Australian Government

Australian Pesticides and Veterinary Medicines Authority

TRADE ADVICE NOTICE

on Flupropanate in the product Tussock Herbicide

APVMA Product Number 51909

DECEMBER 2010

The Manager, Public Affairs
Australian Pesticides and Veterinary Medicines Authority
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PREFACE

The Australian Pesticides and Veterinary Medicines Authority (APVMA) is the Australian Government regulator 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 proposed extensions of use for existing chemicals where there may be trade implications, as defined in *Ag MORAG: Manual of Requirements and Guidelines* Part 5B.

About this document

This is a Trade Advice Notice.

It 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 to vary the registration of **TUSSOCK HERBICIDE containing the active constituent flupropanate** 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. In relation to this document, these grounds relate to the **trade implications** of the extended use of the product. Comments received outside these grounds cannot be considered by the APVMA.

Submissions must be received by the APVMA by close of business on **6 January 2011** 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)
- The date you made the submission.

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:

Contact Officer
Pesticides Program
Australian Pesticides and Veterinary Medicines Authority
PO Box 6182
Symonston ACT 2609

Phone: 02 6210 4818
Fax: 02 6210 4775
Email: pesticides@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: http://www.apvma.gov.au

[1] A full definition of "confidential commercial information" is contained in the Agvet Code.

1 INTRODUCTION

The Australian Pesticides and Veterinary Medicines Authority (APVMA) has before it an application from Grow Choice Pty Ltd, to vary the registration of the product, TUSSOCK HERBICIDE, containing 745 g/L flupropanate.

Currently a 4 month grazing withholding period is associated with the blanket / cover spray use of Tussock Herbicide on pasture while a 14 day grazing withholding period is associated with the spot spray use pattern. A 14 day slaughter interval / livestock withholding period and the restraint “Lactating cows or goats must not be grazed in treated areas” currently applies to the use of Tussock Herbicide.

The applicant has proposed that the restraint “Lactating cows or goats must not be grazed in treated areas” be removed and an MRL for flupropanate in milk be established so that the product can be used in pastures that may be grazed by dairy animals.

The potential for flupropanate residues in milk and other animal commodities to unduly prejudice Australian trade is discussed below.

2 TRADE CONSIDERATIONS

2.1 Commodities exported

Commodities of animal origin, such as meat, offal and dairy products, which may be derived from livestock feeding on treated pastures, are exported and are considered to be major export commodities[2]. Residues in these commodities resulting from the use of TUSSOCK HERBICIDE have the potential to unduly prejudice trade.

2.2 Destination and value of exports

The significant export markets for Australian meat, kidney and liver are listed in Appendix 3 of Part 5B of Ag MORAG. The destination and value of Australian dairy exports are summarised in Table 1 below.

Table 1: Destination and value of Australian dairy exports

DESTINATION	VALUE OF AUSTRALIAN EXPORTS OF DAIRY PRODUCTS, BY DESTINATION ($ MILLION)						
	2002-03	2003-04	2004-05	2005-06	2006-07	2007-08	2008-09
CHEESE							
Japan	272.0	299.6	378.9	298.5	337.9	426.7	398.9
Saudi Arabia	98.9	69.0	81.5	103.5	86.7	89.7	30.6
United States	36.1	33.9	45.4	54.2	52.7	37.2	59.7
Other	393.3	336.7	370.9	381.0	346.9	414.8	306.9
TOTAL	800.3	739.2	876.7	837.2	824.2	968.4	796.1
BUTTER AND BUTTER FAT							
Egypt	18.9	6.4	10.5	12.5	13.9	5.0	22.0
Malaysia	12.7	13.5	11.6	15.8	11.0	17.4	14.0
Singapore	15.5	18.2	16.8	21.1	14.4	26.2	20.2
Other	176.9	144.8	149.6	175.3	139.3	146.0	175.9

