



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



## TRADE ADVICE NOTICE

on imazamox and imazapyr for use on faba beans

Minor use permit PER86849

FEBRUARY 2019

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This publication is available from the APVMA website: [www.apvma.gov.au](http://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.

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 Australian Pesticides and Veterinary Medicines Authority is considering an application to vary the use of an existing registered agricultural or veterinary chemical by issuing a minor use permit. 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 minor use permit for the use of imazamox and imazapyr on imidazolinine tolerant faba beans to control annual broadleaf and grass weeds 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 **Tuesday 19 March 2019** 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)**<sup>1</sup> 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:** (02) 6210 4701

**Email:** [enquiries@apvma.gov.au](mailto: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](#).

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<sup>1</sup> A full definition of "confidential commercial information" is contained in the Agvet Code.

## 1 INTRODUCTION

The Australian Pesticides and Veterinary Medicines Authority has before it an application from Landmark Operations Limited for a minor use permit for the use of imazamox and imazapyr on imidazolinine tolerant faba beans to control annual broadleaf and grass weeds. The permit is proposed for all states for a period of five years. Plantings of imidazolinine tolerant faba beans are not anticipated to exceed 10,000 ha.

PER14726 (expiry 30 September 2019) allows for the use of imazamox on faba beans at 31.5 g ai/ha at the 3–6 node crop growth stage with a harvest WHP of 'Not Required when used as directed' and a grazing WHP of six weeks.

The use of imazapyr has not previously been assessed for use on faba beans or other pulses.

The livestock dietary burden of imazamox and imazapyr are not expected to increase as a result of the proposed use. No further consideration to the trade risk for animal commodities is required.

## 2 TRADE CONSIDERATIONS

### 2.1 Destination and value of exports

The total pulse exports (including faba beans) for 2014–15, 2015–16, 2016–17 and 2017–18 were 1729 kt (valued at \$1.2 billion), 2098 kt (valued at \$1.8 billion) 3833 kt (valued at \$3.1 billion) and 2694 kt (valued at \$1.9 billion) respectively. The main export markets for Australian pulses include Asia, North Africa, Middle East and the Indian sub-continent<sup>2</sup>.

The major export markets for faba beans are Egypt, Saudi Arabia and Indonesia. The total volume of pulse exports in the 2017–18 marketing year were 2,200,000 t which faba beans made up approximately 15 per cent (300,000 t).

### 2.2 Proposed Australian use-pattern

Table 3: Proposed use pattern

NUFARM INTERCEPT HERBICIDE (33 g/L IMAZAMOX AND 15 g/L IMAZAPYR)

CROP	PEST	RATE/CONCENTRATION	CRITICAL COMMENTS
Faba beans	Annual broadleaf and grass weeds	0.75 L/ha (11.25 imazapyr + 24.75 imazamox g ai/ha)	Foliar application via boom spray. Spray volume 100 L/ha. Maximum 1 application per crop. Apply early post emergent. Spray at 4–5 leaves unfolded growth stage of the crop. DO NOT apply after BBCH 15 of the crop. Apply to actively growing weeds in the 2 leaf to 6 leaf stage. Apply to grass weeds up to the 2 tiller stage.

Withholding periods:

Harvest: Not required when used as directed.

Grazing: Do not graze or cut for stock food for 28 days after application.

### 2.3 Results from residues trials presented to the APVMA

Details of four trials involving the application to both imazamox and imazapyr to imidazolinine tolerant faba beans have been provided to the APVMA in support of this minor use permit.

<sup>2</sup> <http://www.pulseaus.com.au/growing-pulses/publications/marketing-pulses>

Imazamox

Following one application at BBCH 14-15, at approximately 1 x the proposed rate (24.75 g ai/ha) imazamox residues in faba bean seed were <0.01 mg/kg (n=4). The current broad beans (dry) (faba beans) MRL of T\*0.05 mg/kg remains appropriate for the proposed use.

Imazapyr

Following one application at BBCH 14-15, at approximately 1 x the proposed rate (11.25 g ai/ha), imazapyr residues in faba bean seed were <0.01(3) and 0.02 mg/kg. Following one application at BBCH 14-15, at approximately 2 x the proposed rate (22.5 g ai/ha), imazapyr residues in faba bean seed were 0.013, 0.015, 0.016 and 0.058 mg/kg.

