



Australian Government
**Australian Pesticides and
Veterinary Medicines Authority**



TRADE ADVICE NOTICE

on Iodosulfuron-Methyl-Sodium and Mefenpyr-Diethyl
in the Product Hussar OD Selective Herbicide

APVMA Product Number 61992

FEB 2010

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PREFACE

The Australian Pesticides and Veterinary Medicines Authority (APVMA) is the Australian Government regulator 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 proposed extensions of use for existing chemicals where there may be trade implications, as defined in *Ag MORAG: Manual of Requirements and Guidelines* Part 5B.

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 extend the use of **HUSSAR OD SELECTIVE HERBICIDE** containing the existing active constituents iodosulfuron-methyl-sodium and mefenpyr-diethyl 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 **6/04/2010** 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:

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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: <http://www.apvma.gov.au>

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 Bayer CropScience Pty Ltd to extend the use of HUSSAR OD SELECTIVE HERBICIDE, containing the active ingredients iodosulfuron-methyl-sodium at 100 g/L and mefenpyr-diethyl at 300 g/L, to barley for the control of grass weeds (annual ryegrass, wild oats, annual phalaris and paradoxa grass).

An application from Bayer CropScience Pty Ltd is also being considered by the APVMA to amend the residue definition for mefenpyr-diethyl. The recommendations from that evaluation are also outlined in this Trade Advice Notice.

The potential for iodosulfuron-methyl-sodium and mefenpyr-diethyl residues in barley to unduly prejudice trade is discussed below.

2 TRADE CONSIDERATIONS

2.1 Commodities exported

Barley, together with, cereal hay (consisting mainly of oaten hay), and meat and dairy products, are exported in varying quantities. It is proposed to establish a new MRL for iodofurofuron-methyl-sodium in barley grain, forage of cereal grains, and straw and fodder (dry) of cereal grains. The current MRL for mefenpyr-diethyl in cereal grains remains appropriate; however, new MRLs for mefenpyr-diethyl have been proposed for forage of cereal grains, and straw and fodder (dry) of cereal grains. No changes to animal commodity MRLs are required.

2.2 Destination and value of exports

The total exports of Australian barley (including feed barley, malting barley and malt (grain equivalent)) in 2007/2008 amounted to 4,050 kt valued at \$1 496 million (Australian Commodity Statistics figures). The 10 largest export markets for Australian barley in 2005 by volume and value are tabulated below (Food and Agriculture Organization of the United Nations figures).

Table 1: Australian Barley Export Markets by Volume (2005)

BARLEY		MALT		MALT EXTRACT	
DESTINATION	TONNES	DESTINATION	TONNES	DESTINATION	TONNES
Saudi Arabia	939,306	Japan	91,594	New Zealand	5,006
China	917,381	Thailand	86,095	Sri Lanka	855
Japan	636,024	Korea, Republic of	84,520	Japan	509
United Arab Emirates	162,038	Philippines	34,134	Philippines	494
Kuwait	113,393	Indonesia	24,056	USA	320
Taiwan	81,451	Singapore	22,317	Korea, Republic of	302
Qatar	36,816	Papua New Guinea	7,311	Fiji	292
Korea, Republic of	36,198	Malaysia	5,950	Singapore	232
Oman	33,020	Cambodia	5,445	French Polynesia	219
Thailand	8,088	Mauritius	3,215	Papua New Guinea	197

Table 2: Australian Barley Export Markets by Value (2005)

BARLEY		MALT		MALT EXTRACT	
DESTINATION	\$ MILLION	DESTINATION	\$ MILLION	DESTINATION	\$ MILLION
China	142.4	Japan	31.0	New Zealand	10.3
Saudi Arabia	115.7	Thailand	28.3	French Polynesia	1.6
Japan	99.9	Korea, Republic of	25.7	Philippines	1.1
United Arab Emirates	20.4	Philippines	10.1	Sri Lanka	1.0
Kuwait	13.7	Indonesia	7.9	Fiji	0.9
Taiwan	11.6	Singapore	7.0	Singapore	0.6
Korea, Republic of	5.9	Papua New Guinea	2.6	USA	0.6
Qatar	5.5	Malaysia	2.0	Papua New Guinea	0.5
Oman	4.2	Cambodia	1.8	Japan	0.5
Thailand	1.5	Mauritius	1.1	Korea, Republic of	0.5

The estimated exports of Australian hay/straw for 2008/2009 are 680 kmt (Australian Bureau of Statistics and Australian Fodder Industry Association estimates), primarily to Japan, Taiwan and Korea.

