Australian Government

Australian Pesticides and Veterinary Medicines Authority

TRADE ADVICE NOTICE

on azoxystrobin and cyproconazole in the product Titan Azoxystrobin Extra Fungicide for use on chickpeas and lentils

APVMA product number 69204

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This publication is available from the APVMA website: www.apvma.gov.au.

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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, Department of the Environment and Energy, 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 regulatory guidance published on the APVMA website.

About this document

This is a Trade Advice Notice.

It indicates that the 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 Titan Azoxystrobin Extra Fungicide should 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. These grounds relate to the **trade implications** of the extended use of the product. Submissions should state the grounds on which they are based. Comments received outside these grounds cannot be considered by the APVMA.

Submissions must be received by the APVMA by close of business on 19 December 2018 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:

Residues and Trade
Scientific Assessment and Chemical Review
Australian Pesticides and Veterinary Medicines Authority
PO Box 6182
Kingston ACT 2604

Phone: +61 2 6210 4701
Email: enquiries@apvma.gov.au

Further information

Further information can be obtained via the contact details provided above.

Further information on public release summaries can be found on the APVMA website: 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 Titan AG Pty Ltd, to vary the registration of Titan Azoxystrobin Extra Fungicide to add uses on chickpeas and lentils. A similar use of azoxystrobin and cyproconazole has previously been approved under Minor Use permits with a 4 week harvest withholding period.

2 TRADE CONSIDERATIONS

2.1 Commodities exported

Chickpeas (but not lentils) are considered to be a major export commodity[2], as are commodities of animal origin, such as meat, offal and dairy products, which may be derived from livestock fed feeds produced from treated chickpeas and lentils. Residues in these commodities resulting from the use of *Titan Azoxystrobin Extra Fungicide* may have the potential to unduly prejudice trade.

No changes are required to the current animal commodity MRLs for azoxystrobin and cyproconazole. An ESI similar to that on the current label for other forage crops will apply to chickpea and lentil forage and fodder and ensure the risk to trade in animal commodities is low and does not require further consideration.

2.2 Destination and value of exports

Australian exports of chickpeas in 2016–17 were 1,970 kt valued at $1,920 million (Agricultural Commodity Statistics, ABARES 2017). Major markets are Bangladesh, India, Pakistan, United Arab Emirates and the United Kingdom.

[2] APVMA Regulatory Guidelines – Data Guidelines: Agricultural - Overseas trade (Part 5B)

2.3 Proposed Australian use-pattern

TITAN AZOXYSTROBIN EXTRA FUNGICIDE (200 G/L AZOXYSTROBIN, 80 G/L CYPROCONAZOLE)

CROP	PEST	RATE	CRITICAL COMMENTS
Chickpeas, Lentils	Ascochyta Blight (Ascochyta rabiei) and Ascochyta lentis	400 mL/ha (80 g azoxystrobin/ha + 32 g cyproconazole/ha)	Use only when preventative measures fail to maintain acceptable levels of control. Apply a maximum of two (2) applications per season with a minimum re-treatment interval of 7 to 14 days. Add a non-ionic surfactant at the recommended label rate.

Withholding periods:
Harvest: Do not harvest for 7 weeks after application.
Grazing: Do not graze or cut for livestock for 28 days after application.

Export Slaughter Intervals:
Chickpeas and lentils: Livestock that have been grazing on fed treated crops should be placed on clean feed for 7 days prior to slaughter.

2.4 Results from residues trials presented to the APVMA

Five GLP Australian trials on chickpeas are available for consideration, four of the trials sampled grain and stubble.

Grain

At 37–56 days after the last application at 1× the proposed rate, residues of azoxystrobin in chickpea grain were <0.005, 0.014, 0.019 and 0.021 mg/kg. The OECD MRL calculator recommends an MRL of 0.05 mg/kg. It is noted that an MRL of 0.3 mg/kg has been recently supported for azoxystrobin on pulses for product 82348 which will cover the proposed use on chickpeas and lentils.

At 37–56 days after the last application at 1× the proposed rate, residues of cyproconazole in chickpea grain were <0.005 (2), <0.01 and 0.013 mg/kg. The OECD MRL calculator recommends an MRL of 0.03 mg/kg. A 7 week harvest withholding period would be appropriate in conjunction with this MRL.

It is noted that extrapolation from the 5 available chickpea trials to lentils is considered acceptable for this use pattern noting both crops are in the same Codex commodity subgroup (014B, Dry peas).

Forage

Residues of azoxystrobin in chickpea forage at 27–29 days after the last application at 1× the proposed rate were 0.21, 1.1, 1.3, 2.9 and 4.5 mg/kg on a dry weight basis. The OECD MRL calculator recommends an MRL of 9 mg/kg. No changes are required to the current MRL of 50 mg/kg for azoxystrobin on AL 0157 Legume animal feeds in conjunction with a 28 day grazing WHP.

Residues of cyproconazole in chickpea forage at 27–29 days after the last application at 1× the proposed rate were 0.12, 0.16, 0.34, 0.54 and 1.2 mg/kg dry weight. The OECD MRL calculator recommends an MRL of 3 mg/kg. Noting that all the cyproconazole pulse permits have expired, the current MRL of T5 mg/kg for cyproconazole on Pulse forage and fodder can be replaced with a permanent MRL of 3 mg/kg in conjunction with a 28 day grazing withholding period.

