# GRDC PODCAST TRANSCRIPT

**Managing changing MRLs and export implications**

[00:00:05] **Intro** This is a GRDC podcast.

[00:00:013] **Shannon Beattie** A number of popular herbicides and insecticides have recently become the subject of a review after the Federal Government announced the evaluation of the Australian Pesticides and Veterinary Medicines Authority, or APVMA, in July. Hi, I'm Shannon Beattie. As a result of the review, maximum residue limits have been in the spotlight and chatter has been gaining amongst growers and consultants about what it could mean for the industry. At the GRDC Grains Research Updates at Minyip in Victoria, Gerard McMullen from the National Working Party on Grain Protection told the audience that applying chemicals according to the label right did not necessarily mean grain would meet external market requirements. I sat down with Gerard to chat about maximum residue limits and other chemical related topics currently doing the rounds.

[00:00:59] **Gerard McMullen** The maximum residue limit and I think we'll call it an MRL from now because it's much easier to say. So an MRL is the maximum amount of a chemical residue that is permitted to be on a food that may have been treated with that particular chemical. So that's set by the regulator here in Australia, the APVMA. So it ensures that any food that we eat or in fact stock feed eat is safe to consume.

[00:01:25] **Shannon Beattie** Different countries have different MRLs. Whose job is it to keep track of that and how much attention to growers need to pay to it?

[00:01:33] **Gerard McMullen** In summary, I think it's all of the industry that needs to adhere to importing country requirements, and that's including the Australian domestic market as well. But in reality, that's my role. So I'm responsible for, under my contract, to monitor importing country regulations in terms of chemicals, and that includes their changing MRLs. And so I'm the one that's responsible for monitoring all of those changes in all of the export markets that we have, and then providing that advice to not only growers but all of the industry that's involved in terms of supplying that grain or in fact from a growers perspective producing that grain. So when we're looking at the importing country different MRLs, we all need to be aware of the impact of using chemicals here in Australia and the market access issues that might arise of the use of those chemicals.

[00:02:26] **Shannon Beattie** How do these MRLs impact Australia's grain exports and does it affect states differently?

[00:02:32] **Gerard McMullen** In reality, no, because when we're exporting grain we have to comply with those importing country requirements, whether it's from Western Australia or whether from the East Coast. And we shouldn't just focus, Shannon, on the export market because the largest market for grain in fact is the Australian domestic market. So when we're supplying grain to the domestic market, which obviously the East Coast is large one, we still need to comply with the Australian domestic MRLs as well. So when we're supplying grain to whatever market, it has a significant impact on the Australian industry. So we all need to be aware of the impact of that when we are not only just applying chemicals, but also when we're providing that grain to those markets.

[00:03:16] **Shannon Beattie** Applying chemicals according to the label. Right, doesn't actually necessarily mean that those grains are going to meet external market requirements. And I guess there has been a bit of a sentiment from some growers that it's not entirely fair that their ability to use chemicals registered in Australia or for use in Australia is limited by the rules of other countries. So how do we draw that line between crop production and profitability and keeping access to those important export markets?

[00:03:41] **Gerard McMullen** In reality, it's all about food safety. So when a regulator in whichever country sets the label directions for the use of a chemical and also when they set the MRL on that particular commodity, it's all about ensuring that whoever consumes that product, whether it be for human consumption or for stock feed, that the product that we're eating, in this case grain, is safe for use. And that's whether it's one meal or whether you have that meal for the rest of your life. Those regulators need to make sure that it is safe so each country has its own sets of regulations and they're responsible for making sure that their consumers food safety concerns are being addressed. So that's why each country has its own regulations, because that's what a government regulator has to do.

[00:04:27] **Shannon Beattie** We have already started to see this in action with products such as haloxyfop, which is a herbicide that's traditionally been a key part of Australian canola growers chemical rotation. Can you talk us through what's happened in Europe with MRLs for that chemical and what you're now recommending to growers?

