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1 September 2016

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

Via email: enquiries@apvma.gov.au

# **Dear Sir**

# **RE: Sulfoxaflor in the product Expedite Full Insecticide**

I refer to the Australian Pesticides and Veterinary Medicines Authority (APVMA) Trade Advice Notice dated August 2016 regarding the proposed registration of the abovementioned product on pulses 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. A list of GTA Members is attached

Within this context, GTA provides comment on the proposed registration of Sulfoxaflor for pulses only.

## 2. Pulse Exports from Australia

It is noted in the TAN "Of the pulses proposed for inclusion on the label, field peas, chickpeas, faba beans, navy beans and mung beans are considered to be major export commodities".

However it should be noted that all pulses except lupins are included in the proposed usage pattern change, many of which are exported.

Based on data obtained from Pulse Australia, the following are key markets for some of these pulses:

- Chickpeas India, Bangladesh, Pakistan
- Lentils Bangladesh, Sri Lanka, India
- Faba beans Egypt, Saudi Arabia, UAE
- Field Peas India, Bangladesh, Sri Lanka, Malavsia •
- Mung beans India, Vietnam, China

A large tonnage of these pulses is exported in containers, rather than in bulk for the pulses listed in the TAN.

# 3. Proposed Maximum Residue Limits for Sulfoxaflor

## 3.1 Usage Pattern

We note in the TAN published by APVMA that it states:

"The proposed use pattern for pulses (except lupins) is for two applications at 25 g ai/ha with a 14 day harvest and grazing WHP."

"Residues of sulfoxaflor in pulse grain at harvest 14 days (or more) after the last of two applications at 24 g ai/ha (1× proposed) were 0.02, 0.04, 0.04, 0.06, 0.29 and 0.32 mg/kg."

Various other trials on some pulses proposed for registration in Australia indicated a range of residues subsequently arising.

GTA seeks clarification on why an MRL of 0.7mg/kg is proposed when the usage pattern indicated a highest residue significantly below this value. A lower MRL would significantly reduce trade concerns of a violation of overseas MRLs.

The TAN references the OECD MRL calculator however it appears that this calculator has used data from the US Environmental Protection Agency for the recommendation to increase the Australian MRL to 0.7mg/kg. The calculator reports a "high uncertainty of MRL estimate (small dataset)" when the Australian trial data is entered.

The TAN also reports foreign trial results. If these results are added to the OECD MRL calculator with the Australian trial data the recommended MRL is 0.4 mg/kg. GTA would question the use of foreign trial results that also has different application rates in developing a recommended Australian MRL.

One could infer from the calculator that the Australian trial data set is too small by the calculator's admission.

The TAN states under 2.4 "An MRL of 0.7 mg/kg is proposed for VD 0070 pulses (except soya bean [dry]) in conjunction with a 14 day harvest withholding period." For greater clarity, given lupins is excluded, should this not also be stated.

Notes on the potential risk to trade are outlined on page 13 of the TAN. Stated within that section is "*The applicant has indicated that use of the products is expected to be sporadic dependent on seasonal conditions and as such only a small percentage of any one commodity is expected to be treated in a given season*".

The statement from the applicant regarding the sporadic use being a reduction in risk is irrelevant due to the nature of the pulse container export market. Unlike bulk shipments where loads are commonly commingled ex-farm, container packing generally has smaller segregations or is through a packing facility where a container may consist of pulses from one location/grower only. Therefore the dilution of the chemical residue through comingling grower loads does not occur and the above statement of the applicant is not relevant in terms of leading to a lower risk of MRL violations.

# 3.2 Overseas MRLs

As noted in the TAN "*MRLs for sulfoxaflor have not been established in Japan or Taiwan. Codex has an MRL for dry beans at 0.3ppm*".

GTA provide the following comments on the risks of the proposed use on the various pulse commodities:

- Industry advice is that Japan applies a default of 0.01mg/kg. Additionally it is believed that South Korea applies 0.2mg/kg although this may change (be deleted) under the current PLS process. Neither market is a significant pulse market for Australia.
- The latest advice to industry is that Taiwan applies a default 0.3mg/kg based on other dry beans (again this may alter under their review system).
- While Codex does have a Beans (dry) MRL of 0.3mg/kg, clarification is sought on the MRL that applies to those pulse commodities that are currently being reviewed under the general Pulse classification (e.g., Peas [dry]) mainly chickpeas and lentils. Clarification is sought on

whether this review will impact on future MRLs for all pulses (dry) that fall within those classifications.

