Australian Government

Australian Pesticides and Veterinary Medicines Authority

Trade Advice Notice

on cyclaniliprole in the product Teppan 50SL Insecticide for use on pome fruit, tree nuts and vegetables

APVMA product number 68689

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Assistant Director, Communications
Australian Pesticides and Veterinary Medicines Authority
GPO Box 3262
Sydney NSW 2001 Australia

Telephone: +61 2 6770 2300

Email: communications@apvma.gov.au.

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Preface

The Australian Pesticides and Veterinary Medicines Authority (APVMA) is an independent statutory authority with responsibility for assessing and approving agricultural and veterinary chemical products prior to their sale and use in Australia.

The APVMA has a policy of encouraging openness and transparency in its activities and of seeking stakeholder involvement in decision making. Part of that process is the publication of Trade Advice Notices for all proposed extensions of use for existing products where there may be trade implications.

The information and technical data required by the APVMA to assess the safety of new chemical products and the methods of assessment must be undertaken according to accepted scientific principles. Details are outlined in regulatory guidance published on the APVMA website.

About this document

This Trade Advice Notice indicates that the APVMA is considering an application to vary the use of an existing registered agricultural chemical.

It provides a summary of the APVMA's residue and trade assessment.

Comment is sought from industry groups and stakeholders on the information contained within this document.

Making a submission

The APVMA invites any person to submit a relevant written submission as to whether the application to vary the registration of Teppan 50SL Insecticide should be granted. Submissions should relate only to matters that the APVMA is required by legislation to take into account in deciding whether to grant the application. These grounds relate to the trade implications of the extended use of the product. Submissions should state the grounds on which they are based. Comments received outside these grounds cannot be considered by the APVMA.

Submissions must be received by the APVMA by close of business on Friday 29 September 2023 and be directed to the contact listed below. All submissions to the APVMA will be acknowledged in writing via email or by post.

Relevant comments will be taken into account by the APVMA in deciding whether to grant the application and in determining appropriate conditions of registration and product labelling.

When making a submission please include:

- contact name
- company or organisation name (if relevant)
- email or postal address (if available)
- the date you made the submission.

Please note: submissions will be published on the APVMA's website, unless you have asked for the submission to remain confidential, or if the APVMA chooses at its discretion not to publish any submissions received (refer to the public consultation coversheet).

Please lodge your submission using the public consultation coversheet, which provides options for how your submission will be published.

Note that all APVMA documents are subject to the access provisions of the *Freedom of Information Act 1982* and may be required to be released under that Act should a request for access be made.

Unless you request for your submission to remain confidential, the APVMA may release your submission to the applicant for comment.

Written submissions should be addressed to:

Executive Director, Risk Assessment Capability

Australian Pesticides and Veterinary Medicines Authority

GPO Box 3262

Sydney NSW 2001

Phone: +61 2 6770 2300

Email: enquiries@apvma.gov.au

Further information

Further information can be obtained via the contact details provided above.

Further information on Trade Advice Notices can be found on the APVMA website: apvma.gov.au.

Introduction

The APVMA has before it an application from Ishihara Sangyo Kaisha, Ltd to vary the registration of Teppan 50SL Insecticide (P68689) containing cyclaniliprole as its active ingredient. Ishihara Sangyo Kaisha wishes to modify the currently registered use on apples to include all pome fruit with a shorter harvest withholding period and add uses on tree nuts (almonds, macadamias and walnuts), fruiting vegetables other than cucurbits (protected cropping only), brassica vegetables and leafy vegetables.

Teppan is currently registered on apples with up to 2 applications at up to 4 g ai/100 L allowed per crop with a 10-day minimum interval between treatment. The current harvest withholding period for apples is 28 days. A 7-day harvest withholding period is proposed here for all pome fruit with up to 3 applications proposed at up to 4 g ai/100 L with a minimum 14-day retreatment interval.