[2] Appendix 1 of Part 5B of Ag MORAG: http://www.apvma.gov.au/morag_ag/vol_3/

DESTINATION	VALUE OF AUSTRALIAN EXPORTS OF DAIRY PRODUCTS, BY DESTINATION ($ MILLION)						
	2002-03	2003-04	2004-05	2005-06	2006-07	2007-08	2008-09
TOTAL	224.0	182.9	188.5	224.7	178.6	194.6	232.1
SKIM MILK POWDER							
Malaysia	51.4	52.7	64.2	77.1	72.2	63.4	49.0
Philippines	71.8	60.1	49.4	72.0	46.1	64.1	99.7
Singapore	38.4	42.4	57.8	56.1	67.1	61.8	54.0
Other	246.9	232.3	248.7	323.7	319.6	343.9	350.2
TOTAL	408.5	387.5	420.1	528.9	505.0	533.2	552.9
CASEIN							
Japan	20.6	23.3	23.1	30.4	31.8	38.4	43.6
United States	81.4	68.8	56.6	27.3	32.4	42.2	29.5
Other	26.4	30.5	36.5	31.3	49.3	44.2	34.4
TOTAL	128.4	122.5	116.2	89.0	113.5	124.8	107.5
WHOLEMILK POWDER							
Malaysia	22.3	28.9	33.1	23.8	14.5	27.3	14.9
Singapore	25.2	21.4	30.9	44.6	41.4	88.9	77.0
Taiwan	44.9	40.0	31.5	22.8	13.5	11.8	9.3
Other	284.4	231.6	228.9	242.4	205.4	264.1	374.2
TOTAL	379.8	321.8	324.4	333.6	274.9	392.2	475.3
OTHER PRODUCTS							
Fresh milk	98.2	104.0	108.8	107.3	96.3	83.6	102.1
Other fresh products	5.6	9.6	9.1	6.3	11.8	12.0	0.4
Condensed milk	133.3	121.0	139.8	147.5	156.9	152.4	158.9
Other powders	274.4	257.3	248.3	241.5	211.0	247.4	249.7
TOTAL	511.5	492.0	506.0	502.6	476.0	495.5	511.1
TOTAL DAIRY PRODUCTS	2,453	2,246	2,432	5,516	2,372	2,709	2,675
Source: ABARE, Australian commodity statistics 2009, Canberra							

2.3 Australian use-pattern

The currently approved use pattern for TUSSOCK HERBICIDE is presented below:

Table 2: Currently approved use pattern for Tussock Herbicide (745 g/L flupropanate)

Crop/ Situation	Weeds Controlled	States	Rate			Critical Comments	
			Ground per ha	Air per ha	Spot Spraying per 100L		
Pastures and non-crop situations	Parramatta grass (*Sporobolus* spp.)	Qld, NSW, Vic, WA only	2L/ha (1.49 kg ai/ha)	2L/ha (1.49 kg ai/ha)	200mL (149 g ai/100L)	Apply December to February inclusive.	**Application volumes**: Pastures Aerial: 40-80L water per ha Ground Boom Spray: 150L water per ha Spot Spraying: NSW & Qld: 1000L/ha or for a 15L knapsack treat 150m^2.
	Sporobolus sp. such as Giant Parramatta Grass (*S. fertilis*), Giant Rat's Tail Fescue (*S. pyramidalis*) and *S. natalensis*	NSW only	1.5-2L/ha (1.12 - 1.49 kg ai/ha)	-	200mL/100L (149 g ai/100L)	In Northern NSW apply from July to December inclusive, during the drier time of year. Use the higher rate for heavy infestations. To obtain better herbicide selectivity and less damage to desirable pasture species, apply when the pasture is dormant, semi-dormant. For example in NSW, the optimum application time is late winter and early spring. DO NOT apply in severe droughts or to weeds retarded by burning.	
	African love grass (*Eragrostis curvula*)	NSW, WA only	3L/ha (2.24 kg ai/ha)	-	300mL/100L (224 g ai/100L)	Apply July to December.	
		Vic. only				Apply July to December inclusive. All other Critical Comments as for Serrated Tussock (Vic.).	
	Rats tail grasses	Qld, WA only	2L/ha (1.49 kg ai/ha)	-	200mL/100L (149 g ai/100L)	Spray to run-off.	
Urban open space, woodlands, roadsides, nature reserves and pastures	Needle grasses (*Nassella neesiana, N. leucotricha, N. hyalina, N. charruana, N. tenuissima*)	NSW, ACT, Vic, SA, WA only	1.5 - 3L/ha (1.12 - 2.24 kg ai/ha)	-	200mL + 150mL Biochoice 360 Herbicide /100L (149 g ai/100L)	Apply tank mix to actively growing plants from Spring to autumn. Apply once per year.	
					100-300mL/ha (74.5 - 224 g ai/100L)	Calibrate spray equipment to apply 1000L water per hectare. Apply to actively growing and stress free plants. Control will take 3-12 months depending on weather conditions and senescence of plant foliage. High rates will kill native grasses. Apply once per year Avoid use in channels or drains. Do NOT re-seed treated areas until at least 100mm of leaching rain has fallen.	
Pastures and non-crop situations	Coolatai Grass (Small patchy infestations) (*Hyparrhenia* spp)	NSW only	-	-	300mL/100L (224 g ai/100L)	Apply in winter and spring between the months of July and October. Apply using high volume spot spray applicators. Apply herbicide solution to Coolatai grass to the point of run-off from leaf surfaces.	

