



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



Trade Advice Notice

on chlorantraniliprole for use on citrus

Emergency use permit PER89354

March 2020

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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 Australian Pesticides and Veterinary Medicines Authority 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 Permit 89354 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 **30 March 2020** 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)

- submission date.

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:

Residues and Trade
Scientific Assessment and Chemical Review
Australian Pesticides and Veterinary Medicines Authority
GPO Box 3262
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 public release summaries can be found on the [APVMA website](#).

¹ A full definition of 'confidential commercial information' is contained in the Agvet Code.

1 INTRODUCTION

The APVMA has before it an emergency permit application from Horticulture Innovation Australia Ltd for use of chlorantraniliprole on citrus for the control of fall armyworm. The permit is proposed for all states for a duration of three years.

2 TRADE CONSIDERATIONS

2.1 Commodities exported

Citrus fruit are considered to be a major export commodity², as are commodities of animal origin, such as meat, offal and dairy products, which may be derived from livestock fed citrus pulp produced from treated fruit. Residues in these commodities resulting from the use of Altacor Hort Insecticide, Altacor Insecticide and Coragen Insecticide may have the potential to unduly prejudice trade.

As the mammalian dietary burden through consumption of citrus pulp derived from treated citrus fruit should be no greater than previously considered, no changes are required to the established animal commodity MRLs for chlorantraniliprole. The risk to trade in animal commodities is unchanged and does not require further consideration.

2.2 Destination and value of exports

Australian exports of citrus fruit totalled approximately 214 kt, 218 kt and 258 kt (value \$297 m, \$332 m and \$ 429 m) in 2015–16, 2016–17 and 2017–18 respectively³.

The major export markets for Australian citrus fruit in 2017–18³ are shown below.

Table 1: Major destinations for Australian citrus fruit exports in 2017–18

Citrus crop	Major destinations
Oranges	China, Japan, Hong Kong, Malaysia, Singapore
Mandarins	China, Thailand, Hong Kong, New Zealand, USA
Grapefruit	Japan, Canada, China, New Zealand, Philippines
Lemon	Indonesia, Philippines, Malaysia, Singapore, Canada

² APVMA Regulatory Guidelines—Data Guidelines: Agricultural: Overseas trade (Part 5B)

³ Australian Horticulture Statistics Handbook—Fruit 2017–18

2.3 Proposed Australian use-pattern

Table 2: Proposed use pattern

Crop	Pest	Concentration	Critical Comments
Citrus fruit	Fall armyworm (Spodoptera frugiperda)	<u>350 g/kg product</u>	Regularly scout crops to monitor for eggs and larvae. Target sprays against eggs and newly hatched larvae (prior to third instar stage) before they become entrenched. DO NOT apply more than 2 foliar applications per crop by air-blast sprayer or equivalent, with a minimum 7 day re-treatment interval. Use enough water to ensure thorough coverage of the crop. Use in accordance with Crop Life Insecticide Resistance Management Strategy Guidelines.
		12g product/100L (= 4.2 g a.i./100L) + 15 g a.i./100L of non-ionic surfactant/wetting agent <u>200 g/L product</u> 18 mL product/100L (= 3.6 g a.i./100L) + 125 g a.i./100L of non-ionic surfactant/wetting agent	

Altacor Hort Insecticide and Altacor Insecticide (350 g/kg chlorantraniliprole as the only active constituent)

Coragen Insecticide (200 g/L chlorantraniliprole as the only active constituent)

Withholding period:

Harvest: DO NOT harvest for 14 DAYS after application.

Grazing: DO NOT graze or cut for stockfood.

2.4 Results from residues trials presented to the APVMA

A total of 15 citrus residue trials relevant to the proposed GAP are summarised in the 2014 JMPR evaluation⁴.

In eight trials (four orange, three mandarin and one tangelo) conducted in South Africa in 2009, residues in citrus whole fruit at the proposed 14 day WHP were in rank order:

0.14, 0.15, 0.18, 0.20, 0.22, 0.23, 0.25 and 0.35 mg/kg (STMR = 0.21 mg/kg, n = 8).

In seven trials (three orange and four mandarin) conducted in South Africa in 2010, residues in citrus whole fruit at a 7 day WHP (14 day WHP data was not available) were in rank order:

0.11, 0.14, 0.15 (2), 0.22, 0.24 and 0.30 mg/kg (STMR = 0.15 mg/kg, n = 7).

The OECD MRL calculator estimates an MRL of 0.7 mg/kg based on the 2009 dataset as well as the combined dataset. A chlorantraniliprole MRL of 0.7 mg/kg is considered appropriate for FC 0001 citrus fruits.

⁴ fao.org/fileadmin/templates/agphome/documents/Pests_Pesticides/JMPR/Evaluation14/Chlorantraniliprole.pdf

2.5 Overseas registration and approved label instructions

The Applicant has indicated that chlorantraniliprole is registered for the control of various Lepidopteran species, in a range of tree and fruit crops in South Africa and the USA. In the USA the use pattern consists of two applications at rates of 75–110 g ai/ha with harvest intervals of one day. In South Africa it is registered for use in citrus fruit at 3.5 g ai/100L, with a seven day WHP.

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. Chlorantraniliprole has been considered by Codex. The following relevant Codex CXLs and overseas MRLs have been established for chlorantraniliprole.

Table 3: Overseas MRLs

Commodity	Tolerance for residues arising from the use of chlorantraniliprole (mg/kg)							
	Australia	EU	Japan	Codex	USA	Hong Kong	Korea	China
Citrus fruits	T0.7 (proposed)	0.7	0.7	0.7	1.4	0.5	0.6	0.5

Note: an MRL of 1.4 mg/kg is established for chlorantraniliprole in citrus fruit in the Australian Schedule 20 of the Food Standards Code.

Malaysia, Singapore and Thailand are known to refer to Codex MRLs.

2.7 Current and proposed Australian MRLs for chlorantraniliprole

Table 4: Proposed MRL Standard—Table 2

COMPOUND	FOOD	MRL (mg/kg)
CHLORANTRANILIPROLE		
ADD:		
FC 0001	Citrus fruits	T0.7

2.8 Potential risk to trade

Export of treated produce containing finite (measurable) residues of chlorantraniliprole 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 use pattern requires the establishment of a citrus fruit MRL at T0.7 mg/kg.

All residues values (HR = 0.35 mg/kg) considered for MRL establishment were within the MRLs of 0.5–0.7 mg/kg set by Codex and various overseas markets. It is noted that some of the other major overseas markets for Australian citrus fruit default to Codex MRLs which, for citrus, is 0.7 mg/kg, the same as proposed.

3 CONCLUSION

The APVMA has before it an emergency permit application from Horticulture Innovation Australia Ltd for use of chlorantraniliprole on citrus for the control of fall armyworm.

Prior to making a determination on issue of the permit, the APVMA must be satisfied that the proposed use does not constitute an undue prejudice to trade.

Based on the coverage of MRLs established in major export destinations for Australian citrus, the APVMA proposes to determine that the risk to trade associated with the proposed use on citrus is not undue. Stakeholders are requested to provide comment on industry systems that can manage any potential risks to international trade associated with the proposed use.