

## **Head Lettuce Agrichemical Regulatory Risk Assessment**

**November 2025**

Regulatory pressures on agrichemicals are increasing globally, with many being either restricted or withdrawn from use.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 require 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 to ensure compliance, as 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. Consequently, 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 Head Lettuce in Australia, as well as assisting with any current initiatives aimed at identifying and addressing pest management deficiencies.

R1	Short-term risk: Critical concern over retaining access < 1 year
R2	Medium-term risk: Maintaining access of significant concern <2-5 years
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## Head Lettuce - Agrichemical Regulatory Risk Assessment

### INSECTICIDES/MITICIDES/NEMATOCIDES - Insect and other pests

Blue text = new APVMA approved uses

Active Constituent	MoA Group	Pest	Risks and Comments
AFIDOPYROPEN	9D	Cabbage aphid Cotton aphid Currant lettuce aphid Green peach aphid Silverleaf whiteflies	Australia: No current concerns. EU: Not approved
<i>Bacillus thuringiensis</i>	11A	Helicoverpa Armyworm Diamondback (Cabbage) moth Loopers Soybean looper Cotton bollworm Native budworm Cabbage moth Cabbage white butterfly Lightbrown apple moth Vine moth  Permit PER14694 for the control of Fungus Gnats ( <i>Sciaridae</i> spp.)	Australia: No current concerns. Permit PER14694 Expiry date: 31/03/2029 USA: Under Registration Review (scheduled)
BIFENAZATE	20D	Permit PER14210 for the control of Two-Spotted Mite	Australia: No current concerns. Permit PER14210 Expiry date: 31/10/2026 Canada: In re-evaluation

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CANOLA OIL	-	NT, APHID, CABBAGE MOTH, CABBAGE WHITE BUTTERFLY, CATERPILLAR, EARWIG, FLY, LEAFHOPPER, MEALY BUG, SCALE, SOOTY MOULD, THRIP, TWO SPOTTED MITE, WHITEFLY	Australia: No current concerns.
CANOLA OIL   PYRETHRINS		Aphids, thrips, caterpillars, whitefly, ants, flies, earwigs, leafhopper, two-spotted mite, scale, mealybug, sooty mould	Australia: No current concerns
CARBARYL	1A	Vegetable weevil	Australia: No current concerns. EU: Not approved Canada: In re-evaluation USA: Under Registration Review (scheduled)
CHLORANTRANILIPROLE	28	<i>Helicoverpa</i> spp.	Australia: No current concerns. Codex MRL: 20 mg/Kg Canada: In re-evaluation
CYROMAZINE	17	Permit PER81867 for the control of Leaf miners	Australia: No current concerns. Permit PER81867 Expiry date: 31/10/2030 Codex MRL: 4 mg/Kg EU: Not approved
EMULSIFIABLE BOTANICAL OILS		Permit PER14077 for the control of Silverleaf whitefly	Australia: No current concerns. Permit PER14077 Expiry date: 31/07/2028
FLUBENDIAMIDE	28	<i>Helicoverpa</i>	Australia: No current concerns. Codex MRL: 5 mg/Kg EU: Not approved UK: Withdrawn (2024).
HELICOVERPA ARMIGERA NPV	31	<i>Helicoverpa</i>	Australia: No current concerns.

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INDOXACARB	22A	<i>Helicoverpa</i>	Australia: No current concerns. Codex MRL: 7 mg/Kg EU: Not approved UK: Withdrawn (2024).
MALATHION	1B	28-spotted potato ladybird Aphids Australian plague locust Diamondback (Cabbage) moth Green vegetable bug Redlegged earth mite Rutherglen bug Thrips	Australia: The final regulatory decision was published in an <a href="#">APVMA Special Gazette on 2 May 2024</a> . Labels have been varied. Products bearing previously approved labels must not be supplied after 1 May 2026. UK: Withdrawn (2025). Canada: In re-evaluation USA: Under Registration Review (scheduled)
PETROLEUM OIL	UN	Permit PER12221 for the control of: Aphids Green mirid Green vegetable bug Grey cluster bug Leafhoppers Mites Rutherglen bug Thrips	Australia: No current concerns. Permit PER12221 Expiry date: 30/09/2027 EU: Not approved
PIRIMICARB	1A	Aphids	Australia: No current concerns. Codex MRL: 5 mg/Kg EU: Approved, candidate for substitution. Canada: Cancelled
POTASSIUM SALTS OF FATTY ACIDS	--	Permit PER13920 for the control of Glasshouse whitefly and Silverleaf whitefly	Australia: No current concerns. Permit PER13920 Expiry date: 31/12/2027 Canada: In re-evaluation

