



Australian Government

**Australian Pesticides and
Veterinary Medicines Authority**



**Trade Advice Notice on chlorantraniliprole in the product
Vantacor Insecticide for use on cereal crops**

Submissions received
August 2025



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18th August 2025

Executive Director, Risk Assessment Capability
Australian Pesticides and Veterinary Medicines Authority
GPO Box 574
CANBERRA ACT 2601

By email: enquiries@apvma.gov.au

To Whom It May Concern,

RE: Trade Advice Notice Vantacor Insecticide for use on cereal crops

AgForce Queensland Farmers Limited (AgForce) is a peak organisation representing Queensland's cane, cattle, grain and sheep, wool & goat producers. The cane, beef, broadacre cropping and sheep, wool & goat industries in Queensland generated around \$11.2 billion in on-farm value of production in 2022-23. AgForce's purpose is to advance sustainable agribusiness and strives to ensure the long-term growth, viability, competitiveness and profitability of these industries. Over 6,000 farmers, individuals and businesses provide support to AgForce through membership. Our members own and manage around 55 million hectares, or a third of the state's land area. Queensland producers provide high-quality food and fibre to Australian and overseas consumers, contribute significantly to the social fabric of regional, rural and remote communities, as well as deliver stewardship of the state's natural environment.

The Australian Pesticides and Veterinary Medicines Authority (APVMA) is considering an application by FMC Australasia Pty Ltd to vary the registration of Vantacor Insecticide, containing chlorantraniliprole, for use on a range of grain crops including sorghum, maize, popcorn, rice, millet, and sweet corn.

This submission is made in support of the proposal. Cereal grains are central to both Australia's domestic food supply and its agricultural exports. They underpin livestock feed industries, provide essential dietary staples, and represent significant export earnings. Capping the maximum number of applications of Vantacor Insecticide delivers important agronomic, economic, and trade benefits. It provides growers with the flexibility to respond to fluctuating pest pressures, particularly during critical growth stages of grain crops or grain-fill in sorghum, while supporting resistance management strategies by allowing chlorantraniliprole to be used in a controlled sequence with other insecticides, reducing over-reliance on single chemistries.

Maximum applications safeguard farmer profitability and ensure Australia continues to deliver reliable, high-quality grain to domestic and export markets without unintended Maximum Residue Limit (MRL) breaches, strengthening both food security and trade confidence.



As a diamide insecticide, chlorantraniliprole works on ryanodine receptors, offering a distinct mode of action compared to older insecticides. Its inclusion in grain production provides growers with a rotational option to manage resistance in fall armyworm and Helicoverpa. With limited effective modes of action available, this is a critical addition to long-term resistance management programs. We have seen an over reliance on Vantacor during the early days of the fall armyworm incursion, with farmers desperately trying to protect and save crops with limited knowledge. As information and data sets have improved, grain producers have adopted a management system that does not involve significant reliance on insecticides.

Effective management of MRLs is critical to safeguarding Australia's grain export markets. International buyers set strict MRL standards to protect consumer safety, and even minor exceedances can lead to rejected shipments, market suspensions, or long-term reputational damage. For Australian grain producers, who rely heavily on export earnings from maize, rice, sorghum, and other cereals, maintaining compliance with international MRLs underpins both market access and price competitiveness. Proactive MRL management ensures that residues from crop protection products, such as Vantacor, remain within established thresholds across diverse markets, even where standards differ between the EU, Asia, and North America. This requires adherence to label instructions, withholding periods, and exporter guidance, supported by residue testing where necessary.

By embedding MRL stewardship into production systems, Australian growers can protect trade relationships, preserve premium market positions, and provide global consumers with ongoing confidence in the safety and reliability of Australian grain. For these reasons, AgForce recommends that the APVMA approve the proposed changes of Vantacor registration for grain crops. This will protect yields, safeguard export value, and provide Australian growers with long-term certainty in managing pest threats.

For further information or to discuss this submission in more detail please contact Ruth Thompson, Grains Policy Director via email (thompsonr@agforceqld.org.au) or phone (0427 472 467).

Sincerely,



Brendan Taylor
AgForce Grains President



THE LEADING VOICE FOR QUEENSLAND PRODUCERS





To:

Executive Director
Risk Assessment Capability
Australian Pesticides and Veterinary Medicines Authority
GPO Box 574
Canberra ACT 2601

Via email: enquiries@apvma.gov.au

Date: 12 August 2025

To whom it may concern

I write in response to a request for comments on an application from FMC Australasia Pty Ltd, to vary the registration of Vantacor® Insecticide to extend the use to lucerne, maize (for grain and silage), popcorn, teosinte, rice, sorghum, millet and sweet corn.

This submission is presented on behalf of the National Working Party on Grain Protection (NWPGP) and deals with maize, millet and sorghum 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 in the Trade Advice Notice (TAN), industry supports the registration as proposed. Comments on this view include:

- a) Maize Cereals – given the TAN states that quantifiable residues are unlikely to arise, industry supports a Maize Cereals MRL of 0.01*mg/kg as per the existing temporary MRL.
- b) Millet – Millet falls under the sorghum crop group. Millet is not a significant crop grown in Australia nor is there an export market to any significant extent. China would potentially be

the only export market of concern, noting China has an MRL under Upland Crops of 0.02*mg/kg as per Codex.

- c) Sorghum – it is noted the proposed Australian new MRL would be 1.5mg/kg for sorghum grain and millet. Industry does not have any issues with the proposed registration based on the fact that China, being a key market, does have a temporary MRL of 5mg/kg for sorghum and this has been in place for several years. The TAN incorrectly states China does not have an MRL for sorghum. The TAN only reviewed the recently proposed additional MRL listings for China, and not the full MRL listing that is in place under GB2763-2021. For all other markets of Australian sorghum, the new proposed MRL is not a concern that can't be managed, given the majority are above the 1.5mg/kg proposed, noting some lesser tonnage/important markets have a lower MRL.

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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