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Risk Assessment Capability
Australian Pesticides and Veterinary Medicines Authority
PO Box 574
Canberra ACT 2601

25 October 2024

Via Email: enquiries@apvma.gov.au

Trade Advice Notice on prosulfocarb and S-metolachlor in the product Boxer Gold Herbicide for use on oats and triticale

To whom it may concern

I write in response to a request for comments on an application from Syngenta Australia Pty Ltd to vary the registration of Boxer Gold Herbicide which contains prosulfocarb and S-metolachlor as the only active constituents. Syngenta wish to extend the application timing, and the weeds controlled in oats and triticale. The use patterns will be the same as registered for wheat and barley.

Unless otherwise stated, this submission:

- Deals with the use of paraquat and diquat and their impact on Residues and Trade of fodder only.
- Fodder refers to straw and fodder (dry) of cereal grains.

1. Australian Export Fodder Industry

This submission is presented on behalf of the Australian Export Fodder Industry through a research project funded by AgriFutures Australia. That research project:

- Is undertaken on behalf of the Australian Export Fodder Industry.
- Is funded and supported by AgriFutures Australia.
- Is conducted on behalf of a range of members across the entire Australian fodder supply chain.
- Reviews current and proposed revisions to market MRLs.
- Provides advice to government on export fodder industry views in relation to the impact on market access of chemicals in use on Australian fodder.

2. Industry comments on the Application

Based on data reviewed by APVMA and residues arising from some trials above the limit of quantification, there are some market access risks if that treated fodder, with residues as per the trial data, was supplied to some specific markets.

However, industry does not object to the proposed registration on the basis that those residues can be managed.

For some of the major oaten hay markets, there are no regulations for fodder and industry manages outturns to comply with applicable Australian maximum residue limits (MRLs). For some other major

oaten hay markets, that either do not have their own MRL for prosulfocarb and S-metolachlor or follow Codex MRLs where in this case there are no MRLs, that market access risk can be managed by industry quality assurance processes. These include a range of measures based on the market and use of these products by growers:

- Declarations by fodder producers of the use of the registered product.
- Compliance by fodder producers of label directions, including label rates and withholding periods.
- Residue testing to determine the levels of prosulfocarb and S-metolachlor on fodder received.
- Selection of fodder supplies based on compliance with market requirements.
- Outturn to markets of fodder in compliance with the market MRL.

Should you have any questions on this submission please do not hesitate to contact me.

Regards



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Produced through Agrifutures Australia funding of "Chemical Residue monitoring for the Fodder Industry"