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4 July 2016

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

Email: enquiries@apvma.gov.au

Dear Sir/Madam

RE: Trade Advice Notice Saflufenacil in the Product Sharpen WG Herbicide

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. A list of all members is attached.

Within this context, GTA provides comment on the abovementioned Trade Advice Notice (TAN) regarding varying the registration of the product Sharpen WG Herbicide.

2. Concerns with the proposed variation on use in Cereals

As noted in the TAN, Australia is a significant exporter of cereal grains (wheat and barley) to many markets throughout Asia, Europe and the Pacific. In supplying those markets, the Australian grain industry has a commitment to not only supply a quality product, but also to comply with relevant international and national regulations relating to chemical residues.

It is noted in the TAN "BASF wish to add late season uses on cereals (wheat, barley and triticale).

It is proposed that the current MRL of *0.03 mg/kg for Saflufenacil on GC 0080 cereal grains be increased to 0.2 mg/kg.

Saflufenacil residues in wheat, barley and oat grain from Australian trials at 27-68 days after treatment at 23.8-34 g ai/ha applied at BBCH 73-83 were <0.010 (5), <0.0174 (2), 0.010 (2), 0.011 (2), 0.012 (2), 0.014, 0.016, 0.051 and 0.11 mg/kg."

As outlined in the TAN the proposed use will lead to Saflufenacil residues on the harvested commodity. The residues cited resulting from the trial treatments in the TAN are of concern to the Australian grain industry based on the proposed MRL changes.

Clarification is required on the label versus the proposed usage pattern. The label states the proposed usage is for "Crop topping in Wheat, Barley and Triticale" yet the residue trials have been done on wheat, barley and oats. Industry understands that oats and triticale may have differing crop growing habits and seeks clarification of the suitability of the oat trials for triticale, and the label directions for the respective cereal crops being proposed under this TAN.

The concerns regarding impacts of the revised Australian MRL are summarised below for some key Australian export markets of wheat and barley, noting that the highest trial data was 0.11ppm (Triticale is not exported to any extent and thus not included in this list):

China

- China has no MRL for wheat or barley and therefore a zero tolerance applies. While it may consider deferring to Codex in a dispute situation, the risk of this "not occurring" is unacceptable to the trade.
- China is a significant importer of Australian wheat and barley.
- The proposed changes are a concern for exports to this market.

European Union

- The EU MRL is 0.03ppm, which is the current MRL in Australia.
- The proposed change in usage and resultant MRL levels potentially arising are a concern for exports to the EU for durum and barley.

Gulf Cooperation Council

- Various markets for wheat and barley exist in countries that comply with GCC regulations.
- There is no MRL for wheat or barley in these markets and a default MRL does not apply.
- The proposed changes are a concern for exports to the countries within the GCC.

Indonesia

- Indonesia does not have an MRL for Saflufenacil and a default MRL does not apply.
- This is a significant market for wheat and the proposed change in usage pattern and resultant potential residues arising are a concern to this market.

Japan

- The Japan MRL for cereals is 0.03mg/kg.
- As noted in the TAN, while the applicant has indicated that they are applying for import tolerances in Japan for wheat, barley and animal commodities at the same level as the US MRLs (which would remove industry concerns for wheat and barley), this process is expected to take significantly longer than the change in Australian usage/MRL. This would place exports at risk until those changes in Japan were approved.
- The proposed change in usage and resultant MRL levels potentially arising are a concern for wheat and barley which are significant exports to Japan.

Malaysia

- Malaysia is a significant importer of Australian wheat and defaults to Codex (0.01mg/kg) for Saflufenacil.
- The proposed changes are a concern for exports to this market.

South Korea

- While the TAN states there is no MRL in South Korea, industry advice is the MRL is 0.03mg/kg.
- Nevertheless, if there is no MRL (or an MRL of 0.03mg/kg applies), the proposed change in usage pattern and resultant potential residues arising are a concern to this significant market of Australian wheat.

Vietnam

- Vietnam does not have an MRL for Saflufenacil for wheat or barley and has not officially stated they will accept Codex under a deferral policy.
- Vietnam is a significant wheat and barley export market for Australia.
- The proposed changes are a concern for exports to this market.

Codex

- As stated in the TAN the Codex MRL for cereal grain is 0.01mg/kg.
- Several markets default to Codex. For those markets, this limit will therefore apply.
- The Codex level is significantly lower than the proposed Australian MRL and potential residues arising from the revised usage pattern.
- It is noted in the TAN that "*the applicant has also stated that the 2016 JMPR will be considering new uses on cereals (desiccant uses) and animal products*". The timeframe for adoption of any new Codex MRL, assuming it would be equivalent to the Australian MRL, is unknown. Therefore while we acknowledge this progress, until the final MRL as recommended by JMPR and the timeframe for adoption is known, an unacceptable risk of market violations occurs for those markets defaulting/accepting the Codex MRL.

3. Concerns with the proposed variation on use in Pulses

The Indian sub-continent (India, Pakistan, Sri Lanka and Bangladesh) is the world's largest consumer and importer of pulses. It is Australia's biggest and most important pulse market.

As with cereals, there are risks associated with the revised usage pattern for Saflufenacil on pulses, with some comments outlined below for these markets within the Indian sub-continent. Unless listed, several of these markets import a range of pulses in any year, depending on a range of factors.

Bangladesh

- Bangladesh is a major market for Australian pulses.
- There is no MRL in this market for Saflufenacil.
- They fully defer to Codex and thus this market is not an issue.