Stubble

Residues of azoxystrobin in chickpea straw at harvest 37–56 days after the last application at 1× the proposed rate were 0.08, 0.30, 0.43 and 0.77 mg/kg on a dry weight basis. The OECD MRL calculator recommends an MRL of 1.5 mg/kg. No changes are required to the current MRL of 50 mg/kg for azoxystrobin on AL 0157 Legume animal feeds in conjunction with a 7 week harvest withholding period.

Residues of cyproconazole in chickpea straw at harvest 37–56 days after the last application at 1× the proposed rate were 0.04, 0.06, 0.08 and 0.25 mg/kg on a dry weight basis. The OECD MRL calculator recommends an MRL of 0.5 mg/kg. Residues of cyproconazole in chickpea and lentil straw after a 7 week harvest withholding period would be covered by the MRL of 3 mg/kg recommended above for cyproconazole on Pulse forage and fodder.

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. Azoxystrobin and cyproconazole have been considered by Codex. The following relevant Codex CXLs and overseas MRLs have been established for azoxystrobin and cyproconazole:

Table 1 Current and proposed Australian and overseas MRLs/tolerances for azoxystrobin

COMMODITY	TOLERANCE FOR RESIDUES ARISING FROM THE USE OF AZOXYSTROBIN (mg/kg)					
	AUSTRALIA	EU	JAPAN	TAIWAN	CODEX	USA
Residue Definition	Azoxystrobin	Azoxystrobin	Azoxystrobin	-	Azoxystrobin	Azoxystrobin
Chickpeas	T0.5 (current) 0.3 (pulses - proposed*)	0.15 (pulses)	0.5 (other legumes/pulses	0.5	0.07 (pulses, except soya beans))	0.5 (Pea and bean, dried shelled, except soybean, subgroup 6C)
Lentils	T0.5 (current) 0.3 (pulses - proposed*)	0.15	0.5 (other legumes/pulses	-	0.07 (pulses except soya beans)	-

*An azoxystrobin MRL for pulses at 0.3 mg/kg has recently been supported for product 82348; Azoxystrobin MRLs for pulses (other than soy bean) are not established in Korea

Table 2 Current and proposed Australian and overseas MRLs/tolerances for cyproconazole

COMMODITY	TOLERANCE FOR RESIDUES ARISING FROM THE USE OF CYPROCONAZOLE (mg/kg)					
	AUSTRALIA	EU	JAPAN	TAIWAN	CODEX	USA
Residue Definition	Cyproconazole, sum of isomers	Cyproconazole	Sum of isomers of cyproconazole	-	Cyproconazole	Cyproconazole*
Chickpeas	0.03 (proposed)	0.08 (pulses)	-	-	0.02 (peas (dry))	-
Lentils	0.03 (proposed)	0.08	-	-	-	-

Cyproconazole MRLs for pulses (other than soy bean) are not established in Korea. It is noted that in Japan and Taiwan MRLs for peas are established at 0.05 and 0.01 mg/kg respectively.

2.6 Current and proposed Australian MRLs for Azoxystrobin and Cyproconazole

Table 3: Current MRL Standard—Table1

Table 1

COMPOUND		FOOD	MRL (mg/kg)
Azoxystrobin			
VD	0524	Chick-pea (dry)	T0.5
MO	0105	Edible offal (Mammalian)	0.03
PE	0112	Eggs	*0.01
VD	0533	Lentil (dry)	T0.5
MM	0095	Meat (mammalian) [in the fat]	0.02
ML	0106	Milks	0.005
PO	0111	Poultry, Edible offal of	*0.01
PM	0110	Poultry meat	*0.01
Cyproconazole			
MO	0105	Edible offal (Mammalian)	1
PE	0112	Eggs	*0.01
MM	0095	Meat [mammalian]	0.03
ML	0106	Milks	*0.01
PM	0110	Poultry meat	*0.01
PO	0111	Poultry, Edible offal of	*0.01
VD	0070	Pulses	T0.07

Table 4: Proposed MRL Standard—Table1

Table 1

COMPOUND		FOOD	MRL (mg/kg)
Cyproconazole			
DELETE:			
VD	0070	Pulses	T0.07
ADD:			
VD	0524	Chick-pea (dry)	0.03
VD	0533	Lentil (dry)	0.03

2.7 Potential risk to trade

Export of treated produce containing finite (measurable) residues of azoxystrobin and cyproconazole 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 have been proposed to the recently supported azoxystrobin MRL for pulses at 0.3 mg/kg. Cyproconazole MRLs for chickpeas and lentils are proposed at 0.03 mg/kg. The residue potential for the proposed use is less than has previously existed under permits which had a shorter withholding period (4 weeks) than proposed (7 weeks) and corresponding higher MRLs.

3 CONCLUSIONS

Titan AG Pty Ltd have made an application to vary the registration of Titan Azoxystrobin Extra Fungicide containing azoxystrobin and cyproconazole. Titan propose adding uses on chickpeas and lentils, which requires the establishment of permanent MRLs for azoxystrobin and cyproconazole on these commodities.

Comment is sought on the potential for Titan Azoxystrobin Extra Fungicide to prejudice Australian trade when used on chickpeas and lentils according to the proposed label directions.