Based on the available information, a TMRL of 0.05 mg/kg is considered appropriate for broad bean (dry) (Faba bean (dry)) (VD 0523) for the proposed use pattern.

## 2.4 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. Imazamox and imazapyr has been considered by Codex. The following relevant Codex CXLs and overseas MRLs/tolerances have been established for imazamox and imazapyr.

### Current and proposed Australian and overseas MRLs/tolerances for imazamox

COMMODITY	TOLERANCE FOR RESIDUES ARISING FROM THE USE OF IMAZAMOX (MG/KG)				
	AUSTRALIA	EU	JAPAN	CODEX	USA
Residue definition	Imazamox	Sum of imazamox and its salts	MRLs for imazamox-ammonium include residues of imazamox-ammonium	Imazamox	Exempt from the requirement of a tolerance on all food commodities when applied as a herbicide in accordance with good agricultural practices.
Faba beans	T*0.05	-	-	-	-
Beans, dried	(T*0.05 mung bean (dry)) (*0.05 soya bean, dry)	-	0.1 (0.1 soyabeans, dried)	(*0.05 Beans (dry)) (*0.05 Beans, except broad bean and soya bean) (*0.01 soya bean (dry))	-

COMMODITY	TOLERANCE FOR RESIDUES ARISING FROM THE USE OF IMAZAMOX (MG/KG)				
	AUSTRALIA	EU	JAPAN	CODEX	USA
Pulses	-	(*0.05 beans, peas and lupins) (0.2 lupins)	(0.05 other legume/pulses)	(0.2 lentil (dry))	

Current and proposed Australian and overseas MRLs/tolerances for imazapyr

COMMODITY	TOLERANCE FOR RESIDUES ARISING FROM THE USE OF IMAZAPYR (MG/KG)				
	AUSTRALIA	EU	JAPAN	CODEX	USA
Residue definition	Imazapyr	Imazapyr	Imazapyr	Imazapyr	Imazapyr
Faba beans	T0.05 (proposed)	-	-	-	-
Beans, dried		-	0.3	-	-
Pulses		(0.3 lentils)	-	(0.3 lentil (dry))	(0.2 lentils, no current registrations)

No imazapyr MRLs for pulses have been established by the Republic of Korea.

## 2.5 Current and proposed Australian MRLs for imazamox and imazapyr

Table 5: Current MRL Standard—Table 1

COMPOUND	FOOD	MRL (MG/KG)
Imazamox		
VD 0560	Adzuki bean (dry)	T*0.05
<b>VD 0523</b>	<b>Broad beans (dry) (faba beans)</b>	<b>T*0.05</b>
VD 0561	Field pea, dry	*0.05
VD 0536	Mung bean (dry)	*T0.05
VD 0541	Soya bean, dry	*0.05

No imazapyr MRLs are currently established for faba beans or other pulses.

Table 6: Proposed MRL Standard—Table 1

COMPOUND	FOOD	MRL (MG/KG)
Imazapyr		

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COMPOUND	FOOD	MRL (MG/KG)
ADD		
VD 0523	Broad beans (dry) (faba beans)	T0.05

## 2.6 Potential risk to trade

Export of treated produce containing finite (measurable) residues of imazamox and imazapyr 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.

**Imazamox:** Residues of imazamox are not expected to arise in major trades commodities as a result of the proposed use and no change to the current MRL of T\*0.05 mg/kg is proposed.

**Imazapyr:** Appropriate standards for residues that may result from the proposed uses are not established in all major markets. No Codex<sup>3</sup> MRLs are established for imazapyr on faba beans. A finite MRL of T0.05 mg/kg is proposed noting the high residue in 4 trials of 0.02 mg/kg and the median residue of <0.01 mg/kg.

It is noted that the proposed use is for imidazolinine tolerant faba beans only and not all faba beans.

## 2.7 Conclusions

Prior to making a determination on issue of the permit discussed here the APVMA must be satisfied that the proposed use does not constitute an undue prejudice to trade.

Based on the low imazapyr residues observed in grain in the available trials (<0.01 (3) and 0.02 mg/kg), and noting the risk mitigation strategies adopted by the pulse industry in the past, we propose to determine that the risk to trade for the proposed use on imidazolinine tolerant faba beans is not undue, and is acceptable. Stakeholders are requested to provide comment on industry systems that can manage any potential risks to international trade associated with the proposed use.

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<sup>3</sup> <http://www.fao.org/fao-who-codexalimentarius/standards/pestres/search/en/>