Crop/Situation	Weeds controlled	States	Rate				Critical Comments	
			Ground per ha	Air	Wiper	Spot spraying per 100L		
Pastures and non-crop situations	Serrated Tussock *(Nassella trichotoma)*	Vi,c, Tas. , WA only	2L/ha (1.49 kg ai/ha)	2L/ha (1.49 kg ai/ha)	-	200mL/100L (149 g ai/100L)	Apply during November to February inclusive. Graze to reduce cover of desirable species before spraying. **Re-seeding**: Desirable pasture species such as phalaris, cocksfoot, ryegrass, red and white clovers, subterranean clovers and lucerne must not be sown until at least 100mm of leaching rain has fallen. If drought conditions prevail defer sowing until next season. **Spot Spraying**: Spray to run-off at anytime from spring through to autumn but observe above precautions on re-seeding.	**Application volumes**: Pastures Aerial: 40-80L water per ha Ground Boom Spray: 150L water per ha Spot Spraying: NSW & Qld: 1000L/ha or for a 15L knapsack treat 150m^2.
	Serrated Tussock *(Nassella trichotoma)*	Qld only	2L/ha (1.49 kg ai/ha)	2L/ha (1.49 kg ai/ha)	-	200mL/100L (149 g ai/100L)	Apply September to May inclusive. (See Note below)	
Pasture – broadacre treatment	Serrated Tussock *(Nassella trichotoma)*	NSW, ACT, Vic, WA only	1.5-2L/ha (1.12 - 1.49 kg ai/ha)	1.5-2L/ha (1.12 - 1.49 kg ai/ha)	1:20 via a rotating wiper		Apply September to March and June to August inclusive	Aerial application: apply in a volume of 35-80L of water. In more difficult country, use higher rates of water, anti-drift additives and larger droplets. Ground application: apply in a volume of 80-150L . Use the lower rate on slate, shale and granite soils, use the higher rate on basalt soils. Rotating Wiper: graze heavily prior to treatment to ensure height differential between pasture and serrated tussock. In dense serrated tussock, stock may not graze heavily and some pasture damage may result. Apply as single or double pass. Winter application: avoid application in very dry winters.
Pasture – broadacre treatment -to remove seedlings from improved pasture			0.5-2L/ha (0.37 - 1.49 kg ai/ha)	-	-		Apply September to February inclusive	Seedlings of serrated tussock are susceptible to shading and low rates of flupropanate. In all situations, use conservative stocking rates and fertilise to maintain a vigourous pasture after spraying. Use the lower rate for slate and granite soils. Serrated Tussock plants must be less than 10cm high, and have less than 80 leaves. Apply September to November before pastures "bolt" in the spring flush, or December to February when improved species are dormant.
Pasture – broadacre treatment - spray topping			1.5-2L + 0.6-1.25L Biochoice 360 Herbicide + wetting agent /ha (1.12 - 1.49 kg ai/ha)	1.5-2L + 0.6-1.25L Biochoice 360 Herbicide + wetting agent /ha (1.12 - 1.49 kg ai/ha)	-	-	Apply September to November inclusive	If applied after August, serrated tussock is still likely to set viable seed. To prevent seeding, the use of a knockdown spray may be applicable where it is acceptable to damage associated pasture species. Spray to wet plant – approximately 1000L of prepared solution per hectare. Rotating wiper – Apply as a double pass 2 to 8 weeks before seed heads begin to emerge. Add a wetting agent at the recommended label rates. Will NOT kill serrated tussock but will reduce seeding. Graze heavily prior to treatment to ensure height differential between pasture and serrated tussock. In dense serrated tussock, stock may not graze heavily and some pasture damage will occur.
Pasture – spot treatment - to destroy serrated tussock			-	-	-	150-200mL/100L (112 - 149 g ai/100L)	Can be applied all year round	Calibrate spray equipment to apply to 1000L water per hectare. The addition of a wetter to the glyphosate use pattern may prove beneficial. Lower rates of may be used on slate and granite soils. Use a dye marker. Area may need re-treatment in subsequent years. Flupropanate may take several months to affect plants. Seed set may be prevented by the addition of a knockdown herbicide, such as Glyphosate.
Pasture – spot treatment - to destroy serrated tussock and prevent seeding			-	-	-	150-200mL + 120mL Biochoice 360 Herbicide /100L (112 - 149 g ai/100L)	Apply September to November inclusive	To prevent seed set, spray before seedheads begin to emerge. See critical comments for Pasture, "spot treatment to destroy serrated tussock" above.

