



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



TRADE ADVICE NOTICE

on Spinetoram in the product Success Neo Insecticide

APVMA Product Number 64109/101239

DECEMBER 2015

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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 Regulatory 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 regarding the proposed registration of Success Neo Insecticide. 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 5 February 2016 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:

Scientific Assessment and Chemical Review
Residues and Trade
Australian Pesticides and Veterinary Medicines Authority
PO Box 6182
Symonston ACT 2609

Phone: +61 2 6210 4701

Email: enquiries@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 Dow Agrosiences Australia Ltd to vary the registration of Success Neo Insecticide, a product containing spinetoram, to add use in cotton, sorghum and pulses, and to vary the use instructions for forage brassicas.

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

2 TRADE CONSIDERATIONS

2.1 Commodities exported

Cotton, pulses and sorghum, are considered to be major export commodities², as are commodities of animal origin, such as meat, offal and dairy products, which may be derived from livestock fed feeds produced from treated cotton, pulse, sorghum and forage brassica crops.

2.2 Destination and value of exports

In 2012–13, total pulse exports were 2,226 kilotonnes, valued at \$1.19 billion, with the most significant export commodities being chickpeas (852 kt, \$533 m), lupins (416 kt, \$143 m) and field peas (208 kt, \$89 m)³.

In 2013–14, exports of sorghum totalled 701 kt and were valued at \$253 m. Major export markets for Australian sorghum were China, Japan, Taiwan and New Zealand³.

In 2013–14, exports of cottonseed totalled 464 kt, together with 3 kt cottonseed oil, and 36 kt cottonseed meal. Major export markets for Australian cottonseed in 2013–14 were Korea, Japan, the USA and Saudi Arabia. Major export markets for cottonseed meal were Korea and New Zealand³.

Australian dairy product exports in 2013–14 totalled 1025 kt at a value of \$2.7 billion⁹. Major export markets for Australian dairy products in 2013–14 included Japan, China, Indonesia, Russia, Singapore, Malaysia and Thailand.

The significant export markets for meat are defined in Part 5B of the Data Guidelines.

² apvma.gov.au/node/vol_3/1017

³ Agricultural Commodity Statistics 2014, Australian Bureau of Agricultural and Resource Economics and Sciences, December 2014

2.3 Proposed Australian use-pattern

TABLE 1: PROPOSED NEW USE PATTERNS FOR SUCCESS NEO INSECTICIDE (120 G/L SPINETORAM)

RESTRAINTS DO NOT apply more than 3 applications to any Cotton crop in any one season. DO NOT apply more than twice to each of the following crops in any one season: Chickpea & other pulses, Soybean and Sorghum. Product can be applied either twice to the crop during flowering or once at flowering and once up to 14 days before harvest.			
CROP	PEST	RATE	CRITICAL COMMENTS
Carefully monitor crops for eggs and larvae of pest species by regular field scouting. Target sprays against mature eggs and newly-hatched larvae when numbers exceed spray threshold. Apply repeat applications at 7– 14 day intervals as new infestations occur or as specified under Critical Comments.			
Chickpeas	Heliothis (<i>Helicoverpa</i> spp.)	150–200 mL/ha (18– 24 g ai/ha)	Use the low rate against light infestations of newly emerged larvae and higher rates when infestation is heavy and/or larvae are more advanced. Note: Entrenched larvae, or those not actively feeding, will not be controlled.
Cotton	Bollworm (<i>Helicoverpa armigera</i>) Native budworm (<i>Helicoverpa punctigera</i>)	300–400 mL/ha (36–48 g ai/ha)	Use the low rate against light infestations and higher rates when infestation is heavy (see Guidelines below). Carefully monitor eggs and larvae of <i>Helicoverpa</i> species by regular field scouting. Target sprays against brown eggs and newly hatched very small larvae. Guidelines: Light infestation: Use 300 mL/ha when infestation of <i>Helicoverpa</i> species is less than 10 eggs and 2 larvae/m of row. Heavy infestation: Use 400 mL/ha when infestation of <i>Helicoverpa</i> species exceeds 10 eggs and/or 2 larvae per metre of row. Note: Larvae larger than 8mm in length, and larvae feeding within bolls and squares may not be controlled.
	Western flower thrip (<i>Frankliniella occidentalis</i>)	400 mL/ha + wetter (48 g ai/ha)	Use this product as part of the WFT Resistance Management strategy (see end of table for details).

