



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



## **Trade Advice Notice**

on benzovindiflupyr in the product Elatus Flexi Solatenol technology Fungicide for  
use on barley and wheat

APVMA product number 96391

April 2026

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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 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 register Elatus Flexi Solatenol technology 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 14 May 2026 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, Agricultural Chemicals  
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 Trade Advice Notices can be found on the APVMA website: [apvma.gov.au](http://apvma.gov.au).

## Introduction

The APVMA has before it an application from Syngenta Australia Pty Ltd to register Elatus Flexi Solatenol technology Fungicide containing benzovindiflupyr as its only active constituent for use on barley and wheat.

The related product Elatus Ace Solatenol technology Fungicide (APVMA Product no. 86310) contains benzovindiflupyr with propiconazole and is registered for use on barley and wheat at lower benzovindiflupyr rates than proposed here.

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## Trade considerations

### Commodities exported

Barley and wheat are considered to be major export commodities<sup>1</sup>, as are commodities of animal origin, such as meat, offal and dairy products, which may be derived from livestock fed feeds produced from treated forage, fodder and grain. Residues in these commodities resulting from the use of Elatus Flexi Solatenol technology Fungicide may have the potential to unduly prejudice trade.

### Destination and value of exports

In the 2023-24 financial year Australia exported 8323 kt of barley valued at \$3320 million. Major export markets were China, Japan, Thailand, Vietnam, Korea, Philippines, Taiwan and the United Arab Emirates (Australian Bureau of Agricultural and Resource Economics and Sciences, ABARES)<sup>2</sup>.

Total exports of wheat were 22454 kt in the 2023-24 financial year, valued at \$9.9 billion. Major export destinations for Australian wheat were China, Indonesia, the Philippines, Vietnam, Yemen, Korea, Japan, Malaysia, New Zealand, Thailand, Kuwait, United Arab Emirates, Papua New Guinea, Myanmar, South Africa, Taiwan, Fiji, Oman, Iraq, India, Singapore, Mozambique, Saudi Arabia, Bangladesh and Egypt (ABARES).

### Proposed Australian use pattern

The proposed Australian use pattern for Elatus Flexi Solatenol technology Fungicide (100 g/L benzovindiflupyr) is summarised below:

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<sup>1</sup> APVMA Regulatory Guidelines – Data Guidelines: [Pesticides - Overseas trade \(Part 5B\)](#), accessed February 2026

<sup>2</sup> Australian Bureau of Agricultural and Resource Economics and Sciences (ABARES), 2024. [Agricultural commodities and trade data – Agricultural commodity statistics – 2023](#), ABARES website, accessed July 2025

Table 1: Proposed use pattern

Crop	Pest	Rate/concentration	Critical comments
Barley	Leaf rust ( <i>Puccinia hordei</i> )	500 mL/ha	Apply as a preventative spray.
	Net blotch:	(50 g ai/ha)	ELATUS® Flexi MUST be applied in mixture with another approved, non-cross resistant, fungicide recommended for the control of the same target diseases in barley. The addition of an approved triazole fungicide is recommended. Refer to manufacturers' recommendations for rates of partner fungicides.  A repeat spray 21 to 28 days later may be required.  DO NOT apply more than 2 applications per season.  DO NOT apply after GS 69 (end of flowering).  This use is subject to a CropLife resistance management strategy.
	Net form ( <i>Pyrenophora teres</i> f. sp. <i>teres</i> )		
	Spot form ( <i>Pyrenophora teres</i> f. sp. <i>maculata</i> )		
	Powdery mildew ( <i>Blumeria graminis</i> f. sp. <i>hordei</i> )		
Wheat	Leaf rust ( <i>Puccinia triticiana</i> )	500 mL/ha	Apply as a preventative spray.
	Powdery mildew ( <i>Blumeria graminis</i> f. sp. <i>tritici</i> )	(50 g ai/ha)	ELATUS® Flexi MUST be applied in mixture with another registered, non-cross resistant, fungicide recommended for the control of the same target diseases in wheat. The addition of a registered triazole fungicide is recommended. Refer to manufacturers' recommendations for rates of partner fungicides.  A repeat spray within 21 to 28 days may be required under conditions conducive to high disease pressure  DO NOT apply more than 2 applications per season.  DO NOT apply after GS 69 (end of flowering).  This use is subject to a CropLife resistance management strategy.
	Septoria tritici blotch ( <i>Zymoseptoria tritici</i> )		
	Stripe rust ( <i>Puccinia striiformis</i> )		
	Yellow leaf spot ( <i>Pyrenophora tritici-repentis</i> )		

Withholding periods:

Harvest: Not required when used as directed.

