

# Fruit fly AgChemical management: Regulatory trends and challenges

Kevin Bodnaruk

# Fruit fly Agchemical management

- Pressures and trends
  - Regulatory
    - Assessment
    - Reconsiderations
  - New chemistry?
- Trade

# Regulatory trends

- **Risk assessment**

- Current methodologies being reviewed, e.g., Dietary exposures
  - Or refined probabilistic vs deterministic
- New methodologies introduced
- Aggregate, Anti microbial resistance, Threshold of Toxicological Concern, Global estimate of chronic dietary exposure (GECDE) model
- New and/or additional data requirements

# Regulatory trends

- **Increasing complexity**

- Residue definitions

- Metabolites

- HBGVs

} Dietary exposure

- Analytical sensitivity & Measurement uncertainty

- **Different/refined approaches**

- EU: Hazard based thresholds, Qualified presumption of safety

# Regulatory trends

- **Reconsiderations/re-evaluations**
  - Domestic and international
    - APVMA, Codex, PMRA, US EPA, EFSA etc
  - Cyclic
    - EU: 7-15 years,
    - Canada, Codex, USA: 15 years
  - Special reviews
    - New scientific information or legislative triggers

# Regulatory trends

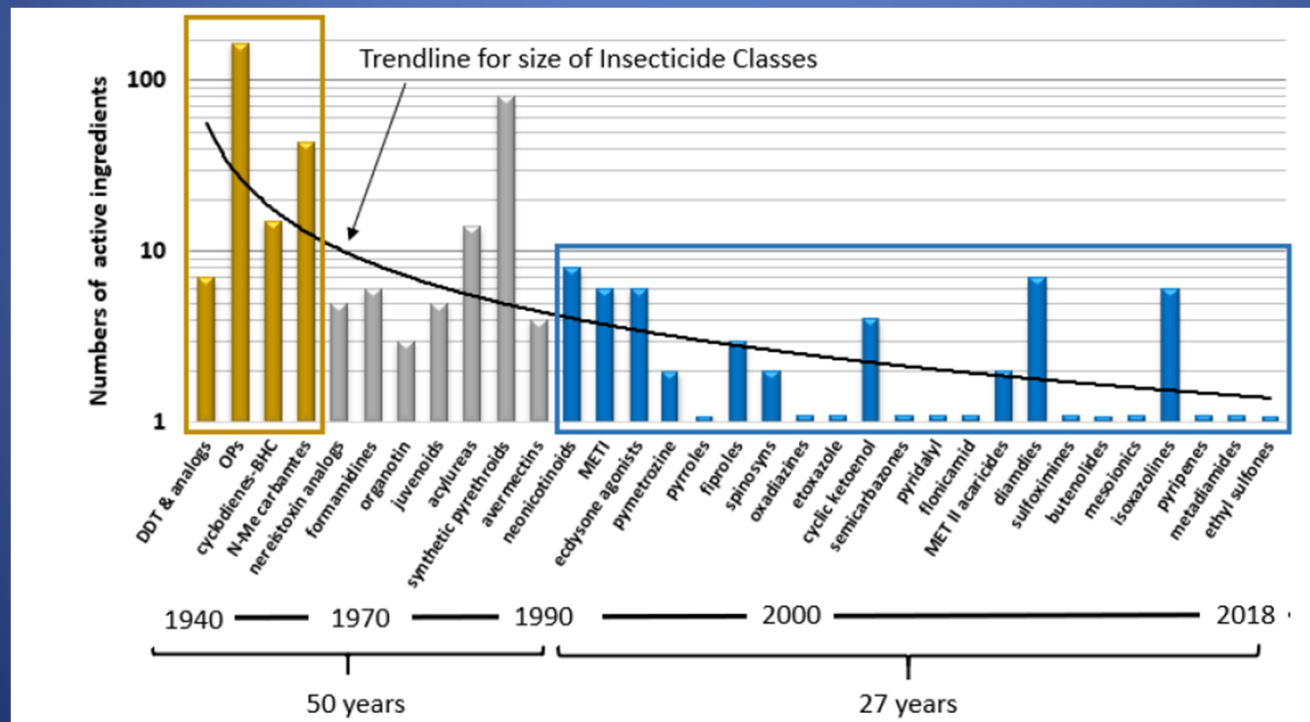
- **Reconsiderations/re-evaluations**
  - Assessed against contemporary standards
    - Gaps in the data will be critical
      - Lack of relevant data - risk assessment and review outcomes uncertain

# Regulatory trends

- **Reconsiderations/re-evaluations**
  - **Pressure on older compounds**
    - **Codex** – Reviews scheduled for dimethoate, diazinon & chlorpyrifos;
    - **EU** – Alpha-cypermethrin, clothianidin, dimethoate, indoxacarb, thiacloprid not authorised. Abamectin glasshouse only;
    - **Canada** – Bifenthrin phased-out, Chlorpyrifos cancelled, Methomyl restricted;
    - **USA** – Chlorpyrifos cancelled

# New chemistry

- New compound/MOA availability?
  - Potentially problematic
    - MOAs vs number of actives



Sparks *et al.* 2019. Pesticide Biochemistry and Physiology



# New chemistry

- Different registrant priorities
  - Market size considerations
  - Focus often on 'world' crops
  - Regulatory support of generic compounds uncertain
  - Off-patent products have increased from < 20% in 1995 to near 80% in 2016
  
- Increased uncertainty

# Fruit fly Agchemical management

- Trade considerations
  - MRL alignment – for new & existing insecticides complex
    - Different or nil use patterns
  - Import MRLs
    - Policies/Legislation
      - Reference (Codex) or Default MRLs?
      - MRL application and establishment processes
- Costs
  - Data generation and fees

# Fruit fly Agchemical management

- Import MRL Guideline adopted as an APEC text  
<https://www.apec.org/Publications/2016/08/Import-MRL-Guideline-for-Pesticides>
- Compendium developed



# Fruit fly Agchemical management

- **In summary**

- Regulatory pressures increasing
- Access to new insecticides uncertain

- **Challenges**

- Satisfying regulatory requirements
  - For new and old
  - Availability of data
- Trade
  - MRL compliance

# Fruit fly Agchemical management

- **Going forward**
  - Strategic analyses
    - Short, mid and long-term w.r.t. threats to insecticide availability
  - Prioritise R&D





Australian Citrus

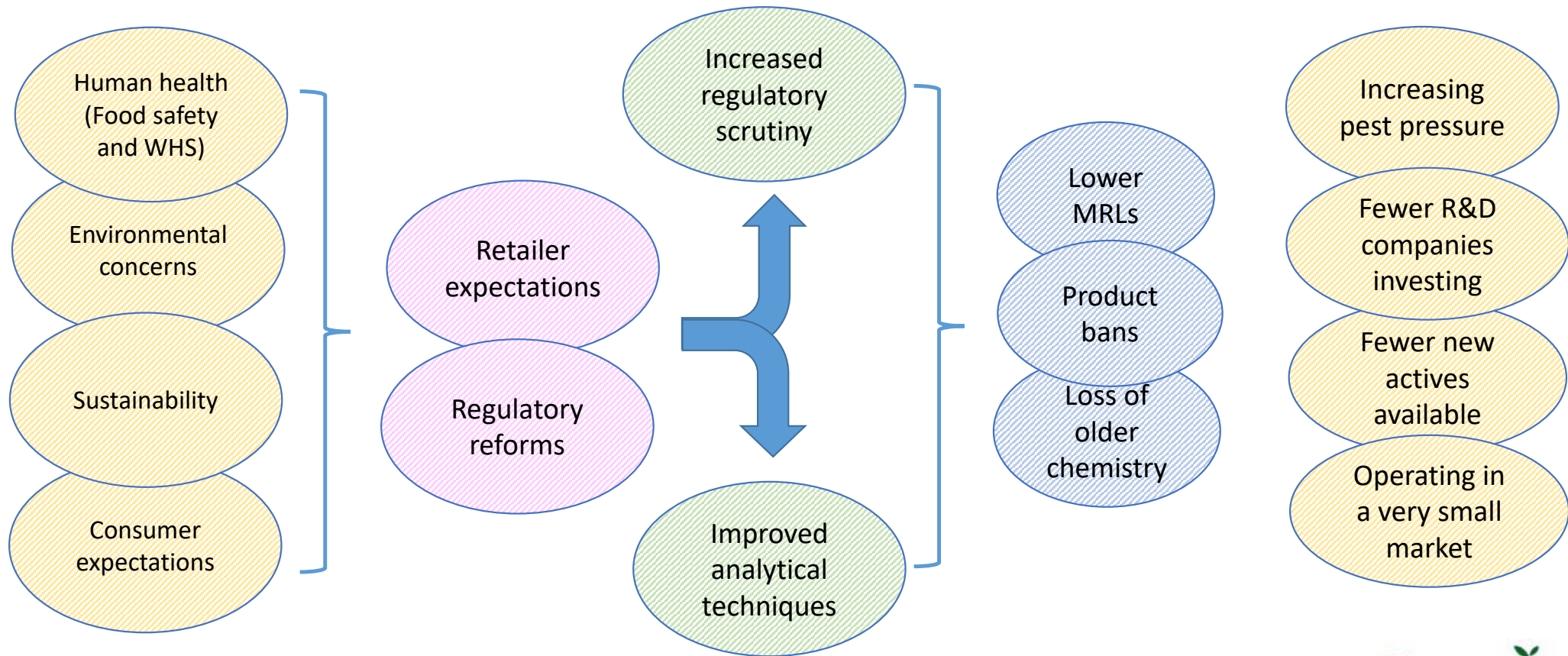
# Agrichemical risk management

**David Daniels**

General Manager Market Development, Citrus Australia

[david.daniels@citrusaustralia.com.au](mailto:david.daniels@citrusaustralia.com.au)