CROP	PEST	RATE	CRITICAL COMMENTS
Pulses (food crops only) (including but not limited to adzuki beans, cowpeas, faba beans, field peas, lentils, lupins, kidney beans, mungbeans and navy beans) Sorghum Soybean	Heliothis (Helicoverpa spp.) Loopers (Chrysodeixis spp.) Soybean looper (Thysanoplusia orichalcea)	200–300 mL/ha (24–36 g ai/ha)	Use the low rate against light infestations and higher rates when infestation is heavy (see Guidelines below). Carefully monitor eggs and larvae of pests by regular field scouting. To achieve best results target sprays against brown eggs and newly hatched, very small larvae. Light infestation: Use 200 mL/ha when infestation of Helicoverpa species is less than 10 eggs and 2 larvae/m of row (pulse crops) or less than 2 larvae per head (sorghum). Heavy infestation: Use 300 mL/ha when infestation of Helicoverpa species exceeds 10 eggs and/or 2 larvae per metre of row (pulse crops) or 2 larvae per head (sorghum). For Southern Australia: If determining insect thresholds by sweep netting, follow the recommendations of your local Department of Agriculture or equivalent advice. Note: Entrenched larvae, or those not actively feeding, will not be controlled.

FORAGE BRASSICAS AND CANOLA:			
<p>RESTRAINTS DO NOT make more than 2 applications to any forage brassicas or canola crops in any one season (see the RESISTANCE statement).</p>			
CROP	PEST	RATE	CRITICAL COMMENTS
<p>ALL FORAGE BRASSICA AND CANOLA CROPS: Carefully monitor crops for eggs and larvae of pest species by regular field scouting. Target sprays against mature eggs and newly-hatched larvae when numbers exceed local spray threshold. Any subsequent sprays to control insects in that crop should be made with a product from a different chemical group.</p>			
Forage Brassicas including choumoellier, kale, fodder rape, swedes, turnips.	Diamondback moth (cabbage moth) Cabbage white butterfly Cabbage cluster caterpillar Centre grub Corn earworm (heliethis) Native budworm Soybean looper	100 mL (12 g i/ha) + Uptake spraying oil 100 mL/ha or a wetting agent	Apply with Uptake spraying oil or with a non-ionic wetting agent at the manufacturer's recommended rate. Apply in a minimum of 50 L/ha water. This treatment will provide knockdown of light infestations of early instar larvae in crops where good spray coverage has been attained. Larvae that are entrenched (hidden in leaves, stems, bulbs or heads) may not be controlled
Canola	Diamondback moth (cabbage moth) Cabbage cluster caterpillar Cabbage white butterfly Centre grub Corn earworm (heliethis) Native budworm	150 mL (18 g i/ha) + Uptake spraying oil at 100 mL/ha or another non-ionic a wetting agent	Success Neo can be applied once at any time up to 14 days before harvest (windrowing). If initially applied at any time up to early pod formation, then a second application can be made from 7 days after the 1st application or at any time up to 14 days before harvest. If not using Uptake, apply with a non-ionic wetting agent at the manufacturer's recommended rate. Apply in a minimum of 50 L/ha water by ground or 30 L/ha by air. Larvae that are entrenched (hidden in leaves, stems or pods) will not be controlled.

