



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



TRADE ADVICE NOTICE

on Metiram in the Product Nufarm Polyram DF Fungicide Spray

APVMA Product Number 58901

MAR 2010

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CONTENTS

PREFACE	IV
About this document	iv
Making a submission	iv
Further information	v
1 INTRODUCTION	6
2 TRADE CONSIDERATIONS	7
2.1 Commodities exported	7
2.2 Destination and value of exports	7
2.3 Proposed Australian use-pattern	8
2.4 Results from residues trials presented to the APVMA	8
2.5 Codex alimentarius commission and overseas MRLs	8
2.6 Current and proposed Australian MRLs for metiram	9
2.7 Potential risk to trade	10
3 CONCLUSIONS	11

List of tables

Table 1: Largest Export markets by value for mangoes in 2007-2008 financial year	7
Table 2: Proposed use pattern	8
Table 3: Codex CXLs and overseas residue MRLs/tolerances for metiram	9
Table 4: Current relevant entries in the MRL Standard – Table 1 and Table 3	9
Table 5: Proposed changes to the MRL Standard – Table1	10

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 **NUFARM POLYRAM DF FUNGICIDE SPRAY** containing the existing active constituent metiram 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 **4 April 2010** 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:

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Pesticides Program
Australian Pesticides and Veterinary Medicines Authority
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Symonston ACT 2609

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Email: mohammad.quadir@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 Nufarm Australia Limited to vary the registration of the product, NUFARM POLYRAM DF FUNGICIDE SPRAY, containing 700 g/kg metiram, to add use on pome fruit, bananas, onions, pulses, poppies and mangoes for control of various fungal diseases. The proposed extensions of use require an increase in the MRL for dithiocarbamates in mangoes. As no changes are required to MRLs for other crops, the other crops will not be discussed further in this note.

The potential for metiram residues in mangoes to unduly prejudice trade is discussed below.

2 TRADE CONSIDERATIONS

2.1 Commodities exported

Mangoes are exported in moderate quantities as summarised below.

2.2 Destination and value of exports

Mangoes

Australia exported \$11 million worth of mangoes in the 2007-2008 financial year. The major export markets and value of mangoes exported to each country in that year are summarised below.

Table 1: Largest Export markets by value for mangoes in 2007-2008 financial year

DESTINATION	VALUE, \$ MILLION
Hong Kong	3.716
Japan	2.083
Singapore	1.493
New Zealand	0.885
United Arab Emirates	0.679
Malaysia	0.547
Qatar	0.314
The Netherlands	0.312
Lebanon	0.305
Canada	0.095
Kuwait	0.094
Other	0.521
TOTAL	11.015

Source of data: Australian Bureau of Statistics

2.3 Proposed Australian use-pattern

The proposed Australian use pattern for NUFARM POLYRAM DF FUNGICIDE SPRAY (700 g/kg metiram) in mangoes is summarised below.

Table 2: Proposed use pattern

CROP	DISEASE	RATE	CRITICAL COMMENTS
Mangoes	Anthracnose (<i>Colletotrichum gloeosporiodes</i>)	200 g/100 L (140 g ai/100 L)	Apply at weekly intervals during flowering then at monthly intervals until near harvest.

WITHHOLDING PERIOD

Mangoes: Do not harvest for 1 day after application.

2.4 Results from residues trials presented to the APVMA

Mangoes

One Australian residue study for mancozeb (a dithiocarbamate that is closely related to metiram) in mangoes was presented. This included application of two formulations at 1X and 2X the proposed application rate. At the proposed 1-day withholding period, dithiocarbamate residues in the Australian 1X trials were 1.0 and 1.7 mg CS₂/kg, while in the 2X trials, residues at the proposed 1-day withholding period were 1.9 (2) mg CS₂/kg. It is proposed to increase the dithiocarbamate MRL for mangoes from 1 mg/kg to 5 mg/kg.

