



Australian Government

**Australian Pesticides and
Veterinary Medicines Authority**



Trade Advice Notice

on imazamox and imazapyr in the product
Nufarm Intercept Herbicide for use on field peas and lentils

APVMA product number 69353

November 2022

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ISSN 2200-3894 (electronic)

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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 or veterinary 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 Nufarm Intercept Herbicide 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 8 December 2022 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 Nufarm Australia Ltd to vary the registration of Nufarm Intercept Herbicide containing imazamox and imazapyr to allow early post-emergence control of certain broadleaf weeds in imidazolinone tolerant field peas.

In field peas, the use of imazamox is currently registered (e.g. AgMerch Imazamox 700 WG Herbicide, [APVMA product no. 91613](#)); however, the use of imazapyr has not been assessed. Nufarm Intercept Herbicide is currently registered in imidazolinone tolerant faba beans and lentils.

The primary purpose of this Trade Advice Notice is for the APVMA to consult with industry stakeholders on the potential trade risks associated with the proposed new use of imazamox and imazapyr on imidazolinone tolerant field peas. This Trade Advice Notice also serves to communicate to industry stakeholders that the established imazamox and imazapyr maximum residue limits (MRLs) for lentils will be increased to cover residues expected from the currently registered use of Nufarm Intercept Herbicide on lentils based on new information.

Trade considerations

Commodities exported

Pulses (including lupins, field peas, chickpeas, faba beans, navy beans and mung beans) are considered to be major export commodities in the APVMA's Part 5B guidelines¹, as are commodities of animal origin, such as meat, offal and dairy products, which may be derived from livestock fed feeds produced from treated field peas.

No changes are required to the animal commodity MRLs for imazamox and imazapyr, therefore the risk to trade with respect to animal commodities is considered to be low and does not require further consideration. The risk to trade with respect to the proposed use on field peas is considered below.

Destination and value of exports

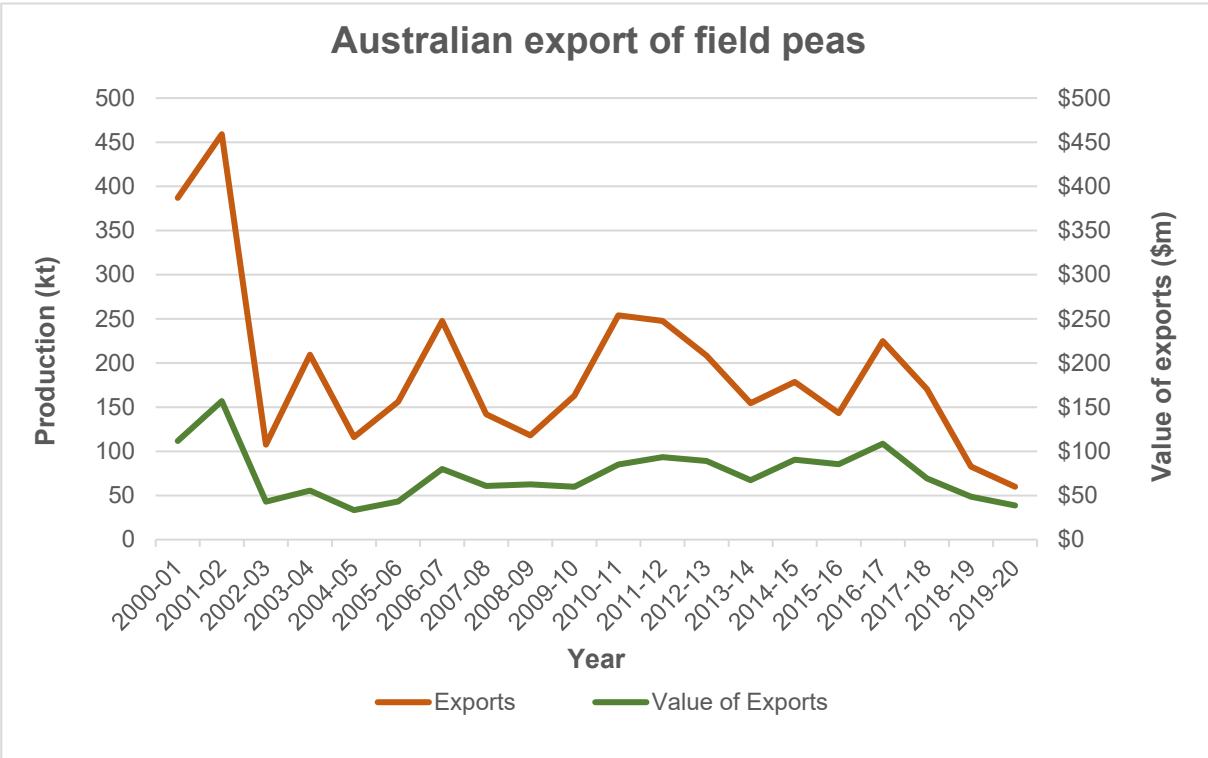
The total pulse exports for 2015–16, 2016–17, 2017–18, 2018–19 and 2019–20 were 2,098 kt (valued at \$1.78 billion), 3,833 kt (valued at \$3.13 billion), 2,694 kt (valued at \$1.87 billion) 1,520 kt (\$1.02 billion) and 1,731 kt (\$1.25 billion)² respectively. The main export markets for Australian pulses include Asia, North Africa, the Middle East and the Indian sub-continent³.