HARVESTING WITHHOLDING PERIODS

Cotton: **DO NOT HARVEST FOR 28 DAYS AFTER APPLICATION.**

Chickpeas, Other Pulses, Soybeans & Sorghum: **DO NOT HARVEST FOR 14 DAYS AFTER THE LAST APPLICATION.**

GRAZING AND STOCKFOOD WITHHOLDING PERIOD (WHP)

Forage Brassicas: **DO NOT GRAZE OR CUT FOR STOCK FOOD FOR 7 DAYS AFTER APPLICATION**

Cotton: **DO NOT ALLOW LIVESTOCK TO GRAZE TREATED COTTON CROP, STUBBLE OR GIN TRASH.**

Pulses and legume vegetables: **DO NOT GRAZE OR CUT FOR STOCK FOOD FOR 14 DAYS AFTER APPLICATION. DO NOT FEED OR ALLOW LACTATING DAIRY ANIMALS PRODUCING MILK FOR HUMAN CONSUMPTION TO GRAZE TREATED PULSE OR LEGUME VEGETABLE FORAGE. TREATED PULSE OR LEGUME FODDER (I.E. HAY OR STRAW) MAY BE FED TO LACTATING DAIRY ANIMALS, IN WHICH CASE THE 14 DAY GRAZING WITHHOLDING PERIOD MUST BE OBSERVED.**

CROPS FOR EXPORT: Some crops for export to particular destinations outside of Australia may require a longer interval before harvest to comply with the residue standards of importing countries. Please check with your exporter.

The grazing withholding periods above apply specifically to stock slaughtered for the domestic market. Export markets may apply different standards. To ensure compliance with residue standards in export markets, comply with the above grazing withholding periods and ensure that the **Export Slaughter Interval (ESI)** is observed before stock are sold or slaughtered.

Export Slaughter Interval:

Canola and sorghum: **28 days**

Forage brassicas: **35 days**

Chickpeas, other pulses, soybeans, legume vegetables (including beans, peas, snow peas and sugar snap peas): **42 days**

Forage and fodder of sweet corn: **56 days**

This means that livestock that have grazed on or were fed treated crops should be placed on clean feed for at least the periods stated above prior to slaughter, except in the case of forage brassicas which can be fed to livestock 28 days after last treatment, without observance of the ESI.

Export Animal Feed Interval (EAFI) For Forage Brassicas:

For situations where a grazing WHP and ESI are not practical after application to forage brassicas, the following EAFI can be observed:

Do not graze or cut treated forage brassicas for 28 days (4 weeks) after application of the chemical product for stock feed for animals intended to be slaughtered for export.

2.4 Results from residues trials considered by the APVMA

Given the close structural similarity of spinetoram and spinosad and their similar residues behaviour, residue data for spinosad in pulse, cotton and sorghum crops was considered as part of the residue evaluation. This approach has been used for previous evaluations of spinetoram⁴.

Pulses

The proposed GAP for spinetoram in pulse crops is 2 × 36 g ai/ha applications with a harvest and grazing withholding period of 14 days.

Residues of spinosad in pulse seed at 14–15 days after 2 applications at 48 g ai/ha (1.33× the proposed rate for spinetoram) were <0.01 (8) mg/kg.

Residues of spinosad in pulse seed at 14–15 days after 2 applications at 96 g ai/ha (2.67× the proposed rate for spinetoram) were <0.01 (7), and 0.02 mg/kg.

An MRL of 0.01 mg/kg is supported for spinetoram in pulses.

Sorghum

The proposed GAP for spinetoram in sorghum is 2 × 36 g ai/ha applications with a harvest and grazing withholding period of 14 days (with no grazing or feeding of sorghum crops by livestock producing milk for human consumption).

The combined spinosad residue data, scaled for the proposed application rate for spinetoram in sorghum, gives the following data set: <0.01 (3), 0.011, 0.015, 0.023, 0.03, 0.049, 0.053, and 0.064 mg/kg.

An MRL of 0.2 mg/kg is proposed for spinetoram in sorghum, in conjunction with a 14-day harvest withholding period.

Cotton

The proposed GAP for spinetoram in cotton is 3 × 48 g ai/ha foliar applications, with a harvest withholding period of 28 days, and no grazing or feeding of treated cotton crops to livestock.

The combined data set for spinosad in cottonseed for the USA and Australia (3–5 × 75–200 g ai/ha applications, 28-day harvest withholding period) is <0.01 (21) mg/kg.

⁴ Registration of Delegate Insecticide (61717/41430), and registration of Success Neo Insecticide (64109/47522).

