

24 May 2013

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Pesticides Program  
Australian Pesticides and Veterinary Medicines Authority  
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Email: [pesticides@apvma.gov.au](mailto:pesticides@apvma.gov.au)

Dear Sir

**RE: Trade Advice Notice - Moddus Evo Yield & Quality Enhancer**

**1. About Grain Trade Australia**

Grain Trade Australia (GTA) is the focal point for the commercial grains industry within Australia. It facilitates trade and works to provide an efficient, equitable and open trading environment by providing leadership, advocacy and commercial services to the Australian grain value chain.

GTA members are responsible for over 95% of all grain storage and freight movements made each year in Australia. Over 95% of the grain contracts executed in Australia each year refer to GTA grain standards and/or trade rules.

GTA members are drawn from all sectors of the grain value chain from production to domestic end users and exporters. GTA members are involved in grain trading activities, grain storage, human and stock feed milling.

Within this context, GTA provides comment on the abovementioned Trade Advice Notice (TAN) in relation to cereal grains only.

**2. Concerns with Registration of trinexapac-ethyl**

It is noted the Australian Pesticides and Veterinary Medicines Authority (APVMA) has before it an application from Syngenta Crop Protection Pty Ltd, to register Moddus Evo Yield & Quality Enhancer for increasing grain yield in wheat, barley and oats by reducing lodging, reducing excessive crop biomass and enhancing general crop development.

Australia is a major exporter of two of those commodities, wheat and barley to many regions of the world. These regions include the Middle East, Asia, South East Asia and Africa. Over 50 countries receive our crop products, with many countries regular buyers on an annual basis. While not a significant export market, oats is exported to a range of niche markets.

The Australian grains industry relies on those exports to confirm our commitment to not only supply a quality product, but also comply with relevant international and national regulations relating to chemicals.

We note within the TAN the proposed use pattern of trinexapac-ethyl is on wheat, barley and oats at the stem elongation stage in crop growth or at other times as stipulated. These proposed usages have not required APVMA to stipulate a harvest withholding period when the product is used as directed.

Nevertheless, the Australian European and US trials cited indicate while application rates were in some instances higher than the proposed Australian GAP, residues are expected in harvested wheat, barley and oats. This is reflected in the proposed Australian MRL of 0.2mg/kg.

While the expected residue detections are relatively low, these are of significant concern to the Australian grains industry. Many of the countries that receive Australian grain do not have an MRL set for trinexapac-ethyl on each of the commodities wheat, barley and oats. In addition, Codex MRLs for this compound have not yet been set on these cereal crops.

We recognise that individual countries have different rules for dealing with detection of chemical residues where an MRL has not been set. Some may default to an MRL of 0.1mg/kg, others adopt 0.01mg/kg, while others default to the level of detection.

In many cases any detection of trinexapac-ethyl in shipments where MRLs have not been set would result in rejection of that grain. Based on trial data listed in the TAN, there is also a significant risk of residues being detected above the default levels noted above.

The Australian grains industry prides itself on meeting customer and regulatory requirements and implements a range of measures to ensure exports are compliant. The proposed use of trinexapac-ethyl presents an unacceptable risk to that trade which cannot be mitigated by measures adopted by the Australian grains industry.

Therefore the Australian grains industry opposes the registration of trinexapac-ethyl until appropriate MRLs are adopted at Codex and in the countries receiving our wheat, barley and oats.

Thank you for consideration of this response.

Geoff Honey

A handwritten signature in black ink, appearing to read 'Geoff Honey', is positioned below the name 'Geoff Honey'.

Chief Executive Officer