# Current status



## Current status

- Since 2014 – global downturn
- Increasing regulation
- AgVet companies looking towards alternative technologies (e.g. biostimulants, BCAs, GM)
- Industry consolidation
- Less competitive environment





## Consolidation

- Nufarm Limited
- Bayer CropScience
- BASF
- FMC
- Corteva Agriscience
- Syngenta Australia



## Citrus agrichemical related investments

1. CT09055 Coordinating a market development program for the Australian citrus value chain
2. CT13022 – Driving citrus industry success through a coordinated market development program – Stage 2
3. CT12005 – Driving citrus exports through improved market access
4. CT11011 – Agrichemical residue monitoring program for Australian citrus exports
5. CT15016 – Agrichemical residue monitoring program for Australian citrus exports – Stage
6. CT15012 – Australian Citrus Industry Innovation and Market Development Program
7. CT18001 – Citrus Agrichemical and Export MRL Program
8. CT18002 – Citrus Market Development, Market Access and Quality
9. MT10029 – Strategic Agrichemical Review Process
10. MT21005 – Strategic Agrichemical Review Process (updates )
11. MT20007 – Regulatory support and coordination (pesticides)
12. MT17019 – Regulatory support and coordination (pesticides)
13. CT14003 – MRL risk analyses and risk management options for major citrus export markets
14. CT14001 – Zero residue concept – scoping study for citrus
15. ST15027 – Generation of residue data for pesticide minor use permit applications

# Ultra-low residues – in search of the holy grail



## Why ??

- Series of MRL breaches in overseas markets
- Immense pressure from import markets (regulators, retailers, consumers, environmentalists)
- Protect reputation
- Loss of options

# Agrichemical risk management

## Monitor MRLs

WTO notifications

Overseas websites

Databases

Government contacts

## Communication

MRL tables

AgChem updates

Forums

Citrus Australia committees

## Residue testing

Laboratory proficiency testing

Maintain and update multi-residue screen

Negotiate price for testing and freight

Calibrate systems and manage risk

## Review

Assist case for new products

Understand use patterns

Understand risk and protect trade

Set priorities

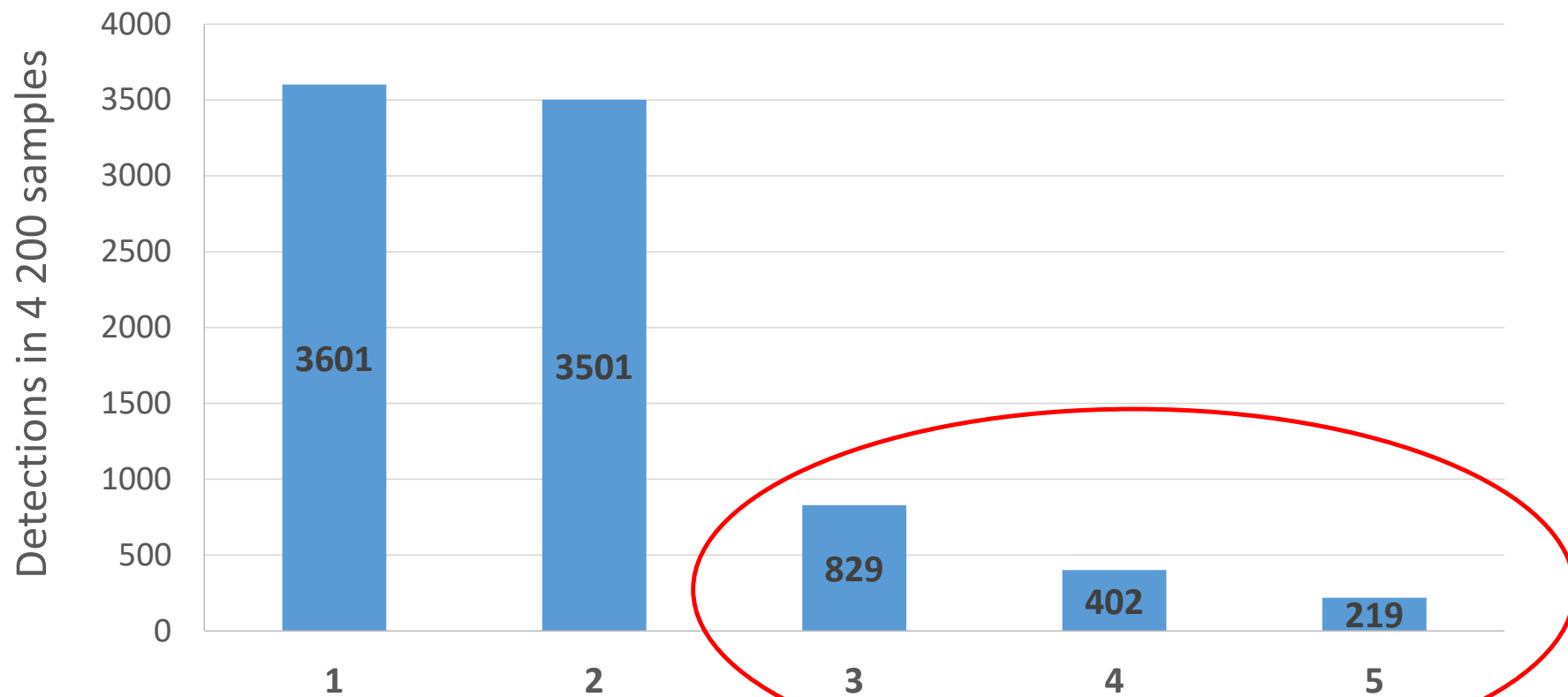
## Residue testing program



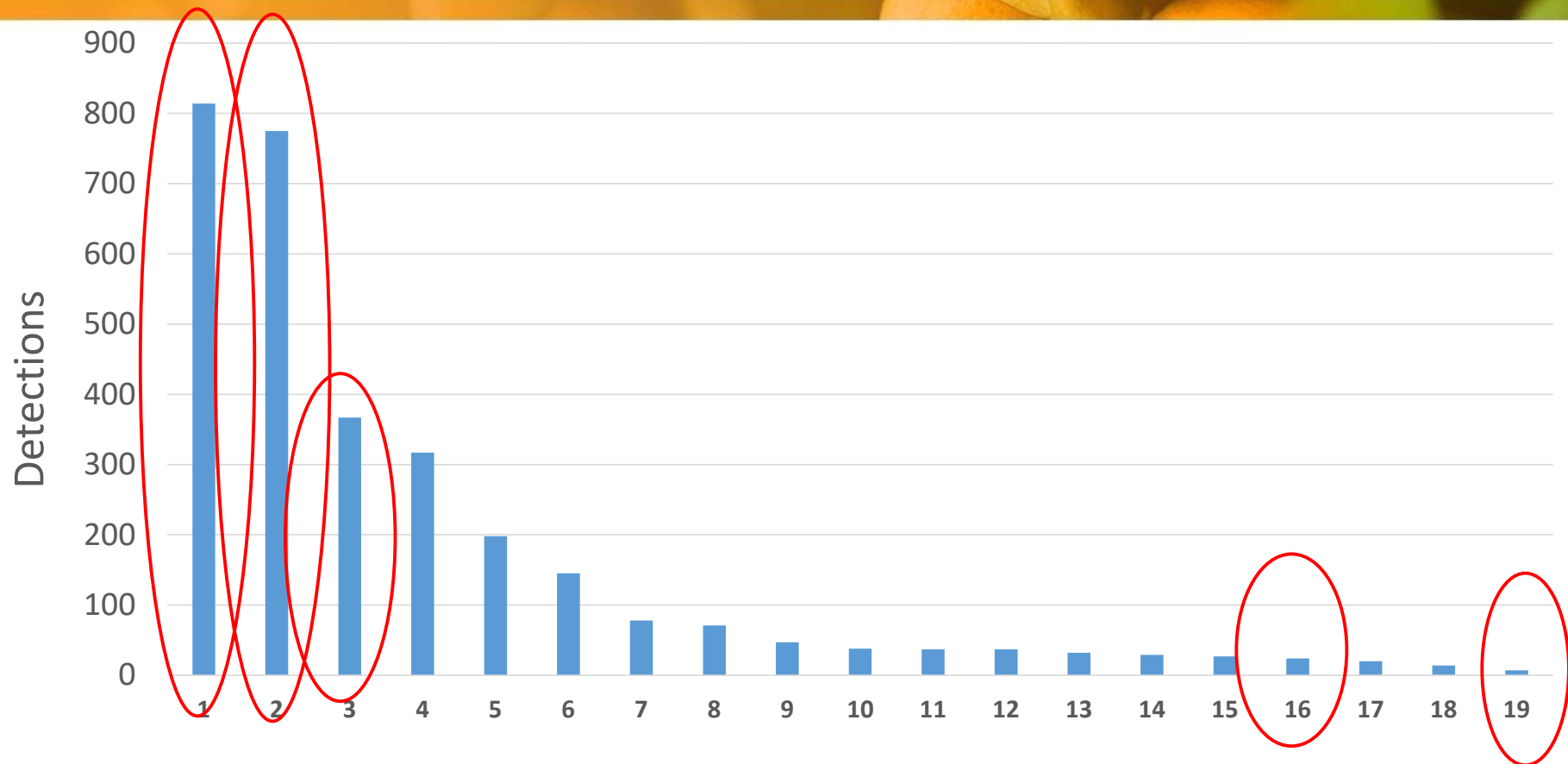
- Over 20 participating businesses
- Operating 11 years
- 4 100 individual samples tested for residues
- multi-residue-screen testing for 310 compounds
- value for money



