

18 November 2021

Re: Support for new Fungicide product for use on onions APP204042

Onions New Zealand (ONZ) strongly supports the application for the new fungicide Xivana.

Onion growers are under an increasingly difficult crop protection environment, with shrinking older chemistry use, due to reassessments and the demands from overseas customers with regard to strict residue standards, and limited new chemistry to protect their crops from diseases.

The introduction of Xivana would be a significant benefit to NZ onion growers as Xivana contains a new active that will assist onion growers with control of downy mildew. This product will carry a label claim, use directions and a WHP for growers to follow. Moreover, registered on label uses are critical to limit resistance as growers can change to different MOAs as well as manage the residue profile. Bayer have said that this product is a valuable alternative tool as it has a high level of efficacy against downy mildew in onions. This is a known control gap in onion production in NZ, where new options for controlling downy mildew are desperately needed.

It is also noted that this product is of low hazard and does not trigger many hazard classifications. Those which are triggered, appear to be the lowest degree of hazard classification for their category.

Onion growers make a significant contribution to NZ GDP and provide a valuable source of employment and revenue for NZ as well as healthy food. Xivana is likely to be a vital additional tool to assist in safeguarding and promoting the productivity of onion growers.

From Bayer's application form ONZ understands and appreciates the following benefits that this new fungicide will provide:

- Good rainfastness= practical benefits for growers.
- Choice is an important benefit for growers. As it allows for rotation to prevent resistance management and can replace some actives which are no longer usable for export crops.
- As it will also be approved on two others crops (one that is also commonly grown by onion growers) - this means growers can stock less product. In turn this can reduce wastage - improving farm profitability.
- High level of efficacy against downy mildew with improved yield in trials conducted
- Level of residues in treated crops are expected to be below the limit of quantification (LoQ) – meaning this product has a very favourable residue profile enabling our growers to access many export markets.
- Xivana will be one of the least hazardous of the current fungicides registered for use in onions. The application rate is also significantly less than currently used control options . Approval of Xivana may result in less overall active ingredient loading to the environment.

ONZ supports this product being approved for use in NZ as soon as possible to have the product registered and available to use for growers in the coming season.

Regards,



Onions New Zealand