

9 May 2014

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Dear Sir/Madam

**RE: Trade Advice Notice – Sulfuryl Fluoride**

**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, grain for human consumption and stock feed milling.

Within this context, GTA provides comment on the abovementioned Trade Advice Notice (TAN) regarding varying the registration of the product, ProFume Gas Fumigant, containing 998 g/kg sulfuryl fluoride, to include use on pulses and oilseeds..

**2. Concerns with Registration of Sulfuryl Fluoride on Oilseeds / Pulses**

As noted in the TAN, Australia is a major exporter of oilseed and pulse crops, with exports significantly exceeding domestic use for many of those crops.

We note the TAN lists several key markets for oilseeds and pulses. Those listed and many other countries are regular buyers of particular commodities, dependent on a range of supply and demand factors. In supplying those markets, the Australian grains industry has a commitment to not only supply a quality product, but also to comply with relevant international and national regulations relating to chemicals.

As outlined in the TAN the proposed use will lead to sulfuryl fluoride and fluoride ion residues on the harvested commodity that is treated. While the residues cited in the TAN are relatively low, these are of concern to the Australian grains industry.

The concern is twofold:

- Many of the countries that receive Australian oilseeds and pulses do not have an MRL set for sulfuryl fluoride and/or fluoride ion or defer to Codex. Codex MRLs for sulfuryl fluoride and fluoride ion have not yet been set on these crops. Each country has different rules for dealing with detection of chemical residues where an MRL has not been set either within their own national legislation or at Codex. 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 sulfuryl fluoride or fluoride ion in shipments where MRLs have not been set would result in rejection of that grain. Examples include:
  - Canola – China, Pakistan and Bangladesh
  - Chickpeas – Pakistan and India

- Based on trial data at the use pattern indicated in the TAN, residues were above the current MRLs for several major markets of Australian oilseeds and pulses. For example:
  - Pulses to Egypt, EU, UAE - Sulfuryl fluoride, MRL of 0.01mg/kg
  - Pulses to Egypt, EU, UAE - Fluoride ion, MRL of 2mg/kg

### 3. Concerns with data provided in the TAN

The grains industry has several questions relating to the data cited in the TAN:

- Industry does not have access to the ProFume Fumiguide that determines the application rate. The TAN states *“Most fumigation can be achieved at much lower rates than the maximum”*. Is the residue figures cited based on the maximum rate/period or the lower rate/period?
- The TAN notes the residue figures were based on a single fumigation. Further information is requested on the impact of a second and subsequent fumigation on the residues expected, assuming such treatments are permitted.
- While the TAN states *“Residues of sulfuryl fluoride may further decline as it is desorbed (off-gassed) during transport and handling”* further information is requested on desorption rates expected, especially following a second fumigation.
- While the TAN states *“MRLs for fluoride ion are not required in Australia as it occurs naturally in the environment and may be present in agricultural commodities at varying concentrations from natural sources”*, this may not apply in some overseas markets. Please advise of the natural levels in Australia, in order for industry to determine any risks to trade when using this compound as proposed.
- In addition, we note one of the outcomes from the 2013 National Working Party on Grain Protection (NWPGP) was *“NRS testing continues to develop baseline Fluoride levels. Outcomes and recommendations will be reported to the NWPGP meeting in 2014”*. How do the figures of natural (control) fluoride levels cited in the TAN compare with those unpublished NRS monitoring figures.
- Is the APVMA confident that the oilseeds and pulses involved in the trials are representative of all commodities proposed for the registration of sulfuryl fluoride? For example, lupins were not involved in the trials however a significant tonnage is exported from Australia.

### 4. Conclusion

The Australian grains industry acknowledges the value of sulfuryl fluoride in controlling stored grain insects pests. The outcomes of the 2013 NWPGP stated *“Development of a registration (of sulfuryl fluoride) on canola would assist insect control options for this commodity”*.

In addition, sulfuryl fluoride has proven to be of significant benefit in assisting to manage insect resistance based on current registered uses.

The Australian grains industry prides itself on meeting customer and regulatory requirements and implements a range of measures to ensure exports are compliant. Based on the information provided in the TAN, the proposed variation to include the use of sulfuryl fluoride on oilseeds and pulses presents an unacceptable risk to that trade which at present cannot be mitigated by measures adopted by the Australian grains industry.

Therefore the Australian grains industry opposes the registration of sulfuryl fluoride on oilseeds and pulses until appropriate MRLs are adopted. This may include at Codex and in relevant countries receiving our oilseeds and pulses. We would also welcome feedback on the questions raised in this submission.

Thank you for consideration of this response.



Geoff Honey  
Chief Executive Officer