- Even if the Codex MRL for Beans (dry) applies to all pulses in future based on Codex Alimentarius Commission 2016 and onwards deliberations, the proposed Australian MRL is significantly higher than the Codex MRL of 0.3mg/kg, placing exports at risk of violation of MRLs in those countries adopting Codex MRLs.
- Many of the markets listed above default to Codex and the proposed Australian MRL in those markets is a concern.
- The EU MRL listed in the TAN also is significantly lower than the proposed Australian MRL, noting the EU is not a significant export market for many pulses. However markets that default to the EU are a significant risk to trade in pulses.

GTA notes in the TAN "*Detectable residues are expected to occur in pulse crops when treated as proposed, however relevant MRLs are established in some markets.*" The TAN indicates residues will arise through use as per the proposed label above the MRL for various important pulse markets for Australia.

In summary, for many pulse markets the proposed use of Sulfoxaflor on pulses presents an unacceptable risk to that trade which cannot be mitigated by measures adopted by the Australian pulse industry due to the nature of stock selection and the nature of loading specific parcels into containers.

Therefore GTA opposes the registration of Sulfoxaflor on pulses.

Thank you for consideration of this response.

OS

Pat O'Shannassy Chief Executive Officer



# GRAIN TRADE AUSTRALIA

Membership List as at 30 June 2016

Organisation	Contact	Website /Phone
nary Member (Trading)		
Level A1 (over 7 Million Tonnes)		
Co-operative Bulk Handling Limited	Mr Jason Craig	cbh.com.au
Glencore Grain Pty Ltd	Mr Phillip Hughes	glencoregrain.com.au
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Level A2 (5 - 7 Million Tonnes)		
Cargill Australia Limited	Ms Penne Kehl	cargill.com.au
Level A3 (3 - 5 Million Tonnes)		
ADM Trading Australia Pty Ltd	Mr Tim Henry	adm.con
Graincorp Operations Ltd	Mr Klaus Pamminger	graincorp.com.a
	C	
Level A4 (1.5 - 3 Million Tonnes)		
Emerald Grain Pty Limited	Mr David Johnson	emeraldgrain.com
Nidera Australia Pty Ltd	Mr David Lengren	nidera.com.a
Level B1 (1.0 - 1.5 Million Tonnes)		
Bunge Agribusiness Australia Pty Ltd	Mr Chris Aucote	bunge.com/Agribusines
CHS Trading Company Australia	Mr Justin Fay	chsinc.com.a
Louis Dreyfus Company Australia Pty Ltd	Mr Robert Green	louisdreyfus.com.a
Level B2 (500,000 - 1 Million Tonnes)		
Agrex Australia Pty Ltd	Mr Richard Glasson	agrexaustralia.com.a
George Weston Foods Limited	Mr Mark O'Brien	gwf.com.a
Inghams Enterprises Pty Limited	Mr Graeme Dillon	inghams.com.a
Plum Grove Pty Ltd	Mr Tony Smith	plumgrove.com.a
Ridley Agriproducts Pty Ltd	Mr Michael Reeves	agriproducts.com.a
Riverina (Australia) Pty Ltd	Mr Jon Mulally	riverina.com.a
Level B3 (250,000 - 500,000 Tonnes)		
Agracom Pty Ltd	Mr Joe Hallman	agracom.com.a
AGRIGRAIN	Mr Jeremy Brown	agrigrain.com
Arrow Commodities Pty Ltd	Mr Dominic Vanzella	arrowcom.com.a
Australian Grain Export Pty Ltd	Mr John Thiele	08 8832 280
Australian Grain Growers Co-operative Limited	Mr Bruce McDonald	aggcoop.com.a
Centre State Exports Pty Ltd	Mr Jeff Voigt	centrestateexports.com.a
Chinatex Australia Pty Ltd	Mr Jiling Lai	02 9957 268
Lempriere Grain Pty Ltd	Mr Jonathan Holdsworth Mr Kane Fukuoka	lemprieregrain.com.a
Mitsui and Co (Australia) Ltd Riordan Grain Services	Mr Kane Fukuoka Mr Bradley Hogan	mitsui.coi riordangrains.com.a
Special One Grain Accumulator	Mr Bradley Hogan Ms Jaimee Carrigan	specialonegrain.com.a
United World Enterprises Pty Ltd	Mr Jimmy Liu	uwetypical.cor
Wilmar Gavilon Pty Ltd	Mr Matt Albion	07 3713 870
	wit watt ADJUII	0/3/13 8/0

