



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



**Trade Advice Notice on imazapic and imazapyr in the product
Sentry Herbicide for use on oats**

Submissions received

May 2022

To:

Executive Director, Risk Assessment Capability
Australian Pesticides and Veterinary Medicines Authority
GPO Box 3262
Sydney NSW 2001
Via email: enquiries@apvma.gov.au

Date: 26 April 2022

To whom it may concern

I write in response to a request for comments on an application from Nufarm Australia Limited to register the use of Sentry Herbicide on Kingbale and Archer oat varieties.

This submission is presented on behalf of the Australian Export Fodder Industry through a research project funded by AgriFutures Australia. That research project:

- Is undertaken on behalf of the Australian Export Fodder Industry.
- Is funded and supported by AgriFutures Australia.
- Is conducted on behalf of a range of members across the entire Australian fodder supply chain.
- Reviews current and proposed revisions to market MRLs.
- Provides advice to government on export fodder industry views in relation to the impact on market access of chemicals in use on Australian fodder.

On behalf of the export fodder industry, I advise that based on the information provided by APVMA in the Trade Advice Notice dated April 2022, the industry does not object to the proposed registration. No comment is made for grain/seed production.

Should you have any questions on this submission please do not hesitate to contact me.

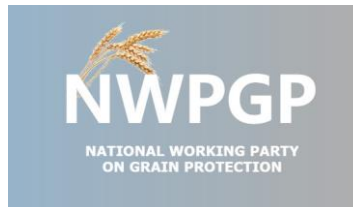
Regards



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Consultant to Agrifutures Australia on behalf of the Australian Export Fodder Industry

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Produced through Agrifutures Australia funding of "Chemical Residue monitoring for the Fodder Industry"



To:

Executive Director, Risk Assessment Capability
Australian Pesticides and Veterinary Medicines Authority
GPO Box 3262
Sydney NSW 2001
Via email: enquiries@apvma.gov.au

Date: 26 April 2022

To whom it may concern

I write in response to a request for comments on an application from Nufarm Australia Limited to register the use of Sentry Herbicide on Kingbale and Archer oat varieties. The product contains 525 g/kg imazapic and 175 g/kg imazapyr as its active ingredients.

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 funded by Grains Australia.
- 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 APVMA in the Trade Advice Notice (TAN), industry does not object to the proposed registration. No comment is made for grazing or oaten hay.



3. Industry Comments

a) Page 8:

It is noted label directions state *“Kingbale and Archer are oaten hay varieties. Grain harvested from failed hay crops, screenings from seed crops or excess seed cannot be delivered to bulk handlers and is not suitable for export. Grain from these situations can be fed to livestock on the Australian domestic market”*.

It is unclear why oat grain is permitted to be fed to livestock on the Australian domestic market, yet oat grain cannot be delivered to bulk handling companies (BHCs). It is recognised not permitting this oat grain to BHCs may reduce the risk of such grain being exported. However, there are many BHCs (may be very small BHCs) that fit within the BHC definition who may choose to solely supply such oat to the domestic livestock market. The TAN proposal effectively prohibits them from carrying out that commercial activity.

b) Page 8

Those same label directions go on to state *“If crops are stressed due to drought conditions, they should be grazed or harvested for grain and not cut for export oaten hay markets”*.

It may be clearer to reference that grain from those crops can be fed to livestock on the domestic market.

c) In addition to the above 2 points, given the proposed increase in oat grain Australian MRLs for both chemicals, it may assist if the label directions make a reference to use of this treated oat grain on the Australian human consumption market, as there is no reference to this potential use.

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 positioned below the 'Regards' text.

Gerard McMullen

Chair

National Working Party on Grain Protection

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Produced through Grains Australia Limited funding of this activity