



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



Trade Advice Notice

on azoxystrobin and difenoconazole for use on rice

Minor use permit PER91695

November 2021

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ISSN 2200-3894 (electronic)

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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 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 a minor use permit for the use of azoxystrobin and difenoconazole on rice 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 23 November 2021** 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 organisation name (if relevant)

- email or postal address (if available)
- the date you made the submission.

Please note: submissions will be published on the APVMA's website, unless you have asked for the submission to remain confidential, or if the APVMA chooses at its discretion not to publish any submissions received (refer to the [public consultation coversheet](#)).

Please lodge your submission using the [public consultation coversheet](#), which provides options for how your submission will be published.

Note that all APVMA documents are subject to the access provisions of the *Freedom of Information Act 1982* and may be required to be released under that Act should a request for access be made.

Unless you request for your submission to remain confidential, the APVMA may release your submission to the applicant for comment.

Written submissions should be addressed to:

Executive Director
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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 Trade Advice Notices can be found on the APVMA website: apvma.gov.au.

Introduction

The APVMA has before it an application from Rice Research Australia Pty Ltd for a minor use permit for the use of azoxystrobin and difenoconazole on rice for the control of stem rot.

The use of azoxystrobin on rice has been previously considered by the APVMA. PER84081 (for stem rot control) and PER89276 (for rice blast control) both allow the use of azoxystrobin on rice with 2 or 3 applications at 280 g ai/ha and a 4-week harvest and grazing withholding period.

The use of difenoconazole on rice has not been previously considered by the APVMA.

The proposed minor use permit is for Queensland and New South Wales only for a period of 2 years on approximately 1,000 to 2,000 hectares of rice.

Trade considerations

Commodities exported

Cereal grains including rice are considered to be major export commodities, as are animal commodities derived from livestock fed on treated crops. Residues in these commodities resulting from the use of azoxystrobin and difenoconazole on rice have the potential to unduly prejudice trade.

Destination and value of exports

Australia exported an average of 350,000 tonnes per year of rice between 2010 to 2011 and 2019 to 2020¹.

In recent years, around 74% of the Australian rice crop was exported, but this percentage varies from season to season. Australia is a small exporter of mostly medium grain rice, representing around 5% of global medium and short grain rice exports and 0.4% of total global rice exports in 2019. Globally, Australia competes primarily with China and the United States in medium grain rice markets. The main export destinations are the Middle East and Oceania.

The significant export markets for Australian beef, sheep, pig meat and offal are listed in the APVMA Regulatory Guidelines – Data Guidelines: Agricultural – Overseas trade (Part 5B)².

¹ Department of Agriculture Water and the Environment, [Australian rice markets in 2020](#), AWE website, 12 January 2021, accessed 14 October 2021.

² Australian Pesticides and Veterinary Medicines Authority, [Agricultural Data Guidelines – Pesticides: Overseas trade \(Part 5B\)](#) APVMA website, 20 July 2020.

Proposed Australian use pattern

Table 1: Proposed use pattern – Amistar Top Fungicide (200 g/L azoxystrobin and 125 g/L difenoconazole)

Crop	Pest	Rate	Critical comments
Rice	Stem rot (<i>Sclerotium oryzae</i>)	0.5 to 1.0L product/ha (100 to 200 g azoxystrobin/ha + 62.5 to 125 g difenoconazole/ha)	<p>Follow all safety precautions on the Amistar Top label.</p> <p>Apply foliar applications via boomspray or aerial application. Use sufficient water to ensure thorough coverage of all plant surfaces – ground application at 100+ L/ha and aerial application at 30+ L/ha.</p> <p>Monitor the crop and apply a preventative foliar spray when conditions favour disease development, or at the first signs of disease. Repeat application a minimum of 14 days later if necessary. The best application timing is around the grain filling stage, BBCH 69 – 87.</p> <p>Do not apply more than 2 applications per crop.</p> <p>Follow spray drift recommendations on the product label. Use the higher rates when conditions favour disease development. Do not allow the release of irrigation/flood water for at least 14 days after the last application.</p>

Withholding periods:

Harvest: DO NOT harvest for 4 weeks after application.