Grazing: Do not graze or cut for stock food for 10 days after application

Restrictions:

DO NOT apply by aircraft

DO NOT apply more than 2 applications of ELATUS® Flexi (or any other Group 7 fungicide) in any one season on the same paddock

## Results from residues trials presented to the APVMA

### Barley

#### Barley Forage

In European barley trials involving 2 applications at a target rate of 50 g ai/ha (1× proposed) between BBCH 30-63 residues in forage at a 10 day PHI, or later if higher residues were observed, were 0.17, 0.26, 0.28, 0.32, 0.37, 0.42, 0.49 (3), 0.50, 0.52, 0.58, 0.67, 0.795, 0.91, 1.0, 1.09 and 2.04 mg/kg on a fresh weight basis.

The OECD Feed Calculator indicates that barley forage consists of 30% dry matter. On a dry weight basis residues were 0.57, 0.87, 0.93, 1.07, 1.23, 1.40, 1.63, 1.63, 1.63, 1.67, 1.73, 1.93, 2.23, 2.65, 3.03, 3.33, 3.63 and 6.80 mg/kg. The OECD MRL Calculator recommends an MRL of 8 mg/kg (n = 18, STMR = 1.65 mg/kg). Noting also the data for wheat forage below it is recommended that the MRL of 7 mg/kg for benzovindiflupyr on Forage of cereal grains (green) be increased to 15 mg/kg.

#### Barley Grain

In Australian and New Zealand barley trials involving 2 applications each at a target rate of 75 g ai/ha between BBCH 50-59 residues in grain scaled for the proposed application rate were <0.01, 0.027, 0.029, 0.033, 0.076 and 0.12 mg/kg.

In European barley trials involving 2 applications at a target rate of 50 g ai/ha (1× proposed) between BBCH 30-63 residues in grain at harvest were <0.01, 0.01, 0.02, 0.02, 0.03, 0.03, 0.04, 0.04, 0.05, 0.05, 0.05, 0.05, 0.06, 0.07, 0.07, 0.10, 0.13 and 0.31 mg/kg.

The combined dataset for barley grain is <0.01, <0.01, 0.01, 0.02, 0.02, 0.027, 0.029, 0.03, 0.03, 0.033, 0.04, 0.04, 0.05, 0.05, 0.05, 0.05, 0.06, 0.07, 0.07, 0.076, 0.10, 0.12, 0.13 and 0.31 mg/kg. The OECD MRL Calculator recommends an MRL of 0.4 mg/kg (n = 24, STMR = 0.045 mg/kg). It is recommended that the current MRL of 0.2 mg/kg for benzovindiflupyr on GC 0640 Barley be increased to 0.4 mg/kg.

#### Barley Straw

In Australian and New Zealand barley trials involving 2 applications each at a target rate of 75 g ai/ha between BBCH 50-59 residues in straw scaled for the proposed application rate were 0.31, 0.35, 0.46, 0.52, 0.62 and 0.89 mg/kg on a dry weight basis.

In European barley trials involving 2 applications at a target rate of 50 g ai/ha (1× proposed) between BBCH 30-63 residues in straw at harvest were 0.14, 0.18, 0.26, 0.37, 0.42, 0.54, 0.60, 0.61, 0.80, 0.95, 0.96, 1.01, 1.16, 1.58, 1.67, 2.22, 4.02 and 4.99 mg/kg on a fresh weight basis. The OECD Feed Calculator indicates that barley straw consists of 89% dry matter. On a dry weight basis residues were 0.16, 0.20, 0.29, 0.42, 0.47, 0.61, 0.67, 0.69, 0.90, 1.07, 1.08, 1.13, 1.30, 1.78, 1.88, 2.49, 4.52 and 5.61 mg/kg.

