



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



TRADE ADVICE NOTICE

on Propyzamide in the Product Ospray Rustler Selective Herbicide

APVMA Product Number P61360

APRIL 2014

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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.

In undertaking this task, the APVMA works in close cooperation with advisory agencies, including the Department of Health, Office of Chemical Safety and Environmental Health (OCSEH), Department of the Environment, 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 **Ospray Rustler Selective Herbicide** containing the existing active constituent propyzamide 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 **13 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 Ospray Pty Ltd to vary the registration of the product, *Ospray Rustler Selective Herbicide*, containing 500 g/L propyzamide, to include use on canola. The proposed variation requires the establishment of a propyzamide MRL for rape seed (canola).

The potential for propyzamide residues arising from the proposed use to unduly prejudice trade in canola is discussed below.

2 TRADE CONSIDERATIONS

2.1 Commodities exported

Canola, including seed, meal and oil, is considered to be a major export commodity².

Livestock may also be fed feeds containing propyzamide residues arising from the proposed use. Considering the highest propyzamide residue expected in canola forage or straw together with available animal feeding data, existing mammalian animal commodity MRLs are adequate. Quantifiable residues of propyzamide are not expected to be found in the feed of poultry consuming canola seed or meal. Therefore, no changes to animal commodity MRLs are required. Residues in animal commodities will not be considered further.

2.2 Destination and value of exports

Canola, including seed, meal and oil, is exported from Australia. The volume of Australian canola that was exported and the major export destinations are shown below. In 2012/13, 3488 kilotonnes of canola seed were exported, along with 116 kilotonnes of canola oil and 41.2 kilotonnes of canola meal. Key markets for canola seed are tabulated below.

Table 1: Largest export markets by volume for canola seed from 2010/11 to 2012/13 financial years

| DESTINATION | 2012/13 | 2011/12 | 2010/11 |
|-------------|---------|---------|---------|
| Bangladesh | 104.50 | 15.01 | 8.88 |
| Belgium | 829.18 | 641.95 | 221.52 |
| Netherlands | 604.61 | 998.03 | 856.30 |
| China | 382.63 | 0 | 0 |
| Japan | 111.56 | 74.31 | 70.84 |
| Pakistan | 551.57 | 161.93 | 1.87 |
| Other | 903.75 | 431.61 | 311.32 |
| TOTAL | 3487.80 | 2322.84 | 1470.74 |

Most canola oil is exported to New Zealand, Korea, China and Malaysia, with most canola meal destined for Vietnam and New Zealand.

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 propyzamide in canola is summarised below.

Table 2: Proposed use pattern of *Ospray Rustler Selective Herbicide* (500 g/L propyzamide) in canola

| WEED | RATE | CRITICAL COMMENTS |
|--|--------------------------------|--|
| Annual ryegrass, barley grass, canary grass, fescue, great brome, prairie grass, rat's tail fescue, silver grass, squirrel tail, wild oats, winter grass | 1 L/ha (500 g ai/ha) | Incorporate by sowing when weeds are at the pre-emergent stage. Best results are obtained when applied during cool and moist conditions. Rain or irrigation is necessary to thoroughly wet the top 3 to 4 cm of soil. This is similar to 25 mm of rain. |

WITHHOLDING PERIODS

Harvest: Not required when used as directed.

Grazing: Do not graze or cut for stock food for 12 weeks after application.

2.4 Results from residues trials presented to the APVMA

The proposed use of propyzamide in canola involves application pre-sowing at 500 g ai/ha. The proposed grazing withholding period is 12 weeks, while a harvest withholding period is not required when used as directed.

Six supervised residue trials were submitted in support of the proposed use, each with treatment at the proposed rate of 0.5 kg propyzamide/ha (1x) and at 1 kg/ha (2x). Residues in canola seed after the 1x treatment were <0.005 (5), and 0.013 mg/kg. Application at 2x the proposed rate gave similar results to the 1x trials. The establishment of a propyzamide MRL of 0.02 mg/kg for SO 0495 Rape seed [canola] is proposed.

Residues of propyzamide in canola straw at harvest following treatment at the proposed application rate were <0.02 (5), and <0.05 [0.022] mg/kg (as received). The establishment of a propyzamide MRL of 0.2 mg/kg for canola straw and fodder is proposed.

Residues of propyzamide in canola forage 12 weeks after application at the proposed application rate were <0.067 (3), 0.12, 0.31, and 1.3 mg/kg (dry weight basis). The establishment of a propyzamide MRL of 3 mg/kg for canola forage is proposed, in conjunction with a 12-week grazing withholding period.

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. Propyzamide has not been considered by Codex. The following relevant international MRLs have been established for propyzamide:

Table 3: Comparison of propyzamide MRLs (mg/kg) for canola

| COUNTRY | COMMODITY | PROPYZAMIDE TOLERANCE (mg/kg) |
|-----------|--------------------|----------------------------------|
| Australia | Rape seed [canola] | 0.02 (proposed) |
| EU | Rape seed | *0.05 |
| Japan | Rape seed | 0.1 |

2.6 Current and proposed Australian MRLs for propyzamide

Current relevant MRLs and the residue definition for propyzamide 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) |
|-------------|--------------------------|-------------|
| PROPYZAMIDE | | |
| MO 0812 | Cattle, Edible offal of | *0.2 |
| MM 0812 | Cattle meat | *0.05 |
| PE 0112 | Eggs | *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 |
|-------------|-------------|
| PROPYZAMIDE | Propyzamide |

The following changes are proposed to Australian propyzamide MRLs:

Table 5: Proposed changes to the MRL Standard - Table 1

MRL STANDARD: TABLE 1

| COMPOUND | FOOD | MRL (mg/kg) |
|-------------|--------------------|-------------|
| PROPYZAMIDE | | |
| ADD: | | |
| SO 0495 | Rape seed [canola] | 0.02 |

Table 6: Proposed changes to the MRL Standard - Table4

MRL STANDARD: TABLE 4

| COMPOUND | FOOD | MRL (mg/kg) |
|-------------|-------------------------|-------------|
| PROPYZAMIDE | | |
| ADD: | | |
| | Canola forage | 3 |
| | Canola straw and fodder | 0.2 |

2.7 Potential risk to trade

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

It is proposed to establish a propyzamide MRL for SO 0495 Rape seed [canola] of 0.02 mg/kg. This MRL is lower than those established in the EU (0.05 mg/kg) and Japan (0.1 mg/kg). There is considered to be minimal trade risk associated with these countries that have MRLs established above the proposed MRL for rape seed.

Only two samples of canola seed from the 12 plots where propyzamide was applied at (1×) or above (2×) the proposed rate contained detectable residues at harvest. Those residues were at a level only slightly above the limit of quantitation.

The overall risk to export trade in canola is considered to be low.

Residues of propyzamide in animal commodities are not expected to exceed the established MRLs and hence there is no change in the risk to trade in meat or dairy products.

3 CONCLUSIONS

The establishment of a propyzamide MRL in rape seed (canola) is proposed. Comment is sought on the potential for propyzamide residues resulting from the proposed use of *Ospray Rustler Selective Herbicide* on canola to unduly prejudice Australian trade, and the ability of industry systems to manage any identified risk.