Australian Government

Australian Pesticides and Veterinary Medicines Authority

Trade Advice Notice on mefentrifluconazole and pyraclostrobin in the product Balaya Fungicide for use on barley, oats, wheat and pulses

Submissions received

October 2025

To:

Executive Director
Agricultural Chemicals
Australian Pesticides and Veterinary Medicines Authority
GPO Box 574
Canberra ACT 2601
Via email: enquiries@apvma.gov.au

Date: 9 October 2025

To whom it may concern

I write in response to a request for comments on an application from BASF Australia Ltd to register the new product Balaya Fungicide, containing 100 g/L mefentrifluconazole and 100 g/L Pyraclostrobin Emulsifiable Concentrate, for use on barley, oats, wheat and pulses.

This submission is presented on behalf of the Australian Export Fodder Industry through a research project funded by AgriFutures Australia. That research project:

- Is undertaken on behalf of the Australian Export Fodder Industry.
- Is funded and supported by AgriFutures Australia.
- Is conducted on behalf of a range of members across the entire Australian fodder supply chain.
- Reviews current and proposed revisions to market MRLs.
- Provides advice to government on export fodder industry views in relation to the impact on market access of chemicals in use on Australian fodder.

On behalf of the export fodder industry, I advise that based on the information provided by APVMA in the Trade Advice Notice (TAN) dated September 2025, the industry does not object to the proposed registration. No comment is made for grain/seed production or animal products.

The support is noted based on the following comments.

1. Mefentrifluconazole – Cereal Forage / Fodder / Straw

The TAN notes "*the OECD MRL calculator estimates an MRL of 9 mg/kg. The STMR is 2.3 mg/kg. Based on the available data, a mefentrifluconazole MRL of 9 mg/kg for Cereals forage and fodder, dry is considered appropriate for the proposed use, in conjunction with the proposed grazing WHP of 4 weeks. The current mefentrifluconazole MRL of 20 mg/kg for Forage and fodder of cereal grains remains appropriate and is expected to cover potential mefentrifluconazole residues arising from the proposed use on barley, oats and wheat*".

Oat fodder is a major export commodity for the industry and the recommendation to keep the current MRL for forage/fodder as it is considered suitable, is agreed.

2. Pyraclostrobin – Cereal Straw/ Fodder

Cereal forage is not a significantly traded commodity; however, straw / fodder (dry) is.

The TAN notes "*The OECD MRL calculator estimates an MRL of 3 mg/kg. The STMR is 0.771 mg/kg.*

Based on the available data, a Pyraclostrobin MRL of 3 mg/kg for AS 0081 Straw and fodder (dry) of cereal grains is considered appropriate for the proposed use, in conjunction with the proposed grazing WHP of 4 weeks. The current Pyraclostrobin MRL for AS 0081 Straw and fodder (dry) of cereal grains at 0.5 mg/kg should be changed to 3 mg/kg."

The increase in MRL is supported.

3. Pulse forage / fodder

Pulse forage / fodder is not a significantly traded commodity and industry does not object to the proposed changes.

Should you have any questions on this submission please do not hesitate to contact me.

Regards

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Consultant to Agrifutures Australia on behalf of the Australian Export Fodder Industry

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Produced through Agrifutures Australia funding of "Chemical Residue monitoring for the Fodder Industry"

To:

Executive Director
Risk Assessment Capability
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Via email: enquiries@apvma.gov.au

Date: 10 October 2025

To whom it may concern

I write in response to a request for comments on an application from BASF Australia Ltd to register the new product Balaya Fungicide, containing 100 g/L Mefentrifluconazole and 100 g/L Pyraclostrobin Emulsifiable Concentrate, for use on barley, oats, wheat and pulses.

This submission is presented on behalf of the National Working Party on Grain Protection (NWPGP) and deals with barley, oats, wheat and pulses only.

1. The NWPGP:

- Is the industry body responsible for providing management and leadership to industry in the areas of post-harvest storage, chemical use, market requirements and chemical regulations.
- Is facilitated by Grain Trade Australia and the Chair is funded by Grains Australia.
- Has members across the entire grain supply chain.
- Hosts an annual conference providing participants with the latest research and developments, in the area of post-harvest storage and hygiene, chemical usage and outturn tolerances, international and domestic market requirements, and regulations.
- Co-ordinates and provides government with industry views on chemicals in use on grain and associated products.
- For further details, refer to http://www.graintrade.org.au/nwpgp

2. Industry Support for the Application

Based on the information provided in the Trade Advice Notice (TAN), industry supports the registration as proposed and the proposed change in maximum residue limits (MRLs).

