

Blackberry and Raspberry Agrichemical Regulatory Risk Assessment

September 2023

Regulatory pressures on agrichemicals are increasing globally, with many being either restricted or withdrawn from use. For older agrichemicals these pressures are often the result of reconsiderations involving new or refined risk assessment methodologies that requiring the generation of new data. A consequence of which can be that many of these agrichemicals are not meeting contemporary risk assessment standards as the necessary data is unavailable, or where data is available, the risk posed is considered unacceptable.

The use of agrichemicals can also be impacted through differences in standards between trading partners. The lack of an appropriate pesticide maximum residue limit (MRL) in an importing country can, for practical purposes, effectively prohibit use in the exporting country so as to ensure compliance, as a MRL breach would adversely affect market access.

The effects of the above are greater regulatory pressure placed on the use of individual agrichemicals or chemical groups. As a consequence it is possible that the number of approved agrichemical options could be adversely impacted.

To assist strategic planning, with respect to future pest management options, the following tables have been developed to highlight the regulatory threats to agrichemicals currently approved for the management of the pests and diseases in blackberries and raspberries as well as current initiatives aimed at addressing identified pest management deficiencies

R1	Short-term: Critical concern over retaining access	
R2	Medium-term: Maintaining access of significant concern	
R3	Long-term: Potential issues associated with use - Monitoring required	

Active Constituents	Chemical group	Problem	Comment
	0.01	INSECT AND OTHER PESTS	
Abamectin	6	Two-spotted (Red spider) mite Fruit flies	APVMA: Nominated for spray drift label review Canada: Some uses amended, & use in greenhouse gown cut flowers cancelled EU: Use restricted to permanent greenhouses
Acetamiprid + pyriproxyfen	4A + 7C	Cottonseed bug (PER91601) Fruit flies (PER91601 - Suppression only) Green potato bug (PER91601) Green vegetable bug (PER91601) Leafhoppers/plant hoppers (PER91601) Lightbrown apple moth (PER91601) Scale insects (PER91601)	Acetamiprid APVMA: Under review
Afidopyropen	9D	Green peach aphid (PER90178) Greenhouse whitefly (PER90178)	EU: No authorisations
Bifenazate	20D	European red mite(PER14425) Two-spotted (Red spider) mite (PER14425)	Canada: Under review EU: Use restricted to non-edible crops in permanent greenhouses
Bifenthrin	3A	Red-shouldered leaf beetle Plague thrips (PER84972)	Canada: Not authorised EU: Not authorised

Active Constituents	Chemical group	Problem	Comment
Carbaryl	1A	Raspberry fruit caterpillar	Canada: Reviewed, large number of uses deleted
		Weevils	Codex: Review scheduled, support uncertain
		Armyworms (Raspberries)	EU: Authorisation not renewed
		Grasshoppers (Raspberries)	USA: Under review
		Lightbrown apple moth (Raspberries)	
		Mealybugs (Raspberries)	
		Rutherglen bug (Raspberries)	
		Wingless grasshopper (Raspberries)	
Chlorpyrifos	18	European earwig(PER90216)	APVMA: Under review. Codex: All MRLs revoked Canada: Cancellation of all uses. EU: No authorisation in place USA: EPA decision to cancel use on food crops
Dimethoate	1B	Aphids	Codex: No MRL
		Jassids	EU: Not authorised
		Redlegged earth mite	
		Rutherglen bug	
		Spider mite	
		Strawberry bug	
		Thrips	
		Fruit flies (PER135859) (After harvest Orchard clean-up)	
Emulsifiable botanical oil	UN	Two-spotted (Red spider) mite (PER14234)	
Etoxazole	10B	Bean spider mite (PER89406)	EU: Only uses on greenhouse ornamentals approved &
		Two-spotted (Red spider) mite (PER89406)	Candidate for substitution

Active Constituents	Chemical	Problem	Comment
	group		
Fenbutatin oxide	12B	Bean spider mite(PER89407)	APVMA: nominated for review
		Broad mite(PER89407)	Codex: To be reviewed by JMPR. No supporting registrant
		European red mite(PER89407)	EU: No authorisation in place
		Red berry mite(PER89407)	USA: Under review
		Two-spotted (Red spider) mite(PER89407)	
Fipronil	2B	English wasp	APVMA: Under review
		European wasp	Codex: Re-evaluation completed, many MRLs withdrawn
		Fruit fly trap toxicant	EU: No authorisation in place
			USA: Under review
Flonicamid	29	Aphids (PER89214)	
		Green vegetable bug (PER89214)	
		Greenhouse whitefly (PER89214)	
		Jassids (PER89214)	
		Rutherglen bug (PER89214)	
Helicoverpa NPV	31	Helicoverpa species	
Indoxacarb	22A	Elephant weevil	Canada: No authorisations
		Lightbrown apple moth (PER13289)	EU: No authorisation
			UK: Proposed non-renewal
Lambda-cyhalothrin	3A	Fruit flies (PER12961 – SA Biosecurity) (Soil drench)	
Malathion/maldison	1B	Fruit flies	APVMA: Under review
			Codex: Re-evaluation scheduled
			EU: Restricted use to permanent greenhouses
Permethrin	3A	European wasp	Codex: Re-evaluation scheduled. Support uncertain
			EU: No authorisation
Petroleum oil	UNM	Scale insects(PER13957)	
		Two-spotted (Red spider) mite(PER13957)	
Pirimicarb	1A	Aphids	Codex: JMPR re-evaluation scheduled
		Green peach aphid (Blackberries)	EU: Candidate for substitution