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## Ordinary Member (Trading) (contd)

Level C (under 250,000 Tonnes) A & B Grains Pty Ltd A T Waterfield & Son Pty Ltd A W Vater and Co Adams Australia Pty Ltd Agmark Commodities Agri Om Australia Pty Ltd Agri-Oz Exports Pty Ltd Agriex Australia Pty Ltd Agrifoods Australia AGT Foods Australia All Commodities Pty Ltd Allied Mills AMPS Agribusiness Group Associated Grain Auscott Ltd AusiCan Commodities Ausrealt International Pty Ltd Australian Choice Exports Pty Ltd Australian Grain Storage Australian Growers Direct Pty Ltd Avigrain Produce Baker Grain Barooga Agriproducts Berriwillock Grain Storage Co-Operative Ltd BFB Pty Ltd Big River Feeds Pty Ltd **Blairs Produce Company** Blue Ribbon Seed and Pulse Exporters Boort Grain Co-Operative Broadbent Grain Pty Ltd Broun and Co Grain Pty Ltd Bungulla Farming Pty Ltd C & S Trading Pty Ltd C K Tremlett Pty Ltd Cameron Pastoral Company Pty Ltd Castlegate James Australasia Pty Ltd **Cleveland Agriculture** Commex International Pty Ltd Coorow Seeds COPRICE Cremer Australia Ptv Ltd DA Hall and Co Dalby Bio-Refining Limited Dalgrains (Qld) Pty Ltd Darwalla Milling Co Pty Ltd Deacon Seeds Company Deckert Group Pty Ltd Defiance Maize Products Pty Ltd Demeter Cormack Pty Ltd Donnellons Bulk Haulage Pty Ltd ED & F Man Grains Australia East Coast Stockfeed Pty Ltd **Elders Grain** Export Trading Group Australia Pty Ltd Feed Central Pty Ltd

Mr Rod Wolski Mr Brad Waterfield Mr Kim Vater Mr Ian Mack Mr Richard Alcorn Mr Kishore Bulchandani Mr Francois Darcas Mr Joseph Khnessier Mr Rob Anderson Mr Peter Wilson Mr Nathan Holmes Mr Simon Gelling Mr David Caldwell Mr Todd Jorgensen Mr Peter Webb Mr Palwinder Singh Mr Robin Luo Mr James Hunt Mr Matt Bailey Mr Jamie Smith Mr Dennis Ward Mr Richard Baker Mr Andrew Leighton-Daly Mr Tony Bellinger Mr Terry Brabin Mr Bjorn Ludvigsen Mr Sean Blair Mr Stephen Donnelly Mr Tony Bellinger Mr Justin Fay Mr Wal Broun Mr Brad Jones Mr Craig Scholz Mr Andrew Tremlett Ms Ross Stephens Mr Dominic Hogan Mr Chris Hurwood Ms Mariam Boulos Mr Brian Pover Ms Kirsty Cutter Mr Brendan Macaulev Mr Bruce Holden Mr Tobin Cherry Mr Gary Heidenreich Mr Terry Deacon Mr Chris Deckert Mr Rodney Walker Mr David Oates Mr Bill Donnellon Mr Jon Bucknall Mr Stuart Dolden Mr Matthew Tolmachoff

