

## **Leafy 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Regulatory pressures on agrichemicals are increasing globally, with many being either restricted or withdrawn from use.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 leafy lettuce crops in Australia, as well as assisting with any current initiatives aimed at identifying and addressing pest management deficiencies.

R0	Use no longer approved
R1	Short-term: Critical concern over retaining access < 1 year
R2	Medium-term: Maintaining access of significant concern <2-5 years
R3	Long-term: Potential issues associated with use – Monitoring required < 5 years
R4	No current risk/concerns

## Leafy 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
ABAMECTIN	6	Two-spotted (Red spider) mite Western flower thrips	Australia: <a href="#">APVMA nominated for reconsideration and spray drift assessment.</a> Canada: Re-evaluation finalised. Label amendments to mitigate risks to human health and environment (July, 2025)
AFIDOPYROPEN	9D	Cabbage aphid Cotton aphid Currant lettuce aphid Green peach aphid Silverleaf whiteflies	Australia: No current concerns. EU: Not approved
ALPHA-CYPERMETHRIN	3A	Helicoverpa  Permit PER13301 for the control of Redlegged earth mite and Vegetable weevil.	Australia: <a href="#">APVMA nominated for reconsideration after 2029.</a> 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 (Sciaridae spp.)	Australia: No current concerns. Permit PER14694 Expiry date: 31/03/2029 USA: Under Registration Review (scheduled)

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R1	Short-term: Critical concern over retaining access < 1 year
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Active Constituent	MoA Group	Pest	Risks and Comments
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
BUPROFEZIN	16	Permit PER82467 for the control of Jassids, leafhoppers, Greenhouse whitefly	Australia: No current concerns. Permit PER82467 Expiry date: 31/03/2030
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	Helicoverpa spp.	Australia: No current concerns. Codex MRL: 20 mg/Kg Canada: In re-evaluation

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CHLORANTRANILIPROLE   THIAMETHOXAM		Brown sowthistle aphid Cluster caterpillar Currant lettuce aphid Green peach aphid Helicoverpa Loopers Lucerne leafroller Silverleaf whiteflies Vegetable leafhopper Western flower thrips.  Permit PER94452 for the control of Leaf miners	CHLORANTRANILIPROLE Australia: No current concerns. Codex MRL: 20 mg/Kg EU: Approved UK: Approved Canada: In review  THIAMETHOXAM Australia: <a href="#">APVMA: Currently under review. Proposed regulatory decisions expected between Dec. 2025 to Oct. 2026.</a> Codex MRL: 3 mg/Kg EU: Not approved Canada: In review USA: Review upcoming  Permit PER94452 Expiry date: 30/06/2026
CHLORPYRIFOS	1B	Blue oat mite Redlegged earth mite Vegetable weevil	Australia: <a href="#">The chemical review was completed in September 2024.</a> Most uses in horticultural crops were removed. After 30 September 2025, products with previously approved labels must not be supplied. The only remaining approved use is in Brassica crops as specified on current labels. EU: Not approved Canada: Cancelled USA: Agricultural uses cancelled. Very few registrations as Restricted Use Pesticide.
CYROMAZINE	17	PER81867 for the control of leaf miner	Australia: No current concerns. Codex MRL: 4 mg/Kg EU: Not approved
DIAZINON	1B	Cutworms	Australia: <a href="#">APVMA made a Final Decision on 2024.</a> After 10 September 2025, crop uses are no longer approved. Codex: All MRLs deleted EU: Not approved Canada: Cancelled USA: Under Registration Review (scheduled)

