



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



**Trade Advice Notice on flonicamid in the product MainMan
500 WG Insecticide for use on canola**

Submissions received

March 2021



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 February 2021

To whom it may concern

I write in response to a request for comments on an application from Ishihara Sangyo Kaisha Ltd to vary the registration of MainMan 500 WG Insecticide to allow use on canola.

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 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 the Australian Pesticides and Veterinary Medicines Authority (APVMA) in the Trade Advice Notice (TAN), industry does not object to the proposed registration on canola.



This advice is provided on the basis that:

- The majority of the listed markets for Australian canola have an MRL at or above the proposed Australian MRL, noting there are MRLs in key markets (EU 0.06mg/kg and China 0mg/kg) lower than the Australian proposed MRL of 0.5mg/kg.
- The majority of residues arising in the trials are below the market with the lowest listed MRL, being the EU at 0.06mg/kg.
- Only 1 high residue was detected from the trials - any stocks, if containing the highest residue as per the trials for Australian GAP at 0.14mg/kg, should be able to be readily identified and managed by the canola industry prior to outturn.

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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25 February 2021

Residues and Trade
Scientific Assessment and Chemical Review
Australian Pesticides and Veterinary Medicines Authority
PO Box 6182
Symonston ACT 2609

**Response to call for public comment on APVMA Trade Advice Note and Request on
flonicamid in the product MainMan 500 WG Insecticide for use on canola**

The GRDC **supports** the proposed registration of flonicamid in the product MainMan 500 WG Insecticide for use on canola, on the bases that.

- The majority of the listed markets have an MRL at or above the proposed Australian MRL, noting there are MRLs in key markets (China 0.2 mg/kg, EU 0.06 mg/kg) lower than the Australian proposed MRL of 0.5 mg/kg. That Japan and Codex MRLs are set at 0.5 mg/kg being equal to the Australian proposed MRL of 0.5 mg/kg.
- The majority of residues arising in the trials are below the market with the lowest listed MRL, being the EU at 0.06mg/kg.
- When 2 foliar applications were made at the proposed maximum label rate (50 gai/ha) only 1 residue detection (0.14 mg/kg) was higher than the lowest key market MRL (EU 0.06 mg/kg). The STMR = 0.03 mg/kg.
- When 2 foliar applications were made at twice the proposed maximum label rate (100 gai/ha) the STMR = 0.07 mg/kg compared to the lowest key market MRL (EU 0.06 mg/kg).

Any risks associated with grain destined for the EU market can be managed through the use of vendor declarations, stock selection and /or grain testing to ensure its suitability prior to outturn.

Please contact me as needed if you would like to discuss any of these comments and suggestions further.

Regards



Gordon Cumming

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SUBMISSION

**APVMA Trade Advice Notice
on flonicamid in the product MainMan 500 WG Insecticide for use on canola
APVMA product number 66373**

PO Box 370
Braidwood NSW 2662

9 March 2021

Executive Director, Risk Assessment Capability
Australian Pesticides and Veterinary Medicines Authority
GPO Box 3262
Sydney NSW 2001

Re: Trade Advice Notice on flonicamid in the product MainMan 500 WG Insecticide for use on canola

Thank you for the opportunity for Grain Producers Australia (GPA) to provide a response to the **Trade Advice Notice on flonicamid in the product MainMan 500 WG Insecticide for use on canola APVMA product number 66373.**¹

Background

Aphids can cause up to 9.7% potential yield loss in canola with a resulting estimated annual yield loss of \$24 million² and are also significant vectors of a number of viral diseases, particularly beet western yellows virus that can cause up to 14.5% yield loss and estimated annual damage of \$61.5 million.³ Insecticide resistance management of aphids is a significant challenge for the Australian grains industry. Green peach aphid has developed to target-site resistance to synthetic pyrethroids and carbamates, and metabolic resistance to organophosphates and neonicotinoids.⁴ Industry access to new modes of action such as flonicamid in the product MainMan 500 WG Insecticide will be an essential tool for Australian canola production.

GPA supports the establishment of a label for the product MainMan 500 WG Insecticide for use on canola as tabled by the APVMA.

GPA has reviewed the APVMA **the Trade Advice Notice for the product MainMan 500 WG Insecticide**. GPA notes that based on the Australian and USA field trials of flonicamid, this resulted in a Supervised Trial Median Residue (STMR) of 0.057 mg/kg and an STMR of 0.03 mg/kg from just the Australian trials conducted at Good Agricultural Practice (GAP). GPA supports the APVMA proposed MRL of 0.5 mg/kg for SO 0495 Rape seed [canola] for the proposed use of flonicamid on canola, in conjunction with a harvest withholding period of 'Not required when used as directed' and restraint of 'DO NOT apply later than crop growth stage BBCH 69 (end of flowering)'. GPA also supports the APVMA proposed MRL of 3 mg/kg for AM 0691 Rape seed [canola] forage and fodder for the proposed use of flonicamid on canola, in conjunction with a grazing withholding period of 21 days.

GPA notes that the proposed Australian flonicamid MRL is consistent with Codex, Japan and Korean MRLs and less than USA MRLs for rape seed [canola]. GPA notes that while the proposed Australian flonicamid MRL for rape seed [canola] of 0.5 mg/kg is higher than the EU and China MRLs, the STMR flonicamid residues derived from the comprehensive Australian GAP trial data set detailed in the MainMan 500 WG TAN, resulted in residues below these trade MRLs.

GPA considers that the risk to trade is considered to be low. 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 andrew.weidemann@grainproducers.com.au or 0428 504 544.

Yours sincerely



Andrew Weidemann
Chairman GPA

¹ <https://apvma.gov.au/node/79841>

² <https://grdc.com.au/resources-and-publications/all-publications/bookshop/2013/02/the-current-and-potential-costs-of-invertebrate-pests-in-grain-crops>

³ <https://grdc.com.au/resources-and-publications/all-publications/publications/2012/06/grdc-report-oilseeddiseasecosts>

⁴ <https://cesaraustralia.com/pestnotes/aphids/green-peach-aphid/>

Background on GPA

Grain Producers Australia (GPA) represents Australia's broadacre, grain, pulse and oilseed producers at the national level. Grain Producers Australia works to foster a strong, innovative, profitable, globally competitive and environmentally sustainable Australian grains industry. Representing 5200 farm businesses, it strives to represent Australian grain farmers nationally and internationally in their contribution to sustainable development and society.

Working with its members – state farm organisations and farmers across the grain production area of Australia - GPA advocates for sound outcomes that deliver a positive commercial result. GPA is a not-for-profit company limited by guarantee. It is governed by a board, elected by its members.

The objectives of GPA 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 has a policy council, strategically focused on three pillars of economic development, social responsibility and environmental management. Our policy council is supported by, and engages with, representatives from State Farm Organisations including:

- Agforce Grains
- Grain Producers SA
- NSW Farmers Association
- Victorian Farmers' Federation Grains Group
- Tasmanian Farmers and Graziers Association
- WA Farmers
- WA Grains Group

GPA⁵ manages the biosecurity program for the grains industry through Plant Health Australia and is a joint Representative Organisation (RO) responsible for overseeing the performance of the Grains Research and Development Corporation (GRDC).

⁵ Further information on GPA: <https://www.grainproducers.com.au/>