Mr Shayne Clark

Mr Tim Ford

#### Level C (under 250,000 Tonnes) cont.

Fellows Nominees FertInvest Pty Ltd **Findlays Barellan** Fletcher International Exports Pty Ltd FREE Evre Grain Ptv Ltd Golden Harvest Grain Exports Goodman Fielder Limited Grain Direct Australia Grain Link (NSW) Pty Ltd Grain Link WA Pty Ltd Grainforce Pty Ltd Grainpro Pty Limited GrainTrend Ptv Ltd Greentree Farming GV Grain & Fodder Hanlon Enterprises Grain Hassad Australia Operations Company Pty Ltd Iloura Resources Ptv Ltd Independent Grain Handlers Pty Ltd Irwin Stockfeeds Itochu Australia Ltd J K International Ptv Ltd J W Koek & Company James Stock Feed and Fertilizer Pty Ltd Jerilderie Grain Storage & Handling KB Agri Services Pty Ltd K M & W M Kelly & Sons Kangaroo Island Pure Grain Pty Ltd Kennett Rural Services Pty Ltd Lachlan Commodities Pty Ltd Laharum Bulk Handling Co Lake Grain Pty Ltd Lane Grain Ptv Ltd Langdon Grain Logistics Laragon Almond Processors Pty Ltd Laucke Flour Mills P/L LDC Enterprises Australia Pty Ltd LPC Trading Pty Ltd Malteurop Australia Pty Ltd Matthews Transport and Grain Traders Max Grains Pty Ltd MC Croker Pty Limited McNaughts Grain & Fertilizer Pty Ltd Melaluka Trading Pty Ltd Mellco Pty Ltd Moulamein Grain Co-Operative Ltd Mountain Industries Pty Ltd Moxey Farms Pty Limited MSM Milling Pty Ltd Murrumbidgee Grains Pty Ltd Namoi Cotton Co-Operative Nandaly Grain Co-Operative Ltd Network Grains Pty Ltd Newcastle Agri Terminal Pty Ltd Noble Resources Australia Pty Ltd Northern Riverina Grains Pty Ltd

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#### Level C (under 250,000 Tonnes) cont.

**OOMA Enterprises NSW Pty Limited** Origin Grain Pty Ltd Pallinup Logistics Ptv Ltd PB Seeds Pty Ltd PeaCo Pearson's Grain Pty Ltd Peters Commodities Pty Ltd Phoenix Commodities (Australia) Ptv Ltd Premium Grain Handlers P/L Preston Grain Pulse Association of the South East (PASE) Inc Quadra Commodities Pty Ltd Quirindi Grain & Produce Regal Seed & Grain P/L Reid Stockfeeds Pty Ltd Rivalea (Australia) Pty Ltd - Animal Nutrition Riverina Oils & BioEnergy Pty Ltd Robinson Grain Trading Co Pty Ltd **Roty Grain Store** Ruddenklau Grain Pty Ltd Rural Logic (Aust) Pty Ltd SANWA Ptv Ltd Seedhouse Tasmania Shannon Bros Bulk Haulage Silo Bag Grain (NSW QLD) Pty Ltd Societa Cofica Pty Ltd Southern Ark Storage Pty Ltd Southern Cotton Trading Pty Ltd Southern Cross Agricultural Exports P/L Southern Grain Storage Pty Ltd Southern Stockfeeds (Operations) Pty Ltd Spagricon Australia Pty Limited Standard Commodities Australia Ptv Ltd Sumitomo Australia Pty Ltd Summer Hill Grains Tasmanian Agricultural Producers Pty Ltd TSS Grain Thallon Grains Pty Ltd Twynam Pastoral Company Unigrain Pty Ltd Unique Grain Management Pty Ltd W B Hunter Pty Ltd Ward McKenzie Pty Ltd Whitty Produce Whyalla Beef Pty Ltd Wilken Grain Wimpak Export Company Pty Ltd XLD Grain Pty Ltd Yenda Prods Grain Pty Ltd

# Mr Malcolm Berry Mr Peter Brick Kevin Imberti Mr Peter Blair Mr Shane Wall Mr Darren Pearson Mr Michael Oxlev Mr Jogesh Virk Mr John Orr Mr Andrew Kell Ms Leanne Burr Mr Andrew Jackson Mr John Webster Mr Damien White Mr Ian Reid Mr Andrew Philpotts Mr Lachlan Herbert Mr Gary Robinson Mr Brian Newman Mr Tim Ruddenklau Mr Michael Wood Mr Charles Emerson Mr Matthew Crane Mr Clayton Shannon Ms Lesley Kilby Mr Dia Ram Sharma Mr Simon Pritchard Mr Chris Veness Mr Matthew Barnes Mr Campbell Brumby Mr David Jemmet Mr Jiger Kotecha Mr Michael Betar Mr Tsuyoshi Osumi Mr Barney Hughes Mr David Skipper Mr Trevor Macleod Mr Andrew Earle Ms Lesley Heidtman Mr Ervin Leong Mr Mark Thiele Mr Stewart Coombes Mr Mal Parkhill Ms Marsha McMonigle Mr Gino De Stefani Mr Richard Wilken Ms Jo Cameron Mr Lachie Stevens Mr Luke Mancini