An MRL of *0.01 mg/kg is supported for spinetoram in cottonseed.

Animal feeds

Pulse forage and fodder

The combined dataset for spinosad in pulse forage at the proposed 14–day grazing withholding period, scaled for the proposed application rate of spinetoram, is <0.01 (5), 0.015, 0.022 (3), 0.037, 0.041, 0.045, 0.052, 0.06 (2), 0.068, 0.11, 0.16, 0.18, 0.24, 0.28, and 0.34 mg/kg.

The combined and scaled dataset for spinosad in pulse straw/fodder at 14 days is <0.01 (4), 0.015 (3), 0.026, 0.060, 0.075, and 0.14 (2) mg/kg.

Residues of spinetoram in pulse forage or fodder at a 14–day grazing withholding period after 2 × 36 g ai/ha applications are therefore not expected to exceed the established MRL of 1 mg/kg for legume animal feeds.

Sorghum forage and fodder

The combined and scaled forage and fodder data sets for spinosad in sorghum at the proposed 14–day grazing withholding period is <0.01 (6), 0.037, 0.045 (2), 0.060 (2), 0.067, 0.068, 0.075, and 0.12 (2) mg/kg.

MRLs of 0.2 mg/kg are proposed for spinetoram in sorghum forage and sorghum fodder.

Forage brassicas

The GAP for spinetoram in forage brassicas is 2 × 12 g ai/ha applications, with a 7-day grazing withholding period and a 28–day export slaughter interval. The applicant has proposed a 28-day export animal feed interval.

At the 7–day withholding period for forage brassica crops, residues of spinetoram (sum of spinosyn-J and spinosyn-L) after 2 applications at 12 or 18 g ai/ha (1× or 1.5× GAP) on a dry weight basis were <0.003, 0.06, 0.08 (2), 0.09, 0.11 (2), 0.12, 0.16, and 0.26 mg/kg.

Based on this dataset, it is proposed to replace the current limit of 0.2 mg/kg for forage brassicas (green) with a limit of 0.5 mg/kg for brassica forage crops.

At a 28–day interval, residues of spinetoram were <0.003 (10) mg/kg, i.e. below the limit of detection. A 28–day export animal feed interval is therefore supported.

Animal commodities

Based on the dietary burden calculations for beef cattle taking account of all feeds potentially containing spinetoram residues and a lactating cattle feeding study submitted with the original application for spinetoram (61717/41430), the calculated HR values for liver, kidney, muscle, and fat are 0.16, 0.12, 0.04, and 1.1 mg/kg. Therefore, the current MRLs of 0.2 mg/kg for edible offal (mammalian) and 2 mg/kg for meat (mammalian) [in the fat] remain appropriate.

Export slaughter intervals of 28 days for animals fed treated sorghum forage/fodder, 35 days for forage brassica crops, and 42 days for pulse or legume vegetable forage/fodder, are sufficient to ensure that residues of spinetoram in muscle, fat and offal will be <LOQ.

For dairy animals (accounting for the current label restriction on feeding sweetcorn forage and fodder to dairy animals, as well as a similar proposed restriction on pulse and legume vegetables forage), the calculated HR values based on the cattle feeding study are 0.008 mg/kg for milk and 0.10 mg/kg for milk fats. It is proposed to remove the LOQ designation from the current MRL of *0.01 mg/kg for milks, and to increase the milk fats MRL to 0.2 mg/kg. The calculated residues of spinetoram in milk and milk fats are shown in Table 2 below for the 'worst case' diet, as well as individual feeds containing spinetoram.

TABLE 2: CALCULATED RESIDUES OF SPINETORAM IN MILK AND MILK FATS

DIET ⁵	SPINETORAM FEEDING LEVEL (ppm)	HIGHEST RESIDUE (mg/kg)		
		WHOLE MILK	CREAM	MILK FAT
Worst case (50% pulse hay + 40% brassica forage + 10% sweetcorn cannery waste)	0.243	0.008	0.041	0.10
70% sorghum forage	0.084	0.003	0.015	0.037
40% brassica forage	0.10	0.004	0.017	0.045
70% pulse hay	0.098	0.004	0.0017	0.045

Residues in poultry commodities are not expected to exceed the current MRLs for spinetoram, which are established at the limit of quantitation.