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EMAMECTIN	6	Diamondback Moth (Cabbage Moth)( <i>Plutella xylostella</i> ), Cabbage White Butterfly ( <i>Pieris rapae</i> ) Heliothis ( <i>Helicoverpa</i> spp.) Cluster caterpillar ( <i>Spodoptera litura</i> ) Loopers ( <i>Chrysodeixis</i> spp.) Cabbage Centre Grub ( <i>Hellula Hydralis</i> )	Australia: <a href="#">APVMA Nominated for targeted spray drift reconsideration</a> EU: Approved, candidate for substitution. UK: Withdrawn (2024).
EMULSIFIABLE BOTANICAL OILS	--	Permit PER14077 for the control of Silverleaf whitefly	Australia: No current concerns. Permit PER14077 Expiry date: 31/07/2028
FIPRONIL	2B	Permit PER83203 for the control of WESTERN FLOWER THRIPS, ONION THRIPS	Australia:APVMA: <a href="#">Currently under review</a> .Proposed Regulatory decision expected by April 2026. EU: Not approved USA: Under Registration Review (scheduled)
FLUBENDIAMIDE	28	Helicoverpa	Australia: No current concerns. Codex MRL: 7 mg/Kg EU: Not approved UK: Withdrawn (2024).
HELICOVERPA ARMIGERA NPV	31	Helicoverpa	Australia: No current concerns.
IMIDACLOPRID	4A	Currant lettuce aphid; PER10918 for the control of Greenhouse whitefly and aphids + PER12351 for the control of Silverleaf Whitefly	Australia:APVMA: <a href="#">Currently under review</a> .Proposed regulatory decisions expected between December2025 to October2026. EU: Not approved Canada: Very few uses allowed in greenhouses and seed treatment. USA: Under Registration Review (scheduled)
INDOXACARB	22A	Helicoverpa	Australia: No current concerns. Codex MRL: 3 mg/Kg EU: Not approved UK: Withdrawn (2024).

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Active Constituent	MoA Group	Pest	Risks and Comments
ISOCYCLOSERAM	30	Permit PER94552 and permit PER94854 for the control of Serpentine leafminer	Australia: No current concerns. Permit PER12221 Expiry date: 30/09/2027
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)
METHOMYL	1A	Cluster caterpillar Helicoverpa	Australia: APVMA reconsideration. <a href="#">Prioritised to be commenced by 2026</a> . Permit PER13920 Expiry date: 31/12/2027 Codex MRL: 0.2 mg/Kg EU: Not approved Canada: In re-evaluation USA: Under Registration Review (scheduled)
PERMETHRIN	3A	Cluster caterpillar	Australia: <a href="#">APVMA nominated for reconsideration after 2029</a> . EU: Not approved
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

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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
PYMETROZINE	9B	Brown sowthistle aphid Cotton aphid Currant lettuce aphid Green peach aphid Potato aphid Silverleaf whiteflies	Australia: <a href="#">APVMA nominated for reconsideration and spray drift assessment.</a> EU: Not approved Canada: Cancelled
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 PER88640 for the control of Liriomyza leafminers PER89870 for the control of Fall Armyworm	Australia: No current concerns. Permit PER89870 Expiry date: 31/10/2030 Permit PER88640 Expiry date: 28/02/2026
PYRIPROXYFEN	7C	Silverleaf whiteflies	Australia: No current concerns.

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Active Constituent	MoA Group	Pest	Risks and Comments
SPINETORAM	5	Helicoverpa 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	Helicoverpa Loopers Western flower thrips  Permit PER89870 for the control of Fall Armyworm	Australia: No current concerns. Codex MRL: 10 mg/Kg Canada: In re-evaluation Permit PER89870 Expiry date: 31/07/2025
SPIROTETRAMAT	23	Brown sowthistle aphid Currant lettuce aphid Green peach aphid Silverleaf whiteflies  Permit PER88640 for the control of Liriomyza leafminers	Australia: No current concerns. Permit PER88640 Expiry date: 28/02/2026 Codex MRL: 7 mg/Kg EU: Not approved Canada: In re-evaluation
SPODOPTERA FRUGIPERDA NPV	--	PER90820 for the control of Fall Armyworm	Australia: No current concerns. Permit PER90820 Expiry date: 31/03/2027
SULFOXAFLOX	4C	Brown sowthistle aphid Green peach aphid Greenhouse whitefly PER82467 for the control of Jassids, leafhoppers, Greenhouse whitefly	Australia: No current concerns. Permit PER82467 Expiry date: 31/03/2030 Codex MRL: 6 mg/Kg
TRICHLORFON	1B	Cutworms Green vegetable bug Rutherglen bug	Australia: <a href="#">APVMA nominated for reconsideration after 2029.</a> Permit PER81867 Expiry date: 30/09/2026 EU: Not approved Canada: Cancelled USA: Under Registration Review (scheduled)