¹ Australian Pesticides and Veterinary Medicines Authority, [Regulatory Guidelines – Data Guidelines: Agricultural – Overseas trade \(Part 5B\)](#), APVMA website, 1 July 2014.

² Australian Bureau of Agricultural and Resource Economics and Sciences (ABARES), [Agricultural commodities and trade data 2020 – Rural commodities – Pulses](#), Department of Agriculture, Fisheries and Forestry website, accessed September 2022.

³ Pulse Australia, [Pulses: Understanding global markets – World markets](#), Pulse Australia website, 20 November 2015, accessed September 2022.

Figure 1: Australian exports of field peas (data from ABARES, Agricultural Commodity Statistics 2020)



Proposed Australian use pattern

Table 1: Proposed use pattern for Nufarm Intercept Herbicide (33 g/L imazamox and 15 g/L imazapyr)

Crop	Pest	Rate/concentration	Critical comments
Imidazolinone herbicide tolerant lentils	Barley (<i>Hordeum vulgare</i>) – non imidazolinone tolerant varieties	375 to 750 mL/ha (12.4 to 24.8 g imazamox/ha)	Always add Nufarm CanDo™ Spray Adjuvant* at 0.5 L/100 L spray solution. Read <i>Follow Crop</i> comments and restrictions on the label prior to use.
Imidazolinone herbicide tolerant field peas	Barley grass (<i>Hordeum leporinum</i>)	+	Read <i>Compatibility</i> section for advice on tank mixes, tank mixes with other herbicides can broaden the range of weeds controlled.
3 to 6 node stage	Brome (<i>Bromus diandrus</i> and <i>B. rigidus</i>)	(5.6 to 11.3 g imazapyr/ha)	Apply to imidazolinone herbicide tolerant lentil or field pea crops at the 3 to 6 node stage.
	Indian hedge mustard (<i>Sisymbrium orientale</i>)		DO NOT apply to imidazolinone herbicide tolerant field peas or lentils after the 6-node stage.
	Muskweed (<i>Myagrum perfoliatum</i>)		
	Oats (<i>Avena sativa</i>)		
	Triticale (<i>Triticosecale</i> spp)		Applications should be targeted at grass weeds when the majority are in the 2 to 4 leaf stage and only when within the recommended crop stages.
	Wheat (<i>Triticum aestivum</i>) – non imidazolinone tolerant varieties		
	Wild oat (<i>Avena fatua</i>)		Application to multi-tillered crops may impair weed control because of poor contact and coverage of weeds.
	Wild radish (<i>Raphanus raphanistrum</i>)		
	Wild turnip (<i>Brassica tournefortii</i>)		The control of brassicaceous weeds will depend on the status of Group 2 resistance in the population. If other weeds require control, apply appropriate herbicides at least 2 weeks before or after Nufarm Intercept®, and only when signs of regrowth or renewed vigour appear, otherwise the effects of the early treatment may affect the performance of the subsequent treatment.
			Nufarm Intercept® should only be applied to Imidazolinone herbicide tolerant field pea variety GIA Ourstar and varieties derived from GIA Ourstar.