Egypt

- The market for faba bean, is more limited than other food pulses, and is largely restricted to the Middle East, principally Egypt.
- Egypt adopts the Codex MRL of 0.3mg/kg.
- There are no concerns with the proposed change in usage pattern for Saflufenacil in this market.

EU

- Except for faba beans, all other pulse MRLs in the EU (some at the LOD) are lower than the proposed revised Australian MRL.
- While not a significant market for pulses, given the container trade to this market and the difficulty of segregation of stock there will be risks associated with exporting pulses to the EU following a change in usage pattern.

India

- India takes a range of Australian pulses.
- India defaults to the Codex MRL of 0.3mg/kg for all pulses.
- There are no concerns with the proposed change in usage pattern for Saflufenacil in this market.

Pakistan

- Pakistan is a major market for Australian pulses.
- There is no MRL in Pakistan for Saflufenacil.
- Pakistan defers to Codex and therefore there are no concerns with the proposed change in usage pattern for Saflufenacil in this market.

Sri Lanka

- Sri Lanka is a major market for Australian pulses.
- There is no MRL in this market for Saflufenacil.
- Unconfirmed reports are that they fully defer to Codex.

Codex

- As noted in the TAN, the MRL for all pulses is 0.3mg/kg.
- This level is higher than the proposed MRL to be adopted in Australia of 0.2mg/kg.
- Further information on the applicability of the proposed MRL of 0.2mg/kg on other pulses exported from Australia (e.g., lentils, lupins) is required before a full determination can be made on the suitability of this for all pulses MRL and the ability of industry to implement measures to meet the Codex MRL in specific markets.

Sweet Lupins

- Export markets for Australian sweet lupin are distinctly different to those for other pulses and include Spain and South Korea for intensive animal feeds, and aquaculture markets in Scandinavia and Indonesia.
- Scandinavia and Spain default to the EU MRL for lupins of 0.03mg/kg.
- Indonesia and South Korea do not have an MRL.
- Therefore exports of sweet lupins to these markets are a risk to industry under the proposal.

4. Conclusion

GTA makes no comment on the proposed change in usage pattern or MRLs for straw, lucerne or animal commodities.

In general it could be assumed that the revised usage pattern will potentially lead to residues above many export market MRLs for Australian wheat and barley. While industry implements various strategies to manage market requirements such as segregations and Commodity Vendor Declarations where relevant, the number of markets receiving wheat and barley will not enable industry to implement adequate numbers of segregations to meet the risk of the revised usage pattern for Saflufenacil.

There are also some concerns with pulse exports from Australia and we request clarification on the issue listed above under the heading Codex.

The Australian grain 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 the use of Saflufenacil presents an unacceptable risk to that trade which at present cannot be mitigated by measures adopted by the Australian grain industry.

Given the potential for residues to arise exceeding several key market MRLs for Saflufenacil, GTA opposes the proposed variation to the registration of Saflufenacil on wheat, barley and pulses.

Thank you for your consideration of this response.

Yours sincerely

Peter Reading

Chair

GRAIN TRADE AUSTRALIA

Membership List as at 30 May 2016

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

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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 Melaluka Trading Pty Ltd Mellco Ptv 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 OOMA Enterprises NSW Pty Limited

Mr Paul Fellows Mr Prevesh Barar Mr Neil Findlay Mr Kurt Wilkinson Mr Mark Rodda Mr Chandru Hiremath Mr Alex Krzanic Mr Lyndon Benecke Mr Paul Pearsall Mr Andrew Goyder Mr Derek Larnach Ms Angela Bonfante Mr Sanjiv Dubey Mr David Brown Ms Joanne Harry Mr Peter Gerhardy Mr James Carson Mr Hans Hol Mr Brad Bryant Mr Bryan Irwin Mr Justin Swan Mr Sandeep Mohan Mr Brian Algate Mr Adrian Moule Mr David Barlow Mr Karl Bliss Mr Chris Kelly Ms Emma Tonkin Mr Andrew Kennett Mr Tony Cogswell Mr Donald Carter Mr Derek Davis Mr Garry Lane Mr Adrian Murphy Mr Mark Webber Mr Roger Laubsch Mr Richard Porter Mr Simon Langfield Mr Jack King Mr Neville Matthews Mr Jack Fahy Mr Greg Carroll Mr Simon Pritchard Mr Steve Mellington Mr Tony Bellinger Mr Bill Law Mr Peter Philipzen Mr Peter MacSmith Mr Peter Hassall Mr Shane McGregor Mr Tony Bellinger Mr Craig Dennis Mr Jock Carter Mr Josh Taylor Mr Tony Bellinger Mr Malcolm Berry

Level C (under 250,000 Tonnes) cont.

Origin Grain Ptv Ltd Pallinup Logistics Pty Ltd PB Seeds Ptv 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 Pty 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 Pty Ltd Sumitomo Australia Ptv 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

Transport Operator

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Mr Julian Gehrke

Mr John Gray

Broker

Large

Medium

Allied Grain Ptv 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 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 Ptv 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 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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Mr Andrew Woodhouse Mr Lloyd George Mr Peter Woods

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asx.com.au/grainfutures anz.com.au agtbreeding.com.au commbank.com.au symbiolabs.com.au 5

agfarm.com.au 03 9742 0589 02 9499 4199 07 3391 8640 commodityinspection.com.au foss.com.au holdingredlich.com hfw.com intertek.com merrickscapital.com nzx.com sbalaw.com au.sgs.com 13

> 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

Ms Alicia Garden Ms Larissa Taylor Mr Andrew Weidemann Mr Justin Crosby Mr Stephen Sheridan

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

Retired K M & W M Kelly & Sons Appointed Appointed July 2015

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