WITHHOLDING PERIODS (Current)

AREAS RECEIVING BLANKET TREATMENT (THAT IS TREATMENT OTHER THAN SPOT SPRAYING) ARE NOT TO BE GRAZED OR CUT FOR STOCK FOOD FOR 4 MONTH AFTER SPRAYING.

AREAS RECEIVING SPOT SPRAY TREATMENT ARE NOT TO BE GRAZED OR CUT FOR STOCK FOOD FOR AT LEAST 14 DAYS AFTER SPRAYING.

STOCK ARE NOT TO BE GRAZED IN 'TUSSOCK HERBICIDE' TREATED AREAS FOR AT LEAST 14 DAYS PRIOR TO SLAUGHTER.

LACTATING COWS OR GOATS MUST NOT BE GRAZED IN TREATED AREAS.

Proposed Amendments to the Withholding Period Statements

WITHHOLDING PERIODS (Proposed)

DO NOT graze, or cut for stock feed, areas receiving **any treatment other than spot spraying**, for at least 4 months after spraying.

DO NOT graze, or cut for stock feed, areas receiving **spot spray treatment** (that is direct spraying of individual plants and not surrounding areas) for at least 14 days after spraying.

AND *after the above grazing WHP has expired, observe the following additional slaughter/milking intervals:*

DO NOT graze livestock in treated areas for at least 14 days prior to slaughter.

(This means livestock must be removed from treated pasture, whether spot or fully sprayed, and removed to untreated pasture at least 14 days prior to slaughter, on an indefinite basis.)

DO NOT graze livestock, which are to produce milk for human consumption, in treated areas any less than 14 days prior to the commencement of lactation or supply of milk for human consumption.

(This means livestock must be removed from treated pasture, whether spot or fully sprayed, and removed to untreated pasture at least 14 days prior to milking for human consumption, on an indefinite basis.)

2.4 Results from residue trials presented to the APVMA

Details of 2 new Australian pasture trials as well as 4 previously evaluated pasture trials are available for consideration. The available trials involved application rates 1 - 1.5x the maximum approved rate.

When corrected to represent the residue expected at the approved application rate, the flupropanate residue levels observed in pasture 4 months (112 – 124 days) after application were 6, 29, 44, 58 and 126 mg/kg. Residues in pasture over time are summarised in Figure 1 below.