Crop	Pest	Rate/concentration	Critical comments
	Above weeds plus:	600 to 750 mL/ha	Always add Nufarm CanDo™ Spray Adjuvant* at 0.5 L/100 L spray solution.
	Charlock (<i>Sinapsis arvensis</i>)	(19.8 to 24.8 g imazamox/ha)	Read <i>Follow Crop</i> comments and restrictions on the label prior to use.
	Dense flowered fumitory (<i>Fumaria densiflora</i>)	+	Weed species will either be controlled or suppressed. Surviving plants will be stunted and will be uncompetitive with the crop, and seed set will be prevented or greatly reduced.
	Marshmallow (<i>Malva parviflora</i>)	(9.0 to 11.3 g imazapyr/ha)	
	Sub clover (<i>Trifolium subterraneum</i>)		DO NOT apply to imidazolinone herbicide tolerant field peas or lentils after the 6-node stage.
	Suppression:		
	Annual ryegrass (<i>Lolium rigidum</i>) ^Ψ , Bedstraw spp. (<i>Galium tricornutum</i> and <i>G. aparine</i>)		Ψ The control of annual ryegrass varies from excellent to poor depending on the status of Group 2 resistance in the population and environmental conditions. Where the population is expected to exceed 200 plants/m ² or a high level of control is required, or the ryegrass is known to be resistant or thought to be developing resistance, an application of a suitable pre-emergent herbicide should be made prior to sowing.
	Doublegee (<i>Emex australis</i>)		
	Silver grasses (<i>Vulpia bromoides</i> and <i>V. myuros</i>)		
	Stinging nettle (<i>Urtica urens</i>)		

Withholding periods

Harvest: Not required when used as directed.

Grazing: Imidazolinone herbicide tolerant field peas: DO NOT graze or cut for stock food for 4 weeks after application.

Imidazolinone herbicide tolerant lentils: DO NOT graze or cut for stock food for 6 weeks after application.

Restraints

Apply ONLY to Imidazolinone herbicide tolerant barley, canola, lentils, faba beans and field peas.

DO NOT apply to conventional or other herbicide tolerant barley, canola, lentil, faba bean or field pea varieties.

DO NOT apply to crops or weeds which are suffering moisture stress (waterlogged or drought affected), insect, disease or nutritional disorders, frost affected (or if frosts are imminent) or stress from previous herbicide or foliar fertilizer treatment.

DO NOT apply by aircraft.

DO NOT apply if rain is expected within 2 hours of application.

DO NOT apply more than once per season to any one crop.

DO NOT apply after the commencement of stem elongation in faba beans.

Trade advice

Growers should note that maximum residue limits (MRLs) or import tolerances may not exist in all markets for crops treated with Intercept®. If you are growing produce for export, please check with Nufarm Australia Limited or your Industry Association for the latest information on MRLs and import tolerances before using Intercept®.

Results from residues trials presented to the APVMA

The proposed use of Nufarm Intercept Herbicide on field peas is for a single application at the 3 to 6 node stage at a maximum rate of 24.8 g imazamox plus 11.3 g imazapyr/ha with a harvest withholding period (WHP) of 'Not required when used as directed' and a grazing WHP of 4 weeks.

Details of 4 GLP Australian trials in field peas, 2 GLP Australian trials in chickpeas, 8 GLP Australian trials in lentils, 2 non-GLP Australian trials in lentils and 3 relevant commercial lentil grower residue results were provided.

In the field pea GLP trials, a single post-emergence application of Intercept Herbicide was made at BBCH 13 to 16 at 1× and 2× the proposed maximum rate. Samples of forage were nominally collected at 14, 28 and 42 days after application (DAA) with seed and straw samples collected at commercial harvest (105 to 127 DAA). Residues of imazamox in field pea seed samples were all below the limit of quantitation (LOQ) (<0.01 mg/kg, n=4); whereas residues of imazapyr were detected at <0.01, 0.01, 0.013 and 0.015 mg/kg. Residues of imazamox (n=4) and imazapyr (n=4) in straw samples were all below the LOQ for both actives. At the proposed 4 weeks (28 days) grazing withholding period, all field pea forage samples contained dry weight residues of imazamox below the LOQ (n=4); however, imazapyr residues of <0.01 (2), 0.061 and 0.114 mg/kg were observed.

