



Australian Government

**Australian Pesticides and
Veterinary Medicines Authority**



Trade Advice Notice on metrafenone for use on wheat

Submissions received

February 2023

20 February 2023

Executive Director, Risk Assessment Capability
Australian Pesticides and Veterinary Medicines Authority
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Re: Trade Advice Notice metrafenone for use on wheat – Permit number 93198

Grain Producers SA (GPSA) welcomes the opportunity to provide a submission to the **Trade Advice Notice metrafenone for use on wheat Permit number 93198¹**

Background on Grain Producers SA

GPSA is the peak industry body for South Australian grain growers. GPSA is non-political and represents producers to government, the community and industry, including grain marketers, exporters, storage and handlers, researchers, and farm input suppliers. We represent the 4,500 grain farming businesses in South Australia, who plant more than four million hectares of cereals, pulses and oilseeds annually and contribute more than \$4 billion to Australia's gross food revenue.

Background on Wheat Powdery Mildew

Wheat powdery mildew (WPM) has been documented to cause up to 25% yield loss in Australia.² Common wheat varieties that are currently being widely grown have poor varietal resistance which has led to heavy reliance on fungicides for WPM control. There are only three registered mode of action fungicide groups for control of mildew in wheat, they are group 3 DMI, group 7 SDHI and group 11 QoI. Fungicide resistance in WPM was identified in South Australia in 2019 and is increasing, rendering group 11 QoI's ineffective and reducing sensitivity to group 3 DMI's. Industry research has also shown the group 7 SDHI fungicides have limited activity on WPM and these fungicides mixtures are reliant on the group 3 mix partner.² Therefore, where fungicide resistance is prevalent, there are no registered fungicide options that perform adequately at controlling WPM.

Although GPSA understands emergency permits are not a long-term solution, there is an immediate need for new fungicide options to control WPM in the interim that new products are registered and more resistant varieties are bred. The urgency of more integrated pest management options for WPM was highlighted at the GPSA Crop Disease Roundtable which saw agronomists, pathologists, plant breeders, researchers and industry experts come together to

¹ [Trade Advice Notice on metrafenone for use on wheat | Australian Pesticides and Veterinary Medicines Authority \(apvma.gov.au\)](https://www.apvma.gov.au)

² [Management of powdery mildew on fungicide resistant wheat - GRDC](#)

highlight the increasing issue of this disease, as well as determining short, medium, and long term control options.

GPSA supports the establishment of a permit for metrafenone use on wheat as tabled by the APVMA.

GPSA has reviewed the APVMA Trade Advice Notice metrafenone for use on wheat.

GPSA supports the APVMA proposal to establish a finite temporary MRL for metrafenone on GC 0654 Wheat of 0.06 mg/kg.

Industry is reassured that the proposed Australian use pattern has the appropriate critical comments and restraints in place to prevent misuse and reduce the risk of exceeding established MRLs.

GPSA notes that the observed median residue for metrafenone was 0.01 mg/kg and that application in all of the 19 relevant trials was at a later timing (BBCH 69 to 83) than that proposed for the permit. Given that metrafenone MRLs have been established in China, and by Codex, the Gulf Cooperation Council, Japan and the European Union at levels equal to or higher than is proposed in Australia, the potential risk to trade for wheat grain to those markets (and markets covered by those MRLs) is considered to be low.

GPSA also notes the demonstrated registered use of UK label for Flexity (300 g/L metrafenone, a suspension concentrate) which has similar use pattern to that what is proposed for Australia.

GPSA considers that while there are some potential trade risks to some markets, 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 further detail on any of GPSA's comments above, please don't hesitate to contact me via the contact details below.

Kind regards,



Brad Perry

Chief Executive Officer

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To:

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Via email: enquiries@apvma.gov.au

Date: 17 February 2023

To whom it may concern

I write in response to a request for comments on an emergency permit application from Grain Producers Australia Limited for the use of metrafenone on wheat, for the control of powdery mildew.

This submission is presented on behalf of the National Working Party on Grain Protection (NWPGP) and deals with the commodity wheat grain only.

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 and the Chair is funded by Grains Australia.
- Has members across the entire grain supply chain.
- Hosts an annual conference 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 Support for the Application

Based on the information provided by APVMA in the Trade Advice Notice (TAN), the NWPGP supports the proposal. This support is provided based on a range of information such as:

- The trial residue data indicates low or non-detectable residues will be present in most situations.
- The reported use to control powdery mildew is expected to be relatively geographically confined that is, to “very high humidity areas”.
- Users must follow the current CroPLife Fungicide Resistance Management Strategy.
- While this product is specific to control powdery mildew, there are other products that are used to provide general control of this disease.



- We understand there is potential for other products to be registered in the near future, or for applications to be made to the APVMA.
- Many markets including Codex have adequate MRLs.
- Industry practices of CVDs, commingling and residue testing prior to outturn should be adequate to manage the risks of sending grain to markets with no MRL where residues may have arisen.
- Industry requests a short permit validity period (i.e., 1 year) to enable industry to evaluate the use of this product and risks to wheat marketing.

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'.

Gerard McMullen

Chair

National Working Party on Grain Protection

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Produced through Grains Australia Limited funding of this activity

