Trade Advice Notice

on

Pyraclostrobin

in the product

Nufarm Aero Fungicide
(product number 61186)

June 2009

1. PREFACE

1.1 About this Document

This is a Trade Advice Notice.

It indicates that the Australian Pesticides and Veterinary Medicines Authority (APVMA) is considering an application for registration of an 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 notice.

The APVMA will only consider comment on submissions that relate to the **trade implications** of the extended use of the product. Comments received outside these grounds will not be considered by the APVMA. Comments made on appropriate grounds will be considered with details posted on the APVMA website noting what action has/will be taken in regard to concerns.

Any advice the APVMA receives through this consultation which it relies on to grant this application will be noted in a subsequent Advice Summary.

Advice Summaries can be found at:
http://www.apvma.gov.au/registration/data_requirements_subpage.shtml

1.2 Prior to Submission

Please note that subject to the *Freedom of Information Act 1982*, the *Privacy Act 1988* and the Agvet Codes all submissions received may be made publicly available. They may be listed or referred to in any papers or reports prepared on this subject matter.

The APVMA reserves the right to reveal the identity of a respondent (you) unless a request for anonymity accompanies your submission. If no request for anonymity is made, you will be taken to have consented to the disclosure of your identity for the purposes of Information Privacy Principle 11 of the *Privacy Act 1988.*

The contents of any submission will not be treated as confidential or confidential commercial information unless they are marked as such and you have provided justification such that the material is capable of being classified as confidential or confidential commercial information in accordance with the *Freedom of Information Act 1982* or the Agvet Codes as the case may be.

1.3 About this consultation

The APVMA invites comment on this Trade Advice Notice until the **1 July 2009.**
Submissions should be addressed to:

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CONTENTS

2. INTRODUCTION

The Australian Pesticides and Veterinary Medicines Authority (APVMA) has before it an application from Nufarm Australia Ltd to extend the use of *NUFARM AERO FUNGICIDE*, containing the active ingredients pyraclostrobin and metiram at 50 and 550 g/kg respectively, to tomatoes, eggplant, capsicum, peppers, mangoes, and poppies. The use instructions for potatoes are to be amended to allow aerial as well as ground application. The product is a fungicide used for control of early and late blight in potatoes, early blight in tomatoes, capsicums, peppers and eggplant, anthracnose in mangoes, and downy mildew in poppies.

The potential for pyraclostrobin residues in these commodities to unduly prejudice trade is discussed below. No discussion of metiram residues is required, as no changes to any MRLs for dithiocarbamates, a class of compounds of which metiram is a member, are required.

3. TRADE CONSIDERATIONS

3.1 Commodities Exported

Tomatoes, capsicum, eggplant, mangoes, poppy seed and potatoes, together with meat and dairy products, are exported in varying quantities. No changes to the MRLs for pyraclostrobin in potatoes, or in any animal commodities, are proposed. An MRL at the limit of quantitation is proposed for pyraclostrobin in poppy seed. Finite MRLs are proposed for pyraclostrobin in fruiting vegetables, other than cucurbits and for mangoes.

3.2 Destination and Value of Exports

The destination and value of export commodities which may contain quantifiable residues of pyraclostrobin as a result of use of NUFARM AERO FUNGICIDE (i.e. mangoes and fruiting vegetables other than cucurbits) are summarised below.

Mangoes
Export markets for Australian mangoes are tabulated below for the year 2002/03 (The Australian Horticulture Statistics Handbook 2004[1]). Total exports in that year were 4266 tonnes, with a value of $11.86 million.

Australian Mango Exports (2002/2003)

Destination	Exports (tonnes)	Value, $ thousands
Singapore	1619	3791
Hong Kong	1380	3458
Malaysia	319	896
United Arab Emirates	288	856
Japan	73	765
France	96	423
Saudi Arabia	114	303
Lebanon	75	224
Qatar	67	222
United Kingdom	31	199
Other	204	723
TOTAL	4266	11860

Fruiting vegetables other than cucurbits (tomatoes, eggplant, capsicum and peppers)
Export markets for Australian tomatoes, capsicums, and peppers are tabulated below for the year 2002/03 (The Australian Horticulture Statistics Handbook 2004[1]). Total fresh tomato exports in that year were 3199 tonnes, with a value of $7.48 million, while total exports of capsicum (including chilli peppers) were 687 tonnes, with a value of $1.84 million. Eggplant exports appear to be relatively small, with the only figure available being 449 kg (less than half a tonne) of organic eggplant being exported in 2002. No value for these exports was given.

