

**Minor use desktop permit
applications from the South
Australian Horticulture
Exemption Scheme - DAFF**

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Project Number: VG07203

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This report is published by Horticulture Australia Ltd to pass on information concerning horticultural research and development undertaken for the vegetables industry.

The research contained in this report was funded by Horticulture Australia Ltd with the financial support of Department of Agriculture, Fisheries and Forestry.

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ISBN 0 7341 1789 2

Published and distributed by:

Horticulture Australia Ltd

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179 Elizabeth Street

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Know-how for Horticulture™

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**MINOR USE DESKTOP PERMIT APPLICATIONS FROM THE SOUTH AUSTRALIAN
HORTICULTURE EXEMPTION SCHEME - DAFF**

Final Report

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Purpose of the Project:

To obtain desk-top permit approvals for a range of pesticides in minor vegetable crops.

AKC Consulting Pty Ltd acknowledges the funding support provided by the Horticulture Australia Limited for this project.

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TABLE OF CONTENTS

TABLE OF CONTENTS	2
MEDIA SUMMARY	3
TECHNICAL SUMMARY	4
1.0 INTRODUCTION.....	5
1.1 Current Situation.....	5
2.0 METHODOLOGY	6
3.0 RESULTS	8
3.1 Permit Approvals	8
4.0 DISCUSSION.....	9
5.0 RECOMMENDATIONS	9

MEDIA SUMMARY

A lack of available pest and disease management tools can hamper the development and productivity of many small or emerging vegetable industries. This lack can be caused by a range of factors, such as: pesticide resistance; emerging pests or diseases; new cropping systems; movement towards integrated pest management and greater selectivity; or the disinclination of pesticide manufacturers to seek registrations in small acreage crops.

To try and alleviate the situation, Horticulture Australia Ltd (HAL) and DAFF, via Project VG07203, required the preparation of minor-use permit applications, covering a range of vegetables crops for submission to the Australian Pesticides and Veterinary Medicines Authority (APVMA). The project's goal was to obtain regulatory approvals for approximately over 40 pesticide-commodity combinations for ten pesticides, previously identified as necessary under the SA Horticultural Exemption Scheme. The project team researched, collated and submitted the necessary information to the APVMA in support of these permit applications.

As all applications were submitted prior to the end of June 2008 it is anticipated that approvals will be gained before the end of December 2008.

TECHNICAL SUMMARY

The issue of chemical access can be problematic for many small or emerging vegetable industries with a lack of pesticide access adversely affecting crop productivity and farmer profitability. This situation has arisen from a combination of factors such as; the introduction of new pests and diseases; pesticide resistance; a move towards integrated pest management; the disinclination of manufacturers to register pesticides for minor crops; and regulatory pressures diminishing previously available pesticide options.

The aim of VG07203 is to gain regulatory approval for pesticide uses needed by a range of horticultural crops, as identified under the South Australian Horticultural Exemption Scheme. A list of priorities was identified via consultation, based on the SA needs covering approximately 40 crops and ten pesticides.

This project has prepared and submitted minor-use applications for the nominated pesticide-commodity to the Australian Pesticides and Veterinary Medicines Authority (APVMA).

1.0 INTRODUCTION

1.1 CURRENT SITUATION

Before a pesticide can be used in Australia it must be approved by the Australian Pesticides and Veterinary Medicines Authority (APVMA). In order to gain approval it must satisfy the APVMA criteria in areas such as efficacy, consumer safety, environmental safety and occupational health and safety. For a manufacturer to register a product they are required to submit a comprehensive data package to the APVMA. The costs for generating and collating such data are high and unfortunately many horticultural crops are too small individually for agrochemical manufacturers to consider expending the cost associated with registering their products for use. As a result, horticulturalists are often placed in situations where they risk severe crop losses from pests, weeds and diseases through lack of access to suitable pest management options.

The need for minor-uses has also increased due to a loss of access to older pesticides as a result of chemical reviews and company product portfolio rationalisation. Further the introduction of Quality Assurance programs dealing with the whole production process including pesticide use, demand that growers only exercise Good Agricultural Practices, i.e., practises are regulatory compliant. In addition, horticultural produce must meet minimum standards relating to quality, safety and consumer expectation emphasising the importance of the farmer ensuring that any pesticides applied are done so in accordance with relevant regulations.