2.3 Current Australian MRLs for iodosulfuron-methyl and mefenpyr-diethyl

Current relevant MRLs and the residue definition for iodosulfuron-methyl and mefenpyr-diethyl are presented below. A full listing of MRLs can be found at <http://www.apvma.gov.au/residues/standard.php>.

Table 3: Current Relevant Entries in the MRL Standard - Table 1, Table 3 and Table 4

MRL STANDARD: TABLE 1

COMPOUND	FOOD	MRL (mg/kg)
IODOSULFURON METHYL		
MO 0105	Edible offal (mammalian)	*0.01
PE 0112	Eggs	*0.01
MM 0095	Meat (mammalian)[in the fat]	*0.01
ML 0106	Milks	*0.01

COMPOUND	FOOD	MRL (mg/kg)
PO 0111	Poultry, Edible offal	*0.01
PM 0110	Poultry meat [in the fat]	*0.01
GC 0654	Wheat	*0.01

MEFENPYR-DIETHYL

GC 0080	Cereal grains	*0.01
MO 0105	Edible offal (mammalian)	*0.05
PE 0112	Eggs	*0.01
MM 0095	Meat (mammalian)	*0.05
ML 0106	Milks	*0.01
PO 0111	Poultry, Edible offal of	*0.05
PM 0110	Poultry meat	*0.05

MRL STANDARD: TABLE 3

COMPOUND	RESIDUE
IODOSULFURON METHYL	Iodosulfuron methyl
MEFENPYR-DIETHYL	Mefenpyr-diethyl

MRL STANDARD: TABLE 4

COMPOUND	ANIMAL FEED COMMODITY	MRL (mg/kg)
IODOSULFURON METHYL		
	Wheat forage (fresh weight)	*0.05
AS 0654	Wheat, straw and fodder, dry	*0.05
MEFENPYR-DIETHYL		
	Cereal forage (fresh weight)	*0.1
AS 0081	Straw and fodder (dry) of cereal grains	*0.1

2.4 Proposed Australian use-pattern

The proposed Australian use pattern for HUSSAR OD SELECTIVE HERBICIDE (100 g/L iodosulfuron-methyl-sodium, 300 g/L mefenpyr-diethyl) is summarised below.

Table 4: Proposed Use Pattern

CROP	WEED	STATE	WEED STAGE	RATE (mL/ha)	CRITICAL COMMENTS
Barley ≥ 4 leaf (Z13, 21) and ≤ 5 tillers (Z25)	Annual ryegrass (<i>Lolium rigidum</i>)	NSW, ACT, Vic, SA, WA only	1 to 3 leaf (Z11 to Z13)	75 (7.5 g iodosulfuron-methyl-sodium/ha + 22.5 g mefenpyr-diethyl/ha)	General note for tolerance in barley: Barley has limited tolerance to Hussar OD and may be substantially damaged. DO NOT use Hussar OD on barley prior to reading the Crop Safety section of the label.
			Early tillering (Z13, 21 to Z13, 22)	100 (10 g iodosulfuron-methyl-sodium/ha + 30 g mefenpyr-diethyl/ha)	Apply generally within 5 to 7 weeks after sowing, but only to barley with at least 4 leaves (Z13, 21) and not more than 5 tillers (Z25). Do not use for control of dense ryegrass populations (>300 plants/m ²). Do not use on weeds resistant to Group B herbicides.
	Wild oats (<i>Avena</i> spp.)	All States	1 to 3 leaf (Z11 to Z13)	100	See ' General note for tolerance in barley ' above and Crop Safety section of this label. Apply generally within 5 to 7 weeks after sowing, but only to barley with at least 4 leaves (Z13, 21) and not more than 5 tillers (Z25). Do not use for control of dense wild oat populations (>150 plants/m ²).
				75	Suppression of wild oats. Will substantially reduce the growth of wild oats and their ability to compete with the crop and will reduce seed set of wild oats but may not give a significant reduction in plant numbers. Critical comments above for wild oat control (100 mL/ha rate) also apply.