Of the crops considered here, only pome fruit are listed in the APVMA Part 5B guideline as a major export commodity[1], while both apple pomace and almond hulls are feeds for livestock. Only these commodities require consideration with respect to trade and are discussed in detail in this document. It is noted that Teppan will only be used on tomatoes grown in protected cropping situations which are normally destined for the fresh vegetable market. Therefore, since Teppan will not be used on tomatoes intended for processing, a livestock feed MRL for cyclaniliprole on tomato pomace is not required at this time.

[1] Australian Pesticides and Veterinary Medicines Authority (APVMA), 2015. *APVMA Regulatory Guidelines – Data Guidelines: Agricultural – Overseas trade (Part 5B)*, APVMA website, accessed August 2023.

Trade considerations

Commodities exported

Pome fruit are considered to be 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 apple pomace and almond hulls.[1] Residues in these commodities resulting from the use of Teppan 50SL Insecticide may have the potential to unduly prejudice trade. Quantifiable residues are not expected to occur in milk so the risk to trade in dairy products does not require further consideration at this time.

Destination and value of exports

In 2021 Australia exported 2,147 t of fresh apples valued at $5.9 million. Major export markets were Papua New Guinea (PNG), Italy, Hong Kong, Thailand and India. In 2021 Australia exported 8,229 t of fresh pears valued at $13.5 million. Major export markets were New Zealand, Canada, Singapore, Indonesia and the United States of America (USA).[2]

The significant export markets for Australian beef, sheep, pig meat and offal are listed in the APVMA Regulatory Guidelines – Data Guidelines: Agricultural – Overseas trade (Part 5B).[1]

Proposed Australian use pattern

Table 1: Proposed use pattern for Teppan 50 SL Insecticide (50 g/L cyclaniliprole)

Crop	Pest	Rate	WHP	Critical comments
Tree crops				
Apply by dilute or concentrate spraying equipment. Rates listed are for dilute spraying. Apply the same total amount of product to the target crop whether applying this product by dilute or concentrate spraying methods. Refer to the Application section of the label.				
Pome fruit	Codling moth (*Cydia pomonella*)	60 to 80 mL/100 L water (up to 4 g ai/100 L)	7 days	Thorough coverage is essential to achieve best results. Select a spray volume appropriate for the size of trees and density of foliage. For best results apply 1,500 to 2,000 litres of water per hectare. Make no more than 3 applications/crop with a 14-day minimum interval between treatments. Use the high rate for heavy infestations and the low rate for mild infestations. Make first application just prior to or at the beginning of egg hatch. Use trap catches and local degree day-based spray timing advisories to determine the development of each codling moth generation. For effective

[2] Hort Innovation, 2021. *Australian Horticulture Statistics Handbook 2020/21*, Hort Innovation website, accessed August 2023.

Crop	Pest	Rate	WHP	Critical comments
				resistance management make applications of Teppan® 50SL Insecticide in one codling moth generation before rotating to an insecticide with a different mode of action (non-Group 28) in the next generation.
	Apple looper (*Phrissogonus laticostata*)	60 mL/100 L water		Thorough coverage is essential to achieve best results. Select a spray volume appropriate for the size of trees and density of foliage. For best results apply 1500 to 2000 litres of water per hectare. Make no more than 3 applications/crop with a 14-day minimum interval between treatments.
	Light brown apple moth (*Epiphyas postvittana*)	40 mL/100 L water		
Macadamia	Macadamia seed weevil (*Kuschelorhynchus macadamiae*) Fruit spotting bug (*Amblypelta nitida*) Banana spotting bug (*A. lutescens lutescens*)	100 mL/100 L water (5 g ai/100 L)	14 days	For best results, apply with a non-ionic adjuvant, such as Activator at 50 mL/100 L. Make no more than 3 applications/crop with a 14-day minimum interval between treatments. Alternate to a different mode of action (non-Group 28) between each Teppan® 50SL Insecticide application. Macadamia seed weevil: Monitor macadamia seed weevil populations and once petal fall has finished, commence applications as part of a program until shell hardening. Fruit and banana spotting bugs: Monitor orchards and apply once economic thresholds are reached, beginning from early nut set. Apply to the point of runoff and ensure thorough coverage as this is critical for control. Macadamia nut borer: Clean up fallen nuts to reduce carry over populations to the next season. Monitor macadamia nut borer populations until they reach economic thresholds, then target eggs and newly hatched larvae. Apply to the point of runoff and ensure thorough coverage as this is critical for control.
	Macadamia nut borer (*Cryptophlebia ombrodelta*)	80 mL/100 L water		
Almonds	Carob moth (*Ectomyelois ceratoniae*) Carpophilus beetle (*Carpophilus* spp)	80 mL/100 L water (4 g ai/100 L)	7 days	For best results, apply with a non-ionic adjuvant, such as Activator at 50 mL/100 L. Make no more than 3 applications/crop with a 14-day minimum interval between treatments. IPM statement:
Walnuts	Codling moth (*Cydia pomonella*), Carob			

