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### **Submission on the Trade Advice Notice Sharpen WG Herbicide - saflufenacil**

Australian Pork Limited (APL) is the national representative body for Australian pig producers. It is a producer-owned, not-for-profit company combining marketing, research & innovation and policy development to assist in securing a profitable and sustainable future for the Australian pork industry. APL works in close association with key industry and government stakeholders.

APL welcomes the opportunity to provide a submission to the Australian Pesticides and Veterinary Medicines Authority (APVMA) on the Trade Advice Notice for saflufenacil in the product Sharpen WG Herbicide. The notice raises a number of concerns for the Australian pork industry, particularly in regard to saflufenacil residues.

Currently saflufenacil is used as a pre-emergent herbicide, but the changes requested by BASF Australia Ltd may result in some level of residues remaining in the straw after harvest. The extent this may occur is unknown or has not been provided.

Residues from saflufenacil may pose a risk to the pork industry. Straw is used in Australian pig production systems for pigs raised indoors on straw, as an enrichment medium and in outdoor production systems. Research funded by APL in 2012 found that approximately seven per cent of the total diet of pigs housed in such systems was the straw bedding material. The amount of bedding material consumed as a percentage of the total diet consumed was consistent across time and live weight<sup>1</sup>. Residue contamination of straw is therefore a major concern when rearing pigs in straw-based ecoshelters.

The Trade Advice notes that any residues are to be managed through an increased MRL, specifically an increase in the edible offal (mammalian) MRL from 0.01 to 7 mg/kg. APL notes that Australian MRLs are only applicable to domestic market. Table 1 of the Trade Advice notes international saflufenacil MRLs apply to Japan (including pigs), not in Taiwan. Australia's major pork export markets include Singapore, Hong Kong and Malaysia. The Trade Advice is silent on saflufenacil MRLs for pork meat and offal in these markets. Furthermore, the notice acknowledges

*... major export commodities, as are commodities of animal origin, such as meat, offal and dairy products, which may be derived from livestock fed feeds produced from treated cereals, pulses and lucerne. Residues in these commodities resulting from the use of Sharpen WG Herbicide may have the potential to unduly prejudice trade.*

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<sup>1</sup> van Barneveld, R. (2012). Nutritional Strategies to Minimise the Influence of Bedding Material Consumption on Growth Efficiency. Final Report to Australian Pork Limited 2005/2012

Asian countries have particular sensitivities to residues. Given the significant impacts residues can have on export markets, the acknowledgement in the Trade Advice of potential issues does not reassure APL particularly as there are a number of unknowns which impact on residue accumulation in the offal. The Trade Advice is not supported by sufficient scientific evidence to ensure that straw with saflufenacil residues would not cause offal residues leading to trade recalls for residues and export market implications.

Despite the APVMA advising withholding period that can be applied for livestock intended for export markets and an export slaughter interval of 30 days (not possible in pigs loaded for market directly from straw based shelters because of welfare concerns), APL does not agree the APVMA should approve the application made by BASF Australia Ltd to vary the registration of Sharpen WG Herbicide, to add late season uses on cereals (wheat, barley and triticale) or for new use on lucerne, without additional evidence to support the level of residues that may still be present in straw supplied to pig producers.

For the APVMA to consider this application, APL requests that additional research must be sought into saflufenacil residues in straw used in livestock production systems, specifically for pigs.

Should you have any questions about this submission, please do not hesitate to contact Jessica Edington on 02 6270 8832 or [Jessica.Edington@australianpork.com.au](mailto:Jessica.Edington@australianpork.com.au).

Yours sincerely



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