Australian Government

Australian Pesticides and Veterinary Medicines Authority

TRADE ADVICE NOTICE

on Chlorantraniliprole in the Product DuPont Altacor Insecticide

APVMA Product Number P61824

APRIL 2014

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CONTENTS

LIST OF TABLES

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.

In undertaking this task, the APVMA works in close cooperation with advisory agencies, including the Department of Health and Ageing, Office of Chemical Safety and Environmental Health (OCSEH), Department of the Environment, Water, Heritage and the Arts (DEWHA), and State Departments of Primary Industry.

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 the APVMA's publication *Ag MORAG: Manual of Requirements and Guidelines*.

About this document

This is a Trade Advice Notice.

It indicates that the Australian Pesticides and Veterinary Medicines Authority (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 **DuPont Altacor Insecticide** containing the existing active constituent chlorantraniliprole 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. In relation to this document, these grounds relate to the **trade implications** of the extended use of the product. Comments received outside these grounds cannot be considered by the APVMA.

Submissions must be received by the APVMA by close of business on 14 May 2014 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 Group name (if relevant)
- postal address
- email address (if available)
- the date you made the submission.

All personal and ***confidential commercial information (CCI)***[1] material contained in submissions will be treated confidentially.

Written submissions on the APVMA's proposal to grant the application for registration that relate to the **grounds for registration** should be addressed in writing to:

Contact Officer
Pesticides Program
Australian Pesticides and Veterinary Medicines Authority
PO Box 6182
Symonston ACT 2609

Phone: +61 2 6210 4748
Fax: +61 2 6210 4776
Email: pesticides@apvma.gov.au

Further information

Further information including a more detailed technical assessment report on the evaluation of the trade implications of this chemical can be obtained via the contact details provided above.

[1] A full definition of "confidential commercial information" is contained in the Agvet Code.

1 INTRODUCTION

The Australian Pesticides and Veterinary Medicines Authority (APVMA) has before it an application from DuPont Australia Ltd to vary the registration of the product, *DuPont Altacor Insecticide*, containing 350 g/kg chlorantraniliprole, to include use on chickpeas, mungbeans and soybeans. The proposed variation requires the establishment of chlorantraniliprole MRLs for these crops.

The potential for the proposed use to unduly prejudice trade in chickpeas, mung beans and soybeans, is discussed below.

2 TRADE CONSIDERATIONS

2.1 Commodities exported

Chickpeas and mung beans are major export commodities along with animals that have been fed feeds containing residues arising from the proposed use[2]. Soybeans are not considered to be a major export commodity[2]. No changes are needed to the established Legume Animal Feeds MRL or to the established animal commodity MRLs as a result of the proposed use. No further consideration to trade in animal commodities is required.

2.2 Destination of exports

Major export markets for Australian chickpeas, mung beans and soybeans are presented below.

Table 1: Major export destinations for Australian chickpeas, mung beans and soybeans.

CROP	MAJOR DESTINATION
CHICKPEAS	Bangladesh, India, Pakistan, United Arab Emirates, United Kingdom
MUNG BEANS	India, Indonesia, Sri Lanka, Thailand, Vietnam
SOYBEANS	China, Taiwan, Japan

[2] http://www.apvma.gov.au/morag_ag/vol_3/part_05b_trade.php

2.3 Proposed Australian use-pattern

The proposed Australian use pattern for *DuPont Altacor Insecticide* (350 g/kg chlorantraniliprole) in chickpeas, mung beans and soybeans is summarised below.

Table 2: Proposed use pattern for *DuPont Altacor Insecticide* (350 g/kg chlorantraniliprole) on chickpeas, mung beans and soybeans

CROP	PEST	RATE/HA	CRITICAL COMMENTS
Chickpea	Cotton bollworm (*Helicoverpa armigera*)	70g (≡ 24.5 g ai)	A maximum of two applications are to be applied to any one crop per season. Further treatments should be made with alternative mode of action insecticides.
	Native budworm (*Helicoverpa punctigera*)	+ non ionic surfactant @ 125g ai/100L	Regularly scout crops to monitor for larvae. Target sprays against larvae. Apply as larvae reach threshold numbers. Larvae in entrenched feeding sites will not be controlled.
Mung bean, Soybean	Bean podborer (*Maruca vitrata*)		Use enough water to ensure thorough coverage of the crop. Target a minimum of 100L/ha by ground rig and a minimum of 30 L/ha by aircraft.
	Cotton bollworm (*Helicoverpa armigera*)		Use in accordance with Crop Life Insecticide Resistance Management Strategy Guidelines.
	Native budworm (*Helicoverpa punctigera*)		Target brown eggs and hatchlings (neonates or first instar) to small larvae (second instar) when they reach the economic spray threshold and before they become entrenched in flowers or pods.
	Soybean looper (*Thysanoplusia orichalcea*)		
	Bean looper (*Mocis alterna*)		
	Irrorated tabby (*Anticarsia irrorata*)		

Restraints:
DO NOT apply if heavy dew is present on crops, or if rainfall is expected within 2 hours of application.
DO NOT make more than 3 applications per cotton crop per season, and no more than 2 consecutive sprays per field per season. DO NOT make more than 2 applications per chickpea, soybean or mung bean crop per season. Application must be a minimum of 7 days apart.

Spray Drift Restraints:
DO NOT apply with spray droplets smaller than a MEDIUM spray droplet size category according to nozzle manufacture specifications that refer to ASAE S572 Standard or the BCPC guidelines.
DO NOT apply when wind speed is less than 3 or more than 20 kilometres per hour at the application site.
DO NOT apply during surface temperature inversion conditions at the application site.