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. The following relevant Codex and overseas country MRLs have been established for spinetoram.

⁵ OECD Feed Tables (see Annex 4 of *Guidance Document on Overview of Residue Chemistry Studies*, OECD, 28 July 2009)

TABLE 3: RELEVANT CODEX AND OVERSEAS COUNTRY MRLS FOR SPINETORAM

COMMODITY	TOLERANCE FOR RESIDUES ARISING FROM THE USE OF SPINETORAM (mg/kg)						
	AUSTRALIA	EU ⁶	JAPAN ⁷	CODEX ⁸	TAIWAN ⁹	CANADA ¹⁰	USA ¹¹
Residue Definition	Sum of spinosyn-J and spinosyn-L (spinetoram)	Spinetoram	Spinetoram	For compliance with MRL: spinetoram	Spinetoram	Spinosyn-J, spinosyn-L, N-demethyl spinosyn-J and N-formyl spinosyn-J	Spinosyn-J, spinosyn-L, N-demethyl spinosyn-J and N-formyl spinosyn-J
Edible offal (mammalian)	0.2 (no change)	*0.01	0.01	0.01*	-	Cattle, sheep, horse, goat 0.85 (liver) 0.6 (other than liver) Pig 0.04	Cattle, sheep, horse, goat 0.85 (liver) 0.6 (other than liver) Pig 0.04
Meat (mammalian)	2 (in the fat, no change)	0.2 (muscle) *0.01 (fat)	0.01 (muscle) 0.2 (fat)	0.2	-	Cattle, sheep, horse, goat 0.2 (meat) 5.5 (fat)	Cattle, sheep, horse, goat 0.2 (meat) 5.5 (fat)

⁶ ec.europa.eu

⁷ www.m5.ws001.squarestart.ne.jp

⁸ www.codexalimentarius.net

⁹ www.fda.gov.tw

¹⁰ www.hc-sc.gc.ca

¹¹ www.ecfr.gov

COMMODITY	TOLERANCE FOR RESIDUES ARISING FROM THE USE OF SPINETORAM (mg/kg)						
	AUSTRALIA	EU ⁶	JAPAN ⁷	CODEX ⁸	TAIWAN ⁹	CANADA ¹⁰	USA ¹¹
						Pig 0.04 (meat) 0.04 (fat)	Pig 0.04 (meat) 0.4 (fat)
Milks	0.01 (proposed removal of LOQ designation)	0.01*	0.01	0.01*	-	0.3	0.3
Milk fats	0.2 (proposed)	-	-	0.1	-	7.5	7.5
Pulses	0.01 (proposed)	-	-	-	-	-	-
Pea and bean, dried shelled, except soybean	-	0.05*	0.1	-	0.05	0.04	0.04
Soybean seed	-	0.05*	0.1	-	0.05	0.04	0.04
Sorghum	0.2 (proposed)	0.05*	-	-	-	-	1
Cottonseed	*0.01 (proposed)	0.05*	-	-	-	-	0.04
Other agricultural products	-	-	-	-	-	-	-

2.6 Current and proposed Australian MRLs for spinetoram

The MRL standard contains the following relevant entries:

A full listing of MRLs can be found at apvma.gov.au/node/10806.

TABLE 4: CURRENT ENTRIES IN THE MRL STANDARD
MRL STANDARD: TABLE 1

COMPOUND	FOOD	MRL (mg/kg)
Spinetoram		
MO 0105	Edible offal (Mammalian)	0.2
PE0112	Eggs	*0.01
VP0060	Legume vegetables	0.2
MM 0095	Meat (mammalian) [in the fat]	2
ML0106	Milks	*0.01
FM 0183	Milk fats	0.03
PO 0111	Poultry, edible offal of	*0.01
PM 0110	Poultry meat [in the fat]	*0.01
SO 0495	Rape seed [Canola]	*0.01
Spinosad		
GC 0080	Cereal grains	1
SO 0691	Cotton seed	*0.01
VD0070	Pulses	0.01