# Results post-harvest fungicides



## Results – in-field applications.





**Thank You**



# Acknowledgement of **Country**

The University of Queensland (UQ) acknowledges the Traditional Owners and their custodianship of the lands on which we meet.

We pay our respects to their Ancestors and their descendants, who continue cultural and spiritual connections to Country.

We recognise their valuable contributions to Australian and global society.





THE UNIVERSITY  
OF QUEENSLAND  
AUSTRALIA

CREATE CHANGE

# RNA based biopesticides - BioClay™ technology

Prof Neena Mitter

Director, Centre for Horticultural Science,  
Director ARC Research Hub for Sustainable Crop protection

QAAFI, The University of Queensland, Australia

[n.mitter@uq.edu.au](mailto:n.mitter@uq.edu.au)





## PESTICIDES:

- RESISTANCE
- RESIDUE
- RUNOFF
- LACK OF SPECIFICITY
- NEW CHEMICALS



# URGENT NEED FOR SAFE METHOD TO PROTECT CROPS



Highly hazardous pesticides should be phased out in developing countries

Tragedy of poisoned school children in India provides another reminder



Pesticide - contaminated meal kills 25 Indian children

<https://www.reuters.com/article/us-india-children-poison/contaminated-school-meal-kills-25-indian-children-idUSBRE96G0AY20130717>

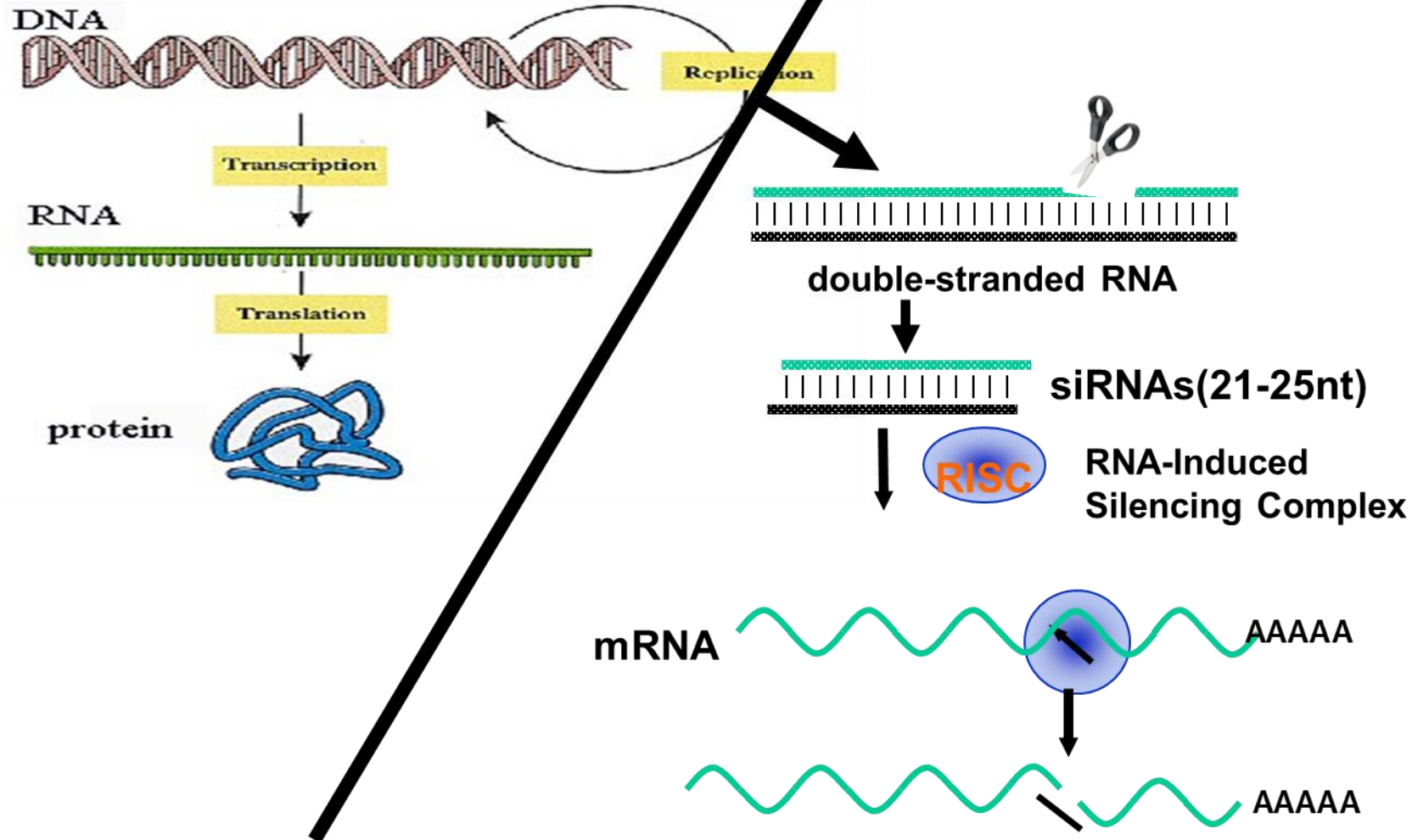


# RNA Interference

*“RNA interference or RNA silencing is the most important thing to happen in molecular biology during the last 10 to 20 years”*

# Expression

# Silencing





# RNA interference for Crop protection

Can we deliver RNA as a topical application instead of genetically modifying the plant?



# Limitations of naked dsRNA

- Unstable
- Degradation on plant surface
- Easily washed off leaves
- Short protection window





Stabilise? Environmentally  
friendly?  
Degradable? Stick to the leaf?

**How can we convert naked dsRNA  
experiments into a commercially  
viable system for farmers?**

Protect from rain? Non-toxic?  
Easy to adopt?