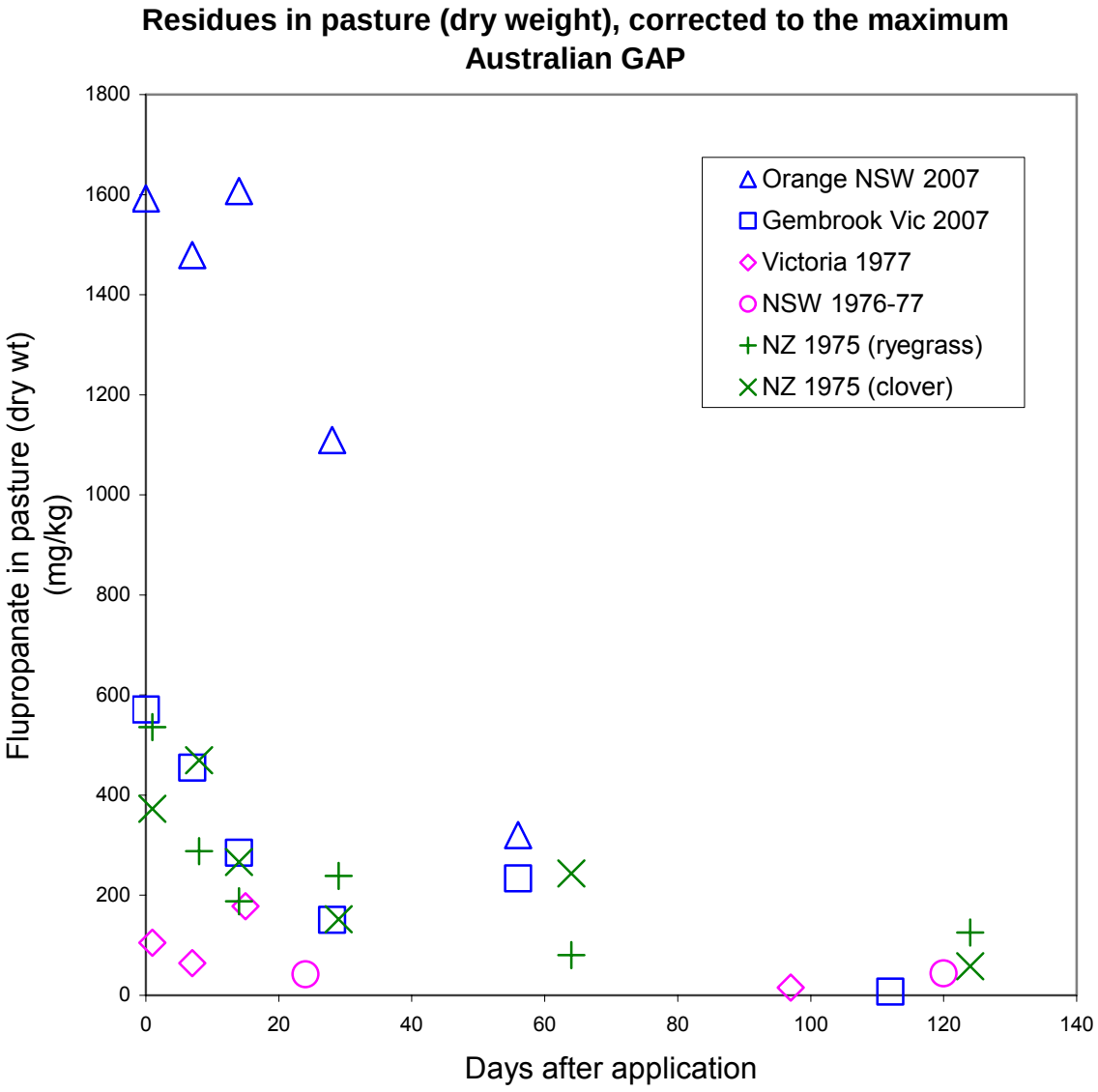

Figure 1: Summary of flupropanate pasture residue data

Details of an Australian lactating cow transfer study conducted in 1979 are available for consideration. Only residues in milk were determined. This study involved a 13 day treatment period, at feeding levels of 200 and 400 ppm flupropanate in the feed, followed by a 14 day withdrawal period. Residue levels decreased as the length of the withdrawal period increased and were below the LOQ of 0.05 mg/kg in the milk of each cow 11 days after withdrawal from treated feed. Residues in milk over time are summarised in Figure 2 below.