Animal Commodities

No changes to stockfeed MRLs for dithiocarbamates are proposed as mangoes are not a significant livestock feed, and no changes are proposed to any other plant commodity MRLs. Therefore, there is not expected to be any increase in the dietary burden of metiram for livestock. Existing MRLs for dithiocarbamates in animal commodities remain appropriate.

2.5 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. Metiram has been considered by Codex. No changes are proposed to Australian animal commodity MRLs and they will not be considered further. The following relevant Codex CXLs and overseas residue MRLs/ tolerances have been established for dithiocarbamates in relevant plant commodities:

Table 3: Codex CXLs and overseas residue MRLs/tolerances for metiram

COUNTRY/STATUS	COMMODITY	TOLERANCE, mg/kg
Australia (proposed)	Mango	5
Codex ²	Mango	2
EU ³	Mango	2
Japan ⁴	Mango	2
New Zealand ⁵	Fruits	7

2.6 Current and proposed Australian MRLs for metiram

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

Table 4: Current relevant entries in the MRL Standard – Table 1 and Table 3

MRL STANDARD: TABLE 1

COMPOUND	FOOD	MRL (mg/kg)
DITHIOCARBAMATES (MANCOZEB, METHAM, METIRAM, PROPINEB, THIRAM, ZINEB AND ZIRAM)		
FI 0345	Mango	1

MRL Standard: TABLE 3

COMPOUND	RESIDUE
DITHIOCARBAMATES (MANCOZEB, METHAM, METIRAM, PROPINEB, THIRAM, ZINEB AND ZIRAM)	Total dithiocarbamates, determined as CS ₂ evolved during acid digestion and expressed as mg CS ₂ /kg.

² Reference: http://www.codexalimentarius.net/mrls/pestdes/jsp/pest_q-e.jsp

³ Reference: http://ec.europa.eu/sanco_pesticides/public/index.cfm?event=activesubstance_selection&a=1

⁴ Reference: <http://www.m5.ws001.squarestart.ne.jp/foundation/search.html>

⁵ Reference: <http://www.nzfsa.govt.nz/policy-law/legislation/food-standards/bn-08-213-nz-mrl-fs-2009-consolidation.pdf>

The following changes are proposed to Australian dithiocarbamates MRLs:

Table 5: Proposed changes to the MRL Standard – Table1

MRL STANDARD: TABLE 1

COMPOUND	FOOD	MRL (mg/kg)
DITHIOCARBAMATES		
DELETE:		
FI 0345	Mango	1
ADD:		
FI 0345	Mango	5

2.7 Potential risk to trade

Export of treated produce containing finite (measurable) residues of metiram 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.

It is proposed to increase the Dithiocarbamates MRL for mangoes. The proposed limit for mangoes (5 mg/kg) is higher than the current Codex MRL for dithiocarbamates in mangoes, and is also higher than the MRLs in Japan and the European Union (all 2 mg/kg). New Zealand has an MRL of 7 mg/kg for dithiocarbamates in fruit. Although the proposed MRL is 5mg/kg, dithiocarbamate residues above 2 mg/kg were not observed in the residue trials submitted to the APVMA.

Comment is sought on the likelihood of the changes in use for NUFARM POLYRAM DF FUNGICIDE SPRAY to cause undue prejudice to trade.

3 CONCLUSIONS

It is proposed to increase the MRL for Mangoes. Comment is sought on the potential for metiram in NUFARM POLYRAM DF FUNGICIDE SPRAY to prejudice Australian trade when it is used on mangoes for the control of anthracnose.

A more detailed technical assessment report on the evaluation of the trade implications of this chemical can be obtained by contacting the APVMA at (02) 6210 4748. Alternatively, the reports can be viewed at the APVMA Library, which is located at:

18 Wormald Street

Symonston ACT, 2609 Office hours: 9.00 - 5.00 (EST) Monday to Friday