Australian Government

Australian Pesticides and Veterinary Medicines Authority

Trade Advice Notice

on proquinazid in the product Talendo Fungicide for use on pome fruit

APVMA product number 64165

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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 (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 Talendo 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 **28 May 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: apvma.gov.au.

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

1 INTRODUCTION

The APVMA has before it an application from Production Agriscience (Australia) Pty Ltd to vary the registration of Talendo Fungicide to add a new use on pome fruit. The product contains 200 g/L proquinazid as its active ingredient.

Talendo Fungicide is currently approved use on grapes, cucurbits, tomatoes and peppers. The use of proquinazid on pome fruit has not been previously considered by the APVMA, however a use on pome fruit is registered in Europe and New Zealand.

2 TRADE CONSIDERATIONS

2.1 Commodities exported

Apples and pears are considered to be major export commodities[2], as are commodities of animal origin, such as meat, offal and dairy products, which may be derived from livestock fed feeds produced from treated apples. Residues in these commodities resulting from the use of Talendo Fungicide may have the potential to unduly prejudice trade.

The mammalian dietary burden through consumption of apple pomace derived from treated apples is no greater than previously considered. Apples and apple pomace are not considered to be significant poultry feeds. No changes are required to the current animal commodity MRLs for proquinazid. The risk to trade in animal commodities is unchanged and does not require further consideration.

2.2 Destination and value of exports

The total exports of Australian apples was 4.4 kt, a total value of approximately $10.6 million in 2018–19[3]. The total exports of Australian pears was 9.9 kt, a total value of approximately $16.4 million in 2018–19[3]. The major export destinations for apples and pears are presented in Table 1 below.

Table 1: Major destinations for Australian pome fruit exports in 2018–19

Crop	Major Destinations
Apple	Papua New Guinea, Italy, Hong Kong, Indonesia and the Netherlands
Pears	New Zealand, Indonesia, Canada, Singapore and Fiji

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

3 horticulture.com.au/growers/help-your-business-grow/research-reports-publications-fact-sheets-and-more/grower-resources/ha18002-assets/australian-horticulture-statistics-handbook/

2.3 Proposed Australian use-pattern

Table 2: Proposed use pattern

Crop	Pest	Rate/concentration	Critical comments
Pome fruit including: Apples, Nashi pears, Pears	Powdery mildew (*Podosphaera leucotricha*)	Dilute Spraying: 25 mL/100 L water (5 g ai/100 L water) Concentrate Spraying: Refer to the Mixing/ Application section	Use as a protectant treatment only. Talendo fungicide has no curative activity and does not control existing infections. Apply Talendo at a minimum spray interval of fourteen (14) days from open cluster. DO NOT apply more than three (3) applications to any crop in any one season. DO NOT apply more than two (2) consecutive sprays per crop. Further treatments should be made with fungicides from a different fungicide group. Concentrated spray: DO NOT apply in water volumes less than 400 L/ha, or with a concentration factor greater than 3X. This low water volume is dependent on the suitability of concentrated spray application equipment. More reliable application may be gained through increased water volumes.

Withholding periods:

Harvest: Pome fruit: Do not harvest for 28 days after application.

Grazing: DO NOT graze or cut for stock food.

Restraints: DO NOT apply with aircraft.

Pome fruit: DO NOT apply more than a spray volume of 2500 L/ha per application.

Trade advice: Export of treated produce.

Cucurbit, Fruiting vegetable, Pome fruit and Table grape growers should note that suitable Maximum Residue Levels (MRLs) or import tolerances may not be established in all markets for produce treated with Talendo®. If you are growing produce for export, please check with Corteva Agriscience for the latest information on MRLs and export tolerances before using this product.

2.4 Results from residues trials presented to the APVMA

The proposed use in pome fruit involves a maximum of three foliar applications at a minimum re-treatment interval of 14 days at 5 g ai/100 L in conjunction with a harvest withholding period of 28 days.

The combined dataset suitable for MRL estimation is, in rank order: 0.01, 0.02, 0.03 (2), 0.04 (2), 0.05 (2), 0.06, 0.08 (2), 0.10 (2) and 0.21 mg/kg (n=14). The OECD MRL calculator estimates an MRL of 0.3 mg/kg. The STMR was 0.05 mg/kg.