CROP	WEED	STATE	WEED STAGE	RATE (mL/ha)	CRITICAL COMMENTS
	Annual phalaris, paradoxa grass <i>(Phalaris paradoxa only)</i>			100	See ' General note for tolerance in barley ' under 'Annual ryegrass' and Crop Safety section of this label. Apply generally within 5 to 7 weeks after sowing, but only to barley with at least 4 leaves (Z13, 21) and not more than 5 tillers (Z25). Do not use for control of dense phalaris populations (>300 plants/m ²). Other phalaris species may not be adequately controlled with Hussar.
				75	Suppression of phalaris. Will substantially reduce the growth of phalaris and its ability to compete with the crop and will reduce seed set of phalaris but may not give a significant reduction in plant numbers. Critical comments above for phalaris control (100 mL/ha rate) also apply.

WITHHOLDING PERIOD

Harvest: *Not required when used as directed*

Grazing: *DO NOT graze or cut for stock food for 4 weeks after application.*

RESTRAINTS

DO NOT use if rainfall or irrigation is to occur within 8 hours of application.

DO NOT apply to crops undersown with legumes.

DO NOT apply to wheat before the 3-leaf stage (Z13).

DO NOT apply to wheat that is physically damaged (e.g. by hail, wind, insect attack).

DO NOT apply without surfactant/wetting agent#.

DO NOT apply to paddocks where there is a high risk of weeds resistant to Group B herbicides.

DO NOT make more than one application of a Group B herbicide per season.

#See '**Use of Surfactant/Wetting Agent**' under 'General Instructions'.

SPRAY DRIFT RESTRAINTS

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.

USE OF SURFACTANT/WETTING AGENT

It is recommended that Hussar OD be applied with the addition of BS1000 bio-degradable surfactant at 0.25% v/v, even when tank mixing with other products. The suitability of other non-ionic wetting agents or oil-based adjuvants should be confirmed with Bayer CropScience prior to mixing with Hussar OD.

Damage to barley (including reduced growth and yield reductions) from Hussar OD is reduced if no additional adjuvant is added to the spray solution. Weed control however may be reduced if no additional adjuvant is used.

In situations where optimum weed control is required it is recommended that Hussar OD be applied with the addition of BS1000 biodegradable surfactant at 0.25% v/v.

Where improved crop tolerance is required and some reduced reliability on control of weeds is accepted then do not add any additional adjuvant when applying Hussar OD.

COMPATIBILITY

Do not mix Hussar OD with any other product, with the exception of BS1000, when applying to barley.

2.5 Consideration of data presented to the APVMA

Overseas residue studies for iodosulfuron-methyl-sodium and mefenpyr-diethyl in barley, wheat, rye and triticale were provided. Studies were also provided which investigated the metabolism of mefenpyr-diethyl in plants (barley) and in animals (laying hen and lactating goat). Previously submitted Australian residue data from wheat trials was also considered.

2.5.1 Consideration of mefenpyr-diethyl residue definition

In the barley metabolism study the major metabolites in straw were AE F113225 (36% Total Radioactive Residue (TRR) (1-(2,4-dichlorophenyl)-5-ethoxycarbonyl-5-methyl-2-pyrazoline-3-carboxylic acid)), AE F109453 (24% TRR (1-(2,4-dichlorophenyl)-5-methyl-2-pyrazoline-3,5-dicarboxylic acid)) and AE F094270 (18% TRR (1-(2,4-dichlorophenyl)-5-methyl-pyrazole-3-carboxylic acid)). The major metabolite in barley grain was AE F094270 (61% TRR). The current residue definition of parent compound is no longer considered appropriate. Analytical methods were supplied that hydrolysed parent and AE F113225 to AE F109453 prior to quantitation. The following definition is proposed for commodities of plant origin:

Commodities of plant origin: Sum of mefenpyr-diethyl and metabolites hydrolysed to 1-(2,4-dichlorophenyl)-5-methyl-2-pyrazoline-3,5-dicarboxylic acid, and 1-(2,4-dichlorophenyl)-5-methyl-pyrazole-3-carboxylic acid, expressed as mefenpyr-diethyl.