[00:04:43] **Gerard McMullen** We try and provide as many tools as possible for growers to use. Obviously growers doesn't want to use a chemical if they don't need to use a chemical, but where there is an issue with a weed or a fungicide, etc., well then they will make that choice to use that particular chemical based on their own economic situation, plus a whole range of agronomic issues as well. In the case of canola, haloxyfop has been a valuable tool in certain areas of Australia, not necessarily everywhere. But in the EU that member States they have banned the use of haloxyfop and what that generally means is that at some stage down the track they will lower the MRL or in fact delete the MRL. So in the case of haloxyfop for several years, we've known that they are reviewing the use of haloxyfop because they had not permitted haloxyfop to be used on rapeseed or canola in the EU. And so we've made submissions to say that you can't lower the MRL to such a level that it makes it uneconomic to use that particular chemical here in Australia because our Australian growers need it. So please don't lower the MRL in the EU to a level that makes it really difficult for us. However, we lost that argument and we were advised late last year that they were going to lower the MRL to basically 0.005PPM, which is significantly low. We then got the industry together and said based on that very low level, all of the risk management tools that the industry uses to mitigate and lower the residue levels on the export of product to the EU, we can't implement those and meet the new requirement for the MRL in the EU. So we put out a fact sheet to industry, basically to growers requesting that they don't use haloxyfop because the post farmgate sector can't manage the risk of residues arising if growers use that.

[00:06:49] **Shannon Beattie** How was that met by growers? What was the response from growers to that?

[00:06:53] **Gerard McMullen** In general it was very good because I think most growers are responsible and growers do have a very good record of compliance with label directions. In this particular case, while haloxyfop is registered for use, there is a market access issue and growers did recognise that if they want to maintain market access to the EU that they need to comply. So in general, most of the feedback that we got was very positive and they recognise that yes, it may cause some difficulties in some areas, but the market requirements must be met.

[00:07:31] **Shannon Beattie** A recent report from the APVMA has led to the urgent review of eight on farm chemicals, including the likes of paraquat and diquat. What are the ramifications that particular review could have for growers?

[00:07:44] **Gerard McMullen** It could have some fairly significant implications for growers if they are relying on that chemistry in their particular area and there's no alternatives to use. For example, in the case of the haloxyfop, in some areas there is a range of alternative chemistry that growers can use and I think that helps to ease the burden on the growers. For the review that's being done by the APVMA, some of those chemicals are key chemicals being used by growers on particular commodities, not on all commodities and certainly not on all occasions. It will potentially have a significant impact depending on the outcome of the review and we don't know the outcome of the review at this stage. We'll have to wait on the decision from the APVMA on that one.

[00:08:29] **Shannon Beattie** Do we have a timeline in place for when that we might find out the results of that review?

[00:08:33] **Gerard McMullen** No, we don't. But most people would say there has been a bit of media from the Minister of late that they are going to speed up the review for some of those chemicals. So we would expect that a couple of those chemicals, the review dates will be announced fairly shortly and we'll obviously be keeping a very close eye on that to make sure that we're aware of what the regulator has proposed and will then liaise with the industry on the impact of that and make a decision based on that outcome.

[00:09:02] **Shannon Beattie** All right. Moving on to an entirely different chemical. There have been some reports lately of some off label usage of carbendazim to control snails. What are the issues with off label usage?

[00:09:16] **Gerard McMullen** I guess the main one is that in most states, off label usage is not legal. So therefore, we need to make sure that as responsible users of chemicals and also as an industry overall, that we are complying with any regulatory requirements. So we've always encouraged growers and anyone in the post farmgate sector or in fact anyone using chemicals that they do comply with regulations. And it's not just, I guess, from a food safety issue. So if someone's not using a chemical according to the label directions, well then there might be a food safety issue. But it's all about the reputation as well. So Australia has a fantastic reputation, not just from the APVMA in terms of being a very well recognised regulator across the world, but also the uses of chemicals here and mainly growers have got a great record in terms of compliance with those legal requirements and following those legal directions. So we do not want to, I guess, upset the apple cart in any way risk that reputation because that will place our reputation, but also our exports in jeopardy. And with the competition around the world, if we can't supply the grain for whatever reason, then an importer can go to someone else and very difficult to get that market access back.