In the chickpea GLP trials, a single post-emergence application of Intercept Herbicide was made at BBCH 15 to 19 at 1× and 2× the proposed maximum rate. Samples of forage were nominally collected at 14, 28 and 42 DAA with seed and straw samples collected at commercial harvest (129 or 142 DAA). Residues of both imazamox (n=2) and imazapyr (n=2) in chickpea seed and straw samples were all below the LOQ (<0.01 mg/kg). At the proposed 4 weeks (28 days) grazing withholding period for field peas, chickpea forage samples contained dry weight residues of imazamox of 0.072 and 0.095 mg/kg, and imazapyr residues all <0.01 mg/kg (n=2).

In the lentil GLP trials, a single post-emergence application of Intervix Herbicide containing 33 g/L imazamox and 15 g/L imazapyr was made at BBCH 3 to 6 at 1× and 2× the proposed maximum rate. Samples of seed and hay were taken at commercial harvest (126 to 151 DAA), while forage samples were taken at 13 to 15, 28 to 29, 41 to 43 and 54 to 57 DAA. Imazamox residues of <0.01 (8) and imazapyr residues of <0.01 (8) were observed in lentil seed with comparable results in lentil straw with imazamox residues of <0.01 (8) and imazapyr residues of <0.01 (8). At or about the 6-week (42 days) grazing withholding period currently established for lentil forage, imazamox residues of 0.11, 0.24, 0.26, 0.31, 0.33, 0.37, 0.38 and 0.42 mg/kg (n=8) were observed. At the same time, imazapyr residues of <0.01, 0.06, 0.07, 0.09, 0.11, 0.16, 0.18 and 0.28 mg/kg (n=8) were reported.

In the lentil non-GLP trials (2021), a single post-emergence application of Intercept Herbicide was made at 1× and 2× the proposed maximum rate at various growth stages including the 3 to 5 node and 6 node. Samples of lentil seed were collected at commercial harvest (119 or 162 DAA in the relevant plots). Imazamox residues of 0.041 and 0.150 mg/kg (n=2) and imazapyr residues of 0.074 and 0.11 mg/kg (n=2) were observed in lentil seed.

In the relevant commercial grower samples, one application of Intercept Herbicide was applied to commercially grown imi-tolerant lentils between the 6 to 7 node stage across 3 different paddocks at 1× the proposed maximum rate. Imazamox residues of 0.03, 0.035 and 0.058 mg/kg (n=3) and imazapyr residues of 0.028, 0.037 and 0.10 mg/kg (n=3) were observed in lentil seed.

Field pea seed

Imazamox

Following one application at the 3 to 6 node stage, at approximately 1× the proposed maximum rate, the combined imazamox residues dataset suitable for MRL estimation for field pea seed is, in rank order, <0.01 (14), 0.03, 0.035, 0.041, 0.058 and 0.150 mg/kg [Supervised Trial Median Residue (STMR)= 0.01 mg/kg, n=19]. The Organisation for Economic Cooperation and Development (OECD) MRL calculator estimates a MRL of 0.2 mg/kg noting the high uncertainty of MRL estimation from the high level of censoring.

A field pea imazamox MRL of 0.2 mg/kg for 'VD 0561 Field pea (dry)' is therefore recommended.

Imazapyr

Following one application at the 3 to 6 node stage, at approximately 1× the proposed maximum rate, the combined imazapyr residues dataset suitable for MRL estimation for field pea seed is, in rank order, <0.010 (11), 0.010, 0.013, 0.015, 0.028, 0.037, 0.074, 0.100 and 0.110 mg/kg (STMR= 0.01 mg/kg, n=19). The OECD MRL calculator estimates a MRL of 0.2 mg/kg noting the high uncertainty of MRL estimation from the high level of censoring.

A field pea imazapyr MRL of 0.2 mg/kg for 'VD 0561 Field pea (dry)' is therefore recommended.

Animal feeds

Sufficient forage and fodder data has been provided for field peas, chickpeas and lentils to establish 'pulse forage and fodder' MRLs for both imazamox and imazapyr.

Imazamox

All field pea, chickpea and lentil straw samples at commercial harvest had imazamox residues (dry weight) below the limits of quantitation (<0.01 mg/kg) at both 1× and 2× the proposed rate.