# RNA-based Biopesticides - *BioClay*<sup>TM</sup>

- RNA as the biological active ingredient
- Clay particles as carriers of the active

Inventors:  
Prof. Neena Mitter  
Prof. Gordon Xu  
Prof. Max Lu

BILL & MELINDA  
GATES *foundation*

QAAFI and AIBN

- **NO RESIDUE**
- **SPECIFIC**
- **STABLE**
- **SUSTAINABLE**
- **SAFE**

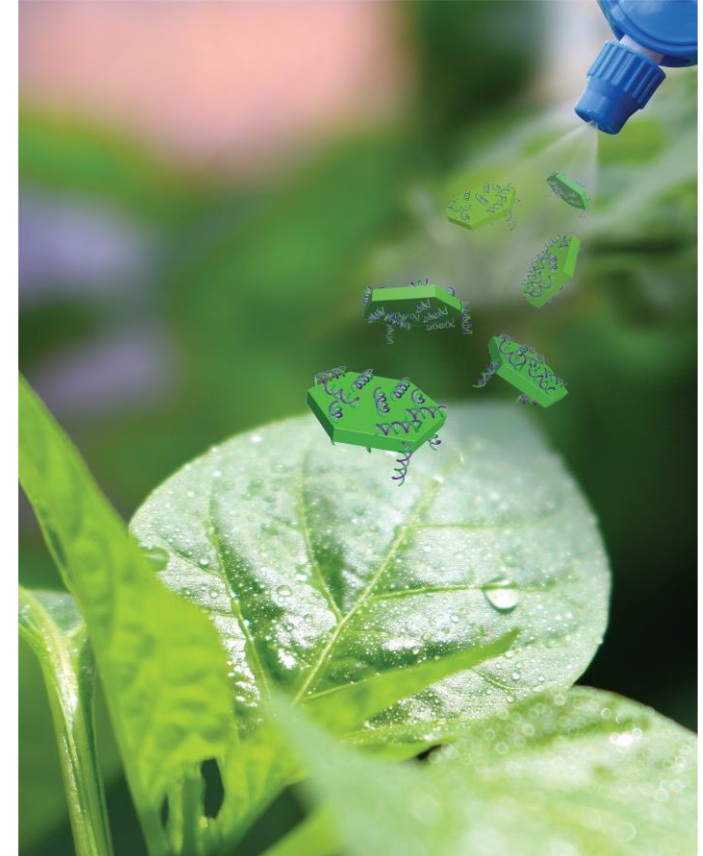


# What is BioClay?

## Inert biodegradable clay to deliver RNA

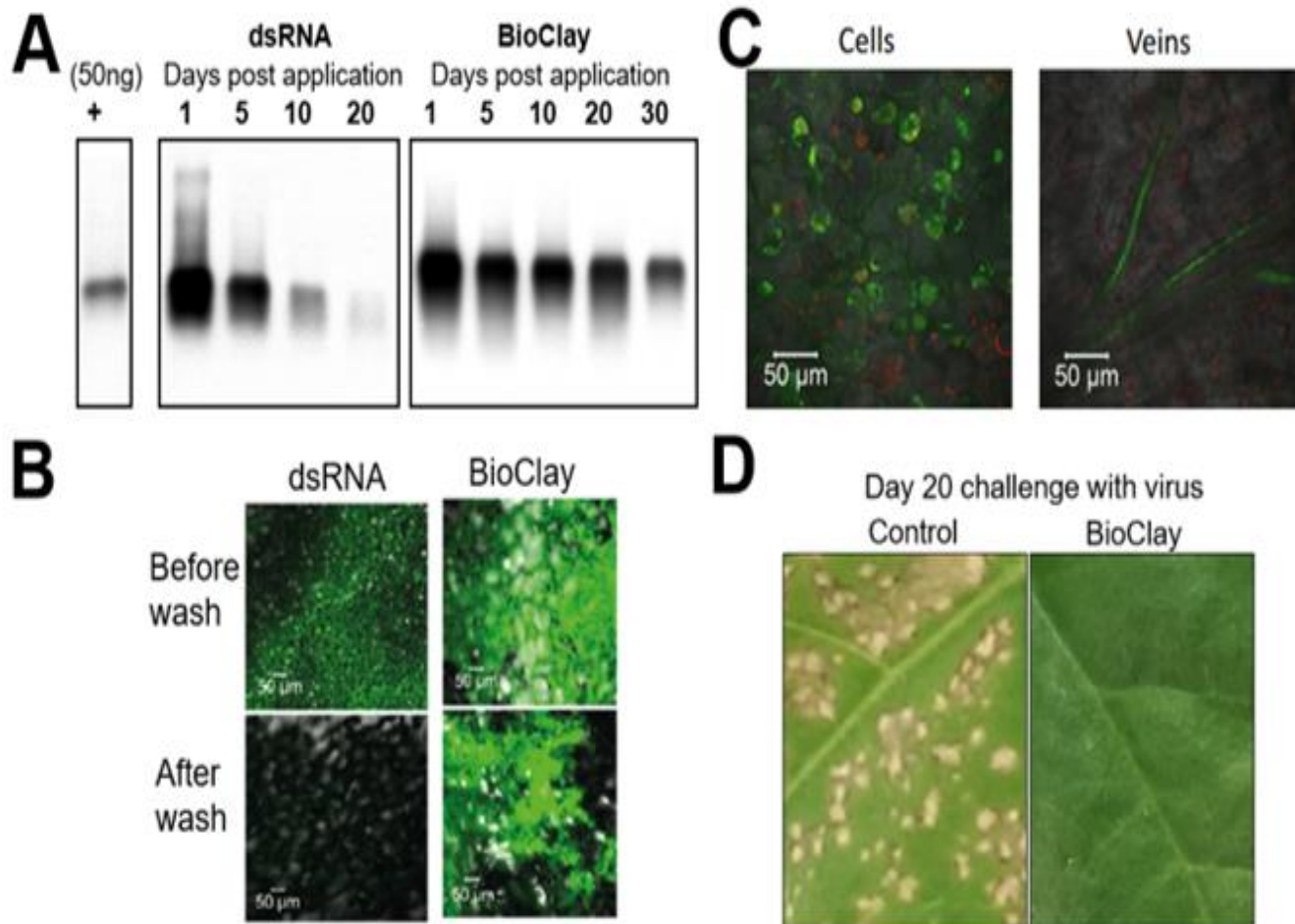
- Applied as a spray application without the need to alter the plant genome
- Clay layers degrade naturally leaving no residue
- Extended stability and slow release of dsRNA on plant surface

