

18 July 2013

Contact Officer
Pesticides Program
Australian Pesticides and Veterinary Medicines Authority
PO Box 6182
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Via email: pesticides@apvma.gov.au

Dear Sir

RE: Sulfoxaflor in the product Transform Insecticide

I refer to the Australian Pesticides and Veterinary Medicines Authority (APVMA) Gazette dated 2 July 2013 regarding the proposed registration of the above-mentioned product and the request for public comment.

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 registration of Sulfoxaflor for cottonseed only.

2. Cottonseed Exports from Australia

Of the total Australian production of approximately 1,250,000t of cottonseed in both 2011 and 2012, on average 50% was exported. During those two seasons the Australian cotton industry generated in excess of \$2.5 billion in export revenue, making it one of Australia's largest rural export earners. This shows the value of the export cottonseed market to industry.

The four major export markets for Australian cottonseed over that period were:

Market	Approx. Exports (tonnes)		Major Use
	2011	2112	
Korea (South)	75,000	70,000	Stockfeed
Japan	80,000	75,000	Crushing, stockfeed
USA	45,000	150,000	Dairy stockfeed
China	360,000	400,000	Crushing

While the size of the cotton crop determines the tonnage of cottonseed available for export, the outlook for cottonseed exports is strong given the increasing demand in Asia for use as stockfeed and for crushing in China.

3. Proposed Maximum Residue Limits for Sulfoxaflor

We note in the advice published by APVMA that it states “Some export destinations for soya bean, cottonseed, table grapes, dried grapes, citrus fruit, pome fruit, stone fruit, milk and mammalian meat and offal do not currently have MRLs for sulfoxaflor. Exports of these commodities are therefore at possible risk as a result of the proposed uses of sulfoxaflor in Australia.”

For the four export destinations for Australian cottonseed listed above, based on the MRLs listed as follows, the presence of Sulfoxaflor residues would be a concern and could severely disrupt trade:

- Japan – no MRL is set
- China – no MRL is set
- Korea (South) – no MRL is set
- USA – MRL of 0.2mg/kg

The APVMA advice does not indicate the potential level of residues of Sulfoxaflor on cottonseed when used as per label requirements. Even if the expected residue detections are at relatively low levels, any detection would be of significant concern to the Australian cottonseed industry.

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 or adopt the Codex MRL.

We note that Codex does not have an MRL for Sulfoxaflor.

For shipments to the above important Australian markets of cottonseed where MRLs have not been set, detection of Sulfoxaflor would result in rejection of that consignment.

Based on APVMA advice that “Exports of these commodities are therefore at possible risk as a result of the proposed uses of sulfoxaflor in Australia”, the proposed use of Sulfoxaflor presents an unacceptable risk to that trade which cannot be mitigated by measures adopted by the Australian cottonseed industry.

Therefore the Australian cottonseed industry opposes the registration of Sulfoxaflor until appropriate MRLs are adopted at Codex and in all countries receiving our cottonseed.

Thank you for consideration of this response.

Geoff Honey
Chief Executive Officer