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### 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 EU: Approved UK: Approved Canada: In review  OXATHIPIPROLIN Australia: No current concerns. Codex MRL: 5 mg/Kg EU: Approved UK: Approved Canada: No current review
BACILLUS AMYLOLIQUEFACIENS STRAIN QST 713	BM02	Permit PER87630 for the control of Bacterial spot / Blight	Australia: No current concerns. Permit per87630 Expiry date: 31/03/2027

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BOSCALID	7	Sclerotinia rot	Australia: No current concerns. Codex MRL: 40 mg/Kg Canada: In re-evaluation
CAPTAN	M4	PER14326 for the control of Grey Mould (Leafy lettuce)	Australia: No current concerns. Permit PER14326 Expiry date: 31/03/2027
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: 9 mg/Kg EU: Not approved Canada: In re-evaluation
DIMETHOMORPH   AMETOCTRADIN	40 + 45	Downy mildew	DIMETHOMORPH Australia: No current concerns. Codex MRL: 9 mg/Kg EU: Not approved UK: Approved Canada: No current review  AMETOCTRADIN Australia: No current concerns. Codex MRL: 50 mg/Kg EU: Approved UK: Approved Canada: No current review

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FENHEXAMID	17	Botrytis/Grey mould	<p>FLUDIOXONIL</p> <p>Australia: No current concerns. Codex MRL: 40 mg/Kg EU: Approved, candidate for substitution. UK: Approved Canada: No current review</p> <p>CYPRODINIL</p> <p>Australia: No current concerns. Codex MRL: 50 mg/Kg EU: Approved, candidate for substitution. UK: Approved Canada: In review</p>
FLORYLPICOXAMID	21	Sclerotinia rot	<p>Australia: No current concerns. EU: Pending</p>
FLUDIOXONIL   CYPRODINIL	9 + 12	Anthracnose Sclerotinia rot	<p>FLUDIOXONIL</p> <p>Australia: No current concerns. Codex MRL: 40 mg/Kg EU: Approved, candidate for substitution. UK: Approved Canada: No current review</p> <p>CYPRODINIL</p> <p>Australia: No current concerns. Codex MRL: 50 mg/Kg EU: Approved, candidate for substitution. UK: Approved Canada: In review</p>

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FLUOPYRAM   TRIFLOXYSTROBIN	7 + 11	Sclerotinia rot	<p>FLUOPYRAM Australia: No current concerns. Codex MRL: 15 mg/Kg EU: Approved UK: Approved Canada: No current review</p> <p>TRIFLOXYSTROBIN Australia: No current concerns. Codex MRL: 15 mg/Kg EU: Approved UK: Approved Canada: In review</p>
IPRODIONE	2	Botrytis/Grey mould Sclerotinia rot	<p>Australia: No current concerns. EU: Not approved USA: Under Registration Review (scheduled)</p>
ISOFETAMID	7	Lettuce drop / Sclerotinia	<p>Australia: No current concerns. Codex MRL: 7 mg/Kg</p>
MANCOZEB	M3	Downy mildew Septoria leaf spot	<p>Australia: APVMA reconsideration. <a href="#">Prioritised to be commenced by 2027.</a> EU: Not approved UK: Withdrawn (2024). USA: Under Registration Review (scheduled)</p>

