



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



## **Trade Advice Notice**

on fluxapyroxad in the product Sercadis Fungicide for use on apples

APVMA product number 85638

DECEMBER 2019

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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 Trade Advice Notice 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 **Sercadis 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 **Monday 20 January 2020** 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)
- submission date.

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  
GPO Box 3262  
Sydney NSW 2001

**Phone:** +61 2 6770 2300

**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 APVMA has before it an application from BASF Australia Ltd to register the use of Sercadis Fungicide on apples. The product contains 300 g/L fluxapyroxad as its active ingredient.

## 2 TRADE CONSIDERATIONS

### 2.1 Commodities exported

Apples are considered to be major export commodities, as are commodities of animal origin, such as meat, offal and dairy products, which may be derived from livestock fed feeds produced from treated pome fruit. Residues in these commodities resulting from the use of Sercadis Fungicide may have the potential to unduly prejudice trade.

As the mammalian dietary burden through consumption of apple pomace derived from treated apples should be no greater than previously considered, and apples or apple pomace are not considered to be significant poultry feeds, no changes are required to the established animal commodity MRLs for fluxapyroxad. The risk to trade in animal commodities is unchanged and does not require further consideration.

### 2.2 Destination and value of exports

Australia typically exports between 2000–5000 tonnes of apples per year (Australian Horticulture Statistics Handbook 2017/18). For the year ending 2018, Australia exported 5060 tonnes. The main markets were Papua New Guinea, the United Kingdom, Italy, Sri Lanka and Hong Kong.

### 2.3 Proposed Australian use-pattern

Table 1: Proposed use pattern

Crop	Pest	Rate	Critical comments
Apple	Black spot or scab ( <i>Venturia inaequalis</i> )	20 mL/100L (= 6g a.i./100L)	Sercadis should be applied before disease is visible.
	Powdery mildew ( <i>Podosphaera leucotricha</i> )		Application may commence at green tips for black spot (scab), and at pink bud stage for powdery mildew control. Applications for alternaria may commence post-flowering/early fruit development.
	Alternaria leaf blotch ( <i>Alternaria mali</i> )		Apply at 7 to 10 days interval prior to petal fall and during periods of rapid growth. Later applications should be at 10 to 14 days interval, or according to prevailing weather conditions and disease incidence.
			Apply by dilute or concentrate spraying equipment. Apply the same total amount of product to the target crop whether applying this product by dilute or concentrate spraying methods.
			DO NOT use in equipment that requires concentrations greater than 5x concentration factor.
			Ensure thorough and even coverage of all plant parts. The use of Sercadis Fungicide is subject to the CropLife Australia Resistance Management Strategy.
			DO NOT apply more than three applications of Sercadis Fungicide per season.

Restraint: DO NOT apply by aircraft

Withholding periods:

Harvest: Nil

Grazing: DO NOT graze treated areas.

Export trade advice—treated crops: treated crop commodities destined for export may require extra time between application and harvest to be accepted in some export markets. Before you use this product, you are advised to contact BASF Australia Ltd and/or your industry body about any potential trade issues and their management.

## 2.4 Results from residues trials presented to the APVMA

The combined dataset of Australian (n=2), European (n=16) and USA (n=3) trials relevant to the proposed use 0 days after treatment are, in rank order:

0.03, 0.04, 0.06, 0.07, 0.09 (2), 0.1, 0.11 (2), 0.13 (2), 0.14, 0.17, 0.18 (2), 0.20, 0.22, 0.24, 0.30, 0.39 and 0.41 mg/kg (n = 21, STMR = 0.13 mg/kg). The values from the Australian trials were 0.22 and 0.30 mg/kg.

A fluxapyroxad MRL of 0.7 mg/kg for FP 0226 Apple is considered to be appropriate for the proposed use in conjunction with a harvest withholding period of “Nil”.

## 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. Fluxapyroxad has been considered by Codex. The following relevant Codex CXLs have been established for fluxapyroxad.

**Table 2: Overseas MRLs**

Commodity	Tolerance for residues arising from the use of fluxapyroxad (mg/kg)					
	Australia	EU	Japan	Codex	Canada	USA
Residue Definition	Fluxapyroxad (plant origin)	Fluxapyroxad	Fluxapyroxad	Fluxapyroxad	Fluxapyroxad	Fluxapyroxad
Apple	0.7 (proposed)		0.9	0.9		0.8
Pome fruits					0.9	0.8

*Note: a permanent MRL of 0.8 mg/kg is established for fluxapyroxad on pome fruit in the Australian Schedule 20 of the Food Standards Code.*

## 2.6 Current and proposed Australian MRLs for [active]

Table 3: Current MRL Standard

COMPOUND	FOOD	MRL (mg/kg)
FLUXAPYROXAD		
MO 0105	Edible offal (mammalian)	0.03
MM 0095	Meat (mammalian) [in the fat]	0.05
FM 0183	Milk fats	0.1
ML 0106	Milks	0.005

Table 4: Proposed MRL Standard

COMPOUND	FOOD	MRL (mg/kg)
FLUXAPYROXAD		
ADD:		
FP 0226	Apple	0.7

Table 5: Proposed MRL Standard

COMPOUND	FOOD	MRL (mg/kg)
FLUXAPYROXAD		
ADD:		
AB 0226	Apple pomace, dry	5

## 2.7 Potential risk to trade

Export of treated produce containing finite (measurable) residues of fluxapyroxad 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 proposed Australian MRL of 0.7 mg/kg for fluxapyroxad in apples, is below MRLs established by Japan and the EU (0.9 mg/kg) and Canada (0.8 mg/kg) for apples, and Codex and the USA for pome fruits (0.9 and 0.8 mg/kg respectively). The highest residue observed in two Australian trials was 0.30 mg/kg. It is also noted that a permanent MRL at 0.8 mg/kg is established for fluxapyroxad on pome fruit in Schedule 20 of the Australian Food Standards Code. The risk to trade is considered to be low based on overseas tolerances.

The Applicant has proposed the following trade advice information to mitigate the risk to trade in apples:

Export Trade Advice—treated crops: treated crop commodities destined for export may require extra time between application and harvest to be accepted in some export markets. Before you use this product, you are advised to contact BASF Australia Ltd and/or your industry body about any potential trade issues and their management.

### **3 CONCLUSION**

BASF Australia Ltd have made an application to register the use of Sercadis Fungicide on apples, requiring the establishment of a permanent MRL at 0.7 mg/kg for apples.

Comment is sought on the potential for Sercadis Fungicide to prejudice Australian trade when used on apples according to the proposed label directions.