MRL STANDARD: TABLE 3

COMPOUND	RESIDUE
Spinetoram	Sum of Ethyl-spinosyn-J and Ethyl-spinosyn-L
Spinosad	Sum of spinosyn A and spinosyn D

MRL STANDARD: TABLE 4

COMPOUND	ANIMAL FEED COMMODITY	MRL (mg/kg)
Spinetoram	Canola forage and fodder	0.1
	Forage brassicas (green)	0.2
AL 0157	Legume animal feeds	1
Spinosad	Cotton seed byproducts	*0.01
	Sorghum forage (green)	0.5
AS0651	Sorghum straw, fodder and forage (dry)	0.5

The following changes are proposed to Australian MRL standard:

TABLE 5: PROPOSED CHANGES TO THE MRL STANDARD—TABLE 1
MRL STANDARD: TABLE 1

COMPOUND	FOOD	MRL (mg/kg)
Spinetoram		
DELETE:		
FM 0183	Milk fats	0.03
ML0106	Milks	*0.01
ADD:		
SO 0691	Cottonseed	*0.01
FM 0183	Milk fats	0.2
ML0106	Milks	0.01
VD0070	Pulses	0.01
GC 0651	Sorghum	0.2

TABLE 6: PROPOSED CHANGES TO THE MRL STANDARD—TABLE 4
MRL STANDARD: TABLE 4

COMPOUND	ANIMAL FEED COMMODITY	MRL (mg/kg)
Spinetoram		
DELETE:		
	Forage brassicas (green)	0.2
ADD:		
	Brassica forage crops	0.5
AF 0651	Sorghum forage (green)	0.2
AS0651	Sorghum straw and fodder (dry)	0.2

2.7 Potential risk to trade

Export of treated produce containing finite (measurable) residues of spinetoram 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 risk to exports of pulses and cottonseed are expected to be relatively low, as residues of spinetoram are expected to be below the limit of quantitation, and MRLs of 0.01 and *0.01 mg/kg are proposed.

There are potential risks to trade in sorghum, as the major export destinations China, Taiwan and Japan do not appear to have relevant standards established. New Zealand, another major export destination, accepts Australian MRLs under the Trans Tasman Mutual Recognition Agreement.

No changes are proposed to spinetoram MRLs for meat or offal.

It is proposed to change the milks MRL by removing the LOQ designation, while for milk fats, it is proposed to increase the MRL to 0.2 mg/kg. However, it is noted that the highest residue for spinetoram in milk fats after accounting for all feeds containing spinetoram residues is 0.10 mg/kg (the same level as the Codex MRL), while after feeding of individual feed items containing spinetoram residues, levels in milk fats are not expected to exceed 0.037 mg/kg for sorghum forage, or 0.045 mg/kg for pulse hay or brassica forage. It is further noted that the MRLs for milk fats in the USA and Canada are significantly higher, at 7.5 mg/kg. For the European Union and Japan, where only whole milk MRLs are established at 0.01 mg/kg, it is likely that residues in Australian milk fats, after conversion to whole milk equivalents, would be less than 0.01 mg/kg. MRLs for spinetoram in milks and milk fats are not established in China or Russia.

The proposed export animal feed interval of 28 days for forage brassica crops will ensure residues in in fat, muscle and offal of animals grazing treated crops are <LOQ, and will provide an additional tool for managing the risk to trade in export meat and offal. The proposed export slaughter intervals of 28 days for sorghum, and 35 days for forage brassicas and pulses will likewise ensure residues of spinetoram in meat and offal are <LOQ.

3 CONCLUSIONS

Dow Agrosiences Australia Ltd has made an application to vary the registration of *Success Neo Insecticide* containing 120 g/L spinetoram as the active constituent to add use on sorghum, pulses and cotton, and to amend the use in forage brassicas to add an export animal feed interval.

Comment is sought on the potential risk to trade for the proposed new use of spinetoram in pulses, sorghum and cotton, particularly in relation to residues in sorghum and dairy products, and the ability of industry systems to manage any identified risk.