Comments on this view are outlined below.

3. General Comments

- NWPGP has been liaising with the registrant on the registration of this product, and as one consequence, the registrant sought and achieved Codex MRLs for all applicable grain commodities in 2023.
- The industry position is to support the development/adoption/registration of as many tools as possible for growers to manage pests and produce a quality and profitable crop.
- While recognising it is impractical for "zero risk" in supplying markets with grain, industry must have appropriate QA systems to meet market requirements or where impractical, not support product registration.
- To assist managing compliance, industry has options to provide key messages to growers to "change behaviours such as varieties/chemicals", as has been done previously via industry advice notices etc.
- This product proposing to be registered would be used to control various fungal pathogens of grain, depending on the commodity as listed in the TAN (page 8 proposed use pattern/label):

Barley

a) A major pest is Net form of net blotch.
b) Triple resistance has been detected in some regions, thought to be South Australia to date, hence additional control options are needed.
c) Growers in general are using highly susceptible varieties (possibly less than 20% of varieties). Estimates are growers could move to more moderately resistant varieties, and this may solve "80% of their problem". But additional control options (i.e., new products with different modes of action) would still be needed, especially if the resistance moves to other areas.

Wheat / Oats

a) Various products with different chemical actives are available to be used, and are used, with this proposed product with a different mode of action to assist control of resistance, proposed to add to those options.
b) Thus, grower product choice will limit the 'residues on resulting grain" of these two chemical actives.

Pulses

a) Various products with different chemical actives are available to be used, and are used, with this proposed product with a different mode of action to assist control of resistance, proposed to add to those options.
b) Various permits for different pulses have been in place in recent seasons for Pyraclostrobin.

4. Barley

Use Patterns and Label Directions

- Are listed on page 9 of the TAN.
- A maximum of 2 uses is proposed to be permitted, prior to a particular growth stage.
- On page 10, no withholding period (W/H) before harvest would be required.

Mefentrifluconazole - Residues Arising from Trials

- Are listed on page 12 of the TAN.
- A number of AUS & overseas trials indicate residues arise up to 0.88mg/kg.

- The OECD MRL calculator estimates an MRL of 1.5mg/kg, noting the STMR is 0.07mg/kg (supervised trials median residue) given only 3 trial results are above 0.17mg/kg.

Mefentrifluconazole - Market MRLs

- On page 12 of the TAN, it is recommended to increase the AUS MRL from 0.2mg/kg to 1.5mg/kg.
- A number of overseas market MRLs are outlined on page 24 of the TAN.

Industry Comment on the Above

1. Trial results are generally lower than the existing AUS MRL, while 3 results are higher leading to a higher AUS MRL being proposed.
2. The STMR is relatively low, lower than the current AUS MRL of 0.2mg/kg.
3. A Codex MRL of 3mg/kg applies in many markets.
4. Taiwan has a lower MRL than the proposed AUS, but not significantly.
5. China and Vietnam (currently reviewing MRLs) do not have an MRL.
6. Given the label directions and the W/H period, the expected use pattern of limited usage overall and resulting residues (including relatively low residues arising from trials), industry can manage meeting market MRLs.

Pyraclostrobin - Residues Arising from Trials

- Are listed on page 12 of the TAN.
- A number of AUS & overseas trials indicate residues arise up to 0.10mg/kg.
- The OECD MRL calculator estimates an MRL of 0.15mg/kg, noting the STMR is 0.036mg/kg.

Pyraclostrobin - Market MRLs

- On page 12 of the TAN, it is recommended to adopt an AUS MRL of 0.2mg/kg from the current MRL at LOQ of 0.01mg/kg* for Cereal Grains.
- While the proposed Cereal Grains MRL covers all cereals, there is no proposed registration in cereal grains other than for wheat, barley and oats.
- On page 26 of the TAN, various market MRLs are outlined. All except Korea are higher than the proposed AUS MRL of 0.2mg/kg.
- Codex has an MRL of 1mg/kg.
- All other AUS export markets also have an MRL above the proposed AUS MRL, except for: India, Korea 0.01 D

Industry Comment on the Above

1. Trial results are lower than 0.039mg/kg, except for 3 results at 0.05, 0.06 and 0.10mg/kg.
2. The STMR is 0.036mg/kg.
3. A Codex MRL of 1mg/kg applies in many markets.
4. India and Korea default to 0.01mg/kg.
5. Given the label directions and the W/H period, the expected use pattern of limited usage overall and resulting residues (including relatively low residues arising from trials), industry can manage meeting market MRL.