In the goat metabolism study, AE F113225 was present in significant amounts, accounting for 83% TRR in kidney, 41% in liver and 38% in milk. In the hen study, AE F113225 was found in liver (12.7% TRR) and egg yolk (7.6% TRR).

Given the relatively high residues of AE F113225 found in the animal metabolism studies it is appropriate to include this metabolite in the animal commodity residue definition.

The following residue definition is proposed for mefenpyr-diethyl in animal commodities:

Commodities of animal origin: Sum of mefenpyr-diethyl and 1-(2,4-dichlorophenyl)-5-ethoxycarbonyl-5-methyl-2-pyrazoline-3-carboxylic acid, expressed as mefenpyr-diethyl.

2.5.2 Results of residue trials

Iodosulfuron-methyl-sodium residues in barley grain collected at harvest at an application rate of 10 to 15 g/ha were <0.01 (n=7) and <0.05 (n=3) mg/kg; in wheat grain were <0.005 (n=8) and <0.01 (n=34) mg/kg; in rye grain were <0.01 (n=5) mg/kg; and in triticale grain were <0.01 mg/kg. The wheat grain sample with a residue of 0.01 mg/kg was re-analysed and residues were <0.01 (n=2) mg/kg.

Residues (as received) in barley straw were <0.02 (n=5) and <0.05 (n=3) mg/kg; in wheat straw were <0.02 mg/kg (n=9) and <0.05 (n=33) mg/kg; in rye straw were <0.05 mg/kg (n=5); and in triticale straw were <0.05 mg/kg. Residues (as received) in barley forage at approximately 28 days after application were <0.01 (n=3) and <0.05 (n=2) mg/kg; in wheat forage were <0.02 (n=3), <0.05 (n=12), 0.06 mg/kg; and in rye forage were <0.05 (n=3) mg/kg. The wheat forage sample with a residue of 0.06 mg/kg was taken from a trial conducted at 1.5× the proposed label rate.

Residues in forage were converted to dry weight. Iodosulfuron-methyl-sodium residues in barley forage (dry) at approximately 28 days after application were <0.03 (n=3) and <0.17 (n=2) mg/kg; in wheat forage were <0.08 (n=3), <0.2 (n=12) and 0.24 mg/kg; in rye forage were <0.17 (n=3) mg/kg; and in triticale forage were <0.17 mg/kg (observed 40 days after application).

Iodosulfuron-methyl-sodium residues in the evaluated trials support the establishment of MRLs of *0.01 mg/kg for barley grain, 0.5 mg/kg for forage of cereal grains and *0.05 mg/kg for straw and fodder (dry) of cereal grains, with an associated withholding period of 4 weeks.

Mefenpyr-diethyl residues (parent only) in barley grain collected at harvest at an application rate of 30 to 45 g/ha were <0.01 (n=2), <0.02 (n=4) and <0.04 mg/kg; in wheat grain were <0.01 (n=11) and <0.02 (n=5) mg/kg; in rye grain were <0.01 (n=3) mg/kg; and in triticale grain were <0.01 mg/kg.

Residues (as received) in barley straw were <0.04 (n=5) and <0.05 (n=2) mg/kg; in wheat straw were <0.04 mg/kg (n=4), <0.05 (n=5), 0.07 and 0.15 mg/kg; in rye straw were <0.05 mg/kg (n=3); and in triticale straw were <0.05 mg/kg. Residues (as received) in barley forage at approximately 28 days (10 to 33 days) after application were <0.02 (n=3) and <0.1 (n=2) mg/kg; in wheat forage were <0.1 (n=7), 0.11, 0.16 and 0.30 mg/kg; in rye forage were <0.1 (n=3) mg/kg; and in triticale forage were 0.17 mg/kg. Residues (converted to dry weight) in barley forage at approximately 28 days (10 to 33 days) after application were <0.07 (n=3) and <0.33 (n=2) mg/kg; in wheat forage were <0.4 (n=7), 0.44, 0.64 and 1.2 mg/kg; in rye forage were <0.33 (n=3) mg/kg; and in triticale forage were 0.57 mg/kg (observed 40 days after application).

