

23 August 2013

The Standards Management Officer
Food Standards Australia New Zealand
PO Box 7186
CANBERRA BC ACT 2610

submissions@foodstandards.gov.au

Dear Standards Management Officer

Re: Call for Submissions – Proposal M1009 – Maximum Residue Limits

CropLife Australia (CropLife) is the peak industry organisation representing the agricultural chemical and biotechnology (plant science) sector in Australia. CropLife represents the innovators, developers, manufacturers and formulators of crop protection and agricultural biotechnology products. Our members have a particular interest in ensuring that residues of agricultural chemical products are efficiently and effectively regulated.

CropLife notes that Proposal M1009 is to incorporate certain maximum residue limits (MRLs) for agricultural and veterinary chemicals that may legitimately occur in food in Standard 1.4.2 of the *Australia New Zealand Food Standards Code* (the Code). While CropLife can only comment on those MRLs associated with agricultural chemicals, CropLife can confirm that it does not oppose incorporating those MRLs.

CropLife recognises that dietary exposure assessments confirm that the proposed limits for agricultural chemical residues of interest do not present any public health or safety concerns in relation to relevant health based guidance values.

MRLs are an effective tool to facilitate access to markets for foods that may contain some residue of agricultural chemicals necessary for sustainable and economically viable production. CropLife notes that part of this proposal will align MRLs within the Code to Codex and trading partner standards. CropLife does not oppose measures that improve MRL consistency between Australia and our trading partners.

CropLife notes that many of the changes to MRLs are for agricultural chemical products produced by CropLife members. CropLife would welcome active and early engagement between FSANZ and product registrants on potential MRL changes to address any potential issues early in any consultation process.

CropLife looks forward to continuing to work with FSANZ to ensure that the food system continues to recognise the critical role that agricultural chemicals play in Australia's food production system. Should you have any questions with respect to the content of this submission, please contact CropLife's Policy Manager for Crop Protection and Stewardship, [REDACTED]

[REDACTED]
Chief Executive Officer