

**Trade Advice Note
on**

Imidacloprid

in the product

**Confidor Guard Soil Insecticide
(APVMA Product Number 55753)**

Australian Pesticides and Veterinary Medicines Authority

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Trade Advice Note on the Product

ConfidorGuard Soil Insecticide (350 g/L imidacloprid)

Introduction

The Australian Pesticides and Veterinary Medicines Authority (APVMA) has before it an application from Bayer CropScience Pty Ltd to approve a label to include use in citrus orchards for the control of black citrus aphid, citrus leafminer, pink wax scale and red scale. The application also requires the establishment of maximum residue limits (MRLs) for food and animal feed commodities.

The APVMA invites any person to submit a relevant written submission with respect to whether the proposed new use is likely to unduly prejudice trade or commerce between Australia and Australia's trading partners. **Please provide your submission by 31 May 2006.** Any submissions provided after this date may be unable to be considered before the regulatory decision is made. All submissions should be addressed to the above contact.

Trade consideration

1. Commodities exported

Citrus fruits such as oranges, mandarins, lemons, limes, grapefruit and other citrus are exported from Australia to a number of overseas markets.

2. Destination and Value of Exports

Australia produces over 580 000 tonnes of citrus fruit each year and in 2002-2003 exported almost 170,000 tonnes valued at nearly \$202 m¹. Major export markets for Australian citrus fruit are tabulated below:

Destination	Volume (*000 tonnes)	Value, \$ million
USA	23.2	49.2
Hong Kong	39.9	44.4
Malaysia	32.0	25.8
Japan	11.4	18.5
Singapore	16.1	15.2
Indonesia	11.9	13.1
Canada	4.9	7.2
New Zealand	7.3	6.7
Taiwan	6.6	6.3
Korea	2.0	3.6

¹ Australian Horticultural Statistics Handbook 2004.

3. Proposed use pattern

Confidor Guard Soil Insecticide (350 g/L imidacloprid)

Crop	Pest	Rate	Critical Comments
Citrus	Black citrus aphid, citrus leafminer, pink wax scale, red scale	<p>9 mL/tree (3.15 g a.i./tree)</p> <p>Apply as a drench in a minimum of 1 L of water per tree around base of tree to a maximum height of 20 cm OR via micro-sprinkler* or drip* irrigation below tree canopy.</p> <p>* Refer to Application directions under GENERAL INSTRUCTIONS (micro-sprinkler and drip application methods will give best results when used in conjunction with other control methods such as the release of beneficial insects)</p>	<p>Ensure treatment area below canopy is weed free prior to application and remains weed free throughout season, otherwise reduced control will occur. Treatment is only recommended for trees of up to 4 m in height.</p> <p>Citrus leafminer, black citrus aphid: Apply Confidor Guard in late spring after main flowering (October to November) prior to the summer flush. Apply prior to pest establishment or at the first signs of pest infestation.</p> <p>Red scale, pink wax scale: Monitor crop throughout late spring to early summer (October to December). If scale is observed, apply Confidor Guard after main flowering has finished and prior to or at the onset of crawler emergence.</p> <p>Extended and/or multiple flowering/cropping citrus e.g. lemons, lime and Valencia oranges: Where extended flowering and/or multiple flowering periods occur, Confidor Guard should only be applied after the main crop has been harvested or stripped, and there is a minimum of 20 weeks to the next harvest.</p> <p>If previous seasons crop is still hanging on the tree during or at the end of a new seasons flowering, Confidor Guard CANNOT be applied unless there is a minimum of 20 weeks to the next harvest.</p> <p>DO NOT leave Confidor Guard exposed to sunlight. If applied via irrigation ensure that after Confidor Guard injection is completed and lines have been flushed, irrigation is continued for a further 10-60 minutes (depending on soil type).</p> <p>DO NOT apply more than once per season.</p>

Withholding periods:

Harvest: Do not harvest for 20 weeks after application.

4. Results from trials presented to the APVMA

When imidacloprid was applied to the base of citrus trees, residues in the fruit ranged from ≤ 0.06 mg/kg up to 1.2 mg/kg, 20 weeks after application at the maximum rate. Imidacloprid is considered to be persistent in soil, and it is considered appropriate to recommend the higher MRL of 2 mg/kg for two applications of imidacloprid a year apart. A withholding period (WHP) of 20 weeks is acceptable.

5. Overseas Registration & Use Pattern

The applicant indicated that imidacloprid products are registered for use on citrus in many countries, mostly as a broadcast or foliar spray application. Imidacloprid is registered for use by soil application or tree trunk paint in Spain and the USA.

6. Codex Alimentarius Commission and overseas MRLs

Codex has considered Imidacloprid and the following relevant Codex MRLs have been established:

Commodity	MRL, mg/kg	Residue Definition
Citrus fruits	1	Sum of imidacloprid and its metabolites containing the 6-chloropyridinyl moiety, expressed as imidacloprid.
Citrus pulp, dry	10	

7. Current and proposed Australian MRLs for imidacloprid relevant to citrus:

Code	Food	MRL, mg/kg	
Table 1		Current	Proposed
FC 0001	Citrus Fruits	T2	2
Table 4			
AB 0001	Citrus pulp, dry	T1	10

For full details of imidacloprid MRLs, please refer to the APVMA website <http://www.apvma.gov.au> and follow the Residues link.

8. Potential Risk to Trade

Export of treated produce containing measurable residues of imidacloprid 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 recommended MRL of 2 mg/kg is greater than the Codex MRL for imidacloprid use on citrus. The proposed use pattern for imidacloprid on citrus trees has been approved under permit for some time, and over the duration of the permit, no adverse effects on trade have been reported to the APVMA as a result of the use. Additionally, highest residues observed in citrus from the use pattern were 1.2 mg/kg, with the majority of residues ≤ 0.1 mg/kg, based on available data considered by the JMPR. Whilst it is considered that the risk to trade will not be significant, comment is sought as a part of this Trade Advice Process.

9. Conclusions

Residue data indicate that imidacloprid residues in citrus will be below 2 mg/kg when the product is used according to label directions. Residues in citrus pulp will be at levels that allow this commodity to be used as an animal feed item in Australia, without violation of the existing Australian animal commodity MRLs.

The APVMA welcomes comment with regard to whether the proposed use of imidacloprid as a soil insecticide for citrus poses an undue prejudice to Australia's trade in citrus and in animal commodities as a result of livestock fed processed citrus product from treated trees.