Grazing: DO NOT graze or cut for stock food for 4 weeks after application.

Trade advice:

EXPORT OF TRADE ADVICE – TREATED PRODUCE: Treated crop commodities destined for export may require extra time being allowed between application and harvest, to be accepted in some export markets. Before you use this product, you are advised to contact Rice Research Australia Pty Ltd about any potential trade issues and their management.

Condition of use: All users of this permit should notify the purchaser of the rice, and provide details on the number of applications, rate(s) and date(s) the product was used.

Results from residues trials presented to the APVMA

The proposed use of azoxystrobin and difenoconazole on rice involves a maximum of two foliar applications, applied by boomspray or aerial application, at 0.5 to 1.0L product/ha (100 to 200 g azoxystrobin/ha + 62.5 to 125 g difenoconazole/ha) with a minimum retreatment interval of 14 days and a harvest and grazing withholding period of 4 weeks.

Four Italian trials conducted in 2010 involved applications with the proposed product Amistar Top on rice. Amistar Top was applied twice to rice at a nominal rate of 225 g azoxystrobin/ha and

140.6 g difenoconazole/ha ($\sim 1.2\times$ proposed) with a retreatment interval of 15 days. Samples of grain and straw were collected at harvest 21 and 28 days after last application (DALA).

The Italian trials were supported by 15 difenoconazole rice trials conducted in the United States of America during 2013–14 that were considered by the 2017 Joint Meeting on Pesticide Residues (JMPPR). The rice trials received 2 foliar applications of difenoconazole at a nominal rate of 137 g ai/ha ($\sim 1.1\times$ proposed) with a retreatment interval of 14 days. Samples of rice grain were collected at normal commercial harvest (26 to 32 DALA) from the harvest trials, and at 20, 25, 31 to 32 and 35 DALA in decline trials.

Grain

The azoxystrobin dataset suitable for MRL (Maximum Residue Limit) estimation for rice grain is, in rank order, 0.17, 0.22, 0.31 and 0.38 mg/kg ($n=4$). The Supervised Trials Median Residue (STMR) was 0.27 mg/kg. The Organisation of Economic Cooperation and Development Maximum Residue Limit (OECD MRL) calculator estimates an MRL of 0.9 mg/kg. The current azoxystrobin Temporary Maximum Residue Limit (TMRL) for GC 0649 rice at T7 mg/kg will cover the expected residues from the proposed use and is considered appropriate in conjunction a harvest withholding period (WHP) of 4 weeks.

The combined difenoconazole dataset suitable for MRL estimation for rice grain is, in rank order, 0.046, 0.34, 0.53, 0.58, 0.73, 0.78, 0.86, 1.0, 1.1 (3), 1.2 (2), 1.4 (2), 1.5, 2.4, 4.3 and 4.4 mg/kg ($n=19$). The STMR was 1.1 mg/kg. The OECD MRL calculator estimates an MRL of 6 mg/kg. Based on the available data a difenoconazole TMRL for GC 0649 rice at T7 mg/kg is proposed and considered appropriate for the proposed use in conjunction with the proposed WHP of 4 weeks. Consequently, the existing difenoconazole MRL for GC 0080 cereal grains at *0.01 mg/kg will also be amended to GC 0080 cereal grains {except rice} at *0.01 mg/kg.

Processing

The 2015 JMPPR evaluation report summarised a processing study conducted as a part of the 2010 Italian rice trials. Two field trials of rice were treated with 2 applications of difenoconazole with a target rate of 0.25 kg ai/ha. Samples of rice grain were collected at 21 and 28 days after the final application. Mean processing factors were estimated to be $0.01\times$ in polished rice, $0.06\times$ in brown rice, $0.15\times$ in rice bran and $4.05\times$ in rice husks.