The combined dataset of dry weight forage data includes residues observed in field pea and chickpea samples following a 4-week WHP and lentil samples following a 6-week WHP. The data set suitable for a 'Pulse, forage and fodder' MRL estimation is, in rank order, <0.01 (4), 0.072, 0.095, 0.11, 0.24, 0.26, 0.31,

0.33, 0.37, 0.38 and 0.42 mg/kg (STMR= 0.175 mg/kg, n=14). The OECD MRL calculator estimates an MRL of 0.9 mg/kg.

A 'pulse forage and fodder' imazamox MRL of 0.9 mg/kg would be appropriate to cover potential residues across pulse crops; however, the current 'legume animal feeds' MRL set at 1 mg/kg will cover the potential residues arising from the proposed use of imazamox in pulses, including field peas, with varying harvest WHPs.

Imazapyr

All field pea, chickpea and lentil straw had imazapyr residues (dry weight) below the limits of quantitation (<0.01 mg/kg) at both 1× and 2× the proposed rate.

The combined dataset of dry weight forage data includes residues observed in field pea and chickpea samples following a 4-week WHP and lentil samples following a 6-week WHP. The data set suitable for a 'Pulse, forage and fodder' MRL estimation is, in rank order, <0.01 (5), 0.06, 0.061, 0.07, 0.09, 0.11, 0.114, 0.16, 0.18 and 0.28 mg/kg (STMR= 0.066 mg/kg, n=14). The OECD MRL calculator estimates an MRL of 0.4 mg/kg.

A 'pulse forage and fodder' imazapyr MRL of 0.4 mg/kg is therefore recommended to cover residues observed in samples taken at the various pulse grazing WHPs both proposed for field peas and for other pulse crops on label.

Lentil seed

The assessment of previously submitted lentil data with data provided for the registration of field peas (summarised above) which is considered relevant to lentils (as field peas, chickpeas and lentils fall under the same commodity subgroup, '015B Dry peas') has resulted in a necessary change in the established MRLs for VD 0533 Lentil (dry) from *0.01 mg/kg to 0.2 mg/kg for both imazamox and imazapyr. The APVMA plans to amend the current lentil MRLs for imazamox and imazapyr in the APVMA MRL Standard at the next opportunity.

Overseas registration and approved label instructions

The applicant indicated imazapyr products are registered for use in a range of crops in: Argentina, Bangladesh, Belarus, Bolivia, Brazil, Cameroon, Chile, China, Colombia, Costa Rica, Ecuador, India, Indonesia, Israel, Japan, Kazakhstan, Kenya, Malaysia, Mexico, Mozambique, New Zealand, Paraguay, Peru, Russia, South Africa, South Korea, Taiwan, Ukraine, Uruguay and the USA.

The applicant indicated imazamox products are registered in for use in a range of crops in: Argentina, Austria, Belarus, Belgium, Bolivia, Brazil, Bulgaria, Canada, Chile, China, Colombia, Costa Rica, Croatia, Cyprus, Czech Republic, Estonia, Finland, France, Germany, Greece, Hungary, India, Ireland, Israel, Italy, Japan, Kazakhstan, Latvia, Lithuania, Malta, Mexico, Moldova, Morocco, Netherlands, Poland, Portugal, Romania, Serbia, Slovakia, Slovenia, South Africa, Spain, Sweden, Switzerland, Tunisia, Turkey, Ukraine, United Kingdom and the USA.

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. Imazamox and imazapyr have been considered by Codex. The following relevant Codex CXLs have been established for imazamox and imazapyr.

Table 2: Codex and International MRLs

Commodity	Tolerance for residues arising from the use of imazamox and imazapyr (mg/kg)				
	Australia ^{4,A}	Codex ^{5,A}	EU ^{6,B}	Japan ^{7,C}	USA ^{8,9,D}
Imazamox					
Field pea (dry)	*0.05 (current) 0.2 (proposed)	*0.05	*0.05	0.05	Exempt
Lentil (dry)	*0.01 (current) ‡	0.2	0.2	--	Exempt
Imazapyr					
Field pea (dry)	0.2 (proposed)	--	--	--	--
Lentil (dry)	*0.01 (current) ‡	0.3	0.3	--	0.2

‡ MRL changes for imazamox and imazapyr for 'Lentil (dry)' to 0.2 mg/kg are required for a currently registered use pattern and will be made in the APVMA MRL Standard at the next opportunity.