The combined dataset for barley straw is 0.16, 0.20, 0.29, 0.31, 0.35, 0.42, 0.46, 0.47, 0.52, 0.61, 0.62, 0.67, 0.69, 0.89, 0.90, 1.07, 1.08, 1.13, 1.30, 1.78, 1.88, 2.49, 4.52 and 5.61 mg/kg. The OECD MRL Calculator recommends an MRL of 7 mg/kg (n = 24, STMR = 0.68 mg/kg). Noting also the data for wheat straw below it

is recommended that the MRL of 3 mg/kg for benzovindiflupyr on AS 0081 Straw and fodder (dry) of cereal grains be increased to 10 mg/kg.

## Wheat

### Wheat Forage

In European wheat trials involving 2 applications at a target rate of 50 g ai/ha (1× proposed) between BBCH 30-69 residues in forage at a 10 day PHI, or later if higher residues were observed, were 0.14, 0.17, 0.26, 0.36, 0.38, 0.41, 0.48, 0.55, 0.67, 0.70, 0.78, 0.87, 1.01, 1.02, 1.09, 1.52, 1.63 and 2.26 mg/kg on a fresh weight basis.

The OECD Feed Calculator indicates that wheat forage consists of 25% dry matter. On a dry weight basis residues were 0.56, 0.68, 1.04, 1.44, 1.52, 1.64, 1.92, 2.2, 2.68, 2.8, 3.12, 3.48, 4.04, 4.08, 4.36, 6.08, 6.52 and 9.04 mg/kg. The OECD MRL Calculator recommends an MRL of 15 mg/kg (n = 18, STMR = 2.74 mg/kg). Noting also the data for barley forage above it is recommended that the MRL of 7 mg/kg for benzovindiflupyr on Forage of cereal grains (green) be increased to 15 mg/kg.

### Wheat Grain

In Australian and New Zealand wheat trials involving 2 applications each at a target rate of 75 g ai/ha between BBCH 52-69 residues in grain scaled for the proposed application rate were <0.01 (4), 0.019 and 0.28 mg/kg.

In European wheat involving 2 applications at a target rate of 50 g ai/ha (1× proposed) between BBCH 30-69 residues in grain at harvest were <0.01 (13), 0.01 (4) and 0.02 mg/kg.

The combined dataset for wheat grain is <0.01 (17), 0.01 (4), 0.019, 0.02 and 0.28 mg/kg. The OECD MRL Calculator recommends an MRL of 0.3 mg/kg (n = 24, STMR = 0.01 mg/kg). It is recommended that the current MRL of 0.01 mg/kg for benzovindiflupyr on GC 0654 Wheat be increased to 0.3 mg/kg.

### Wheat Straw

In Australian and New Zealand wheat trials involving 2 applications each at a target rate of 75 g ai/ha between BBCH 52-69 residues in straw scaled for the proposed application rate were 0.29, 0.35, 0.37, 0.48, 1.33 and 9.27 mg/kg on a dry weight basis.

In European wheat trials involving 2 applications at a target rate of 50 g ai/ha (1× proposed) between BBCH 30-69 residues in straw at harvest were 0.15, 0.22, 0.31, 0.47, 0.55, 0.67, 0.70, 0.77, 0.91, 1.03, 1.14, 1.29, 1.48, 1.87, 1.96, 2.35, 2.66 and 4.48 mg/kg on a fresh weight basis. The OECD Feed Calculator indicates that wheat straw consists of 88% dry matter. On a dry weight basis residues were 0.17, 0.25, 0.35, 0.53, 0.63, 0.76, 0.80, 0.88, 1.03, 1.17, 1.30, 1.47, 1.68, 2.13, 2.23, 2.67, 3.02 and 5.09 mg/kg.