In rice hulls, based on the difenoconazole HR of 4.4 mg/kg and the highest PF of 4.3, the HR-P in rice hulls is calculated to be 18.9 mg/kg. A difenoconazole MRL for rice hulls at T20 mg/kg is recommended in Table 4 of the MRL standard.

Animal feeds

The azoxystrobin dataset suitable for MRL estimation for rice straw and fodder is, in rank order, 0.30, 0.33, 1.1 and 1.2 mg/kg dry weight ($n=4$). The STMR was 0.72 mg/kg. The OECD MRL calculator estimates an MRL of 3 mg/kg. The existing MRL for AS 0649 rice straw and fodder, dry at T15 mg/kg will cover the expected residues in rice straw and fodder from the proposed use in conjunction with a grazing withholding period (GWHP) of 4 weeks.

The combined difenoconazole dataset suitable for MRL estimation for rice straw and fodder is, in rank order, 0.79, 0.82, 1.3, 1.7 (2), 1.8, 1.9, 2.0 (2), 2.2 (2), 2.4 (3), 3.2, 3.9, 5.0, 6.0 and 11.1 mg/kg dry weight (n=19). The STMR was 2.2 mg/kg. The OECD MRL calculator estimates an MRL of 15 mg/kg. A difenoconazole TMRL for AS 0649 rice straw and fodder, dry at T15 mg/kg is recommended and considered appropriate for the proposed use in conjunction with a GWHP of 4 weeks.

Animal commodities

For azoxystrobin, no increase in the maximum livestock or poultry dietary burden is expected from the proposed use, noting the current Legume animal feeds MRL established at 50 mg/kg and expected residues in legumes. Australian animal commodity MRLs for edible offal and meat (mammalian) [in the fat] and milk at 0.03, 0.02 and *0.005 mg/kg, respectively, and poultry edible offal, meat and eggs at *0.01 mg/kg remain appropriate for the proposed use on rice. The potential risk to trade remains unchanged.

For difenoconazole, the maximum dietary burden is calculated to increase from 0.6 ppm (based on the registered uses in wine grapes and seed treatment uses on cereal grains) to 7.7 ppm and 3.6 ppm for beef and dairy cattle, respectively. The estimated maximum (worst-case) dietary burdens are based on the OECD feed calculator, assuming that rice straw (HR), grain (STMR) and hulls (STMR-Processed) can comprise up to 60%, 5% and 15% of the diet, respectively, for beef cattle and rice straw, grain, hulls and bran (STMR-P) can comprise up to 20%, 10%, 20% and 30%, respectively, for dairy cattle. The remaining portion of the diet for cattle is made up of grape pomace at 20%. Based calculated dietary burdens, the available animal feeding studies (JMPR) and the Australian residue definition (difenoconazole only) finite residues of difenoconazole are not expected in milk or tissues except in liver at 0.02 mg/kg. It is concluded that the current Australian difenoconazole MRLs for edible offal and meat (mammalian) at *0.05 mg/kg and milk at *0.01 mg/kg remain appropriate for the proposed use on rice. For poultry, the maximum dietary burden for difenoconazole is estimated at 0.7 ppm. Based on the estimated maximum dietary burden, finite residues are not expected in poultry commodities and poultry MRLs at *0.01 mg/kg remain appropriate for the proposed use on rice.

Codex Alimentarius Commission and overseas MRLs

The Codex Alimentarius Commission (Codex) is responsible for establishing Codex Maximum Residue Limits (CXLs) for pesticides and veterinary medicines. 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 difenoconazole have been considered by Codex. The following relevant Codex CXLs and international MRLs/tolerances have been established for azoxystrobin and difenoconazole.