Mefenpyr-diethyl residues in the submitted trials support the currently established MRL of *0.01 mg/kg for cereal grain; however, it is recommended that the current MRL for cereal forage (fresh weight) be replaced with a forage of cereal grains MRL of 3 mg/kg, and the MRL for straw and fodder (dry) of cereal grains be increased from *0.1 to 1 mg/kg, with an associated withholding period of 4 weeks.

2.5.3 Residues in animal commodities

Based on a metabolism study, the estimated iodosulfuron-methyl residues in a lactating cow fed on 100% cereal forage, containing residues at 0.24 mg/kg (highest residue in dry wheat forage), ranged from 0.00014 to 0.002 mg/kg in heart, liver, lungs and kidney, 0.00003 to 0.00006 mg/kg in meat, 0.0012 to 0.004 mg/kg in fat, and 0.00029 mg/kg in milk. No changes to the current animal commodity MRLs are required.

Estimated mefenpyr-diethyl residues were based on a metabolism study conducted on lactating goats, with goats fed on 100% cereal forage, containing residues at 1.2 mg/kg (highest residue in dry wheat forage). Estimated residues ranged from <0.0001 to 0.0002 mg/kg in edible offal, 0.0006 mg/kg in fat, and 0.00002 mg/kg in milk. No changes to the current animal commodity MRLs are required.

2.6 Overseas registration and approved label instructions

The applicant has indicated that products containing iodosulfuron-methyl-sodium and mefenpyr-diethyl are registered for use on cereals in the UK, European Union, Chile, Kenya, South Africa, Tanzania, Uruguay and Zimbabwe.

2.7 Codex alimentarius commission and overseas MRLs

The Codex Alimentarius Commission (Codex) is responsible for establishing Codex Maximum Residue Limits (CXLs) for pesticides. CXLs are primarily intended to facilitate international trade, and accommodate differences in Good Agricultural Practice (GAP) employed by various countries. Some countries may accept CXLs when importing foods. Iodosulfuron-methyl-sodium and mefenpyr-diethyl have not been considered by Codex. MRLs established overseas for barley and cereal grains are listed below. Overseas MRLs for Mefenpyr-diethyl in hay are only known to be established in the US at 0.2 mg/kg.

Table 5: Overseas Tolerances for Iodosulfuron-Methyl-Sodium in Relevant Commodities

COUNTRY	COMMODITY	TOLERANCE (mg/kg)	RESIDUE DEFINITION	REFERENCE
EU	Cereal Grains	*0.02	Iodosulfuron-methyl (iodosulfuron-methyl including salts, expressed as iodosulfuron-methyl)	EU Pesticides Database, http://ec.europa.eu , updated on 29 April 2009.
Japan	Wheat Grain	P0.01	Iodosulfuron-methyl and iodosulfuron-methyl-sodium salt, calculated as iodosulfuron-methyl-sodium.	Ministry of Health, Labour and Welfare, Table in Item 7(1), Section A General Compositional Standards for Food, Provisional MRLs List , http://www.m5.ws001.squarestart.ne.jp/foundation/search.html , updated 5 February 2007.
	Barley	-		
	Other Cereal Grains	-		
Russia	Cereal Grain	0.1	Iodosulfuron-methyl-sodium	Europe Fresh Quality Guide Online, http://www.freshquality.org/english/news.asp , updated 1 July 2008.
South Africa	Barley Grain	0.05	Iodosulfuron	Regulations governing the maximum limits for pesticide residues that may be present in foodstuffs, http://www.doh.gov.za/search/index.html
	Wheat Grain	0.05		
Switzerland	Cereal Grains	0.01	Iodosulfuron-methyl-sodium	The Federal Authorities of the Swiss Confederation: Ordinance on foreign substances and components, http://www.admin.ch/ch/fr/rs/8/817.021.23.fr.pdf
US	Wheat Grain	0.02	Iodosulfuron-methyl-sodium	United States Food and Drug Administration, Code of Federal Regulations Tolerances and exemptions from tolerances for pesticide chemicals in food, http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&sid=5d35d354cc838eb105a733f5dff13ab8&tpl=/ecfrbrowse/Title40/40cfr180_main_02.tpl , revised 19 June 2009.
	Barley Grain	-		

