



**Australian Government**

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**Australian Pesticides and  
Veterinary Medicines Authority**



## **Trade Advice Notice on cyprodinil for use on barley**

Submissions received  
November 2025

To:

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

Date: 5 November 2025

To whom it may concern

I write in response to a request for comments on an emergency use permit (EUP) application from Grain Producers Australia Limited for the use of cyprodinil on barley, for the control of the net form of net blotch.

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 the Australian Pesticides and Veterinary Medicines Authority (APVMA) in the Trade Advice Notice (TAN) dated October 2025, the industry does not object to the proposed registration.

No comment is made for barley grain/seed production or animal products.

The support is noted based on the following comments:

- a) There is not a significant export market for barley straw, barley hay or barley forage.
- b) There is a Codex MRL of 10mg/kg for barley, straw/fodder under "cereals", adopted by a range of Australian export fodder markets.
- c) For those markets that have fodder MRLs, all except Japan adopt 10mg/kg.
- d) The proposed Australian MRL of 2mg/kg is significantly lower than most fodder markets.
- e) Given the usage pattern and residue data provided in the TAN, industry can manage shipments to meet all market MRLs.

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

Regards



Gerard McMullen

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"*



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To whom it may concern

I write in response to a request for comments on an emergency use permit application from Grain Producers Australia Limited for the use of cyprodinil on barley, for the control of the net form of net blotch.

This submission is presented on behalf of the National Working Party on Grain Protection (NWPGP) and deals with barley 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 emergency application and the proposed change in maximum residue limits (MRLs).

Comments on this view are outlined below.

### 3. General Comments

- NWPGP has been made aware that this emergency use permit (EUP) application was made at the start of this season (i.e., early in 2025).
- If the above is correct, it is disappointing the EUP is being released now, long after the need for use of this product based on the label directions (i.e., DO NOT apply after growth stage BBCH 49). If approved this product would have been an additional option for control of the disease Net form of net blotch this season.
- It is also disappointing a short window of consultation was provided, despite the apparent time lag for APVMA in reviewing/processing the application given the crop stage of barley label directions have passed for all current season barley crops. Industry assumes this short timeframe is because of the EUP application.
- Industry acknowledges that once the APVMA have completed the assessment of submissions and made their final decision, if it is positive, it will allow for the use next season.

### 4. Barley

- As noted in a recent submission for mefentrifluconazole (9 October 2025), a major pest in barley is net form of net blotch and triple resistance has been detected in some regions, thought to be South Australia to date, hence additional control options are needed.
- 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.
- As noted in the TAN, the majority of markets have an MRL equal to or higher than the proposed Australian MRL, except Korea. While Korea is a market for Australian barley, industry management systems, including grower use of resistant cultivars, can effectively manage barley shipments to this market. Note also India does not have an MRL (defaults to 0.01mg/kg) and is not a significant market for barley (no shipments in the last 3 years).

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

Regards



Gerard McMullen

Chair

National Working Party on Grain Protection

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*Produced through Grains Australia Limited funding of this activity*