Table 2: Internationals MRLs/tolerances for azoxystrobin

Commodity	Tolerance for residues arising from the use of azoxystrobin (mg eq./kg)							
	Australia ³	Codex ⁴	EU ⁵	Japan ⁶	Taiwan ⁷	Korea ⁸	China ⁹	USA ¹⁰
Residue definition	Azoxystrobin (plants and animals)	Azoxystrobin (plants and animals)	Azoxystrobin (plants and animals)	Azoxystrobin (plants and animals)	-	-	Azoxystrobin (plants and animals)	Sum of azoxystrobin and the Z- isomer of azoxystrobin [methyl(Z)- 2-(2-(6-(2- cyanophenoxy)pyrimidin-4- yloxy)phenyl)-3 methoxyacrylate] (plants) Azoxystrobin (animals)
Rice	T7	5	5	0.2 (brown rice)	5	T5	1	5
Edible offal (mammalian)	0.03	0.07	0.07	0.07	0.05 (except liver) 0.07 (liver)	-	0.07*	0.07
Meat (mammalian) [in the fat]	0.02	0.05	0.01* (muscle) 0.05 (fat)	0.05 (muscle) 0.05 (fat)	0.07 (muscle) 0.07 (fat)	-	0.05	0.01 (meat and hog fat) 0.02 (fat except hog fat)
Milks	0.005	0.01 0.03 (milk fats)	0.01*	0.01	-	-	0.01* 0.03* (milk fats)	0.006

³ Australian Government, [Agricultural and Veterinary Chemicals Code \(MRL Standard\) Instrument 2019](#), Federal Register of Legislation, accessed 14 October 2021.

⁴ Food and Agriculture Organization of the United Nations, [Codex Alimentarius International Food Standards](#), FAO website, accessed 14 October 2021.

⁵ European Commission, [Pesticide residue\(s\) and maximum residues levels \(mg/kg\)](#), European Commission website, accessed 14 October 2021.

⁶ Japanese Food Chemistry Research Promotion Foundation, [Table of MRLs for Agricultural Chemicals](#), JFCRPF website, accessed 14 October 2021.

⁷ Food and Drug Administration Taiwan, [Standards for Pesticide Residue Limits in Foods](#), [Standards for Pesticide Residue Limits in Animal Products](#), accessed 14 October 2021.

⁸ Food Safety Korea, [Pesticide MRLs for agricultural commodities](#), FSK website, accessed 14 October 2021.

⁹ United States Department of Agriculture, [China: Maximum Residue Limits for Pesticides in Foods](#), *Global Agricultural Information Network report*, 24 August 2021, accessed 14 October 2021.

¹⁰ Electronic Code of Federal Regulations, [USA Electronic Code of Federal Regulations](#), ECFR website, accessed 14 October 2021.

Commodity	Tolerance for residues arising from the use of azoxystrobin (mg eq./kg)							
	Australia ³	Codex ⁴	EU ⁵	Japan ⁶	Taiwan ⁷	Korea ⁸	China ⁹	USA ¹⁰
Eggs	*0.01	*0.01	0.01*	0.01	-	-	0.01*	-
Poultry meat	*0.01	*0.01	0.01* (muscle) 0.01* (fat)	0.01 (muscle) 0.01 (fat)	-	-	0.01	-
Poultry, edible offal of	*0.01	*0.01	0.01*	0.01	-	-	0.01*	-

Table 3: Internationals MRLs/tolerances for difenoconazole

Commodity	Tolerance for residues arising from the use of difenoconazole (mg eq./kg)							
	Australia ¹¹	Codex ¹²	EU ¹³	Japan ¹⁴	Taiwan ¹⁵	Korea ¹⁶	China ¹⁷	USA ¹⁸
Residue definition	Difenoconazole (plants and animals)	Difenoconazole (plants) Sum of Difenoconazole and 1-[2-chloro-4-(4-chlorophenoxy)-phenyl]-2-(1,2,4-triazol)-1-yl-ethanol), expressed	Difenoconazole (plants and animals)	Difenoconazole (plants) Sum of difenoconazole and metabolite D[1-[2-chloro-4-(4-chlorophenoxy)phenyl]-2-(1H-1,2,4-triazole-1-yl)ethanol], calculated as difenoconazole (animals)	-	-	Difenoconazole (plants) Sum of difenoconazole and 1-[2-chloro-4-(4-chloro-phenoxy)-phenyl]-2-(1,2,4-triazol)-1-yl-ethanol), expressed as difenoconazole (animals)	Difenoconazole (plants) Sum of difenoconazole and its metabolite, CGA-205375, 1-[2-chloro-4-(4-chloro-phenoxy)phenyl]-2-[1,2,4]triazol-1-yl-ethanol, calculated as the stoichiometric equivalent of difenoconazole (animals)

¹¹ Australian Government, [Agricultural and Veterinary Chemicals Code \(MRL Standard\) Instrument 2019](#), Federal Register of Legislation, accessed 14 October 2021.

