. Without the sufficient knowledge required, I recommend that this approval be declined or withdrawn and that Glyphosate not be used at all on lupin crops immediately prior to harvest, unless there is evidence to the contrary which shows the residue is less than 0.01mg/kg at harvest on the husk, following harvesting and pod removal

I can be contacted for any questions on this by calling our office on [REDACTED] or [REDACTED]
[REDACTED]

Sincerely
[REDACTED]
[REDACTED]



To:

Assistant Director, Communications
Australian Pesticides and Veterinary Medicines Authority
GPO Box 3262
Sydney NSW 2001
Via email: enquiries@apvma.gov.au

Date: 13 December 2021

To whom it may concern

I write in response to a request for comments on an application from Nufarm Australia Limited to vary the registration of Nufarm CRUCIAL Herbicide containing glyphosate, to extend the approved use in pulses to include lupins.

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 APVMA in the Trade Advice Notice, industry does not object to the proposal to vary the registration of Nufarm CRUCIAL Herbicide containing glyphosate, to extend the approved use in pulses to include lupins.



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 shown.

Gerard McMullen

Chair

National Working Party on Grain Protection

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