Crop	Pest	Rate	WHP	Critical comments
	moth (*Ectomyelois ceratoniae*) Carpophilus beetle (*Carpophilus* spp)			Practice good IPM by shaking mummy nuts off the tree during winter to reduce carob moth infestation. Carob moth: 1st generation Monitor traps for adult carob moth and eggs and larvae in mummy nuts on the tree after flowering in spring. Apply from September to the end of November 2nd generation Target early hull split (1 to 5%) ensuring thorough coverage of the hull. Carpophilus beetle: Before and during hull split, monitor for carpophilus beetle in the orchard. Apply once economic thresholds are reached. Apply at 10 to 50% hull split, prior to shell split. Ensure thorough coverage of the hulls is critical for control. Codling moth (walnuts only): Make first application just prior to or at the beginning of egg hatch. Use trap catches and local degree day-based spray timing advisories to determine the development of each codling moth generation. For effective resistance management make applications of Teppan® 50SL Insecticide in one codling moth generation before rotating to an insecticide with a different mode of action (non-Group 28) in the next generation.
Vegetable crops				
Fruiting Vegetables other than Cucurbits (protected cropping)	Heliothis (*Helicoverpa armigera*) Armyworms (*Spodoptera* sp.)	80 mL/100 L water or 800 mL/ha (4 g ai/100 L or 40 g ai/ha)	1 day	For best results, apply with a non-ionic adjuvant at label rate, such as Activator at 50 mL/100 L. Make no more than 3 applications/crop with a 14-day minimum interval between treatments.
Brassica vegetables (including broccoli, Brussel sprouts, cabbage and cauliflower)	Diamondback moth (*Plutella xylostella*) Cluster caterpillar (*Spodoptera litura*) Cabbage Cluster Caterpillar (*Crocidolomia pavonana*) Cabbage white (*Pieris rapae*)	40 mL/100 L water or 400 mL/ha (2 g ai/100 L or 20 g ai/ha)	1 day	For best results, apply with a non-ionic adjuvant at label rate, such as Activator at 50 mL/100 L. Time sprays to target newly hatched eggs and early larval stages once they reach threshold numbers and before they become entrenched in the plant. Make no more than 3 applications/crop with a 7-day minimum interval, only using successive applications within a single pest generation (please refer to *insecticide*

Crop	Pest	Rate	WHP	Critical comments
	Cabbage Centre Grub (*Hellula hydrates*)			*resistance management* section for guidance)
Leafy vegetables (including Brassica leafy vegetables)	Diamondback moth (*Plutella xylostella*) Cluster caterpillar (*Spodoptera litura*) Cabbage cluster caterpillar (*Crocidolomia pavonana*) Cabbage white (*Pieris rapae*) Cabbage Centre Grub (*Hellula hydrates*) *Spodoptera* sp	40 mL/100 L water or 400 mL/ha (2 g ai/100 L or 20 g ai/ha)	1 day	For best results, apply with a non-ionic adjuvant at label rate, such as Activator at 50 mL/100 L. Time sprays to target newly hatched eggs and early larval stages once they reach threshold numbers and before they become entrenched in the plant. Make no more than 3 applications/crop with a 7-day minimum interval, only using successive applications within a single pest generation (please refer to *insecticide resistance management* section for guidance)

Withholding periods

Harvest

Macadamias

Do not harvest for 14 days after application.