^A Residues definition for compliance is 'parent only' for both imazamox and imazapyr.

⁴ Australian Government Federal Register of Legislation, [Australian Agricultural and Veterinary Chemicals Code \(MRL Standard\) Instrument 2019](#), Federal Register of Legislation website, accessed October 2022.

⁵ Food and Agriculture Organization of the United Nations, [CODEX Alimentarius – MRLs for Residues of Pesticides in Food – Imazamox/Imazapyr](#), FAO website, accessed October 2022.

⁶ European Commission, [European Union Pesticides database – Imazamox/Imazapyr](#), EC website, accessed October 2022.

⁷ Japan Food Chemistry Research Foundation, [List of Limits for Agricultural Chemicals, Veterinary Drugs and Feed Additives Left in Food – Imazamox/Imazapyr](#), JFCRPF website, accessed October 2022

⁸ US Food and Drug Administration Code of Federal Regulations, [Title 40 – §180.1223 – Imazamox; exemption from the requirement of a tolerance](#), eCFR website, accessed October 2022.

⁹ US Food and Drug Administration Code of Federal Regulations, [Title 40 – §180.500 – Imazapyr; tolerances for residues](#), eCFR website, accessed October 2022.

^B Residues definition for compliance for imazamox is 'sum of imazamox and its salts, expressed as imazamox' and 'parent only' for imazapyr.

^C Residues definition for compliance (for imazamox-ammonium) include residues of imazamox and imazamox-ammonium, and parent only for imazapyr.

^D Exempt from the requirement of a tolerance for imazamox on all food commodities when applied as a herbicide and parent only for imazapyr.

Korea¹⁰ (residue definitions unknown) does not have an imazamox or imazapyr MRL for field peas or any other pulse. Taiwan¹¹ (residue definitions unknown) does not have any imazamox MRLs, nor an imazapyr MRL for field peas or any other pulse.

Current and proposed Australian MRLs for imazamox and imazapyr

Table 3: Current MRL Standard – Table 1

Compound	Food	MRL (mg/kg)
Imazamox		
MO 0105	Edible offal (mammalian)	*0.05
PE 0112	Eggs	*0.01
VD 0561	Field pea (dry)	*0.05
VD 0533	Lentil (dry)	*0.01
MM 0095	Meat (mammalian)	*0.05
ML 0106	Milks	*0.05
PM 0110	Poultry meat	*0.01
PO 0111	Poultry, edible offal of	*0.01
Imazapyr		
VD 0523	Broad bean (dry) [faba bean (dry)]	0.07
MO 0105	Edible offal (mammalian)	*0.05
PE 0112	Eggs	*0.01
VD 0533	Lentil (dry)	*0.01

¹⁰ Food Safety Korea, [Pesticides and Veterinary Drugs Information – Residual limit MRLs in pesticide – Imazamox/Imazapyr](#), Food Safety Korea website, accessed October 2022.

¹¹ Taiwan Food and Drug Administration, [Standards for Pesticide Residue Limits in Foods](#), Taiwan Food and Drug Administration website, accessed October 2022.

Compound	Food	MRL (mg/kg)
MM 0095	Meat (mammalian) [in the fat]	*0.05
ML 0106	Milks	*0.01
PM 0110	Poultry meat [in the fat]	*0.01
PO 0111	Poultry, edible offal of	*0.01

Table 4: Proposed MRL Standard – Table 1

Compound	Food	MRL (mg/kg)
Imazamox		
Delete:		
VD 0561	Field pea (dry)	*0.05
VD 0533	Lentil (dry)	*0.01
Add:		
VD 0561	Field pea (dry)	0.2
VD 0533	Lentil (dry)	0.2‡
Imazapyr		
Delete:		
VD 0533	Lentil (dry)	*0.01
Add:		
VD 0561	Field pea (dry)	0.2
VD 0533	Lentil (dry)	0.2‡

‡ The lentil MRL change is required for a currently registered use pattern and will be made in the APVMA MRL Standard at the next opportunity.