**Double stranded RNA of the pest or pathogen is used to kill the pathogen itself – Nature vs Nature**





# BioClay- It works



A – BioClay dsRNA survives on leaves even after 30 days of spray

B – The sprayed dsRNA can enter into the plant system

C – BioClay does not get washed off by water/rain

D – The sprayed leaves are protected from virus even after 20 days of spray

# Novel Topical Vegetable, Cotton Virus and Whitefly Protection –VG16037

 Hort  
Innovation

  
**CRDC**  
COTTON RESEARCH AND  
DEVELOPMENT CORPORATION

 Queensland Government  
Department of Agriculture and Fisheries

  
Nufarm





## BioClay it works....Zucchini yellow mosaic virus



Water  
Unpublished

Naked  
dsRNA

BioClay

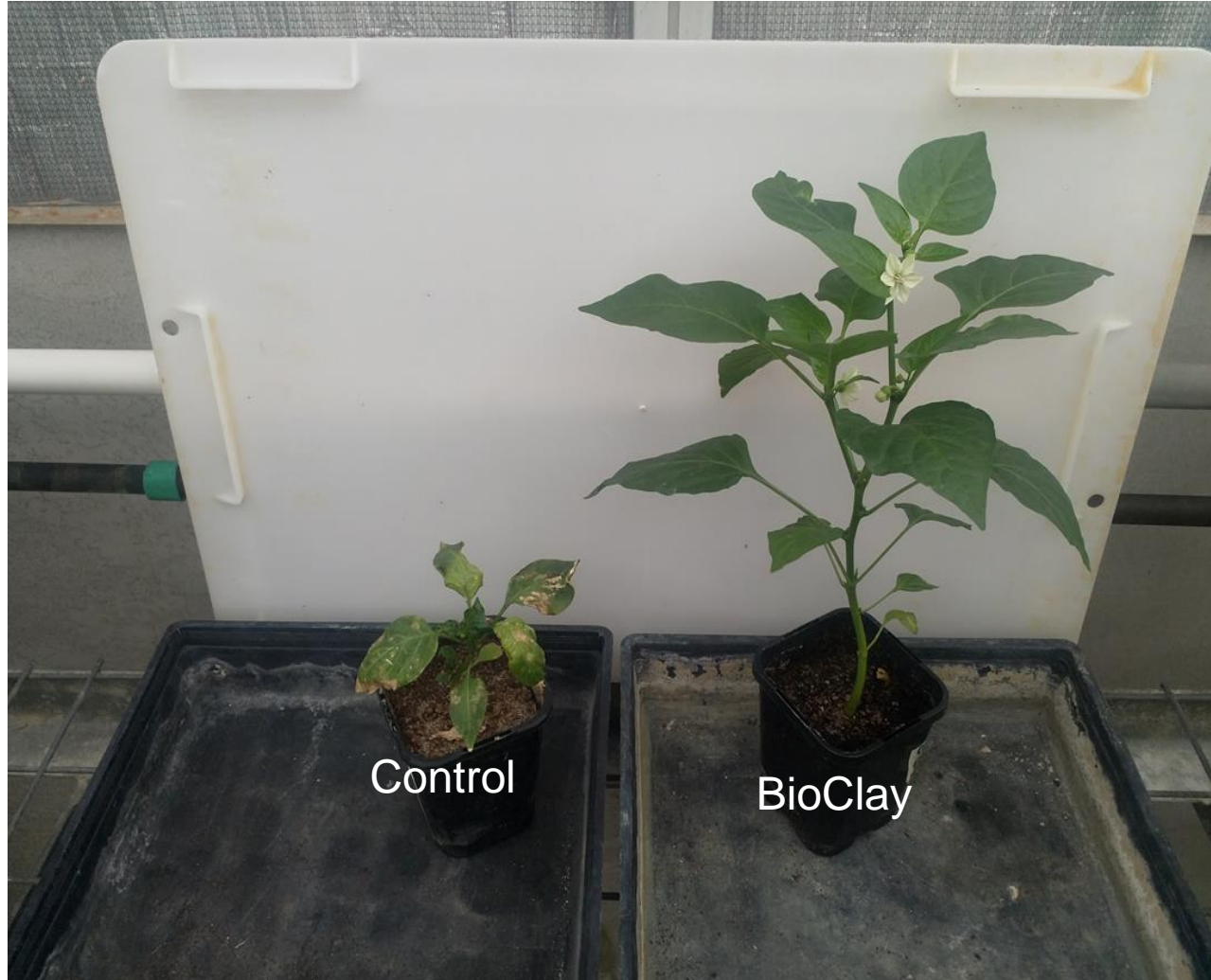


Figure 12. Zucchini Field trial site Redlands

Unpublished



# BioClay it works - Control of Tomato Spotted Wilt Virus



Viruses	Insect pests	Fungi
Tospoviruses	Whiteflies	Botrytis
Potyvirus	Aphids	Sclerotinia
Cucumovirus	Thrips	Fusarium
		Verticillium



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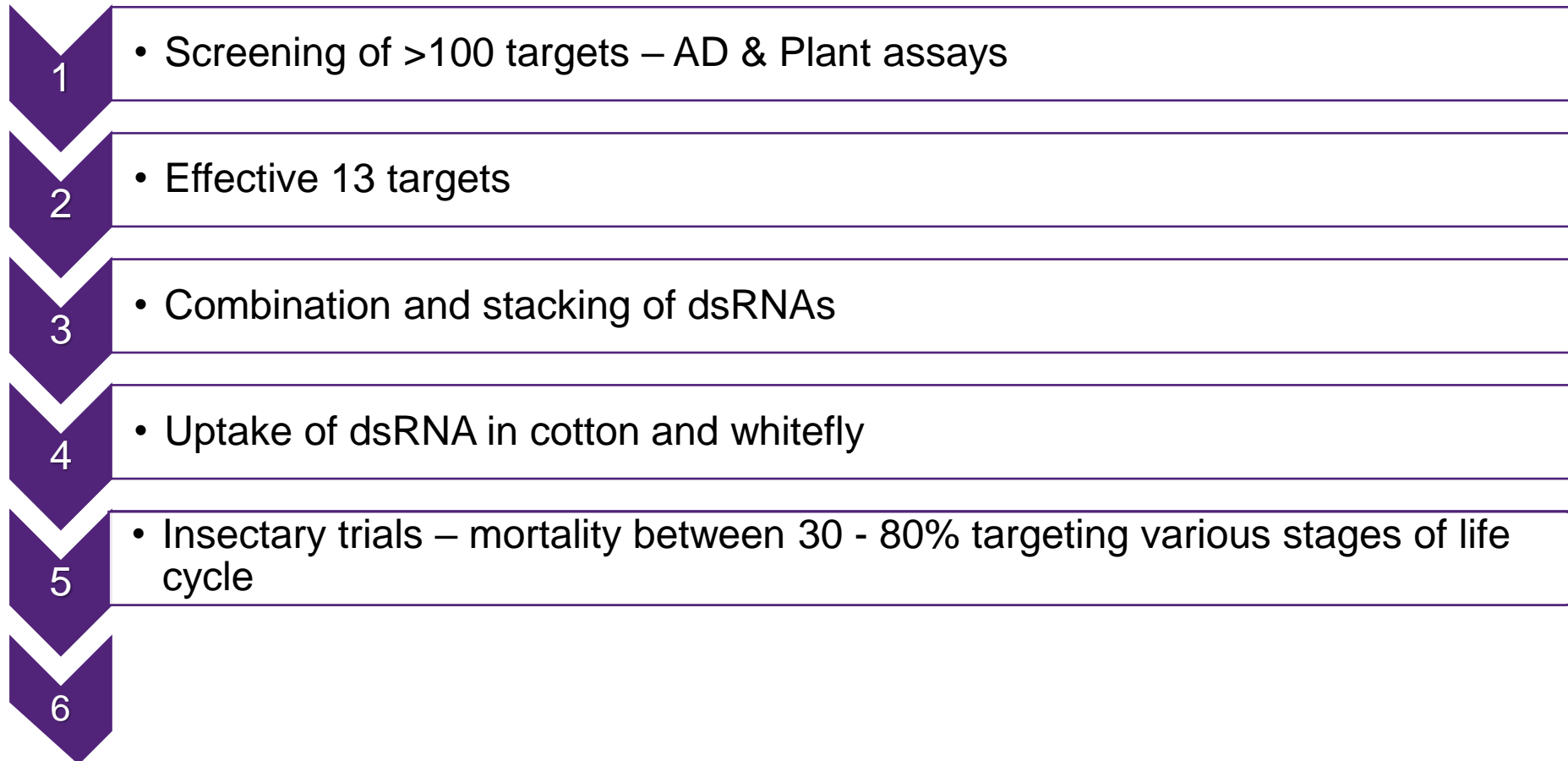
## Foliar application of clay-delivered RNA interference for whitefly control

[Ritesh G. Jain](#), [Stephen J. Fletcher](#), [Narelle Manzie](#), [Karl E. Robinson](#), [Peng Li](#), [Elvin Lu](#), [Christopher A. Brosnan](#), [Zhi Ping Xu](#) & [Neena Mitter](#) 

[Nature Plants](#) **8**, 535–548 (2022) | [Cite this article](#)

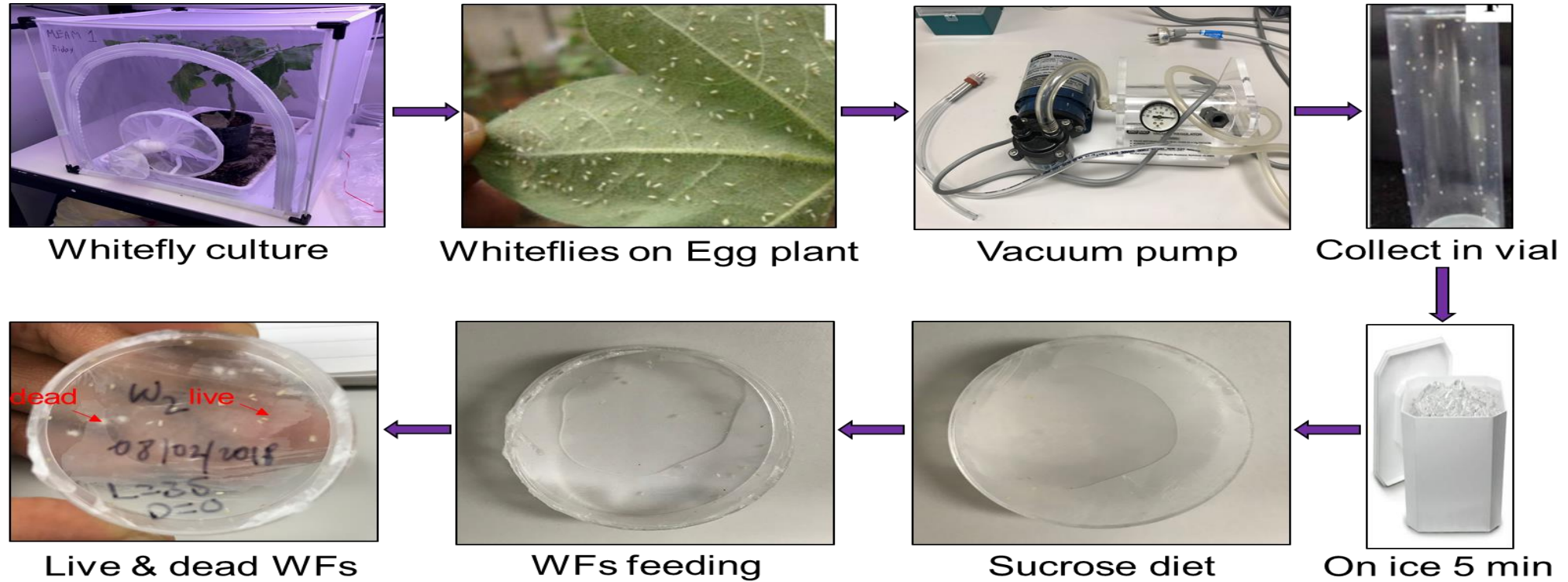
**1595** Accesses | **502** Altmetric | [Metrics](#)