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PYRETHRINS	3A	Ants Cabbage aphid Diamondback (Cabbage) moth Earwig Greenhouse whitefly Helicoverpa Jassids/Leafhoppers Plague thrips Rose aphid Rutherglen bug Thrips Two-spotted (Red spider) mite Whitefly	Australia: No current concerns.
PYRETHRINS	3A	Fruitfly, Rutherglen bug, Spiders	Australia: No current concerns.
PYRIPROXYFEN	7C	Silverleaf whiteflies	Australia: No current concerns.
SPINETORAM	5	<i>Helicoverpa</i> Loopers Western flower thrips	Australia: No current concerns. Codex MRL: 10 mg/Kg EU: Not approved UK: Withdrawn (2024). Canada: In re-evaluation
SPINOSAD	5	<i>Helicoverpa</i> Loopers Western flower thrips  Permit PER89870 for the control of Fall Armyworm	Australia: No current concerns. Permit PER89870 Expiry date: 31/07/2025 Codex MRL: 10 mg/Kg Canada: In re-evaluation

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SPIROTETRAMAT	23	Brown sowthistle aphid Currant lettuce aphid Green peach aphid Silverleaf whiteflies  Permit PER88640 for the control of <i>Liriomyza</i> leafminers	Australia: No current concerns. Permit PER88640 Expiry date: 28/02/2026 Codex MRL: 7 mg/Kg EU: Not approved Canada: In re-evaluation
SULFOXAFLOX	4C	Brown sowthistle aphid Green peach aphid Greenhouse whitefly	Australia: No current concerns. Codex MRL: 6 mg/Kg
SPODOPTERA FRUGIPERDA NPV	-	PER90820 for the control of Fall Armyworm	Australia: No current concerns. Permit PER90820 Expiry date: 31/03/2027

### FUNGICIDES – Disease Control

Active Constituent	MoA Group	Pest	Risks and Comments
AZOXYSTROBIN	11	Anthrachnose Sclerotinia rot Base rot/Bottom rot	Australia: No current concerns. Codex MRL: 3 mg/Kg Canada: In re-evaluation
AZOXYSTROBIN   OXATHIPIPROLIN	11 + 49	Alternaria leaf spot Downy mildew Sclerotinia rot	AZOXYSTROBIN Australia: No current concerns. Codex MRL: 3 mg/Kg Canada: In re-evaluation  OXATHIPIPROLIN Australia: No current concerns. Codex MRL: 3 mg/Kg

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<i>bacillus amyloliquefaciens</i> STRAIN QST 713	BM02	Permit PER87630 for the control of Bacterial spot / Blight	Australia: No current concerns. Permit PER87630 Expiry date: 31/03/2027
BOSCALID	7	Sclerotinia rot	Australia: No current concerns. Codex MRL: 40 mg/Kg Canada: In re-evaluation
CHLOROTHALONIL	M5	Permit PER14964 for the control of Anthracnose (shot hole)	Australia: APVMA reconsideration. <a href="#">Prioritised to be commenced by 2028.</a> Permit PER14964 Expiry date: 31/07/2026 EU: Not approved Canada: In re-evaluation USA: Under Registration Review (scheduled)
COPPER	M1	Anthracnose Bacterial spot Downy mildew Dry leaf spot	Australia: No current concerns.
DIMETHOMORPH	40	Anthracnose Downy mildew Septoria leaf spot	Australia: No current concerns. Codex MRL: 10 mg/Kg EU: Not approved Canada: In re-evaluation
DIMETHOMORPH   AMETOCTRADIN	40 + 45	Downy mildew	DIMETHOMORPH Australia: No current concerns. Codex MRL: 10 mg/Kg EU: Not approved Canada: In re-evaluation  AMETOCTRADIN Australia: No current concerns
FENHEXAMID	17	Botrytis/Grey mould	Australia: No current concerns. Codex MRL: 30 mg/Kg