The APVMA has a regulatory mechanism, i.e., a Minor Use Permit Scheme, by which smaller industries are able to seek access to much needed pesticide tools. This permit scheme adds some flexibility to the approval process and provides a mechanism whereby minor-uses, following a targeted level of risk assessment, concomitant to the importance of the crop and pesticide use in that crop, can be granted approval. The outcome of which is usually the issuing a time-limited permit enabling growers to use a product for the purpose outlined in the permit.

To obtain such minor-use approvals permit applications must be lodged with, and approved by the APVMA. These applications must not only outline the proposed use but also provide a justification and data supporting the requested use. In project VG07203 data for the 10 pesticides was sought, collated and submitted to the APVMA.

2.0 METHODOLOGY

Before issuing a minor use permit the APVMA must undertake a risk assessment to be satisfied that a proposed use is efficacious, safe to users, the environment and will not result in violative residues. In preparing the permit applications the project team attempted to collate and submit information to address these issues so as to facilitate the completion of the required risk assessment and the granting of a permit.

To gather this information the project team undertook a number of data gathering strategies. These strategies included:

- Data mining – The project team sought to identify and utilize relevant publicly available data, i.e., from literature searchers, previously funded HAL projects or JMPR Monographs, i.e., data submitted in support of MRL setting at Codex.
- Industry linkages – The project team used linkages with existing HAL projects such as AH04009, government organisations, peak industry bodies, and national and state grower associations.
- Manufacturer linkages – The project team liaised with chemical manufacturers regarding available data to support applications.

The data mining involved ‘building’ the permit applications and justifications via a series of iterative steps. These steps involved locating supporting data, i.e., overseas labels, trials data, confirmation of pest status via liaison with local researchers and seeking clarification and feedback from industry on specific requests. Once the available information was collected and collated a permit application was generated and submitted.

The steps involved are outlined below in more detail.

Step 1. Supporting data and or additional information, needed to comply with APVMA requirements, was sought. The team then liaised with industry representatives and chemical manufacturers where uncertainty over a requested use existed.

Step 2. Where required discussions were held with the APVMA on specific permit requests, e.g., agreement on permit applications that could be consolidated.

Step 3. Data was the collated and permit applications prepared and submitted.

Through the above process liaison was maintained with the Pesticide Minor Use Co-ordinator (Projects AH04009 and AH06104).

3.0 RESULTS

3.1 PERMIT APPROVALS

Outlined in Table 1 are the permit approvals granted by the APVMA to date. These approvals cover three pesticides and a number of crops.

Table 1 Permit applications submitted as part of the project

Active	Crop	Pest
Abamectin	Beetroot	thrips, Western flower thrips (WFT)
	Radish	WFT
	Beetroot (leaves)	thrips, WFT
	Bok Choy	WFT
	Chicory	WFT
	Endive	WFT
	Mizuna	WFT
	Silverbeet	WFT
	Spinach	WFT
	Spring onion	Western flower thrips, Onion thrips, Plague thrips
Bt	Silverbeet	diamond back moth
	Spinach	diamond back moth
Bifenthrin	capsicum	Greenhouse whitefly, Plague and other thrips (not WFT)
	Leafy lettuce	Greenhouse whitefly, Plague and other thrips (not WFT)
	Cucumber	Greenhouse whitefly, Plague and other thrips (not WFT)
Chloridazon	Spinach beets	weeds
Copper	Beetroot	Cercospora
	Radish	White blister
	Chicory & endive	Cercospora & Downy mildew
	Spinach & silverbeet	Cercospora
Imidacloprid	Carrot	Aphids
	Lettuce	Greenhouse whitefly
	Silverbeet & spinach	Greenhouse whitefly, aphids
Ioxynil	Spring onion	Weeds
Iprodione	Coriander & parsley	Sclerotinia rot
	Chicory & endive	Sclerotinia rot
	Spinach & silverbeet	Sclerotinia rot
	Beetroot leaves	Sclerotinia rot
Tebuconazole	Beetroot	Sclerotinia rot
	Radish	Sclerotinia rot
	Chicory & endive	Sclerotinia rot
	Spinach & silverbeet	Sclerotinia rot
Trifloxystrobin	Tomato & cucumber (greenhouse)	Powdery mildew

4.0 DISCUSSION

There was some confusion associated with some applications due to uncertainty over the existence of the disease as nominated in Australia, e.g., Septoria in chicory and endive, and the basis for the permit request, e.g., copper was requested for the control of Downy mildew in spinach, silver beet and beetroot despite all copper-based products approved for use in Australia already carrying recommendations for this disease in these crops.

5.0 RECOMMENDATIONS

As part of future projects it is recommended that:

- that the status of requested pesticide-commodity combinations be clarified prior to applications being developed.