# Summary of whitefly work – Cotton/Tomato as the host



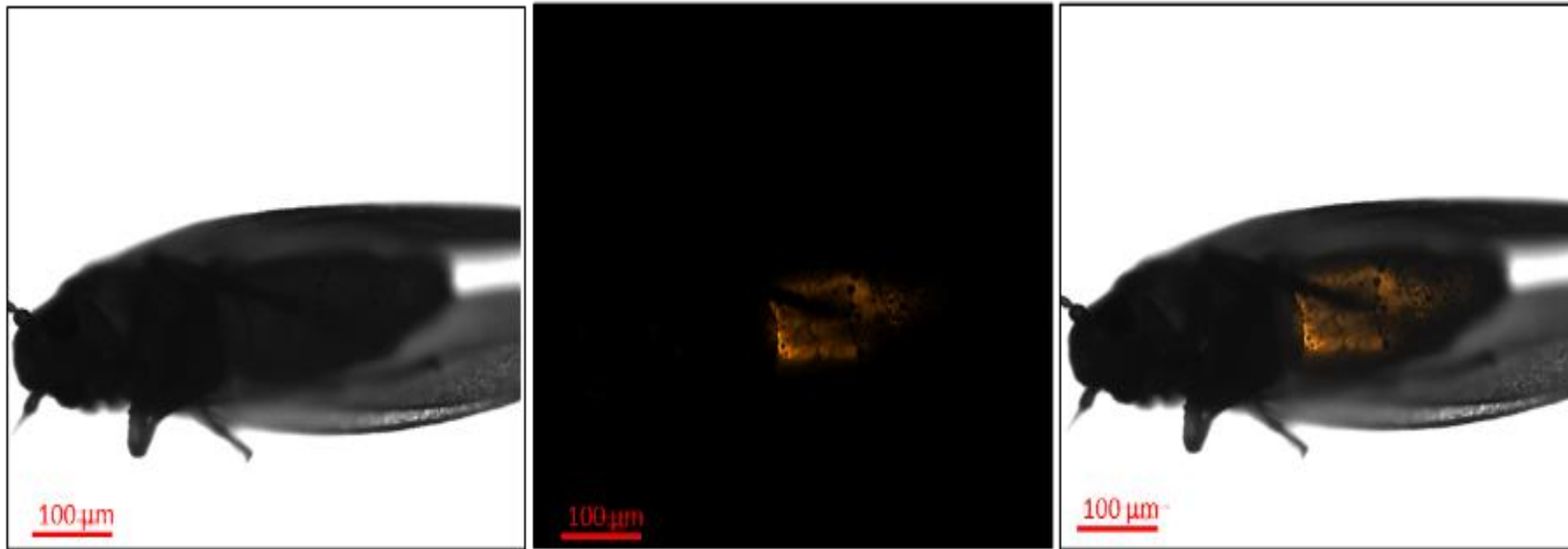
**Whitefly and virus work – ready for translation to horticultural crops- cotton- protected cropping**

# Workflow of RNAi screening bioassays



## Artificial diet assay (AD)

## BioClay for insect pests: RNA uptake in Whitefly



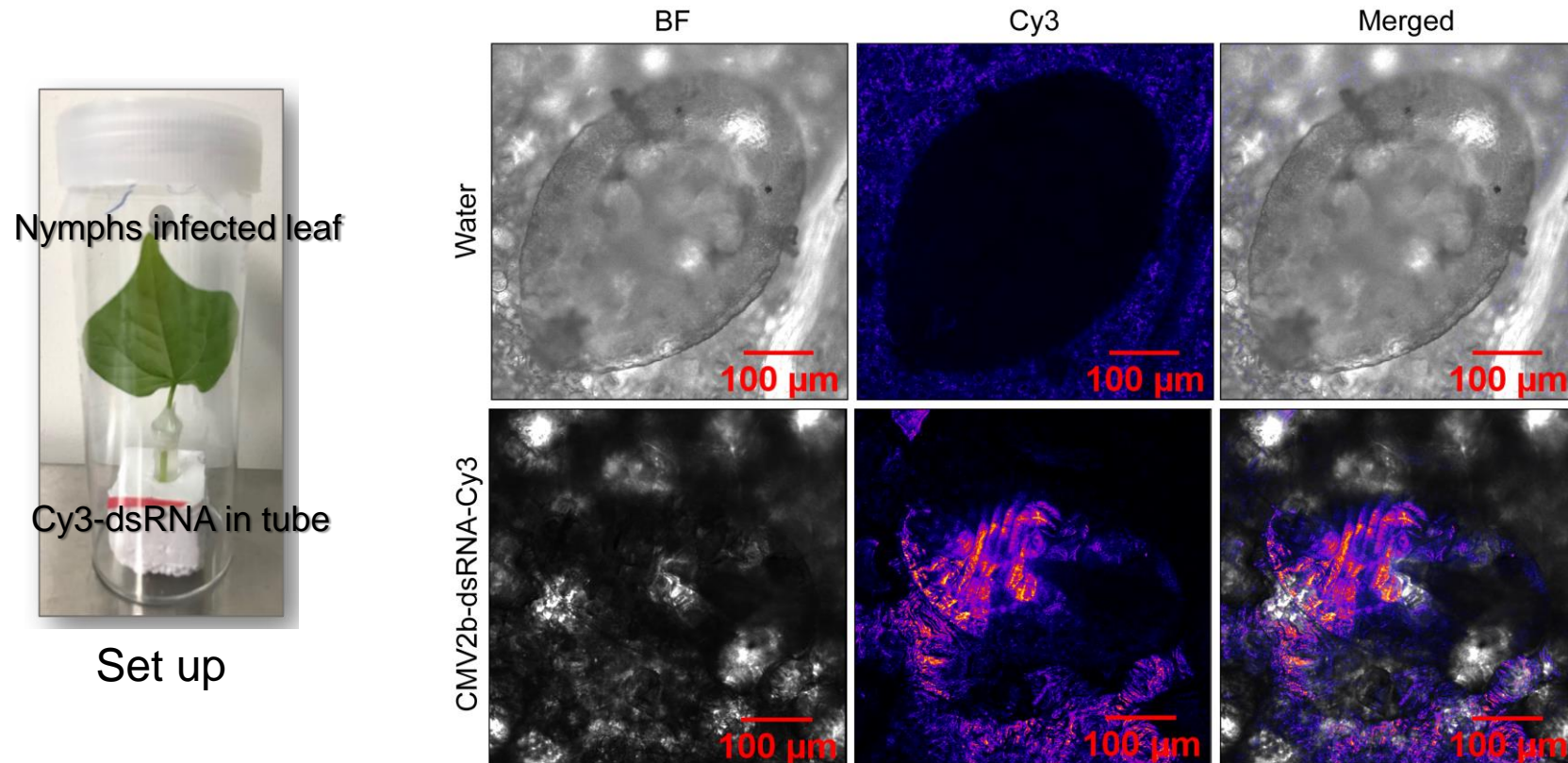
Adult whitefly showing presence of dsRNA in the abdomen 48 after after feeding on a sprayed leaf

Unpublished

[Jain, Ritesh G., Robinson, Karl E., Asgari, Sassan and Mitter, Neena \(2020\). Current scenario of RNAi -based hemipteran control.](#) Pest Management Science, 77 (5) ps.6153, 2188-2196