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MANCOZEB   DIMETHOMORPH	M3	PER14958 for the control of Downy mildew, White Blister and Alternaria Leaf Spot	<p>MANCOZEB</p> <p>Australia: <a href="#">APVMA reconsideration. Prioritised to be commenced by 2027.</a></p> <p>EU: Not approved</p> <p>UK: Withdrawn. Expiry date: 31/05/2024</p> <p>Canada: Most of uses cancelled</p> <p>USA: Review upcoming</p> <p>DIMETHOMORPH</p> <p>Australia: No current concerns.</p> <p>Codex MRL: 9 mg/Kg</p> <p>EU: Not approved</p> <p>UK: Approved</p> <p>Canada: No current review</p> <p>Permit PER14958 Expiry date: 31/10/2027</p>
MANCOZEB   METALAXYL	M3 + 4	Downy Mildew, Septoria Leaf Spot, Anthracnose	<p>Australia:</p> <p>MANCOZEB</p> <p>Australia: APVMA reconsideration. <a href="#">Prioritised to be commenced by 2027.</a></p> <p>EU: Not approved</p> <p>UK: Withdrawn (2024).</p> <p>USA: Under Registration Review (scheduled)</p> <p>METALAXYL</p> <p>Australia: No current concerns.</p> <p>Codex MRL: 0.02 mg/Kg</p> <p>EU: Approved, candidate for substitution.</p> <p>Canada: In re-evaluation</p>
MANDESTROBIN	11	Sclerotinia rot	Australia: No current concerns.
MANDIPROPAMID	40	Downy mildew	<p>Australia: No current concerns.</p> <p>Codex MRL: 25 mg/Kg</p> <p>Canada: In re-evaluation</p>

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METALAXYL	4	Permit PER14318 for the control of Damping off	Australia: No current concerns. Permit PER14318 Expiry date: 31/07/2027 Codex MRL: 1.5 mg/Kg EU: Approved, candidate for substitution. Canada: In re-evaluation
METIRAM	M3	Downy mildew Septoria leaf spot	Australia:APVMA reconsideration. <a href="#">Prioritised to be commenced by 2027.</a> EU: Not approved Canada: Only approved for foliar applications in potato crops.
OXATHIPIPROLIN	49	Downy mildew	Australia: No current concerns. Codex MRL: 5 mg/Kg
PENTHIOPYRAD	7	Powdery mildew Sclerotinia rot	Australia: No current concerns. Codex MRL: 30 mg/Kg
PHOSPHOROUS (PHOSPHONIC) ACID	P07 (33)	PER13698 for the control of Downy Mildew and Damping Off	Australia: No current concerns. Permit PER13698 Expiry date: 31/07/2030
POTASSIUM BICARBONATE	M2	Permit PER13695 for the control of Powdery Mildew	Australia: No current concerns. Permit PER13695 Expiry date: 30/06/2030 Canada: In re-evaluation
PROCHLORAZ	3	PER81131 for the control of Anthracnose (Leafy or open head lettuce)	Australia: No current concerns. Permit PER81131 Expiry date: 31/12/2028 EU: Not approved
PROCHLORAZ	3	Anthracnose (Leafy or open head lettuce)	Australia: No current concerns. EU: Not approved
PROPAMOCARB HYDROCHLORIDE   FLUOPICOLIDE	--	Downy mildew	Australia: No current concerns.
PROPINEB	M3	Downy mildew	Australia:APVMA reconsideration. <a href="#">Prioritised to be commenced by 2027.</a> EU: Not approved

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PROPINEB   OXADIXYL	M3 + 4	Downy mildew	PROPINEB Australia: <a href="#">APVMA reconsideration. Prioritised to be commenced by 2027.</a> EU: Not approved OXADIXYL Australia: No current concerns. EU: Not approved
PYDIFLUMETOFEN   FLUDIOXONIL	28 + 43	Grey mould (Botrytis cinerea) White mould	PROPAMOCARB Australia: No current concerns. Codex MRL: 100 mg/Kg EU: Approved UK: Approved  FLUOPICOLIDE Australia: No current concerns. Codex MRL: 30 mg/Kg EU: Approved, candidate for substitution. UK: Approved Canada: No current review
PYRIMETHANIL	9	Permit PER12565 for the control of Grey Mould	Australia: No current concerns. Permit PER12565 Expiry date: 30/04/2030 Canada: In re-evaluation
QUINTOZENE	14	Bottom Rot (Rhizoctonia)	Australia: No current concerns. EU: Not approved
TEBUCONAZOLE	3	Sclerotinia rot	Australia: APVMA: Removed from nomination list - maintain watching brief 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 (Rhizoctonia solani)	Australia: No current concerns.

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### 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. Codex MRL: 4 mg/Kg 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
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)



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### FUMIGANTS – Mixed Function

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

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

Active Constituent	Use	Risks and Comments
INDOLE BUTYRIC ACID = IBA	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. EU: Approved UK: Approved Canada: No current review

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