Pome fruit, almonds, walnuts

Do not harvest for 7 days after application.

Brassica vegetables

Brassica vegetables (including broccoli, Brussels sprouts, cabbage and cauliflower), Leafy vegetables (including brassica leafy vegetables), Fruiting vegetables, other than cucurbits (protected cropping) – Do not harvest for one day after application.

Grazing

Almonds, macadamias, pome fruit, walnuts

Do not allow livestock to graze treated orchards.

Brassica vegetables

Brassica vegetables (including broccoli, Brussels sprouts, cabbage and cauliflower), Leafy vegetables (including brassica leafy vegetables), Fruiting vegetables, other than cucurbits (protected cropping): Do not allow livestock to graze treated crops or cut for stockfood.

Restraints

DO NOT apply by aircraft.

DO NOT apply if heavy rains or storms that are likely to cause runoff are forecast within one day.

DO NOT irrigate to the point of runoff for at least one day after application.

DO NOT apply more than 1.6 L product per hectare at a time.

Export of treated produce

Growers should note that suitable MRLs or import tolerances DO NOT exist in all markets for produce treated with Teppan® 50SL Insecticide. In some situations, export requirements may be met by limiting application number and/or imposing a longer withholding period than specified above. If you are growing produce for export, please check with Nufarm Australia Limited or your industry body for the latest information on any potential trade issues and their management before using Teppan® 50SL Insecticide.

Results from residues trials presented to the APVMA

Pome fruit

Australian residue trials on apples (6) and pears (2) are supported by European trials on apples (13) and North American trials on apples (17) and pears (10).

The proposed use on pome fruit is for 3 applications at 4 g ai/100 L with a 14-day minimum re-treatment interval and a 7-day harvest withholding period. It is noted that the overseas trials targeted a rate/ha. The draft label recommends spray volumes to pome fruit of 1,500 to 2,000 L/ha; therefore an application concentration of 4 g ai/100 L would correspond to a maximum rate/ha of 80 g ai/ha.

In the Australian trials, residues of parent cyclaniliprole in apples and pears at 5 to 8 days after the last of 2 to 3 applications at 3.9 to 5 g ai/100 L (~1× proposed) were 0.03, 0.05, 0.05, 0.06 and 0.07 mg/kg.

In the European trials, residues of parent cyclaniliprole in apples at 7 days after the last of 2 applications at 40 g ai/ha (0.5× proposed) were <0.01, <0.01, <0.01, 0.01, 0.02, 0.03, 0.03 and 0.03 mg/kg. Scaled for application rate residues were <0.02, <0.02, <0.02, 0.02, 0.04, 0.06, 0.06 and 0.06 mg/kg.

In the North American trials, residues of parent cyclaniliprole in apples and pears at approximately 7 days after the last of 3 applications at 100 g ai/ha (1.25× proposed) were 0.01, 0.02, 0.02, 0.03, 0.04, 0.04, 0.04, 0.05, 0.05, 0.06, 0.06, 0.06, 0.06, 0.07, 0.07, 0.08, 0.08, 0.10, 0.11, 0.11, 0.11, 0.11, 0.13, 0.14, 0.14 and 0.15 mg/kg. These results will not be scaled for application rate.

The combined dataset for pome fruit based on the enforcement definition of parent compound is <0.02, <0.02, <0.02, 0.01, 0.02, 0.02, 0.02, 0.03, 0.03, 0.04, 0.04, 0.04, 0.04, 0.05, 0.05, 0.05, 0.05, 0.06, 0.06, 0.06, 0.06, 0.06, 0.06, 0.06, 0.06, 0.07, 0.07, 0.07, 0.08, 0.08, 0.10, 0.11, 0.11, 0.11, 0.11, 0.13, 0.14, 0.14 and 0.15 mg/kg.