## **Transport Operator**

Gehrke Grains and Transport Pty Ltd Wakefield Grain Export Services Mr Julian Gehrke Mr John Gray 07 5465 6695 wakefields.com.au 2

#### Broker

Large

#### Medium

Allied Grain Pty Ltd Brightcom Australia Pty Ltd Cereal Milling Services Pty Ltd Fox Commodities Grain Brokers Australia Horizon Grain Brokers Pty Ltd Igrain.com.au Pty Ltd INTL FCStone Pty Ltd McDonald Pelz Australia Perkins Commodity Brokers Teague Australia Pty Ltd

#### **Sole Operator**

A C Grain ACCB Australia AgLink - CMS Cogeser (Australia) Pty Ltd Farm Tender Knight Commodities Mallon Commodity Brokering Quest Commodities Pty Ltd Shearwater International Pty Ltd Wimmera Mallee Grain Services Woodside Commodities Pty Ltd

#### Corporate

#### Large

ASX Limited Australia And New Zealand Banking Group Australian Grain Technologies Pty Ltd Commonwealth Bank of Australia Symbio Laboratories

#### Medium

Agfarm Pty Ltd Agrifood Technology Pty Ltd Agrisk Management Pty Ltd Australian Superintendence Company Commodity Inspection Services (Australia) Pty Ltd Foss Pacific Pty Ltd Holding Redlich Holman Fenwick Willan Intertek Merricks Capital Pty Limited NZX Australia (CGX, ACF, PFA) SBA Law SGS Australia Pty Ltd

#### Small

Advance Trading Australasia Ag Scientia Pty Ltd AvantAgri Australia Pty Ltd

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- Mr Adam Clarke Mr Andy Cunliffe Mr Justen Schofield Mr Robert Luetolf Mr Matt Henke Mr Chris Groat Mr Ian Mallon Ms Jayne Barker Mr Don Cattanach Mr Rodney Edgerton Mr Hamish Steele-Park

Mr Kristen Hopkins Mr Ian Hanrahan Mr Steve Jeffries Mr Tom Barraket Ms Elizabeth Owens

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> advance-trading.com.au 03 9598 1980 avantagri.com.au

# **Corporate - Small (cont)** CloudBreak Grain Marketing Pty Ltd Basis Commodities Ptv Ltd Delta Agribusiness Pty Ltd Direct Commodities Pty Ltd EP Integrated Commodities Pty Ltd Farmanco Marketing Pty Ltd FarMarCo Australia Pty Ltd Finesse Solutions Pty Limited Flexi Grain Goldstar Commodities Grain Storage Solutions Grainx HarvestCheck Pty Ltd Hay Plains Grain Storage Pty Ltd IKON Commodities Pty Ltd JBS Australia MarketAg Pty Ltd McMullen Consulting Pty Ltd Mirfak P/L Murray Goulburn Trading Pty Ltd OMIC Australia Pty Ltd Perten Instruments Australia Pty Ltd Peter McQueen Pty Limited Pinnacle Commodities Pty Ltd Planfarm Marketing Pty Ltd Primal Foods Group Rural Directions Ptv Ltd SGA Solutions Pty Ltd TE Storage & Logistics Pty Ltd Ten Tigers

# **International Affiliate**

CIS - Commodity Inspection Services

## **Industry Association**

Grain Growers Limited Grain Industry Association of WA Grain Producers Australia Ltd NSW Farmers Association Victorian Farmers Federation

## **Merchant Association**

Grain Industry Association of SA Grain Industry Association Of Victoria Grain NSW Inc Queensland Agricultural Merchants Inc.

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Mr Paul Schweitzer

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Mr Tim Mee Mr Colin Peace Ms Joanne Ware Mr John Francis

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