[1] The Australian Horticulture Statistics Handbook 2004, published by Horticulture Australia Ltd 2004 (www.horticulture.com.au)

Australian Fresh Tomato Exports (2002/2003)

Destination	Exports (tonnes)	Value, $ thousands
New Zealand	2491	5742
Singapore	311	443
Hong Kong	220	704
Brunei	33	114
Malaysia	22	80
New Caledonia	23	69
Indonesia	49	142
French Polynesia	2	4
Fiji	21	38
Other	27	139
TOTAL	3199	7475

Australian Capsicum (including chilli pepper) Exports (2002/2003)

Destination	Exports (tonnes)	Value, $ thousands
New Zealand	564	1437
Hong Kong	14	41
Singapore	13	30
Mauritius	2	10
Malaysia	3	10
Kiribati	1	2
Indonesia	18	66
Fiji	23	59
Thailand	0	0
New Caledonia	16	56
Other	33	133
TOTAL	687	1844

3.3 Proposed Australian Use-Pattern

The proposed Australian use patterns for *NUFARM AERO FUNGICIDE*, , are detailed in the 'directions for use' table below. All proposed additions to the existing label directions are underlined.

DIRECTIONS FOR USE
For the control of early and late (Irish) blight in potatoes, early blight in capsicum, eggplant, peppers and tomatoes, downy mildew in poppies and various diseases in mangoes and specified in the DIRECTIONS FOR USE table.

RESTRAINTS
DO NOT apply AERO Fungicide by ground application if waterbodies, watercourses or wetlands are within 10 metres downwind of the application area.
DO NOT apply AERO Fungicide by aerial application if waterbodies, watercourses or wetlands are within 30 metres downwind of the application area.

CROP	DISEASE	RATE	WHP	CRITICAL COMMENTS
Potatoes	Early blight (*Alternaria solani*)	1.0 to 2.0 kg/ha (50-100 g ai/ha pyraclostrobin, 0.55-1.1 kg ai/ha metiram)	7 days	Apply when disease symptoms first appear and repeat 7 to 10 days later if required. Use the higher rate and the shorter spray interval when weather

	Late (Irish) blight (*Phytophthora infestans*)	1.5-3.0 kg/ha (75-150 g ai/ha pyraclostrobin, 0.825-1.65 kg ai/ha metiram)	7 days	conditions favour disease development. If overhead irrigation is used, apply immediately following irrigation. Aero may be applied by ground or aerial application equipment in potatoes. Apply in sufficient water to thoroughly cover the crop. The water volume should increase as the crop size and bulk increases. **Ground application:** A volume of 200-300 L/ha is suggested at the start of the season, increasing to 500-600 L/ha in a vigorous crop at full canopy. **Aerial application:** A volume of 30-40 L/ha is recommended. Use of AERO is subject to **a CropLife Australia resistance management strategy.** DO NOT apply more than two consecutive applications of this product or other Group K products. If consecutive applications of Group K fungicides are used, then they must be followed by a least the same number of applications of fungicide(s) from a different group(s) before a Group K fungicide is used again, either in the current or following season.
Capsicum, eggplant and peppers (except greenhouse) Tomatoes (except greenhouse)	Early blight (*Alternaria solani*)	1.0 to 2.0 kg/ha (50-100 g ai/ha pyraclostrobin, 0.55-1.1 kg ai/ha metiram)	28 days 14 days	Apply as part of a protectant program using two spray 10 to 14 days apart. AERO should be used when conditions favour disease development. Use the shorter interval when disease pressure remains high. This use is subject to **a CropLife Australia Resistance Management Strategy**. DO NOT apply more than two consecutive applications of this product or other Group K products, If consecutive applications are used, then they must be followed by at least the same number of applications of fungicide(s) from a different group(s) before a Group K fungicide is used again, either in the current or following season.
Mangoes	Anthracnose (*Colletotrichum gloeosporioides*), stem end rots	200-300 g/100L (10-15 g ai/100 L pyraclostrobin,	14 days	Apply as part of a protectant program containing fungicides from a different chemical group.