Table 5: Current MRL Standard – Table 4

Compound	Animal feed commodity	MRL (mg/kg)
Imazamox		
	Adzuki bean forage and fodder (fresh weight)	T*0.05
	Broad beans, dry [faba bean] forage and fodder (fresh weight)	*0.01
AL 0157	Legume animal feeds {except Broad bean, dry [faba bean] forage and fodder; Mung bean forage and fodder; Peanut forage; Pea vines (green), Soya bean forage}	1
	Mung bean forage and fodder (fresh weight)	T*0.05
Imazapyr		
	Broad beans, dry [faba bean] forage and fodder	0.3
	Primary feed commodities {except Broad beans, dry [faba bean] forage and fodder; Forage and fodder (dry) of cereal grains {except Maize fodder, dry; Maize forage (fresh weight); Oat forage and fodder; Maize fodder, dry; Maize forage (fresh weight); Oat forage and fodder; Rape seed [canola] fodder, (dry); Rape seed [canola] forage; Straw of cereal grains, dry {except Oat forage and fodder}; Sunflower forage and fodder}	15

Table 6: Proposed MRL Standard – Table 4

Compound	Animal Feed Commodity	MRL (mg/kg)
Imazamox		
Delete:		
	Adzuki bean forage and fodder (fresh weight)	T*0.05
	Broad beans, dry [faba bean] forage and fodder (fresh weight)	*0.01
AL 0157	Legume animal feeds {except Broad bean, dry [faba bean] forage and fodder; Mung bean forage and fodder; Peanut forage; Pea vines (green), Soya bean forage}	1
	Mung bean forage and fodder (fresh weight)	T*0.05
Add:		
AL 0157	Legume animal feeds {except Peanut forage; Pea vines (green), Soya bean forage}	1
Imazapyr		
Delete:		
	Broad beans, dry [faba bean] forage and fodder	0.3

Compound	Animal Feed Commodity	MRL (mg/kg)
	Primary feed commodities {except Broad beans, dry [faba bean] forage and fodder; Forage and fodder (dry) of cereal grains {except Maize fodder, dry; Maize forage (fresh weight); Oat forage and fodder}; Maize fodder, dry; Maize forage (fresh weight); Oat forage and fodder; Rape seed [canola] fodder, (dry); Rape seed [canola] forage; Straw of cereal grains, dry {except Oat forage and fodder}; Sunflower forage and fodder}	15
Add:		
	Primary feed commodities {except Forage and fodder (dry) of cereal grains {except Maize fodder, dry; Maize forage (fresh weight); Oat forage and fodder}; Maize fodder, dry; Maize forage (fresh weight); Oat forage and fodder; Pulse forage and fodder; Rape seed [canola] fodder, (dry); Rape seed [canola] forage; Straw of cereal grains, dry {except Oat forage and fodder}; Sunflower forage and fodder}	15
	Pulse forage and fodder	0.4

Potential risk to trade

Export of treated produce containing finite (measurable) residues of imazamox and imazapyr 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 use of imazamox and imazapyr on field peas requires the establishment of finite MRLs for imazamox and imazapyr on 'field pea, dry' at 0.2 mg/kg. Finite residues of imazamox (HR= 0.15 mg/kg, STMR= 0.01 mg/kg) and/or imazapyr (HR= 0.11 mg/kg, STMR= 0.01 mg/kg) may be expected in exported field peas.

For field peas, there may be a potential risk to international trade as:

The proposed imazamox MRL of 0.2 mg/kg for 'VC0561 Field peas (dry)' is greater than the *0.05 mg/kg MRLs and Codex CXL currently established in some overseas markets and no field pea imazamox MRL has been established in other overseas markets.

Imazapyr MRLs for 'VC0561 Field pea (dry)' have not been established in overseas markets or by CODEX.

It is however noted that the STMRs from the combined dataset of field pea, lentil and chickpea trials for both actives are at the Limits of Quantitation of 0.01 mg/kg in the seed and the HRs in the field pea trials were below the Limit of Detection (<0.005 mg/kg) for imazamox and 0.015 mg/kg for imazapyr.

Conclusion

Nufarm Australia Ltd has applied to vary the registration of Nufarm Intercept Herbicide containing imazamox and imazapyr to allow early post-emergence control of certain broadleaf weeds in imidazolinone tolerant field peas.

Comment is sought on the potential for the use of Nufarm Intercept Herbicide on field peas to prejudice Australian trade when used according to the proposed label instructions.