The Organisation for Economic Co-operation and Development (OECD) Maximum Residue Limit (MRL) Calculator recommends an MRL of 0.3 mg/kg (Supervised Trial Median Residue (STMR)= 0.059 mg/kg (unrounded), n= 39).

It is recommended that the current MRL of 0.1 mg/kg for cyclaniliprole on FP 0226 Apple be replaced with an MRL of 0.3 mg/kg for FP 009 Pome fruits to cover the new use pattern with a 7-day harvest withholding period.

The processing factor for parent in dry apple pomace from the European trials was at least 6× (as residues were <Limit of Quantitation (LOQ) in fruit before processing). For the North American trials, the processing factor for wet apple pomace was 3.2×. The OECD Feed Calculator indicates wet apple pomace consists of 40% dry matter, to give an estimated processing factor for dry pomace of 8×.

Based on a processing factor of 8× for parent in dry apple pomace from the North American trials and a High Residue (HR) in fruit of 0.15 mg/kg the High Residue-Processed (HR-P) in apple pomace is 1.2 mg/kg. The current MRL of 0.7 mg/kg for cyclaniliprole on AB 0226 Apple pomace, dry should be increased to 2 mg/kg. The STMR-P is 0.059 × 8= 0.472 mg/kg.

Almond Hulls

Residues of parent cyclaniliprole in almond hulls at 7 days after the last of 3 applications at 5 g ai/100 L (1.3× proposed) were 1.5, 2.7, 3.0 and 3.2 mg/kg. The OECD Feed Calculator indicates almond hulls consist of 90% dry matter. On a dry weight basis residues were 1.7, 3.0, 3.3 and 3.6 mg/kg. The OECD MRL Calculator recommends an MRL of 9 mg/kg (STMR= 3.15 mg/kg, n= 4). An MRL of 9 mg/kg is recommended for cyclaniliprole on Almond hulls.

Animal commodities

There is a label restraint preventing feeding of treated vegetable crops to livestock or grazing treated orchards. Livestock will therefore only be exposed to cyclaniliprole residues in apple pomace and almond hulls which are considered to be feeds for cattle in Australia, noting the use on tomatoes is in protected cropping situations only so no tomato pomace MRL has been recommended. The estimated livestock dietary burdens for beef and dairy cattle are calculated below using the OECD Feed Calculator:

Table 2: Estimated dietary burden for beef cattle (for MRLs)

Commodity	CC	Residue (mg/kg)	Basis	DM (%)	Residue dw (mg/kg)	AU diet content (%)	AU residue contribution (ppm)
Almond hulls	AM/AV	3.15	STMR	100	3.2	10	0.32
Apple pomace, wet	AB	0.472	STMR	100	0.5	20	0.09
Total						30	0.41

Table 3: Estimated dietary burden for dairy cattle (for MRLs)

Commodity	CC	Residue (mg/kg)	Basis	DM (%)	Residue dw (mg/kg)	AU diet content (%)	AU residue contribution (ppm)
Almond hulls	AM/AV	3.15	STMR	100	3.2	10	0.32
Apple pomace, wet	AB	0.472	STMR	100	0.5	10	0.05
Total						20	0.36

Estimated residues of parent in milk and tissues from feeding at 0.41 ppm for beef cattle and 0.36 ppm for dairy cattle based on residues observed in the transfer study after dosing at 0.6 ppm are summarised below:

Table 4: Estimated residues in milk and tissues and required MRLs

Feeding level (ppm)	Milk	Muscle	Liver	Kidney	Fat
				Cyclaniliprole residue (mg/kg)	
0.6	<0.01	<0.01	0.040	0.045	0.045
0.41 – beef, estimated burden	–	<0.01	0.027	0.031	0.031
0.36 – dairy, estimated burden	<0.01	–	–	–	–