	(*Dorthiorella* sp.) & powdery mildew (*Oidium* sp.)	110-165 g ai/100 L metiram)		A maximum of 2 sprays can be applied. For best results these should be targeted at early fruit set and 14 days prior to harvest. Follow with applications of an approved fungicide from a different chemical group. This use is subject to **a CropLife Austalia Resistance Management Strategy** and **must only be applied as a foliar spray.** DO NOT apply more than two consecutive applications of this product or other Group K products. If consecutive applications are used, then they must be followed by at least the same number of applications of fungicide(s) from a different group(s) before a Group K fungicide is used again, either in the current or following season.

Poppies	Downy mildew	1.0 to 2.0 kg/ha (50-100 g ai/ha pyraclostrobin, 0.55-1.1 kg ai/ha metiram)	-	Apply as part of a protectant program containing fungicides from a different chemical group. A maximum of 2 Aero sprays can be applied per crop. For best results these should be targeted at early – mid running up and at hook stage. Apply AERO preventatively before disease symptoms appear. Ensure thorough spray coverage. Apply in sufficient water to thoroughly cover the crop. The water volume should increase as the crop size and bulk increases. This use is subject to a **CropLife Australia Resistance Management Strategy**. Start disease control early and maintain a regular program, with a fungicide from groups other than Group K, using the spray interval recommended on the label. When conditions favour disease development (high humidity, still weather, overcast skies), do not wait for symptoms (white downy growth on the underside of leaves followed by brown, angular lesions) to appear, but apply two consecutive sprays of a Good K product, at the interval recommended on the label. Then resume the program of sprays using products from a different group to the Group K product just applied. DO NOT apply more than two sprays per season of a product containing a Group K fungicide.

NOT TO BE USED FOR ANY PURPOSE, OR IN ANY MANNER, CONTRARY TO THIS LABEL UNLESS AUTHORISED UNDER APPROPRIATE LEGISLATION

WITHHOLDING PERIODS:

POTATOES: DO NOT HARVEST FOR 7 DAYS AFTER APPLICATION.

MANGOES: DO NOT HARVEST FOR 14 DAYS AFTER APPLICATION.

TOMATOES, CAPSICUMS, EGGPLANT & PEPPERS: DO NOT HARVEST FOR 28 DAYS AFTER APPLICATION.

POPPIES: DO NOT HARVEST FOR 10 WEEKS AFTER APPLICATION.

CROPS AND CROP PRODUCTS INTENDED FOR EXPORT:

CONSULT YOUR PEAK INDUSTRY BODY OR NUFARM FOR THE RECOMMENDED WITHHOLDING PERIOD BEFORE USING AERO.

USE ONLY medium spray droplet size classification or larger according to the ASAE S572 definition for standard nozzles.

DO NOT apply when there are livestock, pasture or any land that is producing feed for livestock downwind from the application area and within the mandatory no-spray zone shown in the table below.

FOR AERIAL APPLICATION	
Wind speed range at the time of application	**Downwind no-spray zone**
3 to 8 kilometres per hour	40
9 to 14 kilometres per hour	60
15 to 20 kilometres per hour	80
FOR GROUND APPLICATION	
Wind speed range at the time of application	**Downwind no-spray zone**
3 to 20 kilometres per hour	5

3.4 Results from residues trials presented to the APVMA

Fruiting vegetables (tomato, capsicum, eggplant, pepper)
Two Australian residues studies were submitted for tomatoes, and two for capsicum. These studies included application at 0.5X and 1X the proposed maximum rate. The Australian trials were complemented by 8 overseas studies at 1X the proposed rate (four each in capsicum and tomatoes) conducted in Italy. The Italian capsicum trials only included application of pyraclostrobin. Only one instead of two applications was made during the Australian trials. At 28 days after application, maximum metiram residues were 1 mg CS_2/kg in tomatoes and 1.35 mg CS_2/kg in capsicum, while the maximum pyraclostrobin residues were 0.03 mg/kg in tomatoes and 0.05 mg/kg in capsicum. In the Italian capsicum trials, pyraclostrobin residues at the longest WHP tested (14 days after the last application) were <0.02 (2), 0.053, and 0.055 mg/kg. In the Italian tomato trials, metiram residues at 13-14 days after the last application were <0.03, 0.04, 0.07 and 0.08 mg CS_2/kg, while pyraclostrobin residues were <0.02 (2), and 0.05 (2) mg/kg.

