



SUBMISSION

APVMA

Response to Trade Advice Notice on Glyphosate

Date 23 June 2014

Supported by



Contact Officer
Pesticides Program
Australian Pesticides and Veterinary Medicines Authority
PO Box 6182
Symonston ACT 2609

Email: pesticides@apvma.gov.au

Dear Sir

RE: Trade Advice Notice – Glyphosate

1. About Grain Producers Australia

GPA is the national Representative Organisation (RO) for the grains industry in accordance with the *Primary Industries and Energy Research Development Act 1989* (PIRD), and has key responsibilities under the *Primary Industries (Excise) Levies Act 1999* and the *Primary Industries (Customs Charges) Act 1999*.

GPA is supported by Grain Levy Payers in Australia and through direct grower members and state affiliates in VFF Grains Group, Grain Producers SA, Western Australia Grain Growers, Agforce Grains. As the Representative Organisation GPA also liaise extensively with all farmer organisations with NSW Farmers and Grain Growers Limited also supporting this submission.

2. Glyphosate In farming Systems

Grain Producers Australia supports the changes as provided in the TAN (Trade Advice Notice) to increase the MRL rating for the usage of Glyphosate in Canola & Wheat to 20 mg/kg. Australian farming systems have changed significantly over the last 10 years and the usage of glyphosate as a pre harvest tool has been seen as a significant consideration in managing weeds in a measured manner with the usage of high clearance sprayers and windrowers with spray bar technology to manage weeds. Current practice and residue testing in place by industry demonstrates glyphosate MRL safety.

GPA also supports the introduction of *Pintobi Attack™ Herbicide* containing 570 g/L glyphosate, for use on canola and wheat pre-harvest for the control of various annual weeds and as a desiccant.

Resistance management of weeds is a concern to growers and the industry has developed significant strategies to manage these issues. Scientific advice to GPA is that additional use of Glyphosate within a given production year will not lead to significant increase in resistance evolution risk. The practices in years adjacent to the production and Glyphosate use year are key determinates of increased glyphosate resistance risk.

3. Market & Trade Access

Based on industry funded research through the Grains Research and Development Corporation in collaboration with Nufarm and scientific advice received, GPA is of the opinion that Glyphosate poses no greater risk or concern to markets if used according to the proposed *Pintobi Attack™* label.

International MRLs for glyphosate in Canola have been set by Codex at 20 mg/kg and this MRL has also been applied in the USA and by Australia's major market competitor Canada. It is essential that the Australian canola industry has ability to utilise chemical technologies and production techniques that key international competitors including Canada already have access to. If the regulator were to disallow equal MRL standards, then Australian industry would be placed in a situation of significant production disadvantage, while grain continues to be traded internationally by major competitors based on a 20 mg/kg MRL for Glyphosate.

The concerns raised in relation to trade by the Australian Oilseeds Federation can be managed now and into the future. The supply chain has changed significantly and now allows for direct sales of Canola or Wheat from farms and local storage sites. This also allows the trade to manage procurement of identified grains through an Identity preserved process.

As part of the current NRS surveillance to assist the trade with ensuring that cargo's are meeting the correct market specification and in GPA's capacity we would consider an increase in testing of grain for Glyphosate residues in Canola & Wheat as required.

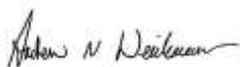
Any marketing organisation deference to these MRLs for markets with lower MRLs can be managed through the supply chain through the usage of Identity preserved process and commodity vendor declarations or (CVDs) and enforced within Grain Contracts. The use of CVDs are already in place by the Australian supply chain to implement a sustainability certification scheme for the purposes of carbon accounting in production of canola exports to the European Union (International Sustainability and Carbon Certification or ISCC).

4. Summary

GPA supports:

- The proposed TAN increasing the Glyphosate MRL in wheat and canola to 20 mg/kg
- The introduction of *Pintobi Attack™ Herbicide* containing 570 g/L glyphosate, for use on canola and wheat pre-harvest for the control of various annual weeds and as a desiccant.
- Australian MRLs for glyphosate being brought into line with major export competitors including the USA and Canada at 20 mg/kg.

Yours Faithfully



Andrew Weidemann

Chairman

Grain Producers

Australia