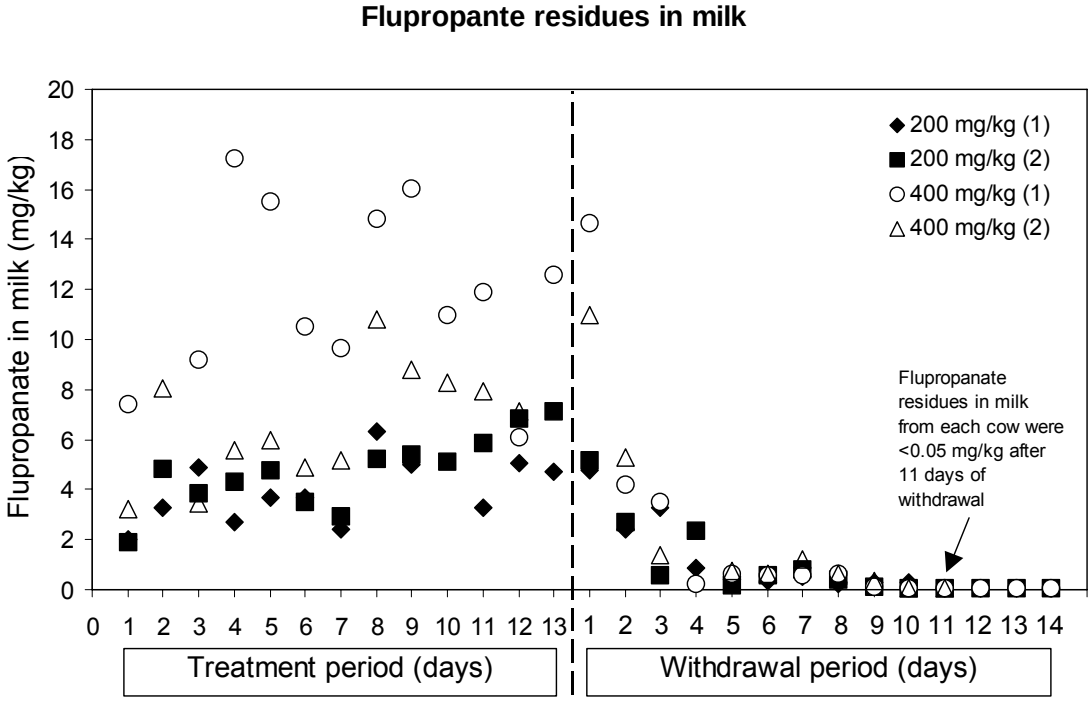

Figure 2: Flupropanate residues in milk over time. Cow 1 (400 mg/kg) had mastitis and cow 2 (400 mg/kg) died from grain poisoning at day 12 of withdrawal.

Details of an Australian sheep transfer study conducted in 1979 are also available for consideration. This study involved a 14 day treatment period, at feeding levels of 45.2 and 243 ppm flupropanate in the feed. Muscle, kidney, liver and fat were collected after 1, 14 and 28 days of withdrawal.

Residue levels of 1.1, 1.0 and 4.8 mg/kg were observed in muscle, liver and kidney respectively 1 day after a 14 day dosing at 243 ppm (in the feed). After 14 days of withdrawal, residue levels of 0.07 and 0.08 mg/kg were observed in muscle and kidney respectively. When corrected for exposure expected from the consumption of treated pasture after a 4 months grazing withholding period (126 ppm flupropanate in the feed), the residue level in muscle and kidney are below the LOQ of 0.05 mg/kg following a 14 day depuration period (clean feed interval / slaughter interval).

Bobby calves may be sent to slaughter when they are 5 – 30 days of age[3]. While bobby calves are often removed from their mother within 12 hours of birth, it may be possible that bobby calves remain with their mother for more than 12 hours, should they be born before the 14 day prohibition on supply of milk for human consumption following grazing of flupropanate treated pasture expires.

Flupropanate residues of 4.5 mg/kg were observed in milk as a result of grazing on flupropanate treated pasture, 4 months after application. Flupropanate residues decline rapidly in milk after withdrawal from treated pasture with residues levels observed at 2.1 and 0.5 mg/kg in milk after 2 days and 5 days of withdrawal respectively.

In the available sheep feeding study, residue levels of 0.36, 0.19, 0.42 and 0.68 mg/kg were observed in muscle, fat, liver and kidney respectively 1 day after a 14 day dosing at 45.2 ppm (in the feed). The flupropanate residue level expected in animal commodities of bobby calves as a result of the feeding of milk containing flupropanate residue levels of 4.5, 2.1 and 0.5 mg/kg to bobby calves for an extended period is estimated in Table 3 below.

Table 3: Flupropanate residue levels estimated to be in animal commodities of bobby calves.

ANIMAL COMMODITY	FLUPROPANATE RESIDUE EXPECTED IN ANIMAL COMMODOTIES OF BOBBY CALVES AS A RESULT OF FEEDING ON MILK		
	NO WITHDRAWAL (4.5 PPM IN MILK)	2 DAYS OF WITHDRAWAL (2.1 PPM IN MILK)	5 DAYS OF WITHDRAWAL (0.5 PPM IN MILK)
Muscle	0.036	0.0016	0.00002
Fat	0.029	0.0013	0.00001
Liver	0.042	0.0019	0.00002
Kidney	0.068	0.0031	0.00003

Animal commodity MRLs are established for MO 0105 Edible offal (mammalian) and MM 0095 Meat [mammalian] [in the fat] at *0.1 mg/kg. It is estimated that the feeding of milk, from cattle that have grazed on treated pasture 4 months after application, to bobby calves at 100% to the diet, would result in flupropanate residue levels below the current MRL of *0.1 mg/kg in the offal and meat of bobby calves. It is noted that residues decline rapidly in milk after the cattle are withdrawal from treated feed, and if lactating cattle are removed from treated pasture for 5 days before the calf feeds on its milk then residue levels in the meat and offal of bobby calves are conservatively estimated to be ≤ $3x10^{-5}$ mg/kg. The risk to veal markets is considered to be minimal.