The data provided were sufficient to support a group MRL for pyraclostrobin of 0.3 mg/kg with a WHP of 28 days for fruiting vegetables, other than cucurbits. The existing group MRL for dithiocarbamates in fruiting vegetables, other than cucurbits [except roselle] remains appropriate. Sufficient processing data in tomatoes were provided to support a Table 4 entry (stockfeed MRL) for tomato pomace (dry) of 5 mg/kg.

Mango
Two Australian residues studies in mangoes, including application of both active constituents at 1X and 2X the proposed application rate, were evaluated. These trials were supported by three Brazilian trials in which the crop was treated at 1X the proposed rate, but with pyraclostrobin only. At the proposed 14-day withholding

period, pyraclostrobin residues in the Australian 1X trials were 0.02 and 0.04 mg/kg. Metiram residues were 0.4 and 1.0 mg CS_2/kg. In the Brazilian trials, all residues were below the limit of quantitiation of 0.05 mg/kg. These trials were sufficient to support an MRL of 0.1 mg/kg for pyraclostrobin with a 14-day withholding period, while confirming that the existing MRL for dithiocarbamates in mangoes remains appropriate.

Poppies
Two trials were conducted in Tasmanian poppies at the proposed application rate. No detectable residues of pyraclostrobin or metiram were found in poppy seed harvested 67-72 days after the last application. This supports an MRL of *0.05 mg/kg for pyraclostrobin in poppy seed with a 10 week withholding period, while confirming that the existing MRL for dithiocarbamates in poppy seed remains appropriate.

Potatoes
No additional data were submitted for potatoes. The proposal to allow aerial application to potatoes does not require any changes to existing MRLs or withholding periods. As a result of spray drift modelling, buffer zones will be included on the label to prevent drift onto adjacent pastures from causing MRL violations in meat and milk of livestock grazing those pastures.

Livestock
No changes to stockfeed MRLs for dithiocarbamates are proposed, and there is not expected to be any increase in the dietary burden of metiram for livestock. Existing MRLs for dithiocarbamates in animal commodities remain appropriate.

A new Table 4 entry of 5 mg/kg for pyraclostrobin in tomato pomace, dry is recommended. There are existing MRLs of 25 and 10 mg/kg respectively for pyraclostrobin in apple pomace, dry and grape pomace, dry. The maximum proportion of the diet of Australian livestock that is likely to be made up of tomato pomace is the same as the likely maximum percentage of similar feeds such as apple or grape pomace, or dried citrus pulp (20-30%). The calculated highest residue (HR-P) for pyraclostrobin in tomato pomace is 1.4 mg/kg. The Maximum Feeding Level (at which the animal commodity MRLs were set) is 4 mg/kg. MRLs for pyraclostrobin in animal commodities are all established at the limits of quantitation (see section 3.7 below). There is therefore unlikely to be any increase of the livestock dietary burden of pyraclostrobin as a result of granting this application, and existing MRLs for pyraclostrobin in animal commodities remain adequate.

The potential for spray drift on to neighboring pastures from aerial and ground based spray application has also been considered in relation to the use of NUFARM AERO FUNGICIDE on potatoes. To ensure that finite residues do not occur in animal commodities after grazing on adjacent pastures, the following statements have been recommended for inclusion on the label as a result of the spray drift risk assessment:

USE ONLY medium spray droplet size classification or larger according to the ASAE S572 definition for standard nozzles.

DO NOT apply when there are livestock, pasture or any land that is producing feed for livestock downwind from the application area and within the mandatory no-spray zone shown in the table below.

FOR AERIAL APPLICATION	
Wind speed range at the time of application	**Downwind no-spray zone**
3 to 8 kilometres per hour	40
9 to 14 kilometres per hour	60
15 to 20 kilometres per hour	80
FOR GROUND APPLICATION	
Wind speed range at the time of application	**Downwind no-spray zone**
3 to 20 kilometres per hour	5

3.5 Overseas registration and approved label instructions

The applicant did not provide any information on overseas registrations of pyraclostrobin in relevant crops. However, there are overseas registrations in tomato, capsicum, eggplant, chilli pepper and mango, and the following use patterns were obtained from the 2004 JMPR evaluation of pyraclostrobin.