# Leaf-mediated uptake of dsRNA in whitefly nymphs



Whitefly nymphs can uptake dsRNA from petiole dip assay

# White Fly - Insectary Trials



insectary room



Cotton plants



Adult Wfs into clip cage

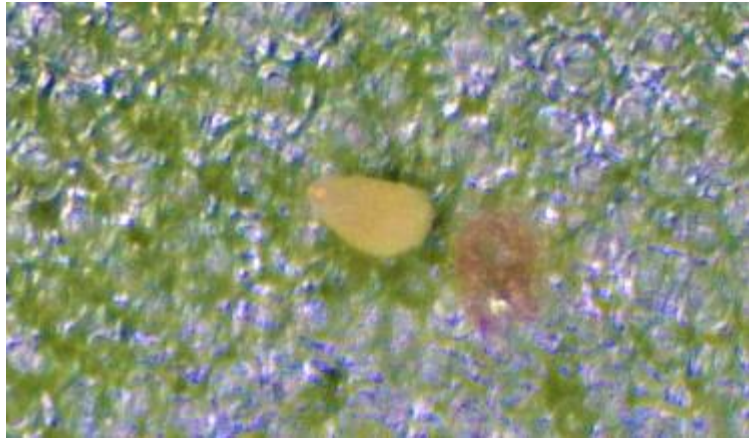


3D printed clip cage

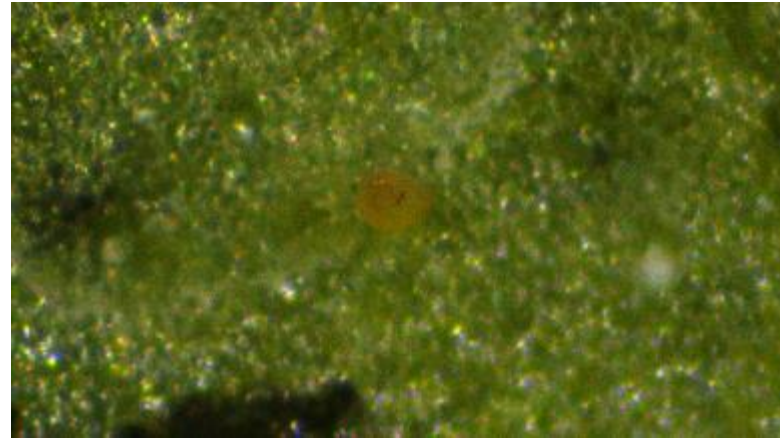


# Phenotypic effects of dsRNA/BioClay

Jain..Mitter et al Nature Plants, 2022



Water treated egg



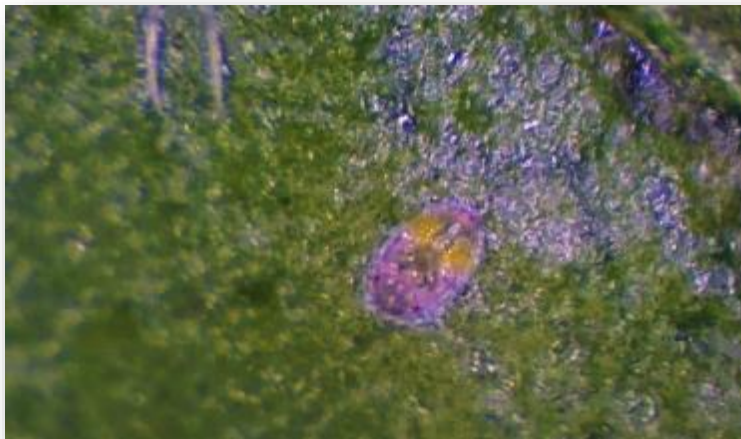
BioClay treated egg



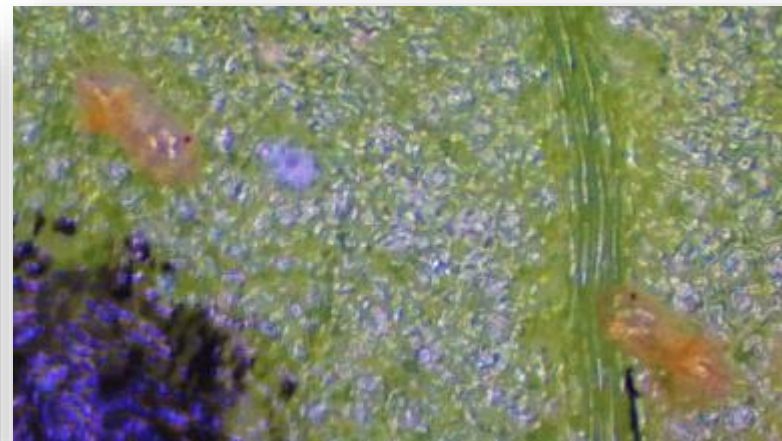
Live Whitefly



BioClay Dead Whitefly



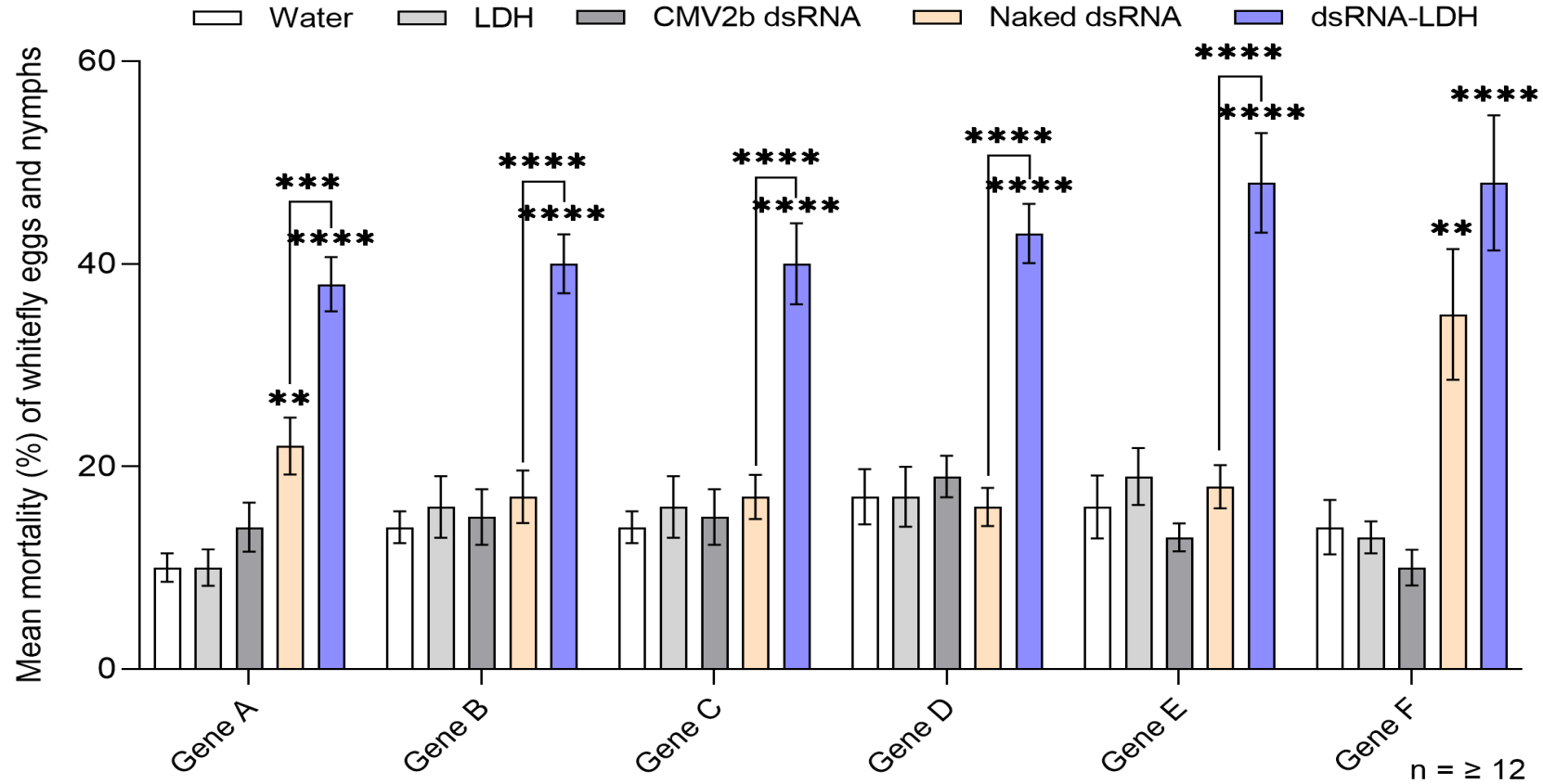
Water treated nymph



BioClay treated nymphs

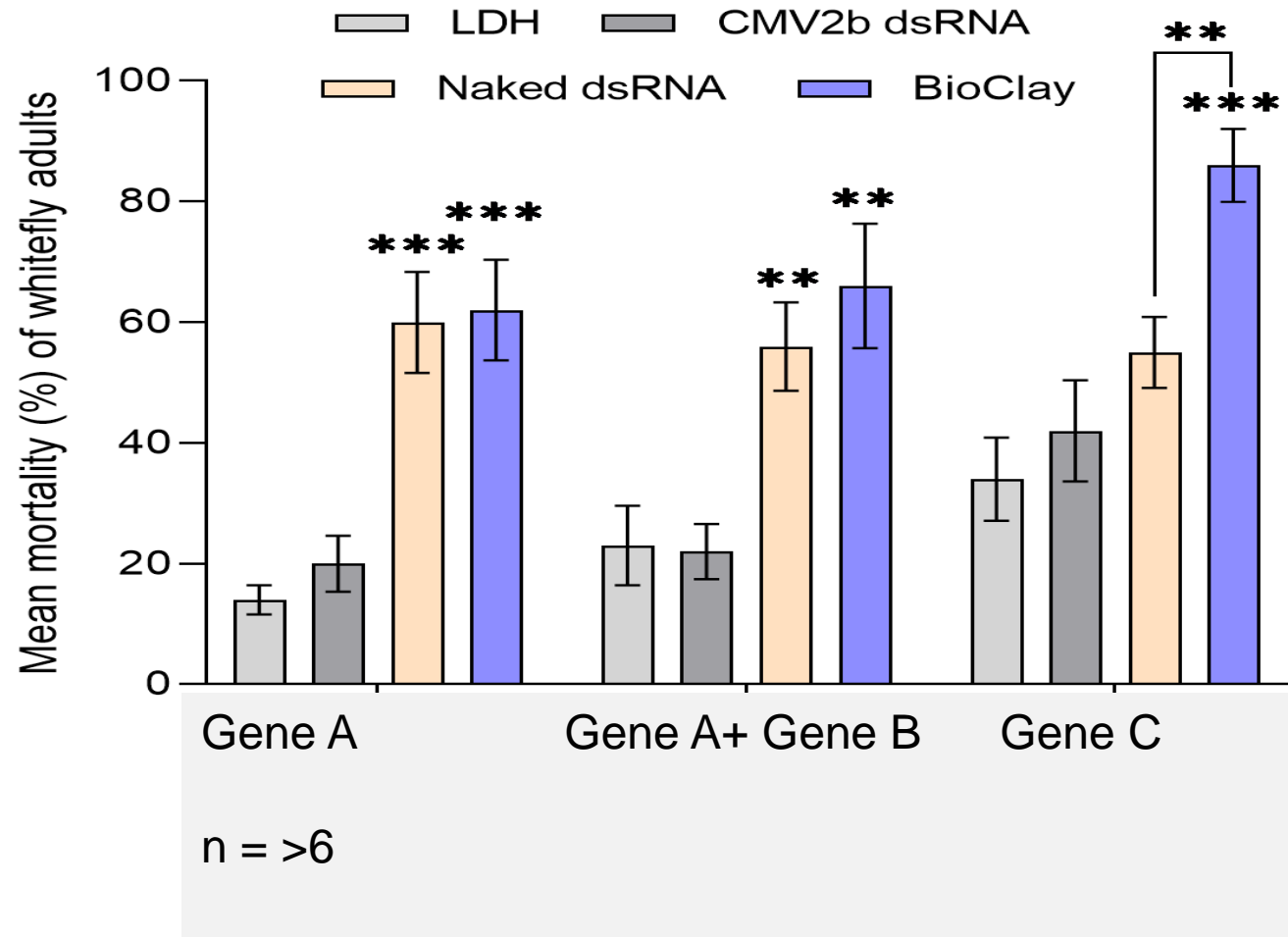
Tested :  
No effect on Stingless Bees  
No effect on aphids

## Percentage eggs and nymphs mortality caused by foliar spray of BioClay on Cotton





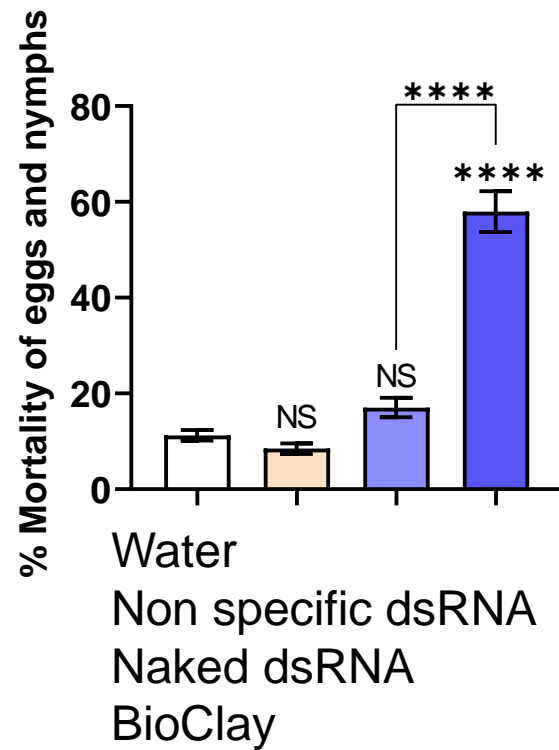
# Percentage adult mortality caused by foliar spray of BioClay on Cotton



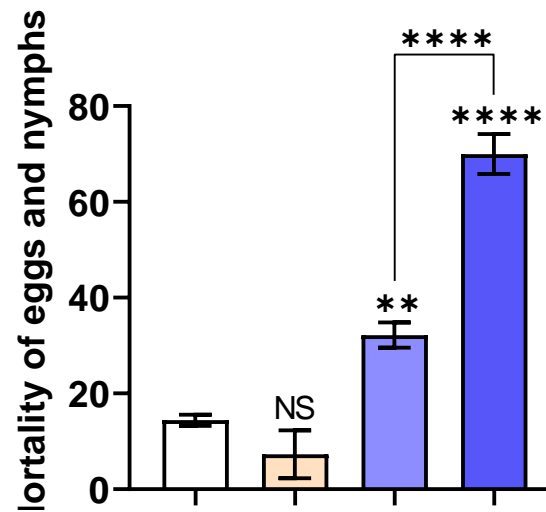
Unpublished

# BioClay showed better protection against eggs/nymphs on Tomato plants

Trial\_1



Trial\_2



# BioClay for control of Fungal diseases

**Australian Research Council Research Hub for Sustainable  
Crop Protection -  
Targeting Fungal Diseases and Officially Opened in Aug 2020**

~\$18 million cash and in-kind

Universities, multiple RDCs,  
State Governments and  
Industry partners

<https://crophub.com.au/>



# RNA-based biopesticides – a paradigm shift

- Pre- and post-harvest application possible
- Increased pest/pathogen specificity
- Easy deployment of new sequences to address resistance
- Finite amount of dsRNA
- Non GM



Photo by Sushobhan Badhai on Unsplash



On **8<sup>th</sup> October 2019** the Australian Parliament formally agreed with the Office of the Gene Technology Regulator's proposal that topically-applied dsRNA be exempt from GMO regulations



## **Gene Technology Amendment (2019 Measures No. 1) Regulations 2019**

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### **24 Schedule 1A (at the end of the table)**

Add:

- 11 Introduction of RNA into an organism, if:
  - (a) the RNA cannot be translated into a polypeptide; and
  - (b) the introduction of the RNA cannot result in an alteration of the organism's genome sequence; and
  - (c) the introduction of the RNA cannot give rise to an infectious agent.

# Trade and Markets

## Naked dsRNA:

- Short or nil withholding periods (set to allow chemical residues in edible commodities for domestic markets)
- Short or nil export intervals (to satisfy the standards imposed by overseas trading partners)

# RNAi based biopesticides

Topical spray

Tissue Culture

Seedling applications

Baits

Feed

- ✓ Non - GM
- ✓ No residue
- ✓ Specificity
- ✓ Minimal issue of resistance development
- ✓ Value across plant and animal health

# Fruit Fly – Can it work???

RNA based approach can be designed and tested in artificial diet, baits, traps, and cover sprays for reducing reproductive fitness, targeting ovipositor, and inducing mortality of Qfly and Medfly.

Vinegar fly (*Drosophila melanogaster*) is a model genetic organism, which has been extensively used in RNAi studies



- Dietary dsRNA could knockdown expression of Oriental fly genes related to spermatogenesis resulting in reduced fecundity of treated males (Dong et al, 2016 )
- Demonstration of similar effect in Qfly genes (Cruz et al, 2018)
- Other fruit fly species have also been successfully targeted using RNAi, including the South American fruit fly (Dias et al 2019) ,

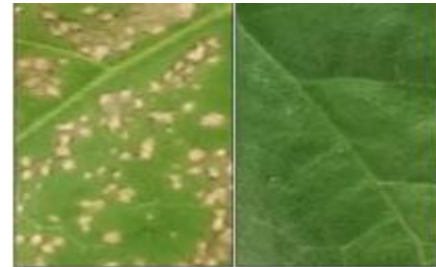


Innovations aimed at contributing to the supermarket trolley

**Endless possibilities...**

Design of regulation and public opinion are crucial

VIRUSES



FUNGI



Hailing Jin, Nature Plants, 2016

INSECTS



pesticide research.com



Spruce.com



Bayer.com



©Kooper, Biological Systems

PROTECTED CROPPING !!



Youtube.com

PACKHOUSES!!



ANIMAL HEALTH !!



Nsw.farming



Agric.wa.gov.au

agric.wa.gov.au

BIOSECURITY!!



pbt.padil.gov.au



Daf.qld.gov.au



Australian Government  
Australian Research Council



The Australian Wine Research Institute



Wine Australia

