



Regulatory changes to the use of botrytis agrochemical

A recent AWRI *eBulletin* cautioned wine exporters about shipments to the European Union after a change in the residue tolerance for the agrochemical iprodione – the active constituent in some agrochemicals used to control botrytis. It was recommended that wines be residue tested prior to shipment. The AWRI's **Marcel Essling** answers some probing questions into the implications of the regulatory changes for this agrochemical.

I have a wine made in 2017 from grapes grown when the EU maximum residue limit was 20 mg/kg. Do I have to test the wine prior to shipment?

The MRL for iprodione of 0.01 mg/L in wine applies to all product that enters the EU after 31 July 2019, regardless of vintage. It is recommended that all wines intended for export to the EU be tested prior to shipment, to ensure they are compliant with the new EU regulations. Wine that is already in the EU before the rule change will not be required to conform to the new limit.

It seems unreasonable that I may not be able to sell my wine into that market after I complied with the rules at the time the grapes were grown. Why is that the case?

It may seem unfair, but it is believed the same principle is applied by Australia on imported products. It appears that Australian regulations apply to food products at the time they are imported regardless of when they were produced. The justification for this approach is that the importing country has no mechanism to verify when an imported product was produced.

These regulatory changes are very disruptive. Is there a way to forecast them so we can be prepared and take steps early if necessary?

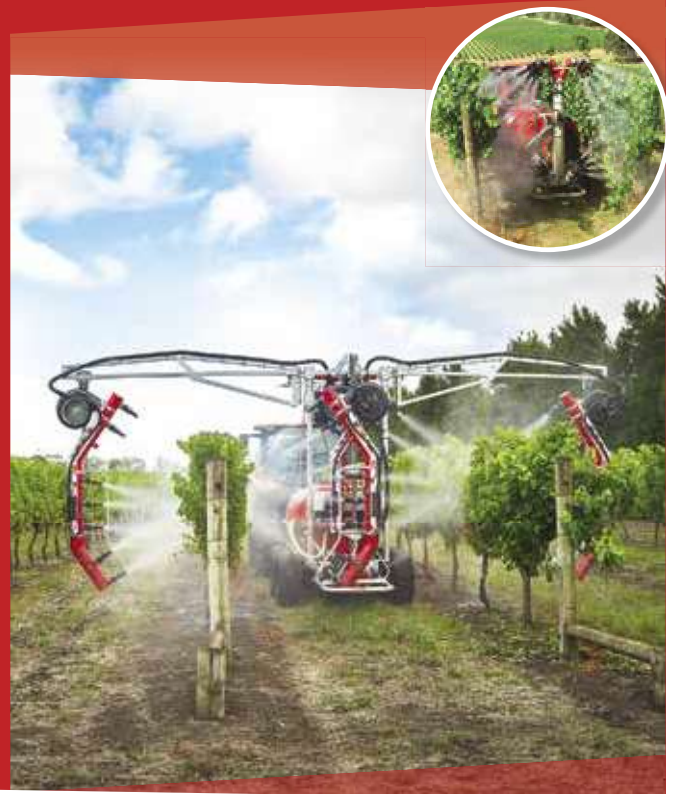
Wine Australia, Australian Grape & Wine and the AWRI receive information about regulatory changes and take action to smooth out disruption where possible. The main mechanism for receiving such information is through the Australian Government Department of Agriculture, which distributes World Trade Organization notifications as they occur. When the notification about iprodione was received in 2017, the implications

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were assessed and the advice to industry was not to use iprodione on fruit destined for export wine.

Some of the regulatory issues that have affected the wine industry in recent years have been unusual and originated from unexpected sources. The manganese, copper and iron regulations enforced by China in 2014 were not predicted and required wine analysis not typically undertaken. To reduce the impact of a similar occurrence, the AWRI now has a regular program of wine testing on behalf of Wine Australia to collect data on compounds that could be present in wine.

The AWRI is also in regular contact with the suppliers of agrochemicals to viticulture. These discussions include the regulatory positions being taken by export markets and any implications for wine and trade.

If an agrochemical is no longer able to be used in the European Union or other market, will its use be restricted in Australia?

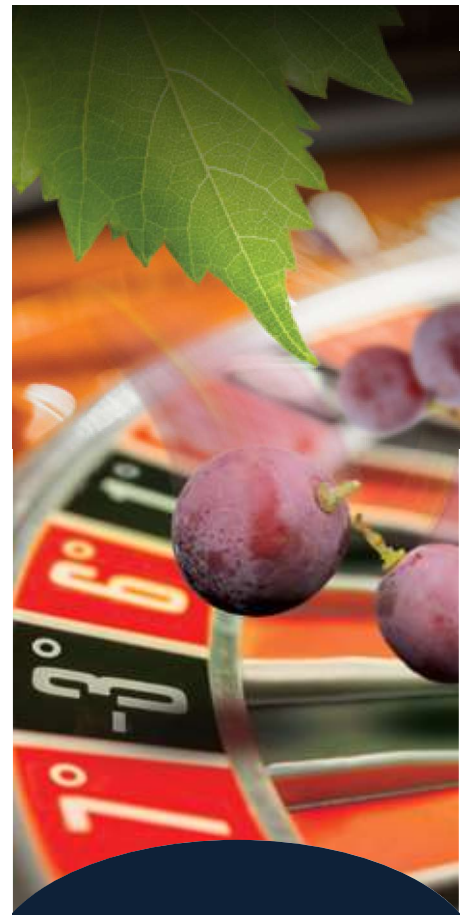
An export market may have a different assessment process for agrochemicals, so a restriction in one market does not necessarily mean that a change in Australia will follow.

The Australian Pesticides and Veterinary Medicines Authority (APVMA) undertakes a robust chemical

risk assessment process and products registered for use in Australia have been determined to be safe and effective providing they are used according to label instructions. The APVMA uses a weight-of-evidence approach to risk assessments that considers the full range of risks on health and the environment and how these risks can be minimised through clear instructions, restricted uses and safety directions. The European Food Safety Authority (EFSA) undertakes a similar assessment process; however, the hazard classification of a substance can automatically trigger certain legislative restrictions on its approval, manufacture, marketing and use, irrespective of the outcome of any risk assessment. Because the Australian regulator uses a risk assessment protocol, different restrictions between different jurisdictions are understandable.

However, an agrochemical may no longer be recommended for use in the 'Dog book' or by wine companies if a chemical review leads to a change to the MRL or residue definition. Pressure can also be asserted by consumer groups and wine buyers which can have a direct impact on the products wineries allow to be used in viticulture.

For more information about agrochemicals, residue testing or any other technical winemaking or viticulture question, contact the AWRI helpdesk on 08 8 313 6600 or helpdesk@awri.com.au



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