



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



**Public Release Summary on florylpicoxamid
in the product Telbek Adavelt active Fungicide**

Submissions received

February 2022



GPA

Grain Producers Australia

SUBMISSION

**Public Release Summary on the evaluation of the active constituent
florypicoxamid in the product Telbek Adavelt active Fungicide**

PO Box 370
Braidwood NSW 2662

8 February 2022

Case Management and Administration Unit
Australian Pesticides and Veterinary Medicines Authority
GPO Box 3262
Sydney NSW 2001

Re: Public Release Summary on the evaluation of the active constituent florylpicoxamid in the product Telbek Adavelt active Fungicide

Thank you for the opportunity for Grain Producers Australia (GPA) to provide a response to the **Public Release Summary on the evaluation of the active constituent florylpicoxamid in the product Telbek Adavelt active Fungicide.**¹

Background

There is a strategic need for new fungicides of a different mode of action as part of an Australian disease control and resistance management strategy. Australian growers urgently require access to new fungicide control technologies in order to maintain crop production. The fungal disease of wheat Septoria tritici blotch – STB (*Zymoseptoria tritici*) can cause a potential yield loss in suitable disease conditions in south-eastern Australia of 18% with potential losses of \$21 million per annum.² These impacts may increase with looming resistance risks to fungicides that are currently effective.

There has been rapid selection and spread of Group 3 triazole demethylation inhibitors (DMI) fungicide resistance in the Australian population of STB.³ While Group 7 succinate dehydrogenase inhibitor (SDHI) fungicides remain effective, there has also recently been reported incidence of strobilurin fungicide resistance in South Australia in 2021.⁴ Based on STB fungicide resistance evolution in Europe, it will be strategically important for the Australian grains industry to have access to Group 11 quinone outside Inhibitor (QoI) fungicides.

GPA supports the establishment of a label for the product Corteva Telbek Adavelt active Fungicide for use on wheat as tabled by the APVMA.

GPA has reviewed the APVMA **Public Release Summary (PRS) on the product Corteva Telbek Adavelt active Fungicide for use on wheat.**

GPA notes that no detectable grain residues were observed in the majority of USA and Australian trials detailed in the PRS. GPA supports the proposed APVMA Maximum Residue Limit (MRL) for florylpicoxamid of 0.02 mg/kg which is at the Limit of Quantification (LOQ) for GC 0654 wheat grain for the proposed use in conjunction with the proposed harvest withholding period of “Not required when used as directed” and the proposed label statement of ‘DO NOT apply after Z69 (end of flowering)’.

GPA notes that products containing florylpicoxamid are not currently registered overseas for agricultural uses. GPA also notes that Florylpicoxamid has not yet been considered by Codex and this is the first global submission, so no relevant international MRLs have been established.

GPA notes that the APVMA PRS details that residues above the combined LOQ of 0.02 mg/kg are not expected in wheat grain and no detectable residues were observed in 23 of the 27 trials conducted according to, or approximating GAP, and therefore the overall risk to trade in wheat grain is considered to be low. GPA also notes that the PRS details that detectable residues should not occur in animal commodities for export if a 4 day Export Slaughter Interval (ESI) is observed.

GPA notes that the active constituent florylpicoxamid is currently only registered in Korea for use on roses and notes that Telbek Adavelt active Fungicide is the first agricultural registration of a florylpicoxamid product anywhere in the world. In particular, GPA notes that Australia is the first global

¹ <https://apvma.gov.au/node/95731>

² https://grdc.com.au/__data/assets/pdf_file/0026/203957/disease-loss-wheat.pdf.pdf

³ <https://grdc.com.au/resources-and-publications/grdc-update-papers/tab-content/grdc-update-papers/2020/02/septoria-tritici-blotch-of-wheat,-management-strategies-for-the-medium-and-low-rainfall-zones-of-south-east-australia>

⁴ <https://grdc.com.au/news-and-media/news-and-media-releases/national/2021/july/strobilurin-resistance-in-septoria-tritici-blotch-confirmed-in-sa>

jurisdiction to have access to the fungicide active for use in grains production and is encouraged by Corteva's commitment to the Australian market. It is critically important that Australian producers have access to new fungicide disease control technologies such as florypicoxamid that address emerging fungicide resistance to remain globally competitive with other production competitors overseas.

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

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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/>