2.8 Proposed Australian MRLs for iodosulfuron-methyl and mefenpyr-diethyl

The following changes are proposed to Australian iodosulfuron-methyl and mefenpyr-diethyl MRLs:

Table 6: Proposed Changes to the MRL Standard - Table 1, Table 3 and Table 4

MRL STANDARD: TABLE 1

COMPOUND	FOOD	MRL (mg/kg)
IODOSULFURON METHYL		
ADD:		
GC 0640	Barley	*0.01

MRL STANDARD: TABLE 3

COMPOUND	RESIDUE
MEFENPYR-DIETHYL	
DELETE:	
	Mefenpyr-diethyl
ADD:	
	Commodities of plant origin: Sum of mefenpyr-diethyl and metabolites hydrolysed to 1-(2,4-dichlorophenyl)-5-methyl-2-pyrazoline-3,5-dicarboxylic acid, and 1-(2,4-dichlorophenyl)-5-methyl-pyrazole-3-carboxylic acid, expressed as mefenpyr-diethyl.
	Commodities of animal origin: Sum of mefenpyr-diethyl and 1-(2,4-dichlorophenyl)-5-ethoxycarbonyl-5-methyl-2-pyrazoline-3-carboxylic acid, expressed as mefenpyr-diethyl.

MRL STANDARD: TABLE 4

COMPOUND	ANIMAL FEED COMMODITY	MRL (mg/kg)
IODOSULFURON METHYL		
DELETE:		
	Wheat forage (fresh weight)	*0.05
AS 0654	Wheat, straw and fodder, dry	*0.05
ADD:		
AF 0081	Forage of cereal grains	0.5
AS 0640	Straw and fodder (dry) of cereal grains	*0.05

MEFENPYR-DIETHYL

DELETE:

		Cereal forage (fresh weight)	*0.1
AS	0081	Straw and fodder (dry) of cereal grains	*0.1

ADD:

AF	0081	Forage of cereal grains	3
AS	0081	Straw and fodder (dry) of cereal grains	1

2.9 Potential risk to trade

Export of treated produce containing finite (measurable) residues of iodosulfuron-methyl-sodium and mefenpyr-diethyl 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.

At the proposed label application rates, quantifiable residues are not expected in barley grain. Therefore, the overall risk to export trade in barley grain is considered to be low.

Tolerance or MRLs for iodosulfuron-methyl-sodium and mefenpyr-diethyl in cereal straw and fodder have not been established in the major export markets for Australian export hay. However, registration is not sought for oats, the major crop used for hay production, and in the absence of specific MRLs for iodosulfuron-methyl-sodium and mefenpyr-diethyl in Japan for animal feed commodities, it is considered that the risk to trade in export hay is low.

No changes are required to animal commodity MRLs as the proposed use is unlikely to result in detectable residues in animal commodities.

3 CONCLUSIONS

It is proposed to establish MRLs for barley grain, barley forage (fresh weight), barley straw and fodder (dry), cereal forage (fresh weight) and straw and fodder (dry) of cereal grains. Comment is sought on the potential for iodosulfuron-methyl-sodium and mefenpyr-diethyl in HUSSAR OD SELECTIVE HERBICIDE to prejudice Australian trade when it is used on barley to control grass weeds.

A more detailed technical assessment report on the evaluation of the trade implications of this chemical can be obtained by contacting the APVMA at (02) 6210 4748. Alternatively, the reports can be viewed at the APVMA Library, which is located at:

18 Wormald Street
Symonston ACT, 2609 Office hours: 9.00 - 5.00 (EST) Monday to Friday