Feeding level (ppm)	Milk	Muscle	Liver	Kidney	Fat
				Cyclaniliprole residue (mg/kg)	
Established MRLs	*0.01 (milks)	*0.01 (meat)		*0.01 (offal)	–
Recommended MRLs	No change	0.05 (fat)		0.05 (offal)	

The current milk MRL for cyclaniliprole at *0.01 mg/kg remains appropriate. The MRLs at *0.01 mg/kg for MO 0105 Edible offal (mammalian) and MM0095 Meat (mammalian) should each be replaced with MRLs at 0.05 mg/kg, with the meat MRL specifying that the residue is “in the fat”.

Residues of the metabolite NSY-28 (which is in the animal commodity risk assessment definition) were all <LOQ in milk and tissues after feeding at 0.6 ppm. The residues of parent observed above are therefore also appropriate for dietary risk assessment, noting also that the total residue (parent + NK-1375 metabolite) in apple pomace and almond hulls was not significantly higher than that for parent.

Codex Alimentarius Commission and overseas MRLs

The Codex Alimentarius Commission (Codex) is responsible for establishing Codex Maximum Residue Limits (CXLs) for pesticides and veterinary medicines. Codex CXLs are primarily intended to facilitate international trade and accommodate differences in Good Agricultural Practice (GAP) employed by various countries. Some countries may accept Codex CXLs when importing foods. Cyclaniliprole has been considered by Codex. The following relevant Codex CXLs and International MRLs have been established for cyclaniliprole.

Table 5: Codex and International MRLs for cyclaniliprole

Commodity	Tolerance for residues arising from the use of cyclaniliprole (mg/kg)							
	Australia	China[3]	Codex[4]	EU[5]	Japan[6]	Korea[7]	Taiwan[8]	USA[9]
Residue definition	Cyclaniliprole	–	Cyclaniliprole	Cyclaniliprole	Cyclaniliprole	–	–	Cyclaniliprole
Pome fruit	0.1 (current, apple) 0.3 (proposed pome)	–	0.2	*0.01	0.3 (apple, pear, quince, loquat)	0.4	0.3 (apple, pear)	0.3
Edible offal (mammalian)	*0.01 (current) 0.05 (proposed)	–	0.2	*0.01 (bovine and sheep)	Default (0.01)	Default (0.01)	–	0.015 (Cattle, sheep meat byproducts)
Meat (mammalian)[in the fat]	*0.01 (current) 0.05 (proposed)	–	0.25 (fat)	*0.01 (bovine and sheep fat)	Default (0.01)	Default (0.01)	–	0.015 (cattle, sheep fat)

[3] United States Department of Agriculture (USDA) Foreign Agricultural Service, 2021. *Translation of Maximum Residue Limits for Pesticides in Foods – China – People's Republic of*, USDA website, accessed August 2023.

[4] Food and Agriculture Organisation of the United Nations (FAO), 2023. *Codex Alimentarius – International Food Standards: Pesticide Index*, FAO website, accessed August 2023.

[5] European Commission (EU), 2016. *EU Pesticide residue(s) and maximum residue levels (mg/kg)*, European Commission website, accessed August 2023.

[6] Japanese Food Chemistry Research Foundation (JFCRPF), 2023. *Table of MRLs for Agricultural Chemicals*, JFCRPF website, accessed August 2023.

[7] Ministry of Food and Drug Safety Korea, 2015. *MRLs in Pesticides*, Ministry of Food and Drug Safety Korea website, accessed August 2023.

[8] Laws & Regulations Database of the Republic of China (Taiwan), 2023. *Standards for Pesticide Residue Limits in Foods*, Laws & Regulations Database of the Republic of China website, accessed August 2023.

[9] Electronic Code of Federal Regulations (eCFR), 2023. *USA Electronic Code of Federal Regulations*, eCFR website, accessed August 2023.