The combined dataset for wheat straw is 0.17, 0.25, 0.29, 0.35, 0.35, 0.37, 0.48, 0.53, 0.63, 0.76, 0.80, 0.88, 1.03, 1.17, 1.30, 1.33, 1.47, 1.68, 2.13, 2.23, 2.67, 3.02, 5.09 and 9.27 mg/kg. The OECD MRL Calculator recommends an MRL of 10 mg/kg (n = 24, STMR = 0.955 mg/kg). Noting also the data for barley straw above it is recommended that the MRL of 3 mg/kg for benzovindiflupyr on AS 0081 Straw and fodder (dry) of cereal grains be increased to 10 mg/kg.

## Animal commodities

### Mammalian

Barley and wheat grain, straw and forage are significant livestock feeds. The OECD feed calculator suggests that barley and wheat forage can contribute 50% and up to 100% to the diet of cattle respectively, and barley and wheat straw can contribute up to 100% and 80% respectively to the diet of cattle. Wheat milled byproducts are also possible animal feeds. The maximum dietary burdens for beef and dairy cattle are as tabulated below, taking into account the registered use on peanuts:

**Table 2. Estimated livestock dietary burden for beef cattle**

Commodity	Codex Code	Residue (mg/kg)	Basis	Dry Matter (%)	Residue dry weight (mg/kg)	AU Diet content (%)	AU Residue Contribution (ppm)
Wheat forage	AF/AS	9.04	HR	100	9.0	100	9.0
Barley forage	AF/AS	6.8	HR	100	6.8	-	-
Total						100	9.0

**Table 3. Estimated livestock dietary burden for dairy cattle**

Commodity	Codex Code	Residue (mg/kg)	Basis	Dry Matter (%)	Residue dry weight (mg/kg)	AU Diet content (%)	AU Residue Contribution (ppm)
Wheat forage	AF/AS	9.04	HR	100	9.0	60	5.4
Barley forage	AF/AS	6.8	HR	100	6.8	-	-
Peanut hay	AL	5.4	HR	100	5.4	40	2.2
Total						100	7.6

Estimated residues in tissues and milk and required MRLs based on a previously submitted animal transfer study are summarised below:

**Table 4. Estimated residues in cattle tissues and milk and required MRLs**

Feeding level (ppm)	Milk	Muscle	Liver	Kidney	Fat
Benzovindiflupyr residue (mg/kg)					
16	<0.01	<0.01	0.07	0.01	0.02
9.0 – beef, estimated burden	-	<0.01	0.04	<0.01	0.01
7.6 – dairy, estimated burden	<0.01	-	-	-	-
Established MRLs	*0.01 (milks)	*0.01 (fat)	*0.01 (offal)		-
Recommended MRLs	No change	0.02 (fat)	0.07		No change

#### Poultry

Barley and wheat grain and wheat milled by-products are significant poultry feeds. No poultry feeding study is available for poultry.

In the previously submitted metabolism study laying hens were dosed at 16-20 ppm parent compound in the dry feed for 14 consecutive days. Maximum parent residues over the 2 labels were: 0.024 mg/kg in egg yolks, 0.004 mg/kg in egg whites, 0.019 mg/kg in fat, <0.001 mg/kg in liver and 0.001 mg/kg in muscle. The dietary burden for broilers and layers of 0.01 ppm, respectively, is over 1000 times lower than the dose administered in the hen metabolism study (16–20 ppm). Therefore, no parent residues > 0.01 mg/kg are expected in eggs, egg yolks and hen tissues. Accordingly, the poultry commodity MRLs established at the LOQ remain appropriate.

### Overseas registration and approved label instructions

The applicant indicated that benzovindiflupyr products are registered for use on barley and wheat in many countries including in Europe and North America.

### 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. Benzovindiflupyr has been considered by Codex. The following relevant Codex CXLs and international MRLs have been established for benzovindiflupyr.