5. Oats

Use Patterns and Label Directions

- Are listed on page 9 of the TAN.
- A maximum of 2 uses is proposed to be permitted, prior to a particular growth stage.
- On page 10, no withholding period before harvest would be required.

Mefentrifluconazole - Residues Arising from Trials

- Are listed on page 13 of the TAN.
- A number of AUS & the barley crop group trials indicate residues arise up to 0.88mg/kg.
- The OECD MRL calculator estimates an MRL of 1.5mg/kg, noting the STMR is 0.07mg/kg.

Mefentrifluconazole - Market MRLs

- On page 13 of the TAN, it is recommended to increase the AUS MRL from 0.2mg/kg to 1.5mg/kg.

Industry Comment on the Above

1. Trial results are generally lower than the existing AUS MRL, while 4 results are higher leading to a higher AUS MRL being proposed, noting 3 results are from the barley trials.
2. The STMR is relatively low, lower than the current AUS MRL of 0.2mg/kg.
3. A Codex MRL of 3mg/kg applies in many markets.
4. China, Taiwan and Vietnam (currently reviewing MRLs) do not have an MRL.
5. Given the label directions and the W/H period, the expected use pattern of limited usage overall and resulting residues (including relatively low residues arising from trials), industry can manage market MRLs with some effort.

Pyraclostrobin - Residues Arising from Trials

- Are listed on page 13 of the TAN.
- A number of AUS, overseas & barley trials indicate residues arise up to 0.16mg/kg, with only 3 above 0.06mg/kg (0.089. 0.10, 0.16mg/kg).
- The OECD MRL calculator estimates an MRL of 0.2mg/kg, noting the STMR is 0.036mg/kg.

Pyraclostrobin - Market MRLs

- On page 13 of the TAN, it is recommended to adopt a new AUS MRL 0.2mg/kg from the current LOQ of 0.01mg/kg* for Cereal Grains.
- While the proposed Cereal Grains MRL covers all cereals, there is no proposed registration in cereal grains other than for wheat, barley and oats.
- On page 27 of the TAN, various market MRLs are outlined. All except Korea are higher than the proposed AUS MRL of 0.2mg/kg.
- Codex has an MRL of 1mg/kg.
- All other AUS export markets also have an MRL above the proposed AUS MRL, except for: India, Korea 0.01 D

Industry Comment on the Above

1. Trial results are lower than 0.06mg/kg, except for 3 results at 0.089, 0.10 and 0.16mg/kg.
2. The STMR is 0.036mg/kg.
3. A Codex MRL of 1mg/kg applies in many markets.
4. India and Korea default to 0.01mg/kg.
5. Given the label directions and the W/H period, the expected use pattern of limited usage overall and resulting residues (including relatively low residues arising from trials), industry can manage meeting market MRL.

6. Wheat

Use Patterns and Label Directions

- Are listed on page 8 of the TAN.
- A maximum of 2 uses is proposed to be permitted, prior to a particular growth stage.
- On page 10, no withholding period before harvest would be required.

Mefentrifluconazole - Residues Arising from Trials

- Are listed on page 14 of the TAN.
- A number of AUS & overseas trials indicate residues arise up to 0.286mg/kg.
- The OECD MRL calculator estimates an MRL of 0.5mg/kg, noting the STMR is 0.01mg/kg.

Mefentrifluconazole - Market MRLs

- On page 14 of the TAN, it is recommended to increase the AUS MRL from 0.03mg/kg to 0.4mg/kg.

Industry Comment on the Above

1. Trial results are generally lower than the existing AUS MRL, while 3 results are higher leading to a higher AUS MRL being proposed.
2. The STMR is low, significantly lower than the current AUS MRL.
3. A Codex MRL of 0.4mg/kg applies in many markets.
4. China and Vietnam (currently reviewing MRLs) do not have an MRL.
5. Given the label directions and the W/H period, the expected use pattern of limited usage overall and resulting residues (including relatively low residues arising from trials), industry has QA systems to manage market MRLs with some effort such as pre-shipment testing and stock selection.

Pyraclostrobin - Residues Arising from Trials

- Are listed on page 14 of the TAN.
- A number of AUS and overseas trials indicate residues arise up to 0.100mg/kg. Only 1 result is above 0.036mg/kg, being 0.100mg/kg.
- The OECD MRL calculator estimates an MRL of 0.1mg/kg, noting the STMR is 0.02mg/kg.