¹² Food and Agriculture Organization of the United Nations, [Codex Alimentarius International Food Standards](#), FAO website, accessed 14 October 2021.

¹³ European Commission, [Pesticide residue\(s\) and maximum residues levels \(mg/kg\)](#), European Commission website, accessed 14 October 2021.

¹⁴ Japanese Food Chemistry Research Promotion Foundation, [Table of MRLs for Agricultural Chemicals](#), JFCRPF website, accessed 14 October 2021.

¹⁵ Food and Drug Administration Taiwan, [Standards for Pesticide Residue Limits in Foods, Standards for Pesticide Residue Limits in Animal Products](#), accessed 14 October 2021.

¹⁶ Food Safety Korea, [Pesticide MRLs for agricultural commodities](#), FSK website, accessed 14 October 2021.

¹⁷ United States Department of Agriculture, [China: Maximum Residue Limits for Pesticides in Foods](#), *Global Agricultural Information Network report*, 24 August 2021, accessed 14 October 2021.

¹⁸ Electronic Code of Federal Regulations, [USA Electronic Code of Federal Regulations](#), ECFR website, accessed 14 October 2021.

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Commodity	Tolerance for residues arising from the use of difenoconazole (mg eq./kg)							
	Australia ¹¹	Codex ¹²	EU ¹³	Japan ¹⁴	Taiwan ¹⁵	Korea ¹⁶	China ¹⁷	USA ¹⁸
	as difenoconazole (animals)							
Rice	T7 (proposed)	8	3	0.2 (brown rice)	0.5	0.2	0.5 (brown rice)	7
Edible offal (mammalian)	*0.05	1.5	0.2	2	-	-	1.5	0.10 (except liver) 0.7 (liver)
Meat (mammalian)	*0.05	0.2 [in the fat]	0.05 (muscle) 0.05 (fat)	0.2 (muscle) 0.2 (fat)	-	-	0.2	0.05 (meat) 0.10 (fat)
Milks	*0.01	0.02	0.005*	0.02	-	-	0.02	0.02
Eggs	*0.05	0.03	0.05*	0.03	-	-	0.03	0.02
Poultry meat	*0.05	*0.01	0.1 (muscle) 0.1 (fat)	0.01 (muscle) 0.01 (fat)	-	-	0.01	-
Poultry, edible offal	*0.05	*0.01	0.1	0.01	-	-	0.01	-

Current and proposed Australian MRLs for azoxystrobin and difenoconazole

Table 4: Current MRL Standard – Table 1

Compound	Food	MRL (mg/kg)
Azoxystrobin		
MO 0105	Edible offal (mammalian)	0.03
PE 0112	Eggs	*0.01
MM 0095	Meat (mammalian) [in the fat]	0.02
ML 0106	Milks	0.005
PM 0110	Poultry meat	*0.01
PO 0111	Poultry, edible offal of	*0.01
GC 0649	Rice	T7
Difenoconazole		
GC 0080	Cereal grains	*0.01
MO 0105	Edible offal (mammalian)	*0.05
PE 0112	Eggs	*0.05
MM 0095	Meat (mammalian)	*0.05
ML 0106	Milks	*0.01
PM 0110	Poultry meat	*0.05
PO 0111	Poultry, edible offal of	*0.05

Table 5: Proposed MRL Standard – Table 1

Compound	Food	MRL (mg/kg)
Difenoconazole		
Delete:		
GC 0080	Cereal grains	*0.01
Add:		
GC 0080	Cereal grains {except Rice}	*0.01
GC 0649	Rice	T7

