



23 August 2013

Project Manager
Proposal M1009
Food Standards Australia New Zealand
PO Box 7186
Canberra BC ACT 2610

Dear sir/madam,

Proposal M1009 – Maximum Residue Limits

The Food & Beverage Importers Association supports the variations of certain maximum residues limits (MRLs) proposed in Proposal M1009.

In making this submission, we wish to endorse specifically the proposed maximum residue permissions for blackberries, strawberries, blueberries, raspberries, boysenberries, berries and other small fruits and cherries.

The FBIA supports these proposals on these grounds:

1. Foods affected by the Proposal are currently imported.
2. The proposed MRLs align the limits in the Food Standards Code with international standards, such as those of the USA or CODEX.
3. The FSANZ safety assessment concludes that the proposed variations do not present health or safety concerns.
4. The Proposal provides for legitimate and safe trade.
5. The setting of maximum residue limits (MRLs) for these chemicals in these foods would be in line with the Ministerial Council Policy Guideline on the Regulation of Residues of Agricultural and Veterinary Chemicals in Food; in particular it would

Food & Beverage Importers Association

Email: fbia@fbia.org.au

Telephone: (03) 9639 3644

Facsimile: (03) 9639 0638

181 Drummond Street,

Carlton, Victoria 3053

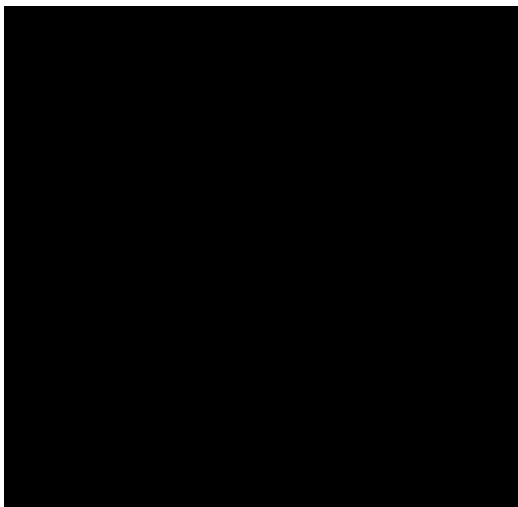
ABN 53 932 472 760



- (a) be consistent with the effective regulation of the registration, permission and use of agricultural and veterinary chemicals;
- (b) promote a consistent approach to MRLs for both domestic and imported foods; and
- (c) be consistent with Australia's obligations under the World Trade Organisation (WTO) Sanitary and Phytosanitary Agreement (SPS Agreement).

Should you have any questions on these comments, please do not hesitate to contact me

Yours faithfully,



Secretary