[3] http://www.dairyaustralia.com.au/Responsible-Dairying/Animal-welfare/Calf-welfare.aspx

2.5 Overseas registration and approved label instructions

The applicant has not indicated that flupropanate products are registered for use on pastures overseas.

2.6 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. Flupropanate has not been considered by Codex.

With the exception of Japanese MRLs at LOQ (*0.1 mg/kg) for flupropanate residues in the meat and offal of mammals[4], no overseas residue MRL/ tolerance has been established for flupropanate residues in animal commodities.

2.7 Current and proposed Australian MRLs for Flupropanate

Current MRLs and the residue definition for flupropanate are presented below. A full listing of MRLs can be found at http://www.apvma.gov.au/residues/standard.php.

MRL Standard: Table 1

COMPOUND		FOOD	MRL (mg/kg)
FLUPROPANATE			
MO	0105	Edible offal (mammalian)	*0.1
MM	0095	Meat (mammalian) [in the fat]	*0.1

MRL STANDARD: Table 3

COMPOUND	RESIDUE
FLUPROPANATE	Flupropanate

[4] http://www.m5.ws001.squarestart.ne.jp/foundation/search.html

Proposed Amendments to the MRL Standard

MRL Standard: Table 1

COMPOUND		FOOD	MRL (mg/kg)
FLUPROPANATE			
ADD:			
ML	0106	Milks	0.1

MRL Standard: Table 4

COMPOUND		FOOD	MRL (mg/kg)
FLUPROPANATE			
ADD:			
		Mixed pasture (leguminous/grasses)	300

2.8 Potential risk to trade

Export of treated produce containing finite (measurable) residues of flupropanate 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 available pasture trials indicate that the use of TUSSOCK HERBICIDE, with a 4 month withholding, period may result in a flupropanate residue level of 126 mg/kg in pastures.

The sheep feeding study indicates that the consumption of pasture treated with TUSSOCK HERBICIDE, should not result in animal tissue residues above the LOQ of 0.05 mg/kg, provided the current 4 month grazing withholding period and 14 day pre-slaughter interval are adhered to. No changes are proposed to the current grazing withholding period or slaughter interval / livestock withholding period. The MRLs that are established for MO 0105 Edible offal (mammalian) and MM 0095 Meat [mammalian] [in the fat] at *0.1 mg/kg remain appropriate. The potential risk to the trade of meat or offal that may be derived from animals that grazed on pasture following the use of TUSSOCK HERBICIDE according to established label directions is considered to be minimal.

The lactating dairy cow feeding study indicates that residue levels up to 4.5 mg/kg may occur in milk as a result of the grazing of dairy cattle on TUSSOCK HERBICIDE treated pastures, after the 4 month grazing withholding period has elapsed. This level of flupropanate residues in milk poses an unacceptable dietary exposure and trade risk.

Residues in milk decreased to below LOQ at 0.05 mg/kg after 11 days of withdrawal from treated feed and therefore the inclusion of a 14 day pre lactation / parturition interval is proposed. The proposed withholding period statements are designed to prevent livestock, which are to produce milk for human consumption, from grazing on treated pasture for 4 months after application and then are the livestock must be withdrawn from treated pasture (to pasture not treated with flupropanate) for 14 days before milking. An MRL of 0.1 mg/kg is proposed for ML 0106 Milks, in conjunction with the proposed withholding period statements. The trade risk is considered to be low as bulking and blending at farm and factory is expected to result in residues well below the limit of quantitation in the rare event that residues may occur in individual animals.

It is estimated that the feeding of milk, from cattle that have grazed on treated pasture 4 months after application, to bobby calves at 100% to the diet, would result in flupropanate residue levels below the current MRL of *0.1 mg/kg in the offal and meat of bobby calves. The risk to veal markets is considered to be minimal.

Comment is sought on the potential for the proposed variation in use of TUSSOCK HERBICIDE to prejudice Australian trade in dairy products.