Pyraclostrobin - Market MRLs

- On page 15 of the TAN, it is recommended to adopt a new conservative AUS MRL 0.2mg/kg from the current LOQ of 0.01mg/kg* for Cereal Grains, noting the degree of uncertainty.
- While the proposed Cereal Grains MRL covers all cereals, there is no proposed registration in cereal grains other than for wheat, barley and oats.
- On page 27 of the TAN, various overseas MRLs are listed, all except USA (not a significant market). Korea and Taiwan are at or above the proposed AUS MRL of 0.2mg/kg.
- All other AUS wheat markets have an MRL equal to or above the proposed MRL of 0.2mg/kg, except

India	0.01mg/kg D
Korea	0.09mg/kg
Taiwan	0.02mg/kg

Industry Comment on the Above

1. The majority of trial results are lower than 0.02mg/kg, except for 6 results at 0.016, 0.018, 0.025, 0.035, 0.036 and 0.100 mg/kg.
2. The STMR is 0.02mg/kg.
3. A Codex MRL of 0.2mg/kg applies in many markets.
4. India defaults to 0.01mg/kg. The Korean MRL is below the highest residue detected in the trials.
5. Given the label directions and the W/H period, the expected use pattern of limited usage overall and resulting residues (including relatively low residues arising from trials), industry can manage meeting market MRL.

7. Pulses

Use Patterns and Label Directions

- Are listed on page 10 of the TAN.
- A maximum of 2 uses are permitted, prior to a particular growth stage.
- Includes a direction of "do not apply less than 14 days before harvest".
- On page 10, no withholding period before harvest is required.

Mefentrifluconazole - Residues Arising from Trials

- Are listed on page 17 of the TAN for a number of pulse commodities.
- A number of AUS trials indicate residues arise up to 1.098mg/kg.
- The OECD MRL calculator estimates an MRL of 1.5mg/kg, noting the STMR is 0.046mg/kg.

Mefentrifluconazole - Market MRLs

- There is no current AUS MRL.
- On page 18 of the TAN, it is recommended to create an AUS MRL of 1.5mg/kg.

Industry Comment on the Above

1. Trial results vary by commodity, however except for one lupin trial (1.098mg/kg), all residue results are below 0.163mg/kg.
2. The STMR is low, significantly lower than many market MRLs where one exists.
3. A Codex MRL of 0.07mg/kg for dry beans and 0.15mg/kg for dry peas applies in many markets.
4. A default 0.01mg/kg applies in Egypt, Great Britain, India and Korea for various commodities.
5. China and Vietnam (currently reviewing MRLs) do not have an MRL.
6. Given the label directions and the W/H period, the expected use pattern of limited usage overall and resulting residues (including relatively low residues arising from trials), alternative chemical options, it could be expected markets that use Codex MRLs can be managed. For other markets where residues may be detected upon discharge, industry would need to utilise QA systems to manage market MRLs.

Pyraclostrobin - Residues Arising from Trials

- Are listed on page 18 of the TAN for a number of pulse commodities.
- A number of AUS trials indicate residues arise up to 0.677mg/kg, with all below 0.093mg/kg except two at 0.185 and 0.677mg/kg.
- The OECD MRL calculator estimates an MRL of 1mg/kg, noting the STMR is 0.027mg/kg.

Pyraclostrobin - Market MRLs

- There is no current AUS MRL.
- On page 18 of the TAN, it is recommended to adopt a new AUS MRL 1mg/kg.
- On page 27 of the TAN, a number of pulse market MRLs are outlined. All the listed MRLs are below the residue trial results except for the highest detected of 0.677mg/kg.
- Codex has pulse MRLs of between 0.2 and 0.5mg/kg.
- A number of other pulse markets are listed in the attached spreadsheet.
- India has a default MRL of 0.01mg/kg.

Industry Comment on the Above

1. Trial results vary by commodity, however except for one lupin trial (0.667mg/kg), all residue results are below 0.185mg/kg, being lower than the majority of market MRLs where they exist.
2. The STMR is low, significantly lower than many market MRLs where one exists.
3. A Codex MRL of 0.2mg/kg for dry beans and 0.3mg/kg for dry peas, along with 0.5mg/kg for lentil applies in many markets.
4. A default 0.01mg/kg applies in India and Korea applies for various pulse commodities.
5. Given the label directions and the W/H period, the expected use pattern of limited usage overall and resulting residues (including generally very low residues arising from trials), alternative treatment options, it could be expected markets that use Codex MRLs can be managed. For other markets, QA systems should be able to adequately manage market MRLs.

Should you have any questions on this submission please do not hesitate to contact me.

Regards

Gerard McMullen

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