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FLORYLPICOXAMID	21	Sclerotinia rot	Australia: No current concerns. EU: Pending
FLUDIOXONIL   CYPRODINIL	12 + 9	Anthrachnose Sclerotinia rot	FLUDIOXONIL Australia: No current concerns. EU: Approved, candidate for substitution.  CYPRODINIL Australia: No current concerns. EU: Approved, candidate for substitution. Canada: In re-evaluation
FLUOPYRAM   TRIFLOXYSTROBIN	7 + 11	Sclerotinia rot	FLUOPYRAM Australia: No current concerns.  TRIFLOXYSTROBIN Australia: No current concerns. Canada: In re-evaluation
IPRODIONE	2	Botrytis/Grey mould Sclerotinia rot	Australia: No current concerns. EU: Not approved USA: Under Registration Review (scheduled)
ISOFETAMID	7	Lettuce drop / Sclerotinia	Australia: No current concerns. Codex MRL: 5 mg/Kg
MANCOZEB	M3	Downy mildew Septoria leaf spot	Australia: APVMA reconsideration. <a href="#">Prioritised to be commenced by 2027.</a> EU: Not approved UK: Withdrawn (2024). USA: Under Registration Review (scheduled)



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MANCOZEB   METALAXYL	M3 + 4	Downy Mildew, Septoria Leaf Spot, Anthracnose	<p>MANCOZEB Australia: APVMA reconsideration. <a href="#">Prioritised to be commenced by 2027.</a> EU: Not approved UK: Withdrawn (2024). USA: Under Registration Review (scheduled)</p> <p>METALAXYL Australia: No current concerns. EU: Approved, candidate for substitution. Canada: In re-evaluation</p>
MANDESTROBIN	11	Sclerotinia rot	Australia: No current concerns.
MANDIPROPAMID	40	Downy mildew	<p>Australia: No current concerns. Codex MRL: 25 mg/Kg Canada: In re-evaluation</p>
METALAXYL	4	Permit PER14318 for the control of Damping off	<p>Australia: No current concerns. Permit PER14318 Expiry date: 31/07/2027 EU: Approved, candidate for substitution. Canada: In re-evaluation</p>
METIRAM	M3	Downy mildew Septoria leaf spot	<p>Australia: APVMA reconsideration. <a href="#">Prioritised to be commenced by 2027.</a> EU: Not approved Canada: Only approved for foliar applications in potato crops.</p>
OXATHIPIPROLIN	49	Downy mildew	<p>Australia: No current concerns. Codex MRL: 3 mg/Kg</p>
PENTHIOPYRAD	7	Powdery mildew Sclerotinia rot	<p>Australia: No current concerns. Codex MRL: 30 mg/Kg</p>
POTASSIUM BICARBONATE	M2	Permit PER13695 for the control of Powdery Mildew	<p>Australia: No current concerns. Permit PER13695 Expiry date: 30/06/2030 Canada: In re-evaluation</p>

