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Food Standards Australia New Zealand
PO Box 7186
CANBERRA BC ACT 2610
AUSTRALIA

26 May 2011

Dear Sir/Madam,

Re: Request to instigate a change to Standard 1.4.2 – *Maximum Residue Limits*

FSANZ recently advised in a letter to the agricultural biotechnology industry's trade association CropLife Australia, dated 18 February 2011, that MRL amendments to the Food Standards Code will now be considered as a separate process from applications to vary Standard 1.5.2.

Monsanto Australia Limited is submitting an application to FSANZ for the inclusion of dicamba tolerant soy MON 87708 in Standard 1.5.2 – *Food Derived from Gene Technology*. Currently there is no MRL for dicamba and its metabolites on soybean or soybean-derived products imported into Australia.

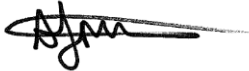
Monsanto Australia Limited would therefore like to request that FSANZ consider amending Standard 1.4.2 – *Maximum Residue Limits* to include a tolerance for dicamba in or on soybean seed that is in line with that set out in the Code of Federal Regulations of the United States of America and established by the Canadian Pest Management Regulatory Authority.

In the United States, a tolerance in or on soybean seed of 10 Parts Per Million has been established for the combined residues of dicamba (3,6 dichloro- *o* –anisic acid) and its metabolites 3,6 dichloro-5-hydroxy *o* –anisic acid (5-hydroxy dicamba) and 3,6 dichloro-2-hydroxybenzoic acid (DCSA). Another dicamba metabolite that has been previously identified in plant metabolism studies in conventional crops is 2,5-dichloro-3,6-dihydroxybenzoic acid (DCGA), however this has not been included by regulators in dicamba tolerance expression in the US because of the low levels of this metabolite.

The Canadian soybean MRL was similarly amended in April 2010 to 10ppm. The definition of Residue is the same as in the United States: Dicamba + Metabolite DCSA + 5-hydroxy Dicamba.

Thank you very much for considering this request. Should you require any further information, please do not hesitate to contact me.

Yours sincerely

A handwritten signature in black ink, appearing to read 'A. Forster', with a long horizontal stroke extending to the right.

Amanda Forster