



Australian Government

**Australian Pesticides and
Veterinary Medicines Authority**



**Trade Advice Notice for use of Sumitomo Shield Systemic
Insecticide on mung beans**

Submissions received

November 2025



To:

Executive Director
Agricultural Chemical Branch
Australian Pesticides and Veterinary Medicines Authority
GPO Box 574
Canberra ACT 2601

Via email: enquiries@apvma.gov.au

Date: 18 November 2025

To whom it may concern

I write in response to a request for comments on an application from Sumitomo Chemical Australia Pty. Ltd. to vary the registration of Sumitomo Shield Systemic Insecticide containing clothianidin to include use on mung beans.

This submission is presented on behalf of the National Working Party on Grain Protection (NWPGP) and deals with dried mung bean 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 Non-support for the Application

Based on the information provided in the Trade Advice Notice (TAN), industry does not support the registration as proposed and the proposed change in maximum residue limit (MRL).

Reasons for this view are outlined below.

a) Field Trials and Results Arising

It is acknowledged the TAN proposes a usage pattern involving:

- A harvest withholding period of 21 days.
- A minimum re-treatment interval of 14 days.

Based on the trial data provided in the TAN, residues from 0.022mg/kg to 0.094mg/kg (proposed label rate) arose. The latter highest residue significantly exceeds the majority of mung bean market maximum residue limits (MRLs) as listed in the table below.

It is not clear from the data provided whether the OECD calculator has been used to generate the proposed Australian MRL of 0.2mg/kg, nor the STMR from the trials. Based on usual methods of developing Australian MRLs, industry assumes the OECD calculator was used. Without that information, which is usually provided, it is difficult to fully understand the risk of residues arising through industry use and to understand the proposed increase in the MRL.

It is also unclear why the TAN states “a conservative permanent MRL” is proposed, rather than a more informed statement of “the OECD calculator recommends...”.

It is also noted National Residue Survey results are quoted in the TAN potentially up to 0.05mg/kg under the current permit.

Nevertheless, despite the uncertainty of the information in the TAN as outlined above, the proposed usage pattern and residues arising while being relatively low, significantly exceed most mung bean markets and is a risk that industry cannot fully manage.

b) Markets and Maximum Residue Limits

While various markets are listed in the TAN, the main mung bean markets from Oct 2024 to Sep 2025 are as listed below, along with their current MRL for clothianidin.

Market	Tonnage (MT)	MRL (mg/kg)
Australia – current	< 5%	0.1 T
Australia - proposed	n/a	0.2
China	113,300 (82%)	0.02
Codex	n/a	0.02
Indonesia	5,260 (4%)	0.02
Philippines	1,920 (2%)	0.02 (Codex)
Thailand	1,780 (1%)	0.02 (Codex)
Vietnam	10,000 (7%)	0.2

As can be seen, China has taken over ¾ of mung beans during that period and the proposed new Australian MRL significantly exceeds the MRL in that market.

A range of other markets exist, some of which adopt the Codex MRL or lower.

It is noted in the TAN:

“To further mitigate risk the label contains the following statement: The Applicant has proposed a Trade statement: Treated crops for export to destinations outside Australia may require a longer interval before harvest to comply with residues standards of importing countries. Please contact your

industry body, exporter or Sumitomo Chemical Australia before using Sumitomo SHIELD Systemic Insecticide.”

Despite those statements and residue data collected on some shipments, the risk is there of residues above most markets for mung beans, and consultation with the registrant or industry body and subsequent management practices will not effectively mitigate those risks to a satisfactory level.

c) Industry Usage Patterns

There are significant industry efforts to increase the area of mung beans grown and resulting tonnage made available for export markets. However, currently there are relatively few mung bean processors/exporters. Grain is generally sourced from local growers and due to the nature of this supply chain, there is generally a limited ability to blend mung beans sourced from different growers where residues may be higher than a market MRL.

Industry uses a range of other management systems to meet customer requirements for MRLs, including:

- Commodity Vendor Declarations from growers listing chemicals used on the growing crop.
- Segregation.
- Sampling and testing of grain received.
- Stock selection.

However, if mung beans are treated in-crop as per the proposed label directions, and residues arise above the market MRL, the ability to supply markets or source alternative markets with suitable MRLs is very limited. For that reason, while industry supports the adoption of as many tools as possible for growers to manage in-crop pests, industry cannot support the proposed registration due to the risk of not being able to supply that grain to key mung bean markets.

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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