Current and proposed Australian MRLs for cyclaniliprole

Table 6: Current MRL Standard – Table 1

Compound	Food	MRL (mg/kg)
Cyclaniliprole		
FP 0226	Apple	0.1
MO 0105	Edible offal (mammalian)	*0.01
PE 0112	Eggs	*0.01
MM 0095	Meat (mammalian)	*0.01
ML 0106	Milks	*0.01
PM 0110	Poultry meat	*0.01

Table 7: Current MRL Standard – Table 4

Compound	Animal Feed Commodity	MRL (mg/kg)
Cyclaniliprole		
AB 0226	Apple pomace, dry	0.7

Table 8: Proposed MRL Standard – Table 1

Compound	Food	MRL (mg/kg)
Cyclaniliprole		
Delete:		
FP 0226	Apple	0.1
MO 0105	Edible offal (mammalian)	*0.01
MM 0095	Meat (mammalian)	*0.01
Add:		
VB 0040	Brassica (cole or cabbage) vegetables, head cabbages, flowerhead brassicas	0.3
MO 0105	Edible offal (mammalian)	0.05
VO 0050	Fruiting vegetables, other than cucurbits	0.2
VL 0053	Leafy vegetables	3

Compound	Food	MRL (mg/kg)
MM 0095	Meat (mammalian) [in the fat]	0.05
FP 0009	Pome fruits	0.3
TN 0085	Tree nuts	*0.01

Table 9: Proposed MRL Standard – Table 4

Compound	Animal Feed Commodity	MRL (mg/kg)
Cyclaniliprole		
Delete:		
AB 0226	Apple pomace, dry	0.7
Add:		
	Almond hulls	9
AB 0226	Apple pomace, dry	2

Potential risk to trade

Export of treated produce containing finite (measurable) residues of cyclaniliprole may pose a risk to Australian trade in situations where (i) no residue tolerance (import tolerance) is established in the importing country or (ii) where residues in Australian produce are likely to exceed a residue tolerance (import tolerance) established in the importing country.

The proposed Australian pome fruit cyclaniliprole MRL is slightly higher than that established by Codex but the same as those in Japan, Korea, Taiwan and the USA. It is noted that the High Residue (HR) in the available apple and pear trials of 0.15 mg/kg was within the Codex pome fruit MRL of 0.2 mg/kg. However, the EU pome fruit MRL is established at the LOQ (*0.01 mg/kg). The draft label contains the following export advice for treated produce as a way of managing this potential risk:

> Export of treated produce
>
> Growers should note that suitable MRLs or import tolerances DO NOT exist in all markets for produce treated with Teppan® 50SL Insecticide. In some situations, export requirements may be met by limiting application number and/or imposing a longer withholding period than specified above. If you are growing produce for export, please check with Nufarm Australia Limited or your industry body for the latest information on any potential trade issues and their management before using Teppan® 50SL Insecticide.

The proposed Edible offal (mammalian) and Meat (mammalian)[in the fat] MRLs are lower than those established by Codex, but higher than those for other markets (noting no animal commodity MRLs are established in Japan, Korea or Taiwan).

In the depuration phase of the feeding study, total cyclaniliprole residues in all tissues were at or below the LOQ (0.01 mg/kg) by 14 days after the end of dosing at 2.0 ppm. While an Export Slaughter Interval (ESI) is not normally recommended for by-products such as apple pomace and almond hulls, they should not be fed within 60 days of slaughter for export. Cyclaniliprole residues should not be present in animal tissues after this period. The risk to trade in animal commodities from the proposed uses should therefore be low.

Conclusion

Ishihara Sangyo Kaisha, Ltd have applied to vary the registration of Teppan 50SL Insecticide containing cyclaniliprole as its active ingredient. Ishihara Sangyo Kaisha wish to modify the use on apples to include all pome fruit with a shorter harvest withholding period and add uses on tree nuts (almonds, macadamias and walnuts), fruiting vegetables other than cucurbits (protected cropping only), brassica vegetables and leafy vegetables.

Comment is sought on the potential for the proposed uses to pose a risk to Australian trade in pome fruit and animal commodities.