[00:10:38] **Shannon Beattie** Expanding the use of carbendazim for the purpose of snail control has not been supported by GRDC, it's not been supported by the APVMA due to some toxicology, human health and environmental risks. Can you talk us through that decision and reasoning?

[00:10:53] **Gerard McMullen** When the APVMA is looking to register a chemical, they take into account all of those factors that you just talked about - toxicology, efficacy, but they also broadly talk about the risk to trade. So in this particular case, a product is only registered for use on snail control or for whatever control based on meeting all of those criteria. So for carbendazim, and it doesn't meet that criteria and therefore it hasn't been registered on that basis.

[00:11:23] **Shannon Beattie** It's a very simple explanation that makes a lot of sense. Carbendazim registrations have also been removed from a few key markets, including the European Union and North America. With that in mind, why is it important for growers to really strictly adhere to registered crop situations?

[00:11:39] **Gerard McMullen** So products are registered based on, I guess, a range of impacts and the main one being the particular growing conditions in the country of registration. So it's a little bit different here than in North America or the EU, so we need to take that into account when a registration occurs and also when the MRL is set just because a product is registered overseas or not registered overseas and registered here, we can't take that into account. So what it means is that the assessment that is done here for that registration is based on the Australian conditions. The MRL is then set and then we know that works and also that he's going to be safe. In North America and the EU, they've determined that those conditions for the use of that particular product will not be met. So therefore, it's a fait accompli that we can't use a product that's not registered in those particular countries or if the MRL is going to be exceeded through the use of that product here in Australia.

[00:12:38] **Shannon Beattie** Makes sense. I suppose it could be a bit confusing where you're trying to think that a product can be safe in one country but not in another. But obviously our growing conditions, our climatic conditions, the soil. There's so many differences between Australia and North America or the EU, so it makes sense that there might actually be some products that are safe in some areas and just not in others. Overall, what is your advice to growers when it comes to managing their chemical usage and MRLs?

[00:13:05] **Gerard McMullen** I think the simple one, Shannon, is to make sure that they comply with legal directions, so that is all of the directions that are on the label. In fact, it's basically saying that only use a chemical where there is a registered use on that particular commodity or on that particular grain, comply with all of those level directions in terms of the rates that you're using, comply with things like withholding period, and then make sure that if there is any other do not statements on there that you comply with those as well. And if growers comply with that, well then we're going to be fairly well assured that the product that we're going to receive from the growers is not only safe for use, but is also compliant with Australian MRL. And if it complies with the Australian MRL and we know to a large degree that the grower has done the right thing in terms of the use of that chemical, it makes it a little bit easier for that post farmgate sector to say, right, well what's the risk of residues arising on this grain in terms of can we meet a particular importing country requirement where the MRL may be slightly different? So if we know that the growers are going to comply with the registered use of that chemical, it makes it a little bit easier to be able to manage the risk of residues going into a particular country where the MRL is slightly different. And what industry does is that they use a range of tools to manage that process. So we ask growers if you are using a chemical where you are required to fill out a commodity vendor declaration, declaring that if you use that chemical, please fill it out correctly. That way we can then select stock based on that declaration, we can sample and test and then we can blend grain to make sure that we select appropriate stock to make an important requirement. But if the grower has done the wrong thing, whether deliberately or by accident, then that job is a little bit harder. So I guess the final thing I'd say, Shannon, is if a grower has used a chemical, for instance, the haloxyfop issue on canola, if a grower has used it, for whatever reason, then please talk to your agronomist, talk to your storage agent and your marketer, declare that you've used it, and then we may be able to find some appropriate strategies to manage that grain.

[00:15:24] **Shannon Beattie** Your knowledge on this topic is honestly invaluable. So thank you so much for sitting down and sharing all your pearls of wisdom with us today.

[00:15:33] **Gerard McMullen** No problem at all.

[00:15:41] **Shannon Beattie** That was Gerard McMullen speaking about maximum residue limits. More information on this topic can be found in the description box of this podcast or online at GRDC.com.au. I'm Shannon Beattie and this has been a GRDC podcast. Thanks for listening.