



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



Trade Advice Notice

on chlorantraniliprole for use on sugar cane

Emergency use permit PER89384

April 2020

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CONTENTS

PREFACE	1
About this document	1
Making a submission	1
Further information	2
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1 INTRODUCTION	3
2 TRADE CONSIDERATIONS	3
2.1 Commodities exported	3
2.2 Destination and value of exports	3
2.3 Proposed Australian use-pattern	4
2.4 Results from residues trials presented to the APVMA	4
2.5 Codex alimentarius commission and overseas MRLs	5
2.6 Current and proposed Australian MRLs for chlorantraniliprole	5
2.7 Potential risk to trade	6
<hr/>	
3 CONCLUSION	6

LIST OF TABLES

Table 1: Proposed use pattern	4
Table 2: Current and proposed Australian and overseas MRLs/tolerances for chlorantraniliprole	5
Table 3: Current MRL Standard—Table1	5
Table 4: Proposed MRL Standard—Table1	6

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 for Permit 89384 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 **1 May 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)*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
GPO Box 3262
Sydney NSW 2001

Phone: +61 2 6770 2300

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](#).

¹ A full definition of 'confidential commercial information' is contained in the Agvet Code.

1 INTRODUCTION

The APVMA has before it an emergency permit application from Sugar Research Australia Ltd for use of chlorantraniliprole on sugar cane for the control of fall armyworm. The permit is proposed for NSW and Qld to cover isolated outbreaks of the new pest in sugar cane crops. It is estimated that up to 10,000 ha of sugar cane may be treated.

2 TRADE CONSIDERATIONS

2.1 Commodities exported

Sugar is considered to be a major export commodity², as are commodities of animal origin, such as meat, offal and dairy products, which may be derived from livestock fed feeds produced from treated sugar cane forage and fodder. Residues in these commodities resulting from the use of chlorantraniliprole have the potential to unduly prejudice trade.

2.2 Destination and value of exports

In 2018–19 Australia exported 3,755 kt of sugar (refined and raw sugar) valued at \$1,530 million (ABARES estimate³). The total production of sugar in 2018–19 was 4,548 kt. The major export market in 2018–19 was Korea (1,078 kt), Indonesia (1,039 kt) with lower quantities going to Malaysia and Japan.

² APVMA Regulatory Guidelines—Data Guidelines: Agricultural: Overseas trade (Part 5B)

³ agriculture.gov.au/abares/research-topics/agricultural-commodities/agricultural-commodities-trade-data#2019

2.3 Proposed Australian use-pattern

Table 1: Proposed use pattern

Crop	Pest	Rate/concentration	Critical comments
Sugar cane	Fall Armyworm <i>Spodoptera frugiperda</i>	<u>200 g/kg product</u>	One in-furrow or banded spray application applied to the soil next to the sugar cane row up to the 12 leaf crop growth stage PLUS one foliar spray made more later than 8 weeks prior to harvest. Chlorantraniliprole should be applied after careful field monitoring of pest populations of eggs and larvae to determine the need for application, the correct timing of the initial application and of any subsequent applications. Subsequent applications are dependent on economic thresholds, as well as the growth rate of new unprotected plant material. Apply as pest population indicates.
		785 g (157 g ai/ha) made in-furrow or banded spray to soil	
		PLUS	
		140 g (28 g ai/ha) foliar application	
		<u>350 g/kg product</u>	
		450 g (157 g ai/ha) made in-furrow	
		PLUS	
		80 g (28 g ai/ha) foliar application	

Coragen Insecticide (200 g/kg chlorantraniliprole as the only active constituent)

Altacor Insecticide (350 g/kg chlorantraniliprole as the only active constituent)

Withholding periods:

Harvest: Do not harvest for eight weeks after application

Grazing: DO NOT graze treated area or cut for stock food

Trade advice: Export statement:

Import tolerances for produce treated with chlorantraniliprole may be pending in some countries. Consult with your exporter before applying chlorantraniliprole to export crops.

2.4 Results from residues trials presented to the APVMA

A total of four relevant chlorantraniliprole residue trials conducted on sugar cane in Brazil are summarised in the 2010 JMPR evaluation⁴. These trials involved one in furrow application made at 157.5 g ai/ha at the five to 12 leaf stage and then one foliar application made at 28 g ai/ha at 60 to 64 days before harvest.

Chlorantraniliprole residues in sugar cane were 0.09, 0.13, 0.16 and 0.16 mg/kg (STMR = 0.145 mg/kg). An eight week harvest withholding period is supported by this data. The OECD MRL calculator estimates an MRL of 0.4 mg/kg based on the 2010 dataset. A chlorantraniliprole MRL of 0.5 mg/kg is considered appropriate for GS 0659 sugar cane.

A processing study for chlorantraniliprole in sugar cane is not available.

⁴ fao.org/fileadmin/templates/agphome/documents/Pests_Pesticides/JMPR/Evaluation14/Chlorantraniliprole.pdf

The sugar cane residue trials did not address chlorantraniliprole residues in sugar cane top. It is proposed that the grazing restriction 'DO NOT graze treated area or cut for stock food' accompany this emergency use permit to prevent the exposure of livestock to chlorantraniliprole via treated sugar cane tops.

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. Chlorantraniliprole has been considered by Codex. The following relevant Codex CXLs and international MRLs have been established for chlorantraniliprole.

Table 2: Current and proposed Australian and overseas MRLs/tolerances for chlorantraniliprole

Commodity	Tolerance for residues arising from the use of chlorantraniliprole (mg/kg)				
	Australia	Korea	Japan	Codex	USA
Sugar cane	T0.5 (proposed)	-	14	0.5	14

2.6 Current and proposed Australian MRLs for chlorantraniliprole

Table 3: Current MRL Standard—Table1

COMPOUND	FOOD	MRL (mg/kg)
CHLORANTRANILIPROLE		
MO 0105	Edible offal (mammalian)	0.02
PE 0112	Eggs	0.03
MM 0095	Meat (mammalian) [in the fat]	0.02
FM 0183	Milk fats	0.1
ML 0106	Milks	0.02
PM 0110	Poultry meat [in the fat]	*0.01
PO 0111	Poultry, edible offal of	*0.01

Table 4: Proposed MRL Standard—Table1

COMPOUND	FOOD	MRL (mg/kg)
CHLORANTRANILIPROLE		
ADD:		
GS 0659	Sugar cane	T0.5

2.7 Potential risk to trade

Export of treated produce containing finite (measurable) residues of chlorantraniliprole 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 use pattern requires the establishment of a sugar cane MRL at T0.5 mg/kg.

All residues values (HR = 0.16 mg/kg) considered for MRL establishment were within the MRLs of 0.5–14 mg/kg set by Codex, USA and Japan. It is noted that some of the major overseas markets for Australian sugar cane (such as Indonesia and Malaysia) may default to Codex MRLs which, for sugar cane, is 0.5 mg/kg, the same as proposed.

A 'DO NOT graze treated area or cut for stock food' restriction has been proposed as residue data for sugar cane tops is not currently available. Should this restriction not be manageable for the proposed emergency permit use, then a potential risk to the trade of animal commodities may exist.

3 CONCLUSION

The APVMA has before it an emergency permit application from Sugar Research Australia Ltd for use of chlorantraniliprole on sugar cane for the control of fall armyworm.

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

Based on the coverage of MRLs established in major export destinations for Australian sugar cane, the APVMA proposes to determine that the risk to trade associated with the proposed use on sugar cane is not undue. Stakeholders are requested to provide comment on industry systems that can manage any potential risks to international trade associated with the proposed use.