Based on the available information, a proquinazid MRL of 0.3 mg/kg for pome fruits [FP 0009] is considered appropriate to cover proquinazid residues arising in apples and pears as a result of the proposed use in conjunction with a harvest withholding period of 28 days.

Apple processing factors of 8.3, 10.1 and 13× were obtained for proquinazid in dry apple pomace. Based on the highest observed residue of 0.21 mg/kg in apples, the maximum anticipated proquinazid residue in apple pomace (dry weight basis) is estimated at 2.7 mg/kg. A proquinazid MRL of 3 mg/kg for [AB 0226] Apple pomace, dry is considered appropriate to cover proquinazid residues in dry apple pomace.

2.5 Overseas registration and approved label instructions

The applicant indicated that the use of proquinazid is approved on apples and pears in Europe (with a 50 day withholding period) and on apples in New Zealand (with a 56 day withholding period).

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. Proquinazid has not been considered by Codex. The following relevant overseas MRLs have been established for proquinazid.

Table 3: Current and proposed Australian and overseas MRLs/tolerances for proquinazid

Commodity	Tolerance for residues arising from the use of proquinazid (mg/kg)					
	Australia	EU[4]	New Zealand[5]	Codex[6]	USA[7]	Canada[8]
Residue definition for enforcement	Proquinazid	Proquinazid	Proquinazid	Not considered	Proquinazid	Proquinazid
Apples		0.08	0.1	-	-	-
Pears		0.08	-	-	-	-
Pome fruits	0.3 (proposed)	-	-	-	-	-

[4] ec.europa.eu

[5] mpi.govt.nz/news-and-resources/resources/registers-and-lists/maximum-residue-levels-database/

[6] codexalimentarius.net

[7] ecfr.gov

[8] pr-rp.hc-sc.gc.ca/mrl-lrm/index-eng.php

Table 4: Current MRL Standard—Table 1

COMPOUND	FOOD	MRL (mg/kg)
PROQUINAZID		
MO 0105	Edible offal (mammalian)	0.05
PE 0112	Eggs	*0.01
VC 0045	Fruiting vegetables, cucurbits	0.2
FB 0269	Grapes	0.5
MM 0095	Meat (mammalian)	*0.01
ML 0106	Milks	*0.01
PM 0110	Poultry meat	*0.01
PO 0111	Poultry, edible offal of	*0.01
VO 0448	Tomato	0.3

Table 5: Current MRL Standard—Table 4

COMPOUND	FOOD	MRL (mg/kg)
PROQUINAZID		
AB 0269	Grape pomace, dry	15
	Tomato pomace, dry	5

Table 6: Proposed MRL Standard—Table 1

COMPOUND	FOOD	MRL (mg/kg)
PROQUINAZID		
ADD:		
FP 0009	Pome fruits	0.3

Table 7: Proposed MRL Standard—Table 4

COMPOUND		FOOD	MRL (mg/kg)
PROQUINAZID			
ADD:			
AB	0226	Apple pomace, dry	3

2.7 Potential risk to trade

Export of treated produce containing finite (measurable) residues of proquinazid 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 STMR and HR associated with the proposed use with a 28 day withholding period were 0.05 mg/kg and 0.21 mg/kg respectively. The proposed Australian MRL of 0.3 mg/kg for proquinazid in pome fruit, is higher than the MRL established by the EU for apples and pears (0.08 mg/kg) and New Zealand for apples (0.1 mg/kg). A potential risk to international trade exists as Codex has not established MRLs and the proposed Australian MRL is higher than that established in Europe.

The applicant has proposed the following trade advice information to mitigate the risk to trade in pome fruit:

‘Export of treated produce’

Cucurbit, fruiting vegetable, pome fruit and table grape growers should note that suitable Maximum Residue Levels (MRLs) or import tolerances may not be established in all markets for produce treated with Talendo®. If you are growing produce for export, please check with Corteva Agriscience for the latest information on MRLs and export tolerances before using this product.

3 CONCLUSION

Production Agriscience (Australia) Pty Ltd have made an application to vary the registration of Talendo Fungicide to add a new use on pome fruit.

Comment is sought on the potential for Talendo Fungicide to prejudice Australian trade when used on pome fruit according to the proposed label directions.