Table 6: Current MRL Standard – Table 4

Compound	Food	MRL (mg/kg)
Azoxystrobin		
AL 0157	Legume animal feeds	50
AS 0649	Rice straw and fodder, dry	T15
AS 0081	Straw and fodder (dry) of cereal grains {except maize fodder; rice straw and fodder, dry}	3
Difenoconazole		
AS 0081	Straw and fodder (dry) of cereal grains	*0.05

Table 7: Proposed MRL Standard – Table 4

Compound	Food	MRL (mg/kg)
Difenoconazole		
Delete:		
AS 0081	Straw and fodder (dry) of cereal grains	*0.05
Add:		
	Rice hulls	T20
AS 0649	Rice straw and fodder, dry	T15
AS 0081	Straw and fodder (dry) of cereal grains {except rice straw and fodder, dry}	*0.05

Potential risk to trade

For azoxystrobin, no changes to the current MRLs for rice (grain) and rice straw and fodder are proposed. No increase in the livestock or poultry dietary burden for azoxystrobin is expected from the proposed use on rice therefore, animal commodities MRLs remain appropriate.

The proposed use pattern has a lower residue potential than the current approved uses on rice. It is noted that the current Australian MRL for rice at T7 mg/kg has been established since 2011 and the trade risk has been managed. The potential risk to Australian trade from the use of azoxystrobin on rice remains unchanged. The potential risk to Australian trade from the proposed use of azoxystrobin on rice is not considered to be undue.

For difenoconazole, an MRL for rice (grain) is proposed at T7 mg/kg. This MRL is equal to or lower than the MRLs/tolerances established by Codex, Canada and the USA but is higher than MRLs established in Europe

and Asian markets. The applicant has proposed a trade advice statement as outlined in the proposed Australian use pattern to assist in mitigating the potential risk in European and Asian markets.

Difenoconazole decline data in rice beyond the proposed withholding period of 4 weeks is limited and is not sufficient to allow determination of an appropriate export harvest interval (EHI) and ensure potential residues meet all markets. Noting the scale of the proposed use (up to 2000 hectares), the HR (4.4 mg/kg) and STMR (1.1 mg/kg), and bulking and blending for rice, comment is sought from industry on the potential risk to trade and the ability of the rice industry to manage that risk.

Residues of difenoconazole in animal commodities are expected to be below the established Australian MRLs, however, the proposed use may result in an increase in the estimated maximum livestock dietary burden and consequently a potential increase in the expected residues in animal commodities. At the estimated maximum (worst case) livestock dietary burdens, finite residues of parent difenoconazole are not expected in tissues or milk except in liver at 0.02 mg/kg. However, finite residues of the metabolite (CGA205375), at the estimated maximum dietary burden, may be expected in milk, muscle, fat, kidney and liver at 0.01, 0.02, 0.08, 0.06 and 0.35 mg eq./kg, respectively. It is noted that the residue definition established by Codex, Canada, China, Japan and the United States of America is the sum of parent difenoconazole + CGA205375. Expected residues of parent + CGA205375 in livestock fed produce treated at the proposed use will be covered by established MRLs in significant export markets which have established relevant difenoconazole MRLs. It is however noted that Taiwan does not have established animal commodity MRLs and therefore defaults to LOQ values (<0.01 mg eq./kg) for parent and its metabolites.

Decline data is limited in animal commodities and is not sufficient to allow determination of an appropriate export slaughter interval (ESI) and ensure potential residues of both difenoconazole and its CGA205375 metabolite meet all market requirements. Again, comment is sought from industry on the potential risk to trade the ability of industry to manage that risk.

Conclusion

Rice Research Australia Pty Ltd has applied for a minor use permit for use of azoxystrobin and difenoconazole on rice.

Comment is sought on the potential for the proposed use to prejudice Australian trade of rice and animal commodities and the ability of industry to manage any potential trade risk.