



Submission to:
Australian Pesticides and Veterinary Medicines Authority

Omethoate: proposed regulatory decisions

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Background:

The Western Australian Farmers Federation (Inc.) (WAFarmers) welcomes the opportunity to comment on the proposed regulatory decision on omethoate.

As background, WAFarmers is the state's largest and most influential rural advocacy and service organisation. WAFarmers represents around 3,500 Western Australian farmers from primary industries, with the majority being grain growers. As the largest WA rural advocacy group, our members are responsible for approximately 35 per cent of the overall grain production in WA.

Introduction:

The proposed regulatory decision on the reconsideration of the active constituent omethoate is part of a review of a number of actives by APVMA. The release of the proposed regulatory decision is the final consultation process with industry, before a regulatory decision is made.

Omethoate is a systemic organophosphorus insecticide and acaricide, used to control insects and mites in horticulture and agriculture. Organophosphates are an essential chemical control option for growers, and are usually used as part of integrated pest management programs, and as part of chemical rotations for resistance management.

Office of Chemical Safety toxicological assessment

WAFarmers welcomes the Office of Chemical Safety (OCS) assessment on any toxicological impacts of the maintenance of omethoate registration.

The OCS, as a subsidiary of the Department of Health, provided a review of the toxicology and metabolic/toxicokinetic effects of omethoate. The review considered the toxicology data provided to initiate the reconsideration, and the registration data and all relevant published data.

Some of the key recommendations from the assessment included:

- Revision of the acceptable daily intake (ADI) from 0.0003 to 0.0004 mg/kg bw.
- no changes to the approval status of the active constituent.
- that the current Scheduling of omethoate is appropriate and no changes are required.

The OCS concluded that there was no objection on toxicological grounds for the ongoing approval of omethoate.

Occupational Health and Safety assessment

WAFarmers welcomes the review of the OHS conditions of the use of omethoate, and the proposal to address any OHS concerns with amendments to safety directions and re-entry periods.

Residues, dietary risk assessment and trade

WAFarmers is concerned that the lack of availability of residue data will lead to the reconsideration of omethoate for control of red legged earth mite, Lucerne flea, and a number of other insects.

The use of omethoate as a barrier spray for red legged earth mite will not be effective for management of the issue, and will limit the integrated pest management options available for farmers, as well as removing a key agricultural chemical that is cost effective and efficient for the control of pests in crop.

MRL recommendations

WAFarmers is concerned that the proposed regulatory decision has recommended to remove the current maximum residue limit (MRL), pending the outcome of the dimethoate regulatory decision.

The removal of the omethoate MRL, while still allowing the use patterns for border spray, have the potential for MRL breaches.

WAFarmers recommends that MRL standards should be maintained, if a use pattern for a chemical on a crop exists.

Next steps

With the proposed deregistration of omethoate for a number of key use patterns due to insufficient residue data available, WAFarmers requests that APVMA allow a permit extension of the use patterns, as described on page 22 of the proposed regulatory decision, to allow industry to provide adequate residue data.

With the reconsideration of chemical actives into the future, WAFarmers requests that industry and APVMA develop a protocol to ensure adequate safety information is available to ensure the APVMA's safety obligations are protected.

Conclusion

With the reconsideration of active constituents by APVMA, the agricultural industry requests that APVMA work with industry to ensure that all adequate information is available to guarantee that a chemical can be effectively assessed.

The potential for deregulation of chemicals is likely if inadequate residue, OHS, or toxicology information is not available for assessment by APVMA, and as such, WAFarmers requests APVMA work with industry to identify short comings in risk assessment data, prior to the release of proposed regulatory decisions.

The loss of omethoate as an integrated pest management option and as a key active for chemical rotations would lead to significant issues with resistance to the remaining active constituents. The loss of omethoate could also lead to an increased usage of less effective chemicals which may lead to an unnecessary elevation of chemical reliance.