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PROCHLORAZ	3	Anthraco nose	Australia: No current concerns. EU: Not approved
PROPAMOCARB HYDROCHLORIDE   FLUOPICOLIDE	M3 + 43	Downy mildew	PROPAMOCARB HYDROCHLORIDE Australia: No current concerns.  FLUOPICOLIDE Australia: No current concerns EU: Approved, candidate for substitution.
PROPINEB	M3	Downy mildew	Australia: APVMA reconsideration. <a href="#">Prioritised to be commenced by 2027.</a> EU: Not approved
PROPINEB   OXADIXYL	M3 + 4	Downy mildew	PROPINEB Australia: APVMA reconsideration. <a href="#">Prioritised to be commenced by 2027.</a> EU: Not approved  OXADIXYL Australia: No current concerns. EU: Not approved
PYDIFLUMETOFEN   FLUDIOXONIL	7 + 43	Grey mould ( <i>Botrytis cinerea</i> ) White mould	PYDIFLUMETOFEN Australia: No current concerns. EU: Pending Canada: In re-evaluation  FLUDIOXONIL Australia: No current concerns EU: Approved, candidate for substitution.
PYRIMETHANIL	9	Permit PER12565 for the control of Grey Mould	Australia: No current concerns. Permit PER12565 Expiry date: 30/04/2030 Codex MRL: 3 mg/Kg Canada: In re-evaluation

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QUINTOZENE	14	Bottom Rot ( <i>Rhizoctonia</i> )	Australia: No current concerns. EU: Not approved
TEBUCONAZOLE	3	Sclerotinia rot	Australia: APVMA: Removed from nomination list - maintain watching brief Codex MRL: 5 mg/Kg EU: Approved, candidate for substitution. Canada: In re-evaluation USA: Under Registration Review (scheduled)
THIRAM	M3	Botrytis/Grey mould Septoria leaf spot Anthracnose	Australia: APVMA reconsideration. <a href="#">Prioritised to be commenced by 2027.</a> EU: Not approved Canada: Only approved for seed treatment.
TOLCLOFOS-METHYL	14	Bottom rot ( <i>Rhizoctonia solani</i> )	Australia: No current concerns.

### HERBICIDES – Weed Control

Active Constituent	MoA Group	Risks and Comments
CHLORIDAZON	5	Australia: No current concerns.
CLETHODIM	1	Australia: No current concerns.
FLUAZIFOP-P PRESENT AS THE BUTYL ESTER	1	Australia: <a href="#">APVMA Nominated for targeted spray drift reconsideration</a> Canada: Cancelled
PENDIMETHALIN	3	Australia: No current concerns. EU: Approved, candidate for substitution. Canada: In re-evaluation USA: Under Registration Review (scheduled)
PHENMEDIPHAM	5	Australia: No current concerns. Permit PER81241 Expiry date: 31/03/2028

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Active Constituent	MoA Group	Risks and Comments
PROPYZAMIDE	3	Australia: No current concerns. EU: Approved, candidate for substitution. Canada: In re-evaluation
SETHOXYDIM	1	Australia: No current concerns. EU: Not approved Canada: Phase-Out
TRIFLURALIN	3	Australia: No current concerns. EU: Not approved Canada: In re-evaluation USA: Under Registration Review (scheduled)

### FUMIGANTS – Mixed Function

Active Constituent	Use	Risks and Comments
CHLOROPICRIN + 1,3-DICHLOROPROPENE	Control of soil borne diseases, plant parasitic Nematodes, Symphylans and Wireworms	CHLOROPICRIN Australia: No current concerns. EU: Not approved USA: Restricted use  1,3-DICHLOROPROPENE Australia: No current concerns. EU: Pending Canada: Cancelled
DAZOMET	Control of bacterial spot ( <i>Xanthomonas</i> spp.) (suppression only). Soil insects and nematodes	Australia: No current concerns. USA: Under Registration Review (scheduled)

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Active Constituent	Use	Risks and Comments
ETHANEDINITRILE	Soil borne pathogens, nematodes and weeds	Australia: No current concerns.
METHAM PRESENT AS SODIUM SALT	Germinating weeds and soil-borne fungus diseases	Australia: No current concerns.

### PLANT REGULATORS AND OTHERS – Plant regulators, post-harvest treatments, rodenticides and others.

Active Constituent	Use	Risks and Comments
INDOLE BUTYRIC ACID	Aid in promotion of root formation, May stimulate plant growth, Reduction of transplant shock	Australia: No current concerns
1-METHYLCYCLOPROPENE	Postharvest treatment	Australia: No current concerns

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