Crop	**Country**	**Formulation**		**Application**						**PHI (days)**
		Type	**Conc**	**Method**	**No.**	**Interval**	**Rate (kg/hl)**	**Water (L/ha)**	**Rate (kg ai/ha)**	
Chilli pepper	USA	WG	20%	Foliar	6	7-14			0.224	0
Egg plant	USA	WG	20%	Foliar	6	7-14			0.224	0
Mango	Brazil	EC	250 g/L	Foliar	2		0.01	1000	0.1	7
Pepper red	Korea	WG	6.3%	Foliar	3	10	0.006	1500	0.095	7
Pepper red	Brazil	EC	250 g/L	Foliar	3	10	0.01	500-1000	0.1	3
Tomato	Brazil	EC	250 g/L	Foliar	5	7-14	0.01	1000	0.1	1
Tomato	Brazil	WG	5%	Foliar	5	7		1000	0.1-0.2	3
Tomato	Chile	EC	250 g/L	Foliar	2	10-14	0.033	300	0.1	1
Tomato	USA	WG	20%	Foliar	6	7-14			0.224	0

3.6 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. Pyraclostrobin has the following relevant Codex and overseas country MRLs.

RELEVANT CODEX MRLS FOR PYRACLOSTROBIN

Commodity	**MRL (mg/kg)**
Eggplant	0.3
Mango	*0.05
Peppers	0.5
Tomato	0.3

OVERSEAS TOLERANCES FOR PYRACLOSTROBIN IN RELEVANT COMMODITIES

Country/status	Commodity	MRL/Tolerance, mg/kg	Reference
USA	Fruiting vegetables, group 8 (solanacea)	1.4	US Code of Federal Regulations Part 180, Tolerances and Exemptions from Tolerances for Pesticide Chemicals in Food, subpart C, section 180.582, 29 May 2009 (www.gpoaccess.gov/cfr/index.html)
	Mango	0.6	
Japan	Tomato	0.3	Maximum Residue Limits table, item 6(1), section A, General Compositional Standards for Food, 5 February 2007, Ministry of Health, Labour and Welfare, Japan (www.mhlw.go.jp).
	Egg plant	1.4	
	Peppers (sweet)	0.3	
	Other solanaceous vegetables	1.4	
Canada	Eggplant	1	List of MRLs Regulated Under the Pest Control Products Act, 8 May 2009, Pest Management Regulatory Agency, Health Canada (www.hc-sc.gc.ca).
	Mangoes	0.1	
	Peppers (sweet)	1	
	Tomatoes	1	
Korea	Green and red pepper (fresh)	0.5	List of MRLs for Pesticides in Food, 7 November 2008, Korea Food and Drug Administration (www.kfda.go.kr).
	Sweet pepper	0.5	
	Tomato	1	
European Union	Eggplant	0.2	EU Pesticides Database, MRLs, Regulation (EC) No. 396/2005, 20 May 2009, Directorate-General for Health and Consumers, European Union (ec.europa.eu).
	Mango	0.05	
	Peppers (chilli peppers)	0.5	
	Tomatoes	0.2	
	Other solanacea	*0.02	
Brazil	Capsicum	1	Monografias de Produtos Agrotoxicos, 16 October 2008, Agencia Nacional de Vigilancia Sanitaria, Brazil (National Health Surveillance Agency, www.anvisa.go.br).
	Mango	0.1	
	Tomato	0.2	

No changes to dithiocarbamate MRLs are required as a result of this application. Therefore, no consideration of overseas or Codex MRLs is required for dithiocarbamates.

3.7 Current and proposed Australian MRLs for pyraclostrobin

Current MRLs

Table 1

Compound	Food		MRL (mg/kg)
Dithiocarbamates	MO 0105	Edible offal (mammalian)	2
	PE 0112	Eggs	*0.5
	VO 0050	Fruiting vegetables, other than cucurbits [except roselle]	3
	FI 0345	Mango	1
	MM 0095	Meat (mammalian)	*0.5
	ML 0106	Milks	*0.2
	SO 0698	Poppy seed	*0.2
	VR 0589	Potato	1

	PM 0110	Poultry meat	*0.5
	PO 0111	Poultry, edible offal of	*0.5
Pyraclostrobin	MO 0105	Edible offal (mammalian)	*0.05
	PE 0112	Eggs	*0.05
	MM 0095	Meat (mammalian) [in the fat]	*0.05
	ML 0106	Milks	*0.01
	VR 0589	Potato	*0.02
	PM 0110	Poultry meat [in the fat]	*0.05
	PO 0111	Poultry, edible offal of	*0.05

*MRL set at the limit of quantitation.