Active Constituents	Chemical	Problem	Comment
	group		
Pyrethrins	3A	Fruit flies	Canada: Under review
		Green stink bug (PER80070)	
		Green vegetable bug (PER80070)	
		Red-shouldered leaf beetle (PER80070)	
Spinetoram	5	Helicoverpa species	
		Lightbrown apple moth	
		Loopers	
		Western flower thrips	
		Fruit flies (PER87408)	
Spinosad	5	Caterpillars	
		Lightbrown apple moth	
		Loopers	
		Western flower thrips	
		Fall armyworm (PER89870)	
Sulfoxaflor	4C	Apple dimpling bug(PER90208)	USA: Pollinator concerns
		Cottonseed bug (PER90208)	EU: Restricted to permanent glasshouses only
		Green mirid & Brown mirid(PER90208)	
		Green peach aphid(PER90208)	
		Greenhouse whitefly(PER90208)	
		Rutherglen bug(PER90208)	
		Scale insects(PER90208)	
Sulfur	M2	Bean spider mite (Blackberries PER87245)	
		Broad mite (Blackberries PER87245)	
		Red berry mite (Blackberries)	

Active Constituents	Chemical	Problem	Comment
	group		
Trichlorfon	1B	Fruit flies (PER12486)	APVMA: nominated for review
		Fruit flies (Bait spray)	Codex: No MRLs
			EU: No authorisations
			USA: No MRLs
		Slugs/Snails	
Methiocarb	1A	Common garden snail	EU: No authorisation in place
Copper		Slugs/Snails	EU: Candidates for substitution
Iron EDTA complex			
Methiocarb	1A		EU: No authorisation in place
Methiocarb	1A	White bradybaena (Oriental) snail	
Methiocarb	1A	White Italian (Sand dune) snail	

Active Constituents	Chemical group	Problem	Comment
		DISEASES	H
A. pullulans	NC	Anthracnose	
		Botrytis flower and fruit rot	
		Botrytis/Grey mould	
		Phomopsis fruit rot	
		Rhizopus fruit rot	
Agrobacterium radiobacter	-	Crown gall(PER13150)	
Azoxystrobin	11	Anthracnose	Canada: Review proposed
		Botrytis/Grey mould	
		Blossom blight	
		Cane spot	
		Cladosporium rot	
Bacillus amyloquefaciens	BM02	Botrytis/Grey mould(PER88058)	
Boscalid +pyraclostrobin	7 + 11	Blossom blight	Boscalid
		Cane spot	Canada: Under review
		Septoria leaf spot	<u>Pyraclostrobin</u>
		Stem end rot	Canada: Under review
		Alternaria leaf blotch(PER82986)	
		Anthracnose (PER82986)	
		Botrytis/Grey mould (PER82986)	
		Phomopsis fruit rot (PER82986)	
		Powdery mildew (PER82986)	
		Rust (PER82986)	
Captan	M4	Botrytis flower and fruit rot (PER13958)	EU: Under review proposed restriction to use in permanent
		Cane spot (PER13958)	greenhouses only
		Spur blight (PER13958)	USA: Under review

Active Constituents	Chemical group	Problem	Comment
Chlorothalonil	M5	Botrytis/Grey mould (PER14449)	APVMA: nominated for review
		Downy mildew (PER14449)	Canada: Proposed cancellation of uses
		Rust (PER14449)	EU: Not authorised
		Septoria leaf spot (PER14449)	USA: Under review
Copper	M1	Downy mildew	EU: Candidates for substitution
		Spur blight	
		Leaf diseases/spots (PER14443)	
		Rust (PER14443)	
Cyprodinil +fludioxonil	9 + 12	Botrytis/Grey mould (PER14422)	Cyprodinil: Canada: Under review
			EU: Candidate for substitution
			Fludioxonil: EU: Under review & candidate for substitution
Fenhexamid	17	Botrytis/Grey mould	
Iodine	М	Bactericide	
Iprodione (Boysenberry,	2	Botrytis/Grey mould	Canada: Majority of food crop uses deleted
Raspberry, Youngberry)			Codex: Review scheduled
			EU: No authorisation in place
			USA: Proposed deletion or restriction of uses
Mancozeb	M3	Downy mildew	APVMA: nominated for review
		Botrytis/Grey mould (PER13958)	Canada: Many uses cancelled
		Rust (PER13958)	Codex: To be reviewed 2024/25
			EU: Authorisation not renewed
Metalaxyl/Metalaxyl-M	4	Phytophthora(PER13958)	Metalaxyl
	4	Downy mildew(PER84973)	EU: Candidate for substitution
			Metalaxyl-M
			EU: Restricted use approval
Myclobutanil	3	Yellow rust	APVMA: nominated for review
			EU: No authorisation in place
Oxathiapiprolin	49	Phytophthora (PER91060-Hydroponic substrate or field grown)	
Phosphorous acid	33	Phytophthora (PER13958)	

Active Constituents	Chemical	Problem	Comment
	group		
Pydiflumetofen + fludioxonil	7 + 12	Grey mould (Botrytis cinerea)	Fludioxonil:
			EU: Under review & candidate for substitution
			<u>Pydiflumetofen</u>
			EU: Authorisation pending
Pyrimethanil	9	Botrytis/Grey mould (PER13958)	Canada: Under review
Triadimenol	3	Powdery mildew (PER13958)	APVMA: nominated for review
			Canada: No authorisation in place
			EU: No authorisation in place
			USA: Registration cancelled

Active Constituents	Chemical	Comment
	Group	
		WEEDS
Carfentrazone-ethyl	14	
	10	Canada: Review proposed
Glufosinate-ammonium		EU: No authorisation in place
	9	Ongoing issues internationally
Glyphosate		EU: Under review
Oryzalin	3	EU: No authorisations
Simazine	5	APVMA: nominated for review
		EU: No authorisation in place

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