Withholding periods:

Harvest:
Chickpea, Mung bean, Soybean: Do not harvest for 14 days after application

Grazing:
Chickpea, Mung bean, Soybean: Do not graze or cut for stock food for 14 days after application

2.4 Results from residues trials presented to the APVMA

The proposed use of chlorantraniliprole on chickpeas, mung bean and soybeans, is for a maximum of two applications of 70 g product/ ha (24.5 g ai/ ha) with a minimum retreatment interval of 7 days and 14–day harvest and grazing withholding periods.

Residues in chickpea seed following application according to the proposed use were, in rank order: <0.005, 0.015, 0.025 and <0.03 mg/kg. The residue data supports the establishment of an MRL at 0.07 mg/kg for VD 0524 Chick-pea (dry).

Residues in mung bean seed following application according to the proposed use were, in rank order: 0.12, 0.17 and 0.26 mg/kg. The residue data supports the establishment of an MRL at 0.7 mg/kg for VD 0536 Mung bean (dry).

Residues in soybean seed following application according to the proposed use were, in rank order: <0.005 (2), 0.009, <0.01 (2) and 0.029 mg/kg. The residue data supports the establishment of an MRL at 0.07 mg/kg for VD 0541 Soya bean (dry).

2.5 Codex alimentarius commission and overseas MRLs

The Codex Alimentarius Commission (Codex) is responsible for establishing Codex Maximum Residue Limits (CXLs) for pesticides. 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. Chlorantraniliprole has been considered by Codex, however, not for use on pulses. The JMPR is considering data for chickpea, mung bean and soybean in 2014. The following relevant overseas MRLs have been established for chlorantraniliprole:

Table 3: Comparison of chlorantraniliprole MRLs (mg/kg) for pulses

COUNTRY	COMMODITY	CHLORANTRANILIPROLE TOLERANCE (mg/kg)
Australia	Mung beans (dry)	T0.5 (current), 0.7 (proposed)
	Soya beans (dry)	T0.05 (current), 0.07 (proposed)
	Chick-pea (dry)	0.07 (proposed)
Canada	Dry chickpeas	2
	Dry mung beans	2
	Dry beans	2
EU	Pulses, dry	*0.01
	Soya bean	*0.01
Japan	Beans, dried	2
	Soybeans, dried	0.2
	Other legumes / pulses	2
Korea	Soy Bean	0.05
	Soy Bean (fresh)	1.0
	Other Agricultural Products	0.05
Taiwan	Soybean	0.2
	Vegetable soybean	0.5
USA	Vegetable, legume, group 6	2.0

2.6 Current and proposed Australian MRLs for chlorantraniliprole

Current relevant MRLs and the residue definition for chlorantraniliprole are presented below. A full listing of MRLs can be found at www.apvma.gov.au/residues/standard.php.

Table 4: Current entries in the MRL Standard

MRL STANDARD: TABLE 1

COMPOUND		FOOD	MRL (mg/kg)
CHLORANTRANILIPROLE			
		All other foods	*0.01
VD	0560	Adzuki bean (dry)	T0.5
VD	0536	Mung bean (dry)	T0.5
VD	0541	Soya bean (dry)	T0.05

MRL STANDARD: TABLE 3

COMPOUND	RESIDUE
CHLORANTRANILIPROLE	Commodities of plant origin and commodities of animal origin other than milk: chlorantraniliprole Milk: sum of chlorantraniliprole, 3-bromo-N-[4-chloro-2-(hydroxymethyl)-6-[(methylamino)carbonyl]phenyl]-1-(3-chloro-2-pyridinyl)-1H-pyrazole-5-carboxamide, and 3-bromo-N-[4-chloro-2-(hydroxymethyl)-6-[[((hydroxymethyl)amino)carbonyl]phenyl]-1-(3-chloro-2-pyridinyl)-1H-pyrazole-5-carboxamide, expressed as chlorantraniliprole

MRL STANDARD: TABLE 4

COMPOUND		FOOD	MRL (mg/kg)
CHLORANTRANILIPROLE			
AL	0157	Legume animal feeds	10

The following changes are proposed to Australian chlorantraniliprole MRLs:

Table 5: Proposed changes to the MRL Standard – Table1

MRL STANDARD: TABLE 1

COMPOUND		FOOD	MRL (mg/kg)
CHLORANTRANILIPROLE			
DELETE			
VD	0536	Mung bean (dry)	T0.5
VD	0541	Soya bean (dry)	T0.05
ADD:			
VD	0524	Chick-pea (dry)	0.07
VD	0536	Mung bean (dry)	0.7
VD	0541	Soya bean (dry)	0.07

2.7 Potential risk to trade

Export of treated produce containing finite (measurable) residues of chlorantraniliprole 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.

While several overseas countries have established chlorantraniliprole MRLs in pulses, some Australian export markets for these commodities have not. As detectable residues are expected to occur when the product is used as directed this creates a potential risk to trade.

The proposed MRLs of 0.07, 0.07 and 0.7 mg/kg for dried chickpea, soybeans and mung beans respectively, are lower than the relevant MRLs established in Japan and North America. The MRLs are higher than those in a number of other markets such as the EU were default tolerances apply.

3 CONCLUSIONS

Comment is sought on the potential for residues resulting from the proposed use of *DuPont Altacor Insecticide* on chickpeas, mung beans and soybeans to unduly prejudice Australian trade, and the ability of industry systems to manage that risk.