Table 4

Compound	Animal feed commodity	MRL (mg/kg)
Dithiocarbamates	Primary feed commodities	50

Proposed MRLs

Table 1

Compound	Food		MRL (mg/kg)
Pyraclostrobin	VO 0050	Fruiting vegetables, other than cucurbits	0.3
	FI 0345	Mango	0.1
	SO 0698	Poppy seed	*0.05

*MRL set at the limit of quantitation.

Table 4

Compound	Animal feed commodity	MRL (mg/kg)
Pyraclostrobin	Tomato pomace (dry)	5

3.8 Potential Risk to Trade

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

No changes to MRLs for metiram (dithiocarbamates) are required as a result of this application. Therefore, there is no increased risk to Australia overseas trade from metiram residues.

No changes are required to Australian MRLs for pyraclostrobin in potatoes, or animal commodities as a result of this application. There is therefore no increased risk to Australian exports of potatoes, meat, dairy products or poultry products from pyraclostrobin residues.

A new MRL at the limit of quantitation is proposed for pyraclostrobin in poppy seeds. Detectable residues of pyraclostrobin are not expected to be found in poppy seeds when crops are treated in accordance with the proposed label instructions. There is therefore no increased risk to Australian exports of poppy seeds as result of pyraclostrobin residues.

Finite MRLs are proposed for pyraclostrobin in mangoes and fruiting vegetables other than cucurbits.

The proposed limit for mangoes (0.1 mg/kg) is higher than the current Codex MRL for pyraclostrobin in mangoes, and is also higher than the EU MRL (both 0.05 mg/kg). Other international MRLs for pyraclostrobin in mangoes are established in Brazil and Canada (both 0.1 mg/kg), and in the USA (0.6 mg/kg). There is therefore some potential for risk to Australian mango exports.

The proposed limit for fruiting vegetables other than cucurbits (0.3 mg/kg) is lower than or equal to existing Codex limits, and MRLs established in the USA, Canada, Korea, and Japan. It is noted that existing European Union and Brazilian limits are

lower than the proposed Australian tolerance. However, exports of Australian tomatoes and capsicum to Europe and Brazil are insignificant. Most exports of tomatoes and capsicums from Australia are destined for New Zealand. Although New Zealand does not have MRLs for pyraclostrobin in tomatoes or capsicum, they accept Australian MRLs under the Trans Tasman Mutual Recognition Agreement. There is therefore a low potential for risk to Australian exports of tomatoes, capsicum and eggplant.

Comment is sought on the likelihood of the changes in use for NUFARM AERO FUNGICIDE, particularly the new uses in mangoes and fruiting vegetables other than cucurbits, to cause undue prejudice to trade.

4 CONCLUSION

No changes to MRLs for metiram (dithiocarbamates) are required as a result of this application. Therefore, there is no increased risk to Australia overseas trade from metiram residues.

No changes are required to Australian MRLs for pyraclostrobin in potatoes, or animal commodities as a result of this application. There is therefore no increased risk to Australian exports of potatoes, meat, dairy products or poultry products from pyraclostrobin residues.

A new MRL at the limit of quantitation is proposed for pyraclostrobin in poppy seeds. Detectable residues of pyraclostrobin are not expected to be found in poppy seeds when crops are treated in accordance with the proposed label instructions. There is therefore no increased risk to Australian exports of poppy seeds as result of pyraclostrobin residues.

Residues of pyraclostrobin may be detectable in mangoes, tomatoes, eggplant, capsicum and chilli peppers, however these are not generally regarded as major trade commodities.

Comment is sought on the potential for pyraclostrobin in NUFARM AERO FUNGICIDE to prejudice Australian trade when it is used to treat various fungal diseases on mangoes, tomatoes, eggplant, capsicum and chilli peppers.

A more detailed technical assessment report on the evaluation of the trade implications of this chemical can be obtained by contacting the APVMA at [to be arranged] 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