Table 5: International MRLs for benzovindiflupyr

Commodity	Tolerance for residues arising from the use of benzovindiflupyr (mg/kg)							
	Australia (proposed)	Codex <sup>3</sup>	China <sup>4</sup>	EU <sup>5</sup>	Japan <sup>6</sup>	Korea <sup>7</sup>	Taiwan <sup>8</sup>	USA <sup>9</sup>
Residue Definition	parent	parent	parent	parent	parent	-	-	parent
Barley	0.4 proposed (0.2 current)	1	1	1.5	2	1.5	1.5	1.5
Wheat	0.3 proposed (0.01 current)	0.1	0.1	0.1	0.1	0.1	0.1	0.1
Edible offal (mammalian)	0.07 proposed (*0.01 current)	0.1	0.1	0.1 (bovine, sheep)	0.1	-	-	0.06 (cattle, sheep liver)
Meat [mammalian][in the fat]	0.02 proposed (*0.01 current)	0.03 (meat, fats)	0.03 (meat, fat)	0.03 (fat – bovine, sheep)	0.03 (muscle, fat)	-	-	0.02 (cattle, sheep fat)

<sup>3</sup> Food and Agriculture Organisation of the United Nations, [Codex Alimentarius, International Food Standards](#), FAO website, accessed February 2026.

<sup>4</sup> United States Department of Agriculture, [Translation of Maximum Residue Limits for Pesticides in Foods, China – People's Republic of](#), accessed February 2026.

<sup>5</sup> European Commission, [EU Pesticide residue\(s\) and maximum residue levels \(mg/kg\)](#), European Commission website, accessed February 2026.

<sup>6</sup> Japanese Food Chemistry Research Foundation, [Table of MRLs for Agricultural Chemicals](#), JFCRPF website, accessed February 2026.

<sup>7</sup> Ministry of Food and Drug Safety, Korea, [MRLs in Pesticides](#), accessed February 2026.

<sup>8</sup> Laws & Regulations Database of the Republic of China (Taiwan), [Standards for Pesticide Residue Limits in Foods, Standards for Pesticide Residue Limits in Animal Products](#), accessed February 2026.

<sup>9</sup> Electronic Code of Federal Regulations, [USA Electronic Code of Federal Regulations](#), eCFR website, accessed July February 2026.

## Current and proposed Australian MRLs for benzovindiflupyr

Table 6: Current MRL Standard – Table1

Compound	Food	MRL (mg/kg)
Benzovindiflupyr		
GC 0640	Barley	0.2
MO 0105	Edible offal (mammalian)	*0.01
PE 0112	Eggs	*0.01
MM 0095	Meat (mammalian) [in the fat]	*0.01
ML 0106	Milks	*0.01
GC 0647	Oats	0.2
SO 0697	Peanut	*0.01
PO 0111	Poultry, edible offal of	*0.01
PM 0110	Poultry meat [in the fat]	*0.01
GC 0650	Rye	0.01
GC 0653	Triticale	0.01
GC 0654	Wheat	0.01

Table 7: Proposed MRL Standard – Table1

Compound	Food	MRL (mg/kg)
Benzovindiflupyr		
Delete:		
GC 0640	Barley	0.2
MO 0105	Edible offal (mammalian)	*0.01
MM 0095	Meat (mammalian) [in the fat]	*0.01
GC 0654	Wheat	0.01
Add:		
GC 0640	Barley	0.4
MO 0105	Edible offal (mammalian)	0.07

Compound	Food	MRL (mg/kg)
MM 0095	Meat (mammalian) [in the fat]	0.02
GC 0654	Wheat	0.3

## Potential risk to trade

Export of treated produce containing finite (measurable) residues of benzovindiflupyr 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 barley MRL is lower than that established by Codex and in other overseas markets. The proposed wheat MRL is higher than those established by Codex and in overseas markets. However, it is noted that wheat grain is often bulked and blended from different sources and that in the available wheat residue trials the STMR in wheat was <0.01 mg/kg, with only one result out of 24 samples above the Codex wheat MRL of 0.1 mg/kg.

The proposed MRLs for edible offal (mammalian) and meat [mammalian][in the fat] are lower than those established by Codex and most overseas markets and similar to MRLs established in the USA. However, no animal commodity MRLs are established for benzovindiflupyr in Korea or Taiwan.

Comment is sought from relevant industry groups on the risk to trade in wheat, barley and animal commodities from the proposed uses.

## Conclusion

Syngenta Australia Pty Ltd have applied to register Elatus Flexi Solatenol technology Fungicide containing benzovindiflupyr as its only active constituent for use on barley and wheat